

10/25/1974

**OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS**



**State of Oregon
Department of
Environmental
Quality**

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A G E N D A

OREGON ENVIRONMENTAL QUALITY COMMISSION

October 25, 1974

Second Floor Auditorium, Public Service Building
920 Southwest Sixth Avenue, Portland, Oregon

9 a.m.

- A. Minutes of September 20, 1974 Commission Meeting
- B. September 1974 Program Activity Report
- C. Tax Credit Applications

NORTHWEST REGION

- D. Interim Policy for Approving New or Expanded Air Emission Sources in the Portland Metropolitan Area--Proposed Adoption of Temporary Rule

CENTRAL REGION

- E. Brooks-Scanlon, Inc., Bend, Oregon--Request for Time Extension for Log Handling in Deschutes River

AIR QUALITY

- F. Portland Transportation Control Plan--Tri-Met Status Report

LAND QUALITY

- G. Chem-Nuclear, Inc.--Proposed License Application
- H. Authorization for Public Hearing to Consider the Adoption of Rules Pertaining to Bonds for Sewage Treatment Facilities
- I. Consideration of Adoption of Administrative Rules Pertaining to Prior Construction Permits or Approvals, and to a Standard Specification for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields

The Commission will meet for breakfast at 7:30 in the Congress Hotel.
No-host luncheon at Noon, Congress Hotel, Main Dining Room.



Hazel

To: Staff

Date: October 28, 1974

From: Shirley Shay

Subject: Environmental Quality Commission - Meeting Results

Following is a summary of actions taken by the Environmental Quality Commission at its meeting held on October 25th in Portland:

- A. Minutes of September 20, 1974 Commission Meeting -- Approved
- B. September 1974 Program Activity Report -- approved; Chairman requested that status reports be prepared and updated on a monthly basis.
- C. Tax Credit Applications

1. deferred from 9/20 meeting and approved:

T-541	American Can Company, Halsey Mill	\$ 73,501.00
T-569	Weyerhaeuser Company Wood Products	273,755.00
T-570	Southern Oregon Plywood, Inc.	61,299.87
T-574	Gemco Wood Products, Inc.	18,225.93
T-575	Weyerhaeuser Company, Paperboard Manufacturing	15,344.00
T-576	Weyerhaeuser Company, Paperboard Manufacturing	36,071.00

2. also approved:

T-531R	Georgia-Pacific Corporation, Toledo Division	\$1,059,151.00
T-577	Weyerhaeuser Company, Paperboard Manufacturing	79,382.00
T-578	Consolidated Foods Corporation, dba B. P. John Furniture	12,908.00
T-583	Edward Hines Lumber Company	28,600.00

3. denied:

T-568	Robert E. Oja, dba Oja's Super Market	\$ 3,150.00
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4. deferred from 9/20 meeting and deferred to November 22 meeting:

T-580	Weyerhaeuser Company, Paperboard Manufacturing	\$8,511,981.00
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D. Interim Policy for Approving New or Expanded Air Emission Sources in the Portland Metropolitan Area, Proposed Adoption of Temporary Rule--adopted with minor changes

E. Brooks-Scanlon, Inc., Bend, Oregon--Request for Time Extension for Log Handling in Deschutes River -- denied request for time extension and approved new Brooks-Scanlon proposal to remove log storage and log handling from the river by developing a small infeed reservoir with EQC requirement to present progress report on new plan by 1/15/75; authorized staff to proceed with issuance of NPDES permit with date of 10/1/75 in compliance schedule for completion of above plan.

[over]

- F. Portland Transportation Control Plan--Tri-Met Status Report
Report presented by Assistant General Manager Steve McCarthy
- G. Chem-Nuclear, Ind.--Proposed License Application -- deferred to November 22 meeting
- H. Authorization for Public Hearing to Consider the Adoption of Rules Pertaining to Bonds for Sewage Treatment Facilities -- approved
- I. Consideration of Adoption of Administrative Rules Pertaining to Prior Construction Permits or Approvals, and to a Standard Specification for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields -- adopted (see copy attached)

The next meeting of the Commission will be held on November 22, 1974, in Salem, Room 20 State Capitol, beginning at 9 a.m.

The Commission will meet on December 20, 1974, in Albany, in the Swept Wing Restaurant, Redwood Room, beginning at 9 a.m.

For the November 22nd meeting,

- 1) items for tentative agenda due Monday, November 4;
- 2) staff reports for Director's signature due Tuesday, November 12;
- 3) mailing of staff reports, November 14.

ENVIRONMENTAL QUALITY COMMISSION

Attendance Record

Meeting of October 25, 1974 in Portland, Oregon

<u>Name</u>	<u>Organization</u>	<u>Address</u>
Wayne E. Kuhn	for C of C	Portland, Oregon
JOHN VLASTELICIA	EPA/OREGON	PORTLAND
Norm Edmiston	EPA/oregon	Portland
Bob Chubbings	Weyerhaeuser Co	Springfield
William J. Patton	Weyerhaeuser Co	Springfield
D M Kaye	Miller, Anderson	Portland
Roy Gorski	" "	Portland
J NED DEMPSEY	Century West Eng	BEND
Maude Michel	Georgia-Pacific	Portland
Unice Trotter	" "	"
Mike Rowe	" "	Tolock
Dick Bernard	BP John Furniture	Portland
Arthur R. Roetho	CHEM-HILL, INC.	Portland
J. Lauman	Ore Wildlife Comm.	Pdx
John D. Moran	Portland Steel Mills Chem Nuclear Systems	"
T. C. Downer	ASSOC ORR IND	PTLD
F. Glen Odell	Glen Odell Consulting Engrs	PTLD.
Kilburn Schmitz	Portland Steel Mills	Mills
Sharon Ross	NPCC	Portland
Donald F. Mazziotti	City Portland / Bureau of Planning	Portland
Carl M. Peterson	Northwest Nat. Gas Co.	Portland
Mahe Alsho	Vancouver Columbia	Vancouver.
Kyo Dowlett	WETA	Portland

MINUTES OF THE SIXTY-FIRST MEETING

of the

OREGON ENVIRONMENTAL QUALITY COMMISSION

September 20, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the sixty-first meeting of the Oregon Environmental Quality Commission was called to order by the Vice Chairman at 9 a.m. on Friday, September 20, 1974, in the Second Floor Auditorium of the Public Service Building, 920 S. W. Sixth Avenue, Portland, Oregon.

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

The Department was represented by Deputy Director Ronald L. Myles; Assistant Directors Frederick M. Bolton (Enforcement), Wayne Hanson (Air Quality), Harold L. Sawyer (Water Quality), and Kenneth H. Spies (Land Quality); Regional Administrators Verner J. Adkison (Midwest), Richard P. Reiter (Southwest), and E. Jack Weathersbee (Northwest); staff members C. Kent Ashbaker, Thomas R. Bispham, Thomas H. Blankenship, Patrick D. Curran, Robert E. Gilbert, Thomas G. P. Guilbert, Clarence P. Hilbrick, Jr., Raymond M. Johnson, John F. Kowalczyk, Judith A. Moore, David W. O'Guinn, T. Jack Osborne, Barbara J. Seymour, Shirley G. Shay, Fredric A. Skirvin, Richard L. Vogt, Jr., and Chief Counsel Raymond P. Underwood.

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

MINUTES OF THE SEPTEMBER 4, 1974 COMMISSION MEETING

It was MOVED by Mr. Somers, seconded by Dr. Phinney and ordered by unanimous consent to approve the minutes of the sixtieth meeting of the Commission, held in Portland on September 4, 1974.

AUGUST 1974 PROGRAM ACTIVITY REPORT

It was MOVED by Mr. Somers, seconded by Dr. Phinney and ordered by unanimous consent to give confirming approval to staff actions, as reported by Mr. Myles,

regarding the 94 domestic sewage, 9 industrial waste, 67 air quality control, and 10 solid waste management projects:

Water Quality Control - Northwest Region (46)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
6-25-74	Salem	Salem Industrial Park Trunk Sewer and Addendum No. 1	Prov. app.
7-10-74	USA (Fanno)	Habitat interceptor sanitary sewer Area A	Prov. app.
7-12-74	Troutdale	Fraley Heights sanitary sewers	Prov. app.
7-12-74	USA (Fanno)	Brookridge interceptor relief sanitary sewer, Phase C, Plan I	Prov. app.
7-16-74	Salem (Willow) Multnomah County (Inverness)	Dorchester Heights sanitary sewers Central County Sanitary Service District--N.E. 158th north of Sandy Boulevard	Prov. app. Prov. app.
7-17-74	CCSD #1	Oak Acres Mobile Home Park sanitary sewer	Prov. app.
7-18-74	Salem (Willow)	Kanuku Street sanitary sewers	Prov. app.
7-23-74	Salem	Safeway store at N.W. Commercial S.E. and Ratcliff Drive sanitary sewer	Prov. app.
7-24-74	West Linn	Hidden Springs trunk sewer	Prov. app.
7-24-74	St. Helens	Gray Cliffs Park sanitary sewers	Prov. app.
7-24-74	USA (Tigard)	S.W. Murdock Street L.I.D. sanitary sewers	Prov. app.
7-26-74	Portland	S.W. 45th Drive and private property sanitary sewers	Prov. app.
7-26-74	Salem	Khyber Court S.E. sanitary sewer	Prov. app.
7-29-74	Lake Oswego	Country Club Park area sanitary sewer improvement L.I.D. 160	Prov. app.
7-29-74	Jefferson	Hazel Street sanitary sewer	Prov. app.
7-29-74	Hillsboro (Westside)	Buena Vista #2 sanitary sewer	Prov. app.
7-29-74	USA (Sunset)	Torreyview sewers N.W. Oak St. sewer revision	Prov. app.
7-29-74	Milwaukie	Milwaukie sanitary sewer laterals, schedule II	Prov. app.
7-29-74	Lake Oswego	Firewood Road sanitary sewer extension, W.O. 4892	Prov. app.
7-31-74	Newberg	Adec Technical Park sanitary sewer extension	Prov. app.
7-31-74	Portland S.W. (Tryon)	sanitary sewers in S.W. Tara Court west of S.W. 56th Avenue	Prov. app.
8-1-74	Tualatin	sanitary sewers west of 65th Avenue from station 0 + 00 to station 8 + 19	Prov. app.
8-1-74	Gladstone	preliminary interceptor sewer to eliminate a pump station on Doncaster Drive	Prov. app.
8-2-74	E. Salem Sewage & Drainage District #1 (Willow)	Wagon Road Village subdivision sanitary sewers	Prov. app.

Water Quality Control - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-5-74	Gresham	Hood Northwest L.I.D. sanitary sewers	Prov. app.
8-5-74	West Linn (Bolton)	sanitary sewer extension near Hood Street & Burns Street	Prov. app.
8-6-74	Salem (Willow)	Kashmir Heights subdivision sanitary sewers	Prov. app.
8-8-74	Salem (Willow)	Salem Industrial Park trunk sewer and Addenda No. 2 and 3	Prov. app.
8-9-74	Portland S.W. (Tryon)	sanitary sewer system serving S.W. 55th Drive, S.W. 57th Avenue and private property, "Greentrees"	Prov. app.
8-9-74	Gresham	Brigadoon subdivision sanitary sewers	Prov. app.
8-9-74	Lake Oswego	Holly Acres Addition sanitary sewers	Prov. app.
8-13-74	Tualatin	L.I.D. No. 2 sanitary sewer	Prov. app.
8-15-74	Independence	Hill Park No. 4 sanitary sewer	Prov. app.
8-15-74	Tualatin	revised sanitary sewer near 65th Avenue	Prov. app.
8-16-74	CCSD #1	Milwaukie Industry Center sanitary sewer	Prov. app.
8-16-74	E. Salem Sewage & Drainage Dist.	Edith Bible sanitary sewer extension	Prov. app.
8-19-74	West Linn	Glen Glenn sanitary sewers	Prov. app.
8-19-74	Tualatin	Indian Woods sanitary sewers	Prov. app.
8-19-74	Tualatin	Arapaho Ridge sanitary sewers	Prov. app.
8-19-74	Tualatin	105th Street sanitary sewers	Prov. app.
8-20-74	Gresham	Honeywood subdivision sanitary sewers	Prov. app.
8-22-74	Troutdale	Stoll's Folly sanitary sewers	Prov. app.
8-26-74	Lake Oswego (Tryon)	Mountain Park Phase 5-B sanitary sewers	Prov. app.
	Oak Lodge S.D.	Oak Lodge Sanitary District Inflow/Infiltration Study	Approved
	Sandy	Sandy Inflow/Infiltration Study	Approved

Water Quality Control - Water Quality Division (48)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-1-74	Klamath County	Round Lake Estates - effluent Cl ₂ revision	Prov. app.
8-5-74	Warrenton	Addendum No. 2 - East Warrenton interceptor	Approved
8-5-74	Albany	sanitary sewer projects--SS-74-5, 74-9A, 74-11, East Gate subdiv.	Prov. app.
8-5-74	Lebanon	12th Street sewer	Prov. app.
8-5-74	Fairview	Halsey Street sewer	Prov. app.
8-5-74	Canyonville	Byron Street and Olson subdivision sewers	Prov. app.
8-5-74	Clackamas Co. S.D. #1	C.O. No. 4 - STP contract	Approved

Water Quality Control - Water Quality Division (cont.)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-5-74	N. Roseburg S.D.	Hewitt Hts. subdivision and Brentwood Manor First Addition sewers	Prov. app.
8-6-74	Seneca	C.O. #1 - Schedule L, STP project	Approved
8-6-74	USA (Forest Grove)	C.O. #1, STP expansion	Approved
8-6-74	Lebanon	Grant Street, Maple Street, Vine Street sewers	Prov. app.
8-7-74	Ashland	Madison subdivision sewers	Prov. app.
8-7-74	Springfield	First Addition to Industrial Park sewers	Prov. app.
8-9-74	Eugene	Five projects	Prov. app.
8-12-74	BCVSA	South Medford interceptor	Prov. app.
8-13-74	Roseburg	Crestview Avenue sewer	Prov. app.
8-13-74	BCVSA	Harry and David camp. sewer	Prov. app.
8-13-74	Medford	Sun Park Terrace subdivision sewers	Prov. app.
8-13-74	N. Roseburg S.D.	Kline Street sewer	Prov. app.
8-19-74	Springfield	N. sanitary sewer - S.P. Ind. Park	Prov. app.
8-19-74	BCVSA	West Dale Street sewer	Prov. app.
8-19-74	Sunriver	Sunriver Sky Park sewers and pump stations	Prov. app.
8-20-74	Milwaukie	C.O. #2 - Milwaukie interceptor - Schedule I	Approved
8-20-74	Port Orford	15th St. sanitary sewer extension	Prov. app.
8-20-74	Bandon	Allegheny and Oregon Streets sewer extensions	Prov. app.
8-20-74	BCVSA	West Main - McAndrews Road Sweet Road sewers	Prov. app.
8-20-74	N. Umpqua S.D.	Main A - sewer extension	Prov. app.
8-21-74	Glendale	2nd Street sewer	Prov. app.
8-21-74	Junction City	West Side collector sewer	Prov. app.
8-29-74	Rufus	sewage collection and treatment lagoons (revised plans)	Prov. app.
8-30-74	Rogue River	Woodville subdivision, Units 1, 2, 3 and 4 sewers	Prov. app.
8-30-74	Eugene	1st Avenue sewer	Prov. app.
8-30-74	Springfield	N. 54th Street and Ilex Plat, 2nd Addition sewers	Prov. app.
8-30-74	Albany	Meadowview Addition and College Park P.U.D. sewer	Prov. app.
8-30-74	BCVSA	15th Street and "G" Avenue - White City sewers	Prov. app.

Water Quality Control - Industrial Projects - Northwest Region (14)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7-12-74	Multnomah County	<u>Stauffer Chemical Co.</u> Tax Credit T-552, "Lined Pond with Pump"	Pending
7-16-74	Polk County	<u>Willamette Industries</u> log pond modifications	Approved

Water Quality Control - Industrial Projects (cont.)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
7-17-74	Marion County	<u>Boise Cascade - Salem</u> digester 8 and counter current washers	Approved
8-1-74	Tillamook County	<u>Joe Donaldson</u> holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	<u>Glen Metcalfe</u> holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	<u>Harvey Wyss</u> holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	<u>Ray Measur</u> holding tank for animal waste disposal system	Approved
8-5-74	Tillamook County	<u>Ron Zuercher</u> holding tank for animal waste disposal system	Approved
8-5-74	Marion County	<u>Stayton Canning Company</u> Tax Credit T-566, "Spray Irrigation System"	Pending
8-5-74	Marion County	<u>Stayton Canning Company</u> Tax Credit T-567, "Wastewater Screening System"	Pending
8-8-74	Multnomah County	<u>Birden & Son</u> study for recirculating cooling water	Pending
8- -74	Columbia County	<u>Kaiser Gypsum</u> preliminary study of sanitary sewer pressure line	Approved
8- -74	Multnomah County	<u>Zidell, Inc.</u> oil-water separator	Pending
8- -74	Yamhill County	<u>Millers Wholesale Meat</u> Lagoon System	Approved

Air Quality Control - Northwest Region (45)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11-9-73	Clatsop County	<u>AMAX Aluminum</u> new aluminum reduction plant	Awaiting EIS
11-21-73	Multnomah County	<u>Union Carbide</u> #1 furnace product change	Processing
7-16-74	Clackamas County	<u>Globe-Union</u> lead remelt furnace	Processing
7-17-74	Marion County	<u>Boise Cascade - Salem</u> new digester	Processing
7-17-64	Marion County	<u>Boise Cascade - Salem</u> new washers	Processing
7-18-74	Clatsop County	<u>Crown Zellerbach (Wauna)</u> scrubber for lime kiln	Processing

Air Quality Control - Northwest Region (cont.)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-18-74	Multnomah County	<u>Oregon Steel Mills (Rivergate)</u> pellet metallizing	Processing
7-18-74	Yamhill County	<u>Publishers Paper - Newberg</u> new hog fuel boiler	Processing
7-24-74	Multnomah County	<u>Oregon Steel Mills</u> front baghouse with canopy	Processing
7-24-74	Multnomah County	<u>City of Portland</u> paint spray booth	Approved
7-24-74	Multnomah County	<u>Firestone Retread</u> smoke control for tire buffing	Approved
7-31-74	Clackamas County	<u>Barton Sand and Gravel</u> rock crusher	Processing
7-31-74	Multnomah County	<u>Cook Industries</u> grain terminal	Issued Proposed Permit
8-1-74	Multnomah County	<u>Oregon Steel (Front Avenue)</u> ladle fume exhaust	Processing
8-5-74	Multnomah County	<u>C. H. Stinson, Inc.</u> portable asphalt paving plant	Processing
8-8-74	Multnomah County	<u>Teeples & Thatcher, Inc.</u> sawdust cyclones	Awaiting detailed plans
8-15-74	Washington County	<u>Western Foundry</u> scrubber to control cupola emissions	Processing
8-19-74	Multnomah County	<u>J. Arlie Bryant, Inc.</u> portable rock crusher	Processing
8-19-74	Multnomah County	<u>Portland State University</u> new boiler	Processing
8-22-74	Multnomah County	<u>Golden Triangle Specialist</u> paint spray booth	Approved

Air Quality Control - Air Quality Division (22)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-5-74	Lincoln County	<u>Georgia Pacific Corp., Toledo</u> No. 2 electrostatic precipitator rebuilt	Approved
8-5-74	Lincoln County	<u>Georgia Pacific Corp., Toledo</u> package boiler installation	Approved
8-6-74	Douglas County	<u>Sunrise Enterprises</u> wood workshop	Approved
8-8-74	Linn County	<u>Western Kraft Corp., Albany</u> installation of a hog fuel boiler	Approved
8-8-74	Clackamas County	<u>Clackamas Town Center</u> 6,000 to 6,500-space parking facility	Add. info. req.
8-8-74	Multnomah County	<u>Mt. Hood Mall</u> 6,328-space parking facility	Add. info. req.
8-8-74	Washington County	<u>Safeguard Mini-Storage</u> 107-space parking facility	Cond. app.

Air Quality Control - Air Quality Division (cont.)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-8-74	Multnomah County	<u>Rustler Steak House</u> restaurant using existing parking	Cond. app.
8-8-74	Clackamas County	<u>Dwyer Memorial Hospital, Milwaukie</u> 56-space parking facility expansion	Cond. app.
8-8-74	Clackamas County	<u>The Dutch Trader, Gladstone</u> 59-space parking facility	Cond. app.
8-9-74	Jackson County	<u>Medford Corporation</u> modification to 2 boilers	Approved
8-9-74	Multnomah County	<u>Precision Castparts</u> 160-space replacement parking	Cond. app.
8-9-74	Multnomah County	<u>Portland Steel Mills</u> 165-space parking facility	Cond. app.
8-16-74	Klamath County	<u>Jeld Wen</u> hog fuel boiler installation	Approved
8-19-74	Klamath County	<u>Jeld Wen</u> baghouse filter and cyclones installation	Approved
8-19-74	Multnomah County	<u>Owens Corning Fiberglas</u> 200-space parking facility	Add. info. req.
8-20-74	Multnomah County	<u>Jantzen Beach, Inc.</u> 727-space parking expansion	Cond. app.
8-20-74	Washington County	<u>Equitable Savings</u> 87-space parking facility	Cond. app.
8-20-74	Multnomah County	<u>Port of Portland</u> 1,445-space interim parking facility, Portland International Airport	Cond. app.
8-21-74	Washington County	<u>Five Oaks Intermediate School</u> 182-space parking facility	Cond. app.
8-28-74	Klamath County	<u>Weyerhaeuser Company</u> oil-fired boiler installation	Cond. app.
8-29-74	Multnomah County	<u>Pacific Northwest Bell Co.</u> Cherry Coin and Service Center, 44-space parking facility	Cond. app.

Land Quality - Solid Waste Management Division (10)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-2-74	Coos County	<u>Joe Ney Disposal Site</u> existing domestic site operational plan	Prov. app.
8-5-74	Klamath County	<u>Keno Landfill</u> existing domestic site closure plan	Approved
8-5-74	Klamath County	<u>Keno Transfer Station</u> new domestic site construction and operational plans	Approved
8-7-74	Marion County	<u>Conestoga Manufacturing</u> new industrial site (letter authorization)	Denied

Land Quality - Solid Waste Management Division (cont.)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
8-8-74	Washington County	Beaverton Seventh-Day <u>Adventist Church</u> unauthorized domestic site closure plan	Prov. app.
8-9-74	Jefferson County	<u>Culver Landfill</u> new domestic site construction and operational plans	Prov. app.
8-12-74	Klamath County	<u>Six Bit Prairie Sludge Lagoon</u> new domestic site construction and operational plans	Prov. app.
8-20-74	Lane County	<u>Swishhome Landfill</u> existing domestic site closure plan	Approved
8-20-74	Lane County	<u>Swishhome Landfill</u> new domestic site construction and operational plans	Approved
8-29-74	Lane County	<u>Oakridge Landfill</u> existing domestic site construction and operational plans	Prov. app.

TAX CREDIT APPLICATIONS

Because the tax credit applications had not been received by the Commission in time to be studied adequately, Mr. Somers MOVED that action on the applications be deferred until the next regular meeting; motion seconded by Dr. Phinney and carried.

OREGON CUP NOMINATION--DR. DAVID CHARLTON

Mrs. Seymour summarized the Screening Committee's nomination of Dr. David Charlton for an individual CUP Award. It was MOVED by Mr. Somers, seconded by Mrs. Hallock, and "ordered by enthusiastic unanimous consent" to approve the nomination.

Dr. Charlton was present and acknowledged the nomination. He showed the Commissioners an original copy of the initiative petition creating the State Sanitary Authority in 1937. Mrs. Seymour noted that Dr. Charlton was active in securing passage of the petition. The Commissioners asked that the petition be copied and sent to them.

OREGON CUP RENEWALS

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

the Director's recommendation that renewal of Publishers Paper Company's Oregon CUP Award be granted for the calendar year 1975. Mrs. Seymour commented that since the Screening Committee had met to consider Publishers renewal, the company announced construction of a deinking plant so it could make better use of recycling techniques.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to approve the Director's recommendation that renewal of American Can Company's Oregon CUP Award be granted for the calendar year 1975.

GLENMORRIE COMMUNITY SEWAGE DISPOSAL, CLACKAMAS COUNTY

Prior to presenting the staff memorandum report, Mr. Gilbert summarized the mandatory annexation procedure covered by ORS 222.850 through 222.915. He then read the staff report and the Director's recommendation that the Commission approve the proposed preliminary plans and specifications and the time schedule for installing sewers in the proposed Glenmorrie annexation area submitted by the City of Lake Oswego under date of April 3, 1974, and certify said approval to the Oregon State Health Division.

Public testimony followed and is summarized below:

Mr. James R. Moore, an attorney in Portland, stated that he represented a Mr. Waterbury who with his neighbors lives on Stonebridge Way in the Glenmorrie area. Mr. Moore said this is an area of approximately 10 lots with the best soil conditions and can adequately support septic tanks; it is also an area least proximate to the City of Lake Oswego. He asked that this area and perhaps others with similar soil conditions be deleted from the annexation proposal.

Mr. William A. Headlee, resident on Glenmorrie Terrace, said he was one of the original petitioners and was in agreement with the staff report recommendations. He stated that conditions of failure are more prevalent than reported in the spot checks conducted by the Department, and that the cost of sewers for oversize lots should not be a consideration in the solution of the health hazard problem. He said that unfortunately when sewer systems are put in, city boundaries that are not in continuity cannot be changed. The exclusion of parcels has caused one of the biggest problems in the continued development of both sewer systems and public services.

Mr. Warren Oliver, Chairman of the Glenmorrie Fire District, stated that he was one of the original petitioners supporting annexation, and that the petition outlined the area of the fire district which contains 130 homes.

Mrs. Jane Erickson of Glenmorrie Drive, said she would like to have sewers but commented that the problems with older homes are considerable, that many basements go 13 to 15 feet below the level the sewer laterals would have to be placed.

Senator Ralph Groener had telephoned a message concerning the cost of the proposed sewers which he asked to be relayed to the Commission by Mrs. Seymour. Senator Groener told Mrs. Seymour that 40 percent of the area are senior citizens on fixed incomes, and according to his information, costs would be exorbitant for them. He felt that the Legislature should provide financial assistance to areas where sewer costs are unusual and said he expected to introduce a bill to that effect.

Mr. John P. Dellett, 2247 South Glenmorrie Lane, discussed the environmental assessment made by the City of Lake Oswego, which showed much higher costs both for the project and for individual lot owners than those costs reported in the City's letter of August 1, 1974 attached to the staff report. His position was that sewers do not need to be built and that the septic tanks can be repaired. When asked by Dr. Crothers what evidence he had for making that statement, Mr. Dellett replied that he did not yet have the evidence since engineering studies to determine that have not been contracted for.

Mr. Richard P. Waterman, 1515 South Cherry Lane, Lake Oswego, stated that he believed a health hazard existed in the area and favored sewers. Although he would prefer having sewers to solve the health problem without annexation, he realized that was both impossible and impractical.

There were no further witnesses.

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

PUBLIC INFORMATION HEARING ON AMAX

The public information hearing on AMAX Aluminum Company, scheduled for October 18, 1974 in Astoria, though not an item appearing on the agenda for this meeting, was discussed by Mr. Somers in view of the conflict of interest

allegations made in the newspapers and on television. He felt it would be reasonable for the Commission to direct the Department to not have a public hearing until such time as the AMAX Company has disclosed satisfactorily to the Department all persons on their behalf or agencies who are in their service and who may be appearing or participating in the formation of their permit. He MOVED that the Commission adopt the following resolution:

"WHEREAS the Environmental Quality Commission insist upon knowing the identity of every person representing AMAX in seeking the issuance of a Department of Environmental Quality permit for the construction and operation of an aluminum plant at Warrenton,

"THEREFORE BE IT RESOLVED that the Commission direct the Director of the Department to not issue any permit for the construction or operation of a plant at Warrenton, until full disclosure satisfactory to the Commission is made by the AMAX Company, and each representative of AMAX seeking or causing to be sought the issuance of a permit be fully disclosed before a further hearing is held on this matter."

Dr. Phinney asked how the hearing scheduled for October 18th would be affected by adopting the resolution. Mr. Somers said if the disclosures were made in time the hearing could be held; otherwise it would not be.

Mrs. Hallock seconded the motion which carried unanimously.

PROPOSED INTERIM POLICY FOR APPROVING NEW OR EXPANDED AIR EMISSION SOURCES
IN THE PORTLAND METRO AREA

Mr. Kowalczyk first displayed charts updating Figure 3 of the staff report:

Chart 1--Particulate Matter: Portland Air Quality Maintenance Area Emissions in Relation to Air Quality Standards. By 1975, the target date for the completion of the Clean Air Implementation Plan, the Department's assessment indicated that the annual standard would barely be met and the daily standard would not be met. After 1975, the Department's Air Quality Maintenance Study, which projected average growth to occur between 1975 and 1985, projected emissions which would steadily increase and which possibly would violate the annual standard by 1977.

Chart 2--Sulfur Dioxide: Portland Air Quality Maintenance Area Emissions in Relation to Air Quality Standards. The Air Quality Maintenance Study indicated that in 1970, 33,000 tons of sulfur dioxide were emitted per year. The State's Implementation Plan projected that by July 1975, these emissions would be reduced and the maximum daily and maximum annual standards would be in compliance. With projected average growth occurring to 1985, standards possibly would be exceeded by 1983.

Mr. Kowalczyk said that two factors have recently altered the projections on both charts. First is that natural gas to industrial users will be further curtailed in years ahead (projected from 120 days' curtailment per year in 1973 to approximately 200 by 1975), and the resulting energy deficiency would be made up by the use of residual fuel oil which would increase the sulfur dioxide emissions projected. He said that 32 million more gallons of oil per year would be needed to make up for the deficiency in natural gas, thus increasing SO₂ emissions to 36,000 tons per year. The SO₂ standards could be exceeded by as early as 1977. Both charts were based on existing Department regulations and included emission reductions anticipated by completion of Implementation Plan control strategies.

The conclusions and recommendations contained in the staff report followed:

Conclusions

1. The Department's report on designation of air quality maintenance areas, submitted to the EQC on March 18, 1974, concludes that the Oregon State Clean Air Act Implementation Plan (I.P.) adopted by the EQC on January 24, 1974, which contained control strategies designed to meet national ambient air standards by 1975, will not be fully successful in meeting and maintaining State and Federal air quality standards.
2. The most critical problem identified in the Air Quality Maintenance Area Report is that suspended particulate air quality in an area along the Willamette River stretching from Northwest Portland through the Downtown core area, will barely achieve the annual standard and will continue to exceed the maximum day standard in 1975 when I.P. control strategies are scheduled to be completed. Based on average industrial growth, particulate air quality is projected to steadily worsen with the annual standard again being exceeded by 1977. Annual and maximum daily sulfur dioxide ambient air standards are now being met but projections indicate that these standards will be exceeded prior to 1985, also based on the assumption that average growth will occur.

3. A revised control strategy to obtain and maintain national ambient air standards within the Air Quality Standards Maintenance Area for the ensuing ten-year period is scheduled to be developed and submitted to the Environmental Protection Agency by July, 1975. The Department is currently undertaking in-depth air quality studies which are designed to provide the information needed to guide the Department in making the necessary revisions to the Oregon Clean Air Implementation Plan.
4. The Department's Northwest Region is presently faced with evaluating proposals for a substantially greater than average number of medium to large new air contaminant sources which are proposed to be located immediately northwest of the Portland core area. This location is the most adverse from an air quality impact standpoint on the critical Willamette River corridor area. The collective air emissions from presently proposed facilities would represent more than a 30% increase in industrial process particulate emissions in Multnomah County and would exceed the projected annual industrial growth rate (of about 1 1/2% per year) for the area by a factor of ten.
5. Approval of all presently proposed facilities could hinder or even prevent attainment and maintenance of National Air Quality Standards. This is in spite of the fact that each individual facility would be required to apply highest and best practicable treatment and control and, individually, each facility might have small impact on area air quality.
6. The Department is legally committed to act on proposed permit applications for air contaminant sources once all information requested is submitted. It is apparent that the Department will have to take action on many of the proposed new air contaminant sources prior to completion of the in-depth air quality study and prior to development and adoption of a ten-year air quality maintenance plan.
7. An interim policy for processing new air contaminant source applications in the Portland Metropolitan Area is urgently needed to:
 - A. Provide the Department with means of assuring that development of an effective air quality maintenance plan is not thwarted.
 - B. Provide guidelines for processing presently pending permit applications in a timely manner.
 - C. Provide present and future permit applicants with air quality criteria so that economic feasibility of projects can be properly assessed.
 - D. Provide the most populous portion of the State of Oregon with protection against excessive and possibly irreversible air quality degradation.
8. The development of a long-range policy for approval of new air contaminant sources in the Portland Metropolitan Area which will assure attainment and maintenance of air quality standards on a technically sound basis can only be accomplished with completion of the in-depth work the Department is now undertaking for development of a ten-year air quality maintenance plan. The plan will take a minimum of 9 months to complete. The best available information upon which to base an interim policy at this time appears to be

data developed in the Department's Report on Designation of Air Quality Maintenance Areas, since this analysis utilized latest available air quality and emission data and followed procedures prescribed by EPA.

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

- A. Allow utilization of calculated air shed capacity but not allow ambient air standards to be exceeded where present projections indicate they will be met after completion of presently proposed implementation plan control strategies.
- B. In cases where maximum day standards are projected to be exceeded even after completion of present implementation plan control strategies and in consideration of minimizing degradation of air quality, emission increases should be allowed only in the amount projected in the air quality maintenance area report as average growth over the next two years. The two-year period is considered reasonable since many, if not all, of the facilities that will be considered under the interim policy could be operational within the ensuing two-year period or shortly thereafter.
- C. As a guideline, not allow any one facility to use more than one-quarter of the total allowable emission increase for the Portland Metropolitan Area.

(Such policy would translate by use of diffusion model analysis to an allowable increase over the next two-year period of approximately 400 tons per year of particulate emissions if all of the allowable development were to occur in the Rivergate/Northwest Portland area and consist of hot gaseous type emissions having a stack height of approximately 100 feet. Maximum allowable increases in particulate and SO₂ emission rates in the Portland Metropolitan AQMA, based on a two-year average growth rate, would amount to 430 tons per year and 1430 tons per year respectively.)

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

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

Director's Recommendation

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

1. Increases in particulate and SO₂ air contaminant emissions from controllable new or expanded point sources within the Portland Air Quality Maintenance Area shall be allowed only to the extent (as indicated in the Department's March 1974 report on Designation of Air Quality Maintenance Areas) that air quality standards will not be exceeded after completion of Implementation Plan strategies.
2. Increases in particulate and sulfur dioxide air contaminant emissions from new or expanded controllable sources in the Portland Metropolitan Area Air Quality Maintenance Area shall be allowed up to the amount of two years' projected "average" controllable growth as defined in the designation of air quality maintenance area report.
3. Define controllable growth as commercial and industrial fuel combustion, process loss sources, solid waste incineration, wig-wam waste burners and power plants.
4. As a guideline, not allocate any one new or expanded source more than 25% of the overall increase in air contaminant emissions allowable under the interim policy.
5. Specific allocations shall be made by the Commission in acting upon individual permit applications.
6. Small air contaminant sources emitting less than ten tons per year of any one contaminant shall be exempted from this policy.

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

The Vice Chairman called for public testimony on the proposed policy. A summary is given below:

Mr. Edward G. Westerdahl II, Executive Director of the Port of Portland, stated that he would speak to the broader issues of the policy being considered by the Commission, and that the Port's Environmental Coordinator, Mr. Walter Hitchcock, would comment on the technical aspects.

Mr. Westerdahl said that it was his opinion that a state agency has in addition to its narrowly defined (statutory) responsibilities, a responsibility to interpret the public good. He said the Port has two primary concerns: (1) the way in which a government agency deals with customers, and (2) technical problems the Port sees in the proposals presented to the Commission. He then called on Mr. Hitchcock.

Mr. Hitchcock first commented on the data in the staff report. He questioned the data base upon which the staff reported 1376 tons per year of particulate matter were emitted from the 10 listed North Portland industries. He said it should be 595 tons and that there were mitigating factors that would make this less. He said the only SO₂ problem is in Willbridge, where 60 percent of the SO₂ sources are located. He said that there are feasible alternatives which should have been evaluated.

Another basic question raised by the proposal is, "Why did it take a federal requirement for the designation of air quality maintenance areas before the success of the Clean Air Implementation Plan was assessed?" He then commented on the 10-year maintenance plan study, stating that it has certain data limitations in the areas of sample analysis and meteorological factors. "It is imperative that this study be expanded in scope so we can proceed into the future on a solid data base and accurate projection techniques."

Mr. Westerdahl said that while the Port supported the concept and the guidelines on an interim basis, they still maintained that the data the Department is receiving for determining emission levels are inconsistent. He said a major problem has been changing requirements, that is, the DEQ has had three different directors and different Commissions, and the Port's principal concern is with after-the-fact changes made by the Department which are unreasonable. Discussions have always begun early between industry and the DEQ, but over a

period of time requirements were changed and "standards are imposed that haven't been met anywhere in the world and cannot be met."

Mr. Westerdahl also discussed the need for the economic growth of the Portland metropolitan area. He said new industries such as Cook, the pulp mill at Halsey, Columbia Independent Refinery, and Owens Corning Fiberglas will put pressure on existing industries to become more efficient.

Mr. Westerdahl suggested that the policy presented to the Commission "is injurious to Oregon," that many of the problems faced by the Commission in this regard are due to a lack of information: "Nobody has an adequate data base." He supported the undertaking of a study by the Department but suggested that the money available be used as a first-phase and much more sophisticated study, that a full study should cost in the neighborhood of \$250,000 to \$300,000, and that the Port would enlist help in persuading the Legislative Assembly to appropriate the needed money. He asked that the Commission adopt standards and stay with them, and take into account broad economic and community needs--the trade-offs--that must be considered in approving specific industries. He concluded by stating that an interim plan makes sense. "Expand the study and get the type of information so we all can have a good data base."

Dr. Crothers asked how many industries were presently looking at Rivergate and how they could all be accommodated there within the Clean Air Act limitations. Mr. Westerdahl replied that Columbia Independent Refinery, Cook Industries, Owens Corning Fiberglas and another grain elevator comparable to that proposed by Cook had applied for Rivergate, and that he believed these industries could be accommodated at that location without injuring the conditions of the air shed. He added that Columbia Independent Refinery was the only one with heavy sulfur emissions.

Mr. Somers asked Mr. Westerdahl what he suggested as a resolution of the problem. Mr. Westerdahl replied that each industry listed in the Department's staff report could be brought into the area without injuring the air shed by working with existing industries and by considering trade-offs. He said, "The newest, the cleanest, and the best put pressure on older industries to improve." He offered the assistance of his staff to spend time with the DEQ staff to look at alternatives.

OREGON PORTLAND CEMENT--PUBLIC INFORMATIONAL HEARING

Because the time of the hearing on Oregon Portland Cement had been set for 10:30 a.m. and the Vice Chairman had previously announced he would allow only a 30-minute discussion of the previous agenda item until after that hearing, the Vice Chairman announced that the public informational hearing on Oregon Portland Cement would begin.

Mr. Somers asked that the reading of the staff report be waived except for the conclusion, which was read by Mr. Kowalczyk:

Conclusion

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

1. Adherence to kiln emission limits that represent highest and best practicable treatment, Section A, Conditions 1, 2 and 3 of the permit.
2. Upgrading of kilns #2 and #3 air pollution control system to attain a degree of collection efficiency demonstrated by the kiln #4 operation, Section A, Conditions 3b and 6c of the permit.
3. A program to insure continuous efforts to minimize fugitive dust emissions, Section A, Condition 12, and Section B, Condition 6 of the permit.
4. Monitoring of major source control equipment performance in order to quickly diagnose operational problems, Section A, Condition 18; and Section B, Condition 8 of the permit.
5. An extensive study of the nature of ambient air particulate in order to assist in determining further emission control measures to eliminate further emission control measures to eliminate continuing ambient air standard violations, Section A, Condition 17 and Appendix I.

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

Mr. Kowalczyk said the staff had met with the company the week of this meeting and two issues in the permit had been resolved:

On page 2 of the proposed permit, Section A(3)(b): "After July 1, [1976] 1975, 0.35 pounds per ton of feed to the kiln or 11 pounds per hour."

On page 1 of Appendix I, Section 3, the following paragraph should be inserted at the beginning of the section:

"The particulate characterization program requirements outlined below are intended to provide minimum study guidelines which the Department feels are necessary to assure that program objectives are realized. In order that this program may be accomplished at minimum expense to Oregon Portland Cement, a quarterly progress report as prepared by OPC's consultant shall be submitted to the Department for review and discussion. If in the judgment of the Department it is apparent that the program objectives will be met during early phases of the study, changes in the program guidelines may be made to delete later portions of the study."

Public testimony followed and is summarized below:

Mr. Erik Voldbaek, First Vice President of Oregon Portland Cement, distributed copies of a prepared statement which he asked be made a part of the permanent record. His testimony focused on two of the permit conditions with which his company has not agreed--the upgrading of Kilns #2 and 3 control system by 1975 to the same efficiency as Kiln #4, and the proposed ambient air monitoring program as shown in Appendix I of the proposed permit.

Mr. Eugene Popma, 100 Leonard Street, Lake Oswego, representing 10 owners of a condominium complex located about three blocks from the cement plant, said he and the other owners backed the staff report and urged its implementation. He said, "We have unbearable air quality living standards," referring to the particulates, dust, noise and odor from the plant.

Mr. Larry Williams, Executive Director of the Oregon Environmental Council, Portland, had asked to testify but was not present when called.

Mr. Joseph Cahan, owner of Friendly Chevrolet and a homeowner in Lake Oswego, presented for inspection by the Commissioners two anodized aluminum strips from 1974 cars etched beyond repair by cement dust. (Mr. Somers indicated they would be called Exhibit A and made a part of the permanent record.)

Mrs. Heidi McLean, a Lake Oswego resident, said she could substantiate Mr. Cahan's testimony concerning dust and noise.

Mr. Steve J. Gimarelli of Dee Thomason Ford in Lake Oswego, said that some of the Oregon Portland Cement employees had tried without success to remove the pitting on the aluminum strips on their cars. He said his firm was obliged to clean their cars with vinegar.

Mr. Bob McGinnes, a Lake Oswego resident on the corner of Church and Durham Streets, had objections similar to those previously presented. He said that most of the dust goes into Old Town, somewhere on Durham Street. He suggested using a razor blade to remove the dust from car windshields.

There were no further witnesses and the Vice Chairman recessed the meeting for lunch.

At 1:15 the meeting was reconvened and the Vice Chairman stated that no action on the Oregon Portland Cement agenda item was required. He added that the Commission expected the Department staff to proceed to draft the conditions of a permit which would produce a great improvement in the area.

PROPOSED INTERIM POLICY (continued)

Mr. Carl N. Petterson, representing Northwest Natural Gas Company, spoke in favor of the proposed oil refinery at Rivergate, which possibly could increase Northwest's year-round supply of gas by 15 percent because enough petroleum naphtha could be produced by an oil refinery to assure Northwest a consistent supply of synthetic natural gas (SNG) plant feed stock. "The prospect of an additional 50 million cubic feet per day of natural gas offers to both energy consumers and the administering DEQ and EQC a significant trade-off in local air emissions as various grades of oil are supplanted by cleaner burning natural gas." He added that the SO₂ content of liquid gas is the same as for natural gas.

Mr. David N. Hobson, attorney for Portland General Electric Company (PGE), said the figures pertaining to PGE were apparently incorrect. He asked for adequate time for persons in opposition to submit information to the Commission before the Commission adopted the report. He referred specifically to the staff placement of PGE in Table 4 (proposed new industries and other significant sources which may locate near Portland), stating that Harborton should have been placed under Table 5 (industries presently in existence). He also said that the report missed "a most important philosophical point"...determining the priorities of what Portland needs.

Mr. Kowalczyk said that Harborton was placed in Table 4 because the Department's permit requires the facility to be relocated by September 1975.

Mr. Roger Ulveling, Planning Coordinator for Columbia Independent Refinery, a subsidiary of Pacific Resources of Honolulu, submitted copies of prepared testimony. He also questioned some data in the staff report; summarized the history of CIRI's application for an air contaminant discharge permit, beginning with former Director L. B. Day; and stated that adoption of the proposed interim policy containing the SO₂ limitation would preclude CIRI's continued development at Rivergate. As to the SO₂ limitation, Mr. Ulveling said that his company and the Department had never discussed SO₂ emissions in relation to the proposed permit.

In response to questions from the Commission regarding the staff projection of 800 tons of particulate per year and the SO₂ limitation in the proposed policy, Mr. Ulveling replied that the maximum level for particulates in the proposed permit would be 225-230 tons per year, "and we expect to meet that level." With respect to the SO₂ limitation, if the policy were adopted as presented, CIRI would effectively be eliminated as an applicant because even using 0.5% sulfur residual fuels, the refinery would still produce 300 tons of SO₂ per year. Mr. Ulveling said his position was based on the fact that there was no indication in the interim policy of trade-offs. If this concept is written into the policy statement, then he said he had no objection to its adoption.

Mr. Weathersbee stated that the refinery would produce low sulfur fuel which would provide other industries with a cleaner fuel source, thereby reducing SO₂ discharges in the entire area.

Commissioners discussed the problems posed by the emissions limitations, the recommendation that no one source could contribute more than 25 percent of the total, and the proposal by CIRI which would exceed both particulate and SO₂ restrictions. They asked what kind of trade-off could be applied to CIRI. Mr. Weathersbee replied that CIRI cannot effect a trade-off in particulates. Mr. Ulveling said that the company could blend fuels and use distillates some of the time in order to alleviate the emissions problems.

Other questions directed by the Commission to Mr. Ulveling dealt with the company's preference for Rivergate as a location for the refinery, the difference

between the SO₂ levels reported by the Port of Portland and CIRI, and the type of crude oil to be processed.

Mr. Ulveling replied that locating the refinery outside Portland--in the Beaver area, for example--would necessitate running a pipeline to Portland, "which would cost as much or more than shipping the product from Bellingham to Portland." The difference in the reported SO₂ levels was the result of CIRI's basing its predictions using the 0.5 percent residual under worst case conditions. The refinery would process low sulfur crude by hydro-desulfurization. The equipment for this process would add approximately \$40 million to building the operation and would add about seven cents per gallon to home heating fuel costs.

Mr. Weathersbee stated that the Department has recognized the trade-off possibility with SO₂ but cannot effect a trade-off in particulates in the Rivergate area. He said that CIRI has submitted an application for a 100,000 barrel per day refinery, and staff analysis indicates that amount of crude cannot be processed burning the fuels proposed and produce less than 800 tons (of particulate matter) per year.

Mr. Ulveling replied that the Department staff based its projections on EPA guidelines developed 18 years ago, and that CIRI planned to substantiate their data in a report on tests that were recently completed in Japan on a similar refinery.

Mr. Weathersbee said that CIRI cannot be accommodated at the Rivergate location at its proposed emission levels without endangering exceeding the standards if any of the other applications were allowed. "Allocating a limited air resource has never been done before and today is the first time we've come to the Commission with this difficult problem."

Mr. Ulveling concluded his testimony by stating that CIRI believed there would be trade-offs in both particulates and SO₂, and that the proposed interim policy was not appropriate at this time.

Dr. George Tsongas, a professor in the Department of Applied Science and Engineering at Portland State University, spoke for the Oregon Environmental Council, the National Environmental Defense Council, and himself as a concerned citizen and professional. He strongly supported such a proposed policy, although

he said he had some problems with the specifics of this particular policy. He suggested that the Department was overly optimistic about the effects of their control strategy and questioned the need for new development. He recommended the following revisions to the policy proposed:

1. The Department should set a one-year moratorium on granting new air contaminant discharge permits until completion of the Air Quality Maintenance Study.
2. The Department should allow new permits only after necessary reductions in other emissions from existing plants have actually been attained.

Dr. Tsongas said he realized these revisions implied little or no growth as regards large industrial sources of pollution but said that may be necessary if the goals of the Clean Air Act were to be reached. Growth, he said, could be accommodated by smaller, cleaner industries.

When questioned about the trade-off concept previously discussed, Dr. Tsongas replied that he would have no objection to applying that concept and further, "Those are the kinds of trade offs we should be making." He concluded his remarks by stating that no one really knew, however, how much of CIRI's low-sulfur residual fuel would be available for use in the Portland area.

Mrs. Ruth Spielman, President of the Portland League of Women Voters, asked for a delay on the decision to adopt the policy because ample notice of the details in the staff report had not been given. She said that this proposed policy was "far more important than just you and the industries; it's between you and the people of the metropolitan area." She stated that the boundaries of the air shed should be further delineated and then a lid clamped on the entire air shed if it is endangered in any way. She also asked what was being done to clamp a lid on the Longview-Kelso area. "If you cannot get a bi-state agreement with the State of Washington, then hopefully you will bring this matter to the attention of the Federal Government."

She also asked that the Commission take into account the economic and social benefits industries bring to the community and requested the Commission to obtain economic information from industries in the Portland area and from the Port of Portland as well. She saw no justification for putting a 100-ton limit on basic industry and letting unlimited numbers of 10-ton permits as outlined in the proposal. "We shouldn't nickel ourselves to death with small emission sources."

If we aren't in imminent danger, then I think that there should be steps taken for public input to have a regional development proposed of the total air shed."

Mr. John Mosser, an attorney with offices at 1505 Standard Plaza, Portland, representing Portland Steel Mill (outside Rivergate but adjacent to it), said he wished to speak in defense of the DEQ staff with respect to certain criticisms voiced at this meeting. He pointed out that the staff, unlike the Port of Portland staff, was subject to the Commission for final decisions and also to federal and state requirements for public hearings; it is not a decision-making staff.

He said there was merit in the testimony given by a number of industries that "if any industry can come in and show that there will in fact be a net offsetting reduction to bring it within that limit, you consider one of even a thousand tons provided it can find 900 tons of offset somewhere."

Mr. Mosser supported Mr. Westerdahl's suggestion to have a larger-scope study to provide the needed information. He concluded by stating that the staff's policy was reasonable with the one addition that if offsetting reductions could be demonstrated, then the Commission consider industries exceeding the 25 percent limitation.

The Commission agreed not to take immediate action on the proposed policy. They informed the Department staff to proceed with the issuance of a permit to Cook Industries (with a 30-ton limit), to calculate the trade offs relative to CIRI, to process the permit applications for the industries listed under Table 4 which have applications pending, and to develop the trade off concept for inclusion in the policy statement.

Mr. Somers asked Mr. Underwood if the Commission had authority under the statutes to decide priorities, as suggested by several witnesses. Mr. Underwood replied that the Commission did not have the authority to decide on any basis other than environmental. He suggested that the proposed interim policy be presented to the Commission in the form of a rule for their consideration. Mr. Somers requested the staff to propose a temporary rule prior to the next meeting for consideration at that meeting.

It was MOVED by Mr. Somers, seconded by Dr. Phinney and ordered by unanimous consent to defer action on the Director's recommendation until the next meeting.

AMBIENT AIR STANDARD FOR LEAD--STATUS REPORT

Mr. Johnson read the staff memorandum report dated September 12, 1974, Because of the large volume of testimony received at and subsequent to the public hearing, the staff was still evaluating the information and planned to present a report to the Commission at the October 25, 1974 meeting.

VARIANCE REQUEST: UNION OIL OF CALIFORNIA

Mr. Hanson summarized the staff report containing the Director's recommendation as follows:

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

- a) no other alternative facility or method of handling is yet available; or
- b) conditions exist, as described in the letter request for extension of variance and in the staff report, that are beyond the control of the persons granted such variance.

Conditions

1. The maximum sulfur content of residual fuel oil to be sold, distributed or used shall not be more than 2.5 percent sulfur by weight.
2. Union Oil shall submit to the Department a report containing the sulfur analysis and quantity of each shipment sold or distributed in the state on a quarterly basis beginning October 1, 1974.
3. On or before May 15, 1975, Union Oil shall submit to the Department a written report describing plans or programs adopted to achieve compliance with the Department rules including expected dates of implementation.
4. This variance shall terminate July 1, 1975.

It was MOVED by Mr. Somers to approve the Director's recommendation. There being no objection it was so ordered by unanimous consent.

INDIRECT SOURCE(S) PROPOSED RULE--AUTHORIZATION FOR PUBLIC HEARING

Mr. Hanson summarized the staff memorandum report on the status of the Indirect Source(s) Proposed Rule. Because comment and testimony were substantive

and extensive, a new draft of the proposed rule was completed and mailed to all interested parties. Therefore, the Director recommended that the Commission authorize the Department to set a public hearing before the Hearings Officer on October 29, 1974 (changed from October 21, 1974), in Portland, Oregon, for the purpose of taking public testimony concerning the proposed rule on Indirect Source(s).

It was MOVED by Mr. Somers to approve the Director's recommendation. There being no objection it was ordered by unanimous consent.

TEMPORARY RULE PERTAINING TO STANDARD SPECIFICATION FOR HOMOGENEOUS PERFORATED BITUMINIZED FIBER PIPE FOR SEPTIC TANK DISPOSAL FIELDS

The staff memorandum report concluded that the following proposed temporary rule be adopted in order to permit the use of perforated bituminized fiber pipe for the distribution lines in septic tank disposal trenches, as recommended by the Technical Advisory Committee for Materials, appointed by the Director in connection with the Department's subsurface sewage disposal program:

Proposed Temporary Rule

Amend the first two sentences of Section II. D. of Appendix E of the Standards for Subsurface Sewage and Nonwater-Carried Waste Disposal administrative rules contained in Subdivision 1, Division 7, OAR, chapter 340, to read as follows:

- "D. Bituminized fiber of which both solid pipe and fittings must meet ASTM (American Society for Testing and Materials) Specification D 1861-69 which is designated Appendix [L] M and by this reference is made a part of these regulations. Perforated bituminized fiber pipe shall meet ASTM Specification D 2312-73 which is designated Appendix L and by this reference made a part of these regulations. Each length of pipe and each fitting shall be marked with the nominal size, the manufacturer's name or trademark, or other symbol which clearly identifies the manufacturer and the appropriate ASTM standard number above." (Words in brackets are to be deleted and words underlined are to be added.)

It was the Director's recommendation that the temporary rule be adopted by the Commission to become effective immediately upon filing with the Secretary of State, and that the Commission find that failure to adopt said rule at this time will cause hardship to property owners desiring to use perforated bituminized fiber pipe in disposal trenches, and further that failure to act promptly will result in prejudice to the public interest as well as to the interest of parties directly concerned.

It was MOVED by Mr. Somers that the Director's recommendation be approved with the addition that the matter immediately be processed for adoption as a permanent rule. There being no objection, it was so ordered by unanimous consent.

FISHHAWK LAKE RECREATION HOMESITES: DOMESTIC SEWERAGE SYSTEM MAINTENANCE PERFORMANCE BOND

Mr. Curran presented the staff memorandum report and responded to questions by the Commission. The Fishhawk Lake Recreation Club, Inc. requested a reduction of the \$25,000 maintenance performance bond and substitution of a mortgage lien on the real property for the present corporate surety and proposed the following agreement with the Environmental Quality Commission:

1. The recreation club is the entity action on behalf of the property owners;
2. The club has shown that a \$5,000 bond is sufficient to ensure compliance with permit requirements, and has proposed a substitute of a mortgage lien on real property valued at \$5,000;
3. A document creating a mortgage lien on an unimproved lot within the plat will be delivered to the Commission;
4. The club agrees to deposit not less than \$1,000 per year cash in a savings account until the account reaches \$5,000, at which time the club will assign or pledge the account to the Commission as security in place of the mortgage lien on the lot. The \$5,000 cash deposit will be permanent and recoverable by the Commission only. Interest will be payable to the club.

It was the Director's recommendation that the Commission reduce the amount of bond required to \$5,000 and, further, to accept in lieu of other security a real property mortgage lien against Lot 32, Division II of the plat of Fishhawk Lake Estates in Columbia County.

Mr. Somers objected to the recommendation principally on the basis that the developer must be held liable in perpetuity rather than being allowed to turn over the responsibility to the purchasers.

It was MOVED by Mr. Somers, seconded by Dr. Crothers and unanimously carried to deny the Director's recommendation.

WEYERHAEUSER COMPANY, KLAMATH FALLS--REQUEST FOR TIME EXTENSION

Mr. Ashbaker summarized the staff memorandum report on the company's inability to comply with the schedule deadline of October 1, 1974, requiring Weyerhaeuser

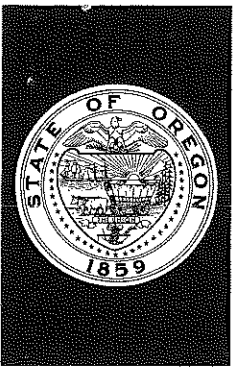
to eliminate the use of the Klamath River as a wet feet channel for the mill and clean up residual debris in the river. Weyerhaeuser proposed to comply with the requirement through the use of a fill in the river adjacent to the mill. Because of the controversial nature of a fill in the river and the requirements to obtain a permit from the Division of State Lands, the proposed project has not yet been implemented and progress toward its implementation has been very slow.

It was the Director's recommendation that the October 1, 1974 deadline for eliminating Weyerhaeuser logs from the Klamath River be rescinded and that the staff be authorized to renegotiate a time schedule for eliminating the problem which relates to the receipt of necessary approvals from other state agencies.

It was MOVED by Mr. Somers to approve the Director's recommendation. There being no objection, it was so ordered by unanimous consent.

There was no further business, and the Vice Chairman adjourned the meeting at 3:15 p.m.

Shirley Shay, Secretary
Environmental Quality Commission



ENVIRONMENTAL QUALITY COMMISSION

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KESSLER R. CANNON
Director

MEMORANDUM

To : Environmental Quality Commission
From : Director
Subject: Agenda Item No. B, October 25, 1974 EQC Meeting
September 1974 Program Activity Report

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

Water Quality

1. Twenty-nine (29) domestic sewage project plans and specifications were reviewed:

WATER QUALITY DIVISION - 29 (see attachment #1)

Approval was given to five (5) change orders and addenda.

Provisional approval was given to:

- a. Two (2) change orders for sewer projects
- b. Nineteen (19) sewer projects
- c. Three (3) sewage treatment plant projects

2. Eighteen (18) industrial waste treatment plans were reviewed:

NORTHWEST REGION - 15 (see attachment #2)

Approval was given to eight (8) plans:

ARCO (Portland), Multnomah County
upgrading 0.1 water separation facilities

Jesse Grieser Dairy Farm, Marion County
animal waste disposal system holding tank

Dayton Feed Yard, Yamhill County
lagoon for animal waste



Contains
Recycled
Materials

Richard Kimball, Yamhill County
animal waste disposal system holding tank

A & H Dairy, Marion County
animal waste disposal system holding tank

Robert Kauer, Jr., Washington County
animal waste disposal system holding tank

Steven Vandehey, Washington County
animal waste disposal system holding tank

Robert Vandehey, Washington County
animal waste disposal system holding tank

Seven (7) plans are pending:

Chipman Chemical (Portland), Multnomah County
Rhodia defuser

Austin Warner, Yamhill County
animal waste disposal system holding tank for livestock operation

Joe Davis, Tillamook County
animal waste disposal system holding tank

Gary Manning, Tillamook County
animal waste disposal system holding tank

William Gates, Tillamook County
animal waste disposal system holding tank

James Trent, Tillamook County
animal waste disposal system holding tank

Hugh Skarda, Tillamook County
animal waste disposal system holding tank

WATER QUALITY DIVISION - 3

Provisional approval was given to three (3) project plans:

Union Oil Company of California, Coos Bay
modification and new facilities

C. A. Stechelin, Woodside Stables, Eugene
animal waste facilities

Herman V. Lilienthal Dairy Farm, North Bend
animal waste facilities

Air Quality

Forty-three (43) pollution control project plans were reviewed:

NORTHWEST REGION - 31 (see attachment #3)

Approval was given to fifteen (15) pollution control plans:

B. W. Feed Company, Multnomah County
bakery waste processing

Boise Cascade, St. Helens, Columbia County
Venturi for #1 and #2 lime kilns

Crown-Zellerbach, Columbia City, Columbia County
hog fuel boiler with scrubber

Multnomah Plywood, Columbia County
veneer dryer control

Fry Roofing, Multnomah County
fume control of storage tanks

Fry Roofing, Multnomah County
Volney felt mill control wood flour

Flintkote Company, Multnomah County
filter for sand handling

Cargill, Inc., Multnomah County
grain handling dust control

Globe Union, Clackamas County
lead remelt furnace

Crown-Zellerbach, Wauna, Clatsop County
scrubber for lime kiln

Portland State University, Multnomah County
new boiler

East Side Plating Works, Multnomah County
two bag collectors and scrubber

ESCO, Multnomah County
new powder burnout booth

Niedermeyer-Martin Company, Columbia County
pole peeling facility

Western Wood Industries, Multnomah County
chip bin and transfer cyclone

One (1) final permit was issued to:

Cook Industries, Multnomah County
grain terminal

One (1) special permit was issued to:

C. H. Stinson, Inc., Multnomah County
portable asphalt paving plant

Three (3) proposed permits were issued to:

Schnitzer Steel Products, Multnomah County
wire incinerator

Columbia Steel Casting, Multnomah County
new furnace and controls

Pacific Carbide, Multnomah County
new furnace

Additional information was requested for eight (8) project plans:

Chamberlain's Pet Crematorium, Multnomah County
cremation incinerator

Triangle Milling, Multnomah County
dust control

Pacific Building Materials, Washington County
concrete readymix plant

Publishers Paper, Newberg, Yamhill County
new digester

Publishers Paper, Newberg, Yamhill County
new hog fuel boiler

Oregon Steel Mills, Rivergate, Multnomah County
pellet metallizing

Barton Sand and Gravel, Clackamas County
rock crusher

J. Arlie Bryant, Inc., Multnomah County
portable rock crusher

Three (3) pollution control project plans are in process:

AMAX Aluminum, Clatsop County
new aluminum reduction plant

Charter Energy Company, Columbia County
new oil refinery

The Oregon Humane Society, Multnomah County
cremation incinerator

AIR QUALITY DIVISION - 12

Approval was given to two (2) air pollution control plans:

Melrose School, Douglas County
installation of a distillate oil-fired boiler

Weyerhaeuser Company, Lane County
process changes to improve No. 3 recovery furnace
black liquor oxidation

Provisional approval was given to one (1) air pollution control plan and four (4) parking space facility proposals:

Gourmet Foods, Morrow County
installation of a potato fryer and emissions control scrubber

Tanasbourne Phase I, Washington County
705-space parking facility

Good Samaritan Hospital, Multnomah County
54-space parking facility

Plaza 12 Condominiums, Lane County
70-space parking facility

I-405 Parking, Multnomah County
340-space parking facility, municipally owned

Amended approval was given to two (2) parking space facility proposals:

LDS Church, Multnomah County
102-space parking facility
(previously filed as 86-space parking facility and
granted provisional approval)

Weigel Apartments, Washington County
modification of existing parking facility

Additional information was requested regarding two (2) parking space facility proposals:

Tri-Met, Multnomah County
100-space employee parking facility

Owens-Corning Fiberglas Plant, Multnomah County
200-space parking facility

No action was required for one (1) parking space facility proposal because it was outside the jurisdiction of the Department, although it had been filed for review:

Clairmont Mall, Clackamas County
700-space parking facility

Solid Waste Management

One (1) project plan was reviewed and approved by the SOLID WASTE MANAGEMENT DIVISION:

Creswell 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 September 1974.



KESSLER R. CANNON
Director

ss

attachments - 3

10/15/74

(for September reporting period,
begin with page 8-I)

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION OFFICE - Technical Services

Water Quality Division - Project/Plan Review

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

See attached sheets for disposition of each project.

Summary of Projects

12	industrial plans/tax credits received
8	industrial plans/tax credits approved
12	industrial plans/tax credits pending (total from previous months)

I N F O R M A T I O N R E C E I V E D

DEQ Staff Disposition

No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
57-I	7-17-74	Salem	Boise Cascade Digester 8 and Counter Current Washer	Boise Cascade	1 plan	8-15-74	Approved	RJ
58-I	8-1-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Joe Donaldson	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHE
59-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Glen Metcalfe	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHE
60-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Harvey Wyss	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHE
61-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Ray Measur	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHE
62-I	8-5-74	Tillamook Co.	Animal Waste Disposal System Holding Tank for Ron Zuercher	U.S.Department of Agriculture	1 plan	8-12-74	Approved	RHE
63-I	8-5-74	Stayton	Stayton Canning Co. Tax Credit T-566, "Spray Irrigation System".	Clark and Groff	1 plan		pending	RJ
64-I	8-5-74	Stayton	Stayton Canning Co. Tax Credit T-567, "Wastewater Screening System".	Clark & Groff	1 plan		pending	RJ
65-I	7-12-74	Portland	Stauffer Chemical Co. Tax Credit T-552, "Lined Pond with Pump".	Stauffer Chemical Co. Engineering Department	1 plan		pending	REC

NORTHWEST REGION - WQ - Industrial Plan Disposition

Sheet: 8-I

I N F O R M A T I O N R E C E I V E D

DEQ Staff Disposition

No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
66-I	8 74	Yamhill Co.	Millers Wholesale Meat Lagoon System	Environmental Associates	1 plan	8-15-74	Approved	RHF
67-I	7-16-74	Polk Co.	Willamette Industries Log Pond Modifications	Willamette Industries	1 plan	8-15-74	Approved	RHF
70-I	8- -74	St. Helens	Kaiser Gypsum Preliminary study of sanitary sewer pressure line	Whiteley/Jacobsen & Associates	1 plan	8-12-74	Approved	LD
71-I	8- -74	Portland	Zidell Oil Water Separator	Bryan Johnson	1 plan		Pending	LD
72-I	8-8-74	Portland	Birden & Son Study for Recirculating Cooling Water	UMA			Pending	LD
73-I	9-4-74	Marion County	Animal Waste Disposal System Holding Tank for Jesse Grieser Dairy Farm	U.S.Department of Agriculture	1 plan	9-10-74	Approved	RHF
75-I	9-11-74	Yamhill County	Dayton Feed Yard Lagoon for Animal Waste	U.S.Department of Agriculture	1 plan	9-18-74	Approved	RHF
76-I	9-9-74	Yamhill County	Animal Waste Disposal System Holding Tank for Richard Kimball	U.S.Department of Agriculture	1 plan	9-18-74	Approved	RHF

I N F O R M A T I O N R E C E I V E D

DEQ Staff Disposition

No.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	
77-1	9-16-74	Yamhill County	Animal Waste Disposal System Holding Tank for Austin Warner Livestock operation	U.S.Department of Agriculture	1 plan		Pending	RH
78-1	9-10-74	Marion County	Animal Waste Disposal System Holding Tank for A & H Dairy	U.S.Department of Agriculture	1 plan	9-19-74	Approved	RH
79-1	8-12-74	Washington County	Animal Waste Disposal System Holding Tank for Robert Kauer, Jr.	U.S.Department of Agriculture	1 plan	9-16-74	Approved	SC
80-1	8-21-74	Washington County	Animal Waste Disposal System Holding Tank for Steven Vandehey	U.S.Department of Agriculture	1 plan	9-13-74	Approved	SC
81-1	9-6-74	Washington County	Animal Waste Disposal System Holding Tank for Robert Vandehey	U.S.Department of Agriculture	1 plan	9-13-74	Approved	SC
82-1	9-5-74	Tillamook County	Animal Waste Disposal System Holding Tank for Joe Davis	U.S.Department of Agriculture	1 plan		Pending	RH
83-1	9-17-74	Tillamook County	Animal Waste Disposal System Holding Tank for Gary Manning	U.S.Department of Agriculture	1 plan		Pending	RH
84-1	9-16-74	Tillamook County	Animal Waste Disposal System Holding Tank for William Gates	U.S.Department of Agriculture	1 plan		Pending	RH
85-1	9-24-74	Tillamook County	Animal Waste Disposal System Holding Tank for James Trent	U.S.Department of Agriculture	1 plan		Pending	RH
86-1	9-23-74	Tillamook County	Animal Waste Disposal System Holding Tank for Hugh Skarda	U.S.Department of Agriculture	1 plan		Pending	RH

INFORMATION RECEIVED

DEQ Staff Disposition

Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
7-11	9-13-74 Portland	Chipman Chemical Rhodia Defuser	Zarosinski Tatone Engineering, Inc.	1 plan		Pending	LDP
8-11	8-26-74 Portland	ARCO Upgrading 0.1 water separation facilities	ARCO Engineering	1 plan	9-23-74	Approved	LDP

DEPARTMENT OF ENVIRONMENTAL QUALITY
Northwest Region
Air Quality - Project/Plan Review

During the month of September 1974, the following air quality project plans and specifications were reviewed by the staff. The disposition of each project is shown pending ratification by the Environmental Quality Commission. See attached sheets for disposition of each project.

Summary of Projects

Air Quality Plans

4 Received
12 Pending (awaiting additional information requested)
8 In Processing
17 Approvals

New Source Air Contaminant Discharge Permits

3 Received
8 Pending (awaiting additional information requested)
4 In Processing
1 Cancellation
4 Proposed Permits Issued
1 Final Permit Issued

P=Permit
 NC=Notice of Construction

DEPARTMENT OF ENVIRONMENTAL QUALITY
 NORTHWEST REGION - AQ-Plan Disposition

I N F O R M A T I O N R E C E I V E D

DEQ Staff Disposition

No.	Date Received	Location	Project	Review Engineer	Information Req'd	Rec'd	Approval Date	Action	By
P144	11-9-73	Clatsop	AMAX Aluminum - <u>New</u> Aluminum Reduction Plant	JFK	12-26-73	9-11-74		Processing	
P/NC145	11-21-73	Multnomah	Union Carbide - #1 furnace Product Change	JAP	7-15-74	8-14-74		Processing	
P/NC146	11-23-73	Multnomah	Schnitzer Steel Products Wire Incinerator	JAP	6-28-74	8-7-74	✓ 9-30-74	Issued Proposed Permit, 9-30-74	
NC493	1-7-74	Multnomah	B.W. Feed Company Bakery Waste Processing	JAP			✓ 9-26-74	Approved	
P/NC259	1-30-74	Multnomah	Columbia Steel Casting New Furnace and Controls	JAP	2-6-74	6-13-74	✓ 9-30-74	Issued Proposed Permit, 9-30-74	
NC504	2-5-74	Multnomah	Western Farmers - Dust Control of Truck Receiving	JAP	3-21-74			Awaiting Info on Air Flows (Delinquent in meeting Compliance Schedule)	
P267	2-28-74	Multnomah	Layton Funeral Home Cremation Incinerator	JAP	5-14-74			Awaiting Source Test	
NC511	3-13-74	Columbia	Boise Cascade - St. Helens Venturi for #1 & #2 Lime Kilns	DDO			✓ 9-25-74	Approved	
NC513	3-26-74	Clackamas	Milwaukie Plywood - Veneer Dryer Control	JAP	6-17-74			Awaiting Revised Proposal (Delinquent in Meeting Compliance Schedule)	
P275-7	4-2-74	Multnomah	Columbia Independent Refinery Oil Refinery	JAP	4-30-74			Awaiting Emission Substantiation	
P282	4-15-74	Multnomah	Pacific Carbide New Furnace	JAP	5-17-74		✓ 9-30-74	Issued Proposed Permit, 9-30-74	
NC520	5-7-74	Multnomah	Resource Recovery Paper Classifier	JAP	5-29-74			Awaiting Info on Controls	

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

I N F O R M A T I O N R E C E I V E D							DEQ Staff Disposition		
No.	Date Received	Location	Project	Review Engineer	Information Req'd	Rec'd	Approval Date	Action	By
NC553	5-28-74	Columbia	Crown Zellerbach (Col. City) Hog Fuel Boiler with Scrubber	DDO	7-10-74	8-9-74	9-23-74	✓ Approved	
P294	5-31-74	Columbia	Cascade Energy, Inc. Oil Refinery	JAP	7-16-74			Awaiting Emission Info and EIA	
P296	6-7-74	Columbia	Niedermeyer-Martin Wood Processing	JAP	6-28-74			Canceled	
NC542	6-12-74	Multnomah	Port of Portland Bulk Loading Facility	JAP	7-22-74			Awaiting Info on Controls	
NC550	6-17-74	Washington	Western Foundry - Control of Furnace, Sand Handling, Cleaning Room	JAP	7-25-74			Processing	
NC526	6-20-74	Multnomah	Rich Manufacturing Baghouse	JAP	7-21-74			Awaiting Info on Air Flows	
NC527	6-20-74	Columbia	Multnomah Plywood Veneer Dryer Control	JAP	7-24-74		9-13-74	✓ Approved	
P305	6-28-74	Multnomah	Owens Corning Fiberglass Plant	JFK	7-31-74			Awaiting Info on More Efficient Controls	
P306	6-28-74	Multnomah	Portland Steel Mills New Steel Mill	JAP	7-17-74			Awaiting Info on Emissions	
NC530	7-1-74	Multnomah	Fry Roofing - Fume Control of Storage Tanks	JAP	7-29-74		9-18-74	✓ Approved	
NC529	7-1-74	Multnomah	Fry Roofing - Volney Felt Mill Control Wood Flour	JAP	7-29-74		9-18-74	✓ Approved	
NC539	7-9-74	Multnomah	Triangle Milling Dust Control	DDO	9-20-74			Additional Info Requested	
NC532	7-10-74	Multnomah	Flintkote Company - Filter for Sand Handling	DDO			9-19-74	✓ Approved	
NC531	7-11-74	Multnomah	Cargill - Grain Handling Dust Control	DDO	8-5-74	8-12-74	9-13-74	✓ Approved	

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

I N F O R M A T I O N R E C E I V E D							DEQ Staff Disposition		
No.	Date Received	Location	Project	Review Engineer	Information Req'd	Information Rec'd	Approval Date	Action	By
NC533	7-12-74	Washington	Pacific Building Materials Concrete Readymix Plant	DDO	9-6-74			Awaiting Permit Application	
NC537	7-12-74	Yamhill	Publishers Paper - Newberg New Digester	DDO	9-26-74			Awaiting Info on Emissions	
NC316	7-16-74	Clackamas	Globe Union Lead Remelt Furnace	JAP	4-15-74	7-14-74	9-18-74	✓ Approved	
NC535	7-17-74	Marion	Boise Cascade - Salem New Washers	DDO	8-15-74			Awaiting Info on Controls	
NC534	7-17-74	Marion	Boise Cascade - Salem	DDO	8-15-74			Awaiting Info on Air Volume Flows	
NC538	7-18-74	Yamhill	Publishers Paper - Newberg New Hog Fuel Boiler	DDO	9-26-74			Awaiting Info on Emissions	
P317	7-18-74	Multnomah	Oregon Steel Mills-Rivergate Pellet Metallizing	DDO	9-16-74			Awaiting Info on Emissions	
NC536	7-18-74	Clatsop	Crown Zellerbach - Wauna Scrubber for Lime Kiln	DDO			9-20-74	✓ Approved	
NC543	7-24-74	Multnomah	Oregon Steel Mills - Front St. Baghouse with Canopy	DDO				Awaiting Hooding Design	
NC548	7-31-74	Clackamas	Barton Sand and Gravel Rock Crusher	JAP	9-17-74			Awaiting Info on Process Changes	
NC544	8-1-74	Multnomah	Oregon Steel Mills - Front St. Ladle Fume Exhaust	DDO				Processing	
P475	8-5-74	Multnomah	C.H. Stinson, Inc. Portable Asphalt Paving Plant	DDO			9-10-74	✓ Issued Special Permit, 9-10-74	
NC545	8-8-74	Multnomah	Teeples & Thatcher, Inc. Sawdust Cyclones	DDO	8-27-74			Awaiting Detailed Plans	
549	8-15-74	Washington	Western Foundry - Scrubber to Control Cupola Emissions	JAP				Processing	

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION - AQ-Plan Disposition

I N F O R M A T I O N R E C E I V E D

DEQ Staff Disposition

No.	Date Received	Location	Project	Review Engineer	Information Req'd	Information Rec'd	Approval Date	Action	By
P321	8-19-74	Multnomah	J. Arlie Bryant, Inc. Portable Rock Crusher	DDO	9-4-74			Additional Info Requested	
NC546	8-19-74	Multnomah	Portland State University New Boiler	DDO			9-16-74	✓ Approved	
NC551	9-9-74	Multnomah	East Side Plating Works 2 Bag Collectors & Scrubber	DDO	9-23-74	9-26-74	9-27-74	✓ Approved	
P323	9-11-74	Columbia	Charter Energy Company New Oil Refinery	JAP				Processing	
P/NC324	9-13-74	Multnomah	Chamberlain's Pet Crematorium Cremation Incinerator	JAP	9-19-74			Awaiting Design Specifications	
P/NC325	9-17-74	Multnomah	The Oregon Humane Society Cremation Incinerator	JAP				Processing	
NC552	9-18-74	Multnomah	ESCO - New Powder Burn-Out Booth	DDO	9-4-74	9-18-74	9-26-74	✓ Approved	
NC554	9-20-74	Columbia	Niedermeyer-Martin Company Pole Peeling Facility	JAP			9-26-74	✓ Approved	
NC555	9-23-74	Multnomah	Western Wood Industries Chip Bin & Transfer Cyclone	JAP			9-30-74	✓ Approved	
320	7-31-74	Multnomah	Cook Industries Grain Terminal	JAP			9-20-74	✓ Issued Final Permit, 9-20-74	

MEMORANDUM

TO: Shirley Shay

Date: 10/14/74

FROM: JFKowalczyk

SUBJECT: Supplement to September 1974 Activity Report to EQC

Northwest Region Permit Work Output-Backlog
September 1974

	Sources Req'd Permits	Appl. Rec'd (mo.)	Permits Drafted (mo.)	Permits Issued (mo.)	Appl. Pending		Sources Under Regular Permit
					Permits To be Drafted	Permits Drafted	
<u>Air Permits</u>							
Process	289	5	4	7	138	37	89
Fuel Burning	800	0	186	1	114	505	8
<u>Water Permits*</u>							
Industrial	160	3	26	1	37	84	39
Domestic	126	2	1	14	12	56	58
<u>Solid Waste Permits</u>							
General Refuse	27	0	5	0	5	5	17
Demolition	10	0	0	0	3	0	7
Industrial	14	1	0	0	3	1	10

*NPDES



ENVIRONMENTAL QUALITY COMMISSION

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MORRIS K. CROTHERS
Salem

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

TO: Environmental Quality Commission

FROM: Hearings Officer

SUBJECT: RULE-MAKING HEARING ON TECHNICAL AMENDMENTS TO CLEAN
AIR IMPLEMENTATION PLAN

Background

Pursuant to Oregon Administrative Rules (OAR) Chapter 340, Section 11-010, the Commission holds a public hearing on each proposed air contaminant discharge permit containing a compliance schedule that extends past a deadline established in OAR, Chapter 340, Section 20-047 (the Clean Air Implementation Plan) by the Environmental Quality Commission. The compliance schedules established in the following proposed permits require modification of the timetable set in section 20-047:

SWF Plywood Company
Fir-Ply Division
White City, Oregon
(vener dryer)

Clatsop County Road Department
Astoria, Oregon
(stationary hot-mix asphaltic concrete
paving plant)

Beaver Lumber Company of Clatskanie, Inc.
Clatskanie, Oregon
(sawmill and planing facility)

The SWF Plywood permit would additionally violate OAR, Chapter 340, Section 25-315 (1)(a), and thus a variance would be required.

Pursuant to notice, a rule-making hearing was scheduled on Monday, September 23, 1974, to receive testimony on the SWF Plywood permit. A separate hearing was scheduled on Monday, September 30, 1974, to receive testimony on the Clatsop County Road Department and Beaver Lumber Company permits. The hearing on the 23rd was held in



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the headquarters of the Department of Environmental Quality in Portland; that on the 30th was held at the Northwest Region Offices of the Department of Environmental Quality in Portland.

No representative of any of the permit applicants nor any member of the general public appeared to testify at either hearing.

Submitted this 30th day of September, 1974.

A handwritten signature in cursive script that reads "Thomas Guilbert". The signature is written in black ink and is positioned above a horizontal line.

Thomas Guilbert
Hearings Officer

TG:bm



ENVIRONMENTAL QUALITY COMMISSION

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Salem

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The Dalles

KESSLER R. CANNON
Director

To: Environmental Quality Commission
From: Director
Subject: Agenda Item C, September 20, 1974, EQC Meeting

Tax Credit Applications

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

KESSLER R. CANNON

ahc

September 13, 1974

Attachments

Tax Credit Summary
Tax Credit Review Reports (7)



TAX CREDIT APPLICATIONS

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

Date August 26, 1974

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

1. Applicant

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

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

2. Description of Facilities

The facilities described in this application are the following:

A. Non-condensable gas incineration system revision.

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

B. Two-stage mud washing system.

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

C. Electrostatic precipitator modifications.

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

D. EPA particulate sampling train.

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

E. Spare recausticizing sump pump.

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

F. Reausticizing sump flowmeter.

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

Facility cost:

A. Non-condensable gas incineration system revision	\$ 8,922
B. Two-stage mud washing system	52,821
C. Electrostatic precipitator modifications	3,685
D. EPA particulate sampling train	3,736
E. Spare reausticizing sump pump	3,569
F. Reausticizing sump flowmeter	768

Total (Accountant's certificate was provided) \$73,501

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

3. Evaluation of Application

A. Non-condensable gas incineration system revision.

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

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

B. Two-stage mud washing system.

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

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

C. Electrostatic precipitator modifications.

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

D. EPA particulate sampling train.

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

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

E. Spare recausticizing sump pump.

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

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

F. Recausticizing sump flowmeter.

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

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

4. Director's Recommendation

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

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

1. Applicant

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

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

2. Description of the Claimed Facility

The claimed facility consists of:

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

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

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

3. Evaluation of Application

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

4. Director's Recommendation

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

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

1. Applicant

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

2. Description of Facility

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

- a. Baghouse
- b. Storage bin
- c. Ductwork
- d. Blowers, motors & controls
- e. Fire protection equipment
- f. Foundations, supports, etc.

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

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

3. Evaluation

This facility collects the particulate matter generated by the sanders.

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

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

4. Director's Recommendation

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

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

1. Applicant

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

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

2. Facility Description

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

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

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

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

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

3. Application Evaluation

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

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

4. Director's Recommendation

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

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

1. Applicant

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

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

2. Description of Facilities

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

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

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

3. Evaluation of Application

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

4. Director's Recommendation

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

CRC:mh

App1 T-576

Date 8-28-74

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

1. Applicant

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

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

2. Description of Facility

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

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

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

3. Evaluation of Application

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

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

4. Director's Recommendation

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

CRC:mh

Date September 9, 1974

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

1. Applicant

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

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

2. Description of Facility

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

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

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

3. Evaluation of Application

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

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

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

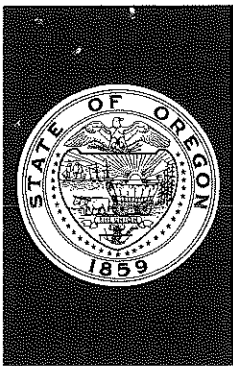
The additional chemicals recovered by the new recovery system does not pay for the installation. Therefore, it is concluded that the No. 4 recovery furnace system was installed solely for pollution control.

Tax Application T-580
Page 2

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

4. Director's Recommendation

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



ENVIRONMENTAL QUALITY COMMISSION

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TOM McCALL
GOVERNOR

TO: Environmental Quality Commission

B. A. McPHILLIPS
Chairman, McMinnville

FROM: Director

GRACE S. PHINNEY
Corvallis

SUBJECT: Agenda Item No. D, October 25, 1974, EQC Meeting

JACKLYN L. HALLOCK
Portland

Interim Policy for Approving New or Expanded Air Emission Sources
in the Portland Metropolitan Area--Proposed Adoption of Temporary Rule

MORRIS K. CROTHERS
Salem

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

Background

At the September 20, 1974, meeting of the EQC an "Interim Policy for Approving New or Expanded Air Contaminant Emission Sources in the Portland Metropolitan Area" was proposed for consideration by the Commission. (See Agenda Item F) The September 20 staff report emphasized the urgent need for such a policy to prevent possible over-allocation of the air resource in the most critical area of the state during the time period when a ten-year air quality maintenance plan is being developed. After considerable public testimony and discussion, it was understood to be the general concensus of the EQC that tradeoffs in terms of air emissions should be considered as an integral part of the proposed interim policy and that the proposed interim policy should be prepared in rule form for further consideration at this Commission meeting.

Policy in Rule Form

The proposed Interim Policy for Approving New or Expanded Air Contaminant Emission Sources in the Portland Metropolitan Area has been drafted in rule form and is presented as Attachment "A". Section 32-020 of this proposed rule contains criteria to be considered in reviewing applications for air contaminant permits for new and expanded sources in the Portland Metro area including consideration of tradeoffs to the extent such tradeoffs can realistically be assured of implementation.

Discussion of Major Issues Regarding Policy

Several significant issues were raised at the September 20, 1974, EQC meeting regarding the proposed interim policy which are worthy of addressing in considering adoption of the proposed policy as an interim rule.

Mr. Edward Westerdahl and Mr. Walter Hitchcock of the Port of Portland supported the concept and guidelines of the policy on an interim basis but questioned the following:



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1. The DEQ staff particulate emission projections for the proposed new sources in Table 4 of the Staff Report and in general the adequacy of the data base for developing accurate projections of allowable future growth.
2. The apparent changing requirements made by the Department for new sources.
3. The lack of considering broad economic and community needs in administering an air emission allocation plan.

In respect to item 1, the Department staff portrayed emissions in Table 4 as best estimates at the time the report was prepared. It is recognized that mitigating factors such as tradeoffs, application of best control technologies and use of cleaner fuels could substantially reduce projected emissions particularly in the case of the CIRI and Owens Corning Fiberglas proposals. Adoption of the proposed interim policy would set the goal posts for each industry so that consideration of the economic feasibility of meeting the requirements set forth could be assessed.

The Department is in full concurrence with the Port regarding lack of a firm data base and recognizes that studies far in excess of the current \$50,000 air quality maintenance modeling contract will be needed to provide the accurate data base necessary to develop a sound 10-year plan. The Department expects to identify the magnitude of further studies needed some time in January 1975 after completion of work now out for contract. The presently proposed policy sets forth the staff's best estimate of the increased industrial emissions that can reasonably be allowed to occur during the period it will take to develop an adequate data base without risking serious over-allocation of the air resource in the critical Portland Metropolitan Area.

In regard to item 2, it should be recognized that re-assessment of the effectiveness of the Interim Policy plan could only be made after significant emission reductions had occurred and that the rapid, unpredicted changes in energy supplies, particularly natural gas supply, has changed the air emission projections radically.

In regard to item 3, it was brought out in discussion that the EQC does not have the legal authority to consider factors outside of those specifically relating to environmental quality.

Mr. Carl Petterson, representing Northwest Natural Gas, spoke in favor of CIRI since petroleum naphtha from the refinery could be utilized to produce synthetic natural gas. He suggested tradeoffs in emissions from the cleaner burning gas should be considered.

The Department concurs such tradeoffs should be considered where they can be assured of implementation. It should not be over-looked that CIRC in its proposed Rivergate location may need to burn gas itself to meet environmental standards and that other proposed refineries located in less critical air quality areas of the state might supply Northwest Natural Gas with its needed naphtha feedstock without adding further particulate loading to the Portland airshed.

Mr. Roger Ulveling, representing CIRC, indicated he had no objection to the policy if it included consideration of tradeoffs. The Commission had questioned whether adoption of the policy would automatically eliminate CIRC from consideration. The Department staff and CIRC's consultants are in the midst of the major task of calculating tradeoffs and it appears that final resolution of figures can be made in early November. Preliminary indication is that CIRC could meet the SO₂ policy criteria with tradeoffs provided a new stringent fuel sulfur content regulation is adopted by the EQC. It should be recognized that cleaner fuels will cost more and although users will object to the higher costs, a more stringent fuel sulfur content regulation appears necessary in the future with or without the presence of CIRC. It should be recognized, also, that other proposed refineries in the state could provide low sulfur fuel and that existing suppliers of fuel oil have indicated they could supply lower sulfur fuel from their own production facilities by 1978-79, given adequate prior notice.

It is not certain whether tradeoffs will allow CIRC to meet the particulate criteria of the proposed policy. This, also, will be resolved by early November. CIRC has indicated, however, that through appropriate refinery product fuel usage it could meet a 100 T/yr particulate limit regardless of tradeoff considerations. The Department staff is now reviewing data to substantiate this; however, it is generally agreed that this could be accomplished by burning clean fuels and, if necessary, limiting refinery capacity.

Ms. Ruth Spielman, representing the Portland League of Women Voters, raised the concern that no legal agreement has been reached with the State of Washington to assure success of the policy in the interstate area and further that exempting small sources (less than 10 tons per year) from the policy might defeat the intent of placing a lid on allowable emission increases.

The Department has requested EPA to determine what can be accomplished under the Clean Air Act to insure that Air Quality Standards and Air Quality Management Planning in Oregon are not adversely affected by sources in the State of Washington. The Department is also confident, based on past history, that the aggregate emissions from the number of new sources having less than 10 tons/yr of emissions during the interim period of the policy would not have a significant effect on the effectiveness of the policy.

George Tsongas, Ph.d., professor in the Department of Applied Science and Engineering at Portland State University, spoke for the Oregon Environmental Council, the National Environmental Defense Council, and himself as a concerned citizen and professional. He supported such a proposed interim policy, although he said he had some problems with the specifics of this particular policy. He suggested that the DEQ was overly optimistic about the effects of their control strategy and questioned the need for new development. He recommended the following revisions to the policy:

1. The DEQ should set a one-year moratorium on granting new air contaminant discharge permits until completion of the Air Quality Maintenance study.
2. The DEQ should allow new permits only after necessary reductions in other emissions from existing plants have actually been attained.

A moratorium on new emission sources was considered as a proposed interim policy for the Critical Northwest Portland-Rivergate area; however, it was rejected as being too stringent in consideration of the present, inadequate data base.

The Department does not accept the concept of a "no-growth" policy. Our objective has been, and is, to continue to make room for new industries and people by requiring the application of highest and best control technologies by all, existing and new, sources on a continuing basis. However, this must be accomplished without sacrificing good air quality.

The Commission asked for more information on tradeoffs from proposed facilities. Aside from what has already been said regarding CIRC, it is proposed that specific tradeoff information will be brought to the Commission when each permit application is submitted for allocation consideration. It is certain that proposed oil refineries will offer certain tradeoffs to the extent the potential benefits can be realized through implementation of mandatory clean fuels use requirements. The staff has not been able to calculate specific quantitative tradeoffs for other proposed facilities including Owens Corning Fiberglass. Specific quantitative tradeoffs in reduction of space heating emissions due to improved insulation would require changes in building code requirements which are probably beyond the authority of this Department. Further, improved insulation would be expected to be realized mostly in new construction in suburban portions of the airshed and any emission reductions due to this factor would appear to have little measurable benefit to the critical northwest Portland and downtown poor air quality areas. Nevertheless, Owens Corning will be asked to calculate tradeoffs in further consideration of their application.

It should be noted that, at the direction of the Commission, the permit for Cook Industries grain elevator at Rivergate has been issued.

Director's Recommendation

In light of the urgent need for adoption of an interim policy to protect the Portland Metro Air Shed against potential irreversible environmental damage and in consideration of public testimony and Commission comments, it is the Director's recommendation that the interim policy for Approval of New or Expanded Air Contaminant Emission Sources in the Portland Metropolitan Special Air Quality Maintenance area contained in Rule Form in Attachment A be adopted by the Commission as a temporary rule to become effective immediately and further that the Commission authorize the Director to conduct necessary hearings within the 120 day time limit of the temporary rule to establish the interim policy as a permanent rule of the Department until such time as it can be replaced by adoption of a 10-year Air Quality Maintenance Plan.



KESSLER R. CANNON
Director

Attachment A

ATTACHMENT A

Revised Draft of Proposed EQC Rule
October 11, 1974

Subdivision 2

Criteria for Approval of New Air Contaminant Sources in the Portland
Metropolitan Special Air Quality Maintenance Area

32-005 PURPOSE. The purpose of this subdivision is to provide criteria for the Department to follow in reviewing and approving air contaminant discharge permit applications for new or expanded air contaminant sources, including their proposed site locations and designs, in the Portland Metropolitan Special Air Quality Maintenance Area; to assure that air quality standards can be achieved and maintained without major disruption to the orderly growth and development of the area.

32-010 DEFINITIONS. (1) "Air contaminant" means a dust, fume, gas, mist, odor, smoke, vapor, pollen, soot, carbon, acid or particulate matter or any combination thereof.

(2) "Implementation plan" means the State of Oregon Clean Air Act, Implementation Plan, described in section 20-047 of this chapter, together with any amendments thereto.

(3) "New or expanded air contaminant source" means an air contamination source, as defined in ORS 468.275, whose construction, installation, establishment, development, modification or enlargement is authorized by the Department after October 25, 1974.

(4) "Portland Metropolitan Special Air Quality Maintenance Area" means that portion of the State of Oregon within the boundaries designated by the Columbia River Region Association of Governments as the 1970 Transportation Study Area, as shown on figure 1 attached. (Generally, the area bounded by the Columbia River to the north; communities of Troutdale, Pleasant Valley and Gladstone to the east; Oregon City to the South and Hillsboro to the west.) Legal definition of the maintenance area is on file with the Department.

(5) "Yearly projected average controllable growth" means 215 tons/year of particulate emissions and 715 tons/year of sulfur dioxide from new or expanded air contaminant point sources as follows: a) commercial and industrial fuel combustion sources, b) process loss sources, c) solid waste incinerators, d) wigwam waste burners, and e) power plants.

32-015 SPECIAL AIR QUALITY MAINTENANCE AREA. The Portland Metropolitan Special Air Quality Maintenance Area is hereby established as a special air quality maintenance area to which the rules provided in this subdivision shall apply.

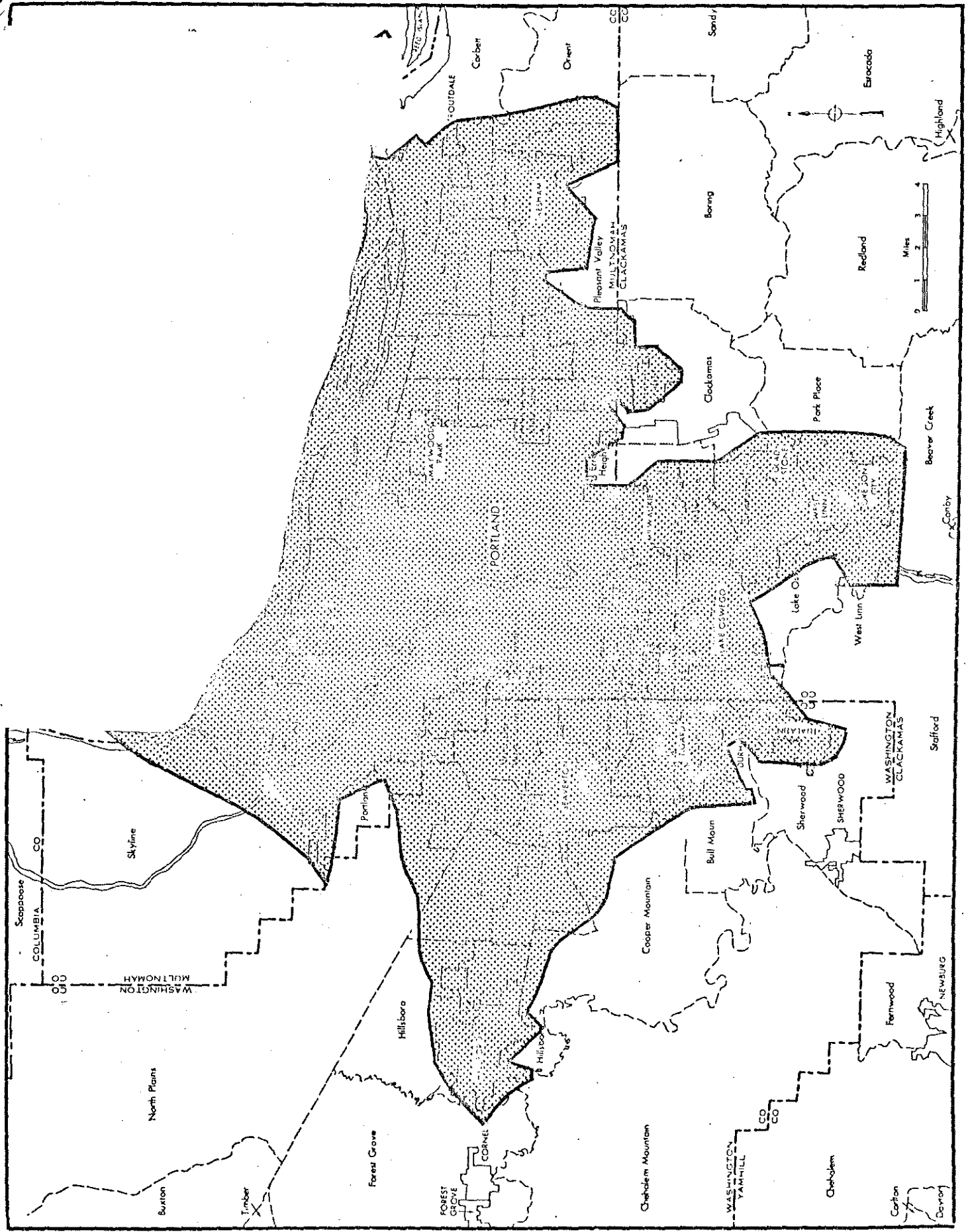
32-020 CRITERIA. In reviewing applications for air contaminant discharge permits for new or expanded air contaminant sources in the Portland Metropolitan Special Air Quality Maintenance Area, the Department shall consider the potential effect upon air quality of increases in particulate and sulfur dioxide emissions from such new or expanded air contaminant sources and shall approve such permit applications only to the extent that:

- (1) Ambient air quality standards will not be exceeded at air sampling stations projected by the Department's March 1974, report on Designation of Air Quality Maintenance Areas to be in compliance with such standards. A copy of the Department's March 1974, report on Designation of Air Quality Maintenance Areas is on file in the Department's Portland office.
- (2) Increases in particulate and sulfur dioxide emissions will not exceed two years of projected average controllable growth (equivalent to 430 tons/year of particulate and 1430 tons/year of sulfur dioxide).
- (3) No single new or expanded air contaminant source shall emit particulates or sulfur dioxide in excess of 25 percent of the total allowable emissions (noted in Criteria 1 and 2, above). The exact proportion shall be determined by the Commission.

The particulate and sulfur dioxide emissions allowable under Criteria (1), (2) and (3) above shall be based on net emission increases after taking into account any offsetting emission reductions which may occur within the Portland Metropolitan Special Air Quality Maintenance Area, or portion thereof, which can be a) assured of implementation and b) are attributable to the source seeking the permit.

32-025 EXCEPTIONS. New or expanded air contaminant sources projected to emit less than ten (10) tons per year of particulate or sulfur dioxide shall be excepted from this rule.

FIGURE I
 (Proposed) PORTLAND METROPOLITAN SPECIAL AIR QUALITY AREA



TESTIMONY OF ASSOCIATED OREGON INDUSTRIES
BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
October 25, 1974

Relating to Subdivision II Criteria for Approval of New Air Contaminant
Sources in the Portland Metropolitan Special Air Quality Maintenance Area

My name is Thomas C. Donaca, Counsel for Associated Oregon Industries and I am here today on behalf of AOI's Air Quality Committee

At the outset let me state that we concur with the Port of Portland's proposals to you regarding the steps which should be taken to complete this phase of the implementation program. We believe the Port's suggestions are thoughtful and meaningful in the sense that if they are pursued by this commission they will provide the agency with greater capability to meet the anticipated air quality needs of this maintenance area as well as providing additional solutions which are needed in maintaining air quality in the future.

However, and without departing from that support, we believe it is important that we review some of the material presented by your staff at the last hearing, as it relates to the proposal before you. Attached you will find Table 2, the projected 1975 and 1985 particulate emissions for the Portland standard metropolitan statistical area. Using only the 1970 and 1975 columns we find some very important information.

- I. Under fuel combustion residential and commercial particulate emissions have continued to rise over the five year period yet industrial emissions, which are the controlled emissions, have dropped some 400 tons per year which allows for a total reduction in particulate matter from fuel combustion over the five year period.
- II. With regard to process loss sources, which are the totally controlled industrial sources, we find the reduction from 14,100 tons to 6,100 tons.
- III. With regard to transportation equipment, we find a general increase.
- IV. Under solid waste, we find general reductions across the board and particularly with regard to wigwam waste burners, a controlled industrial source.
- V. Under miscellaneous sources, field burning shows a drop but these are shown on an annualized basis. The field burning is not an annual figure since it all occurs in a six week period normally when we may well be experiencing air quality problems in the metropolitan area. Forest fires, too, do not occur on an annualized basis but occur generally in the late fall when fire conditions prevail. Slash burning contribution we believe may be high because more and more of the residual slash is being chipped. The value of chips has risen and will probably maintain their high value and we think this figure may now be overstated. We are not certain whether backyard burning is placed in the "other" category or whether it was under open burning. However, backyard burning occurs during only two months, one in the early spring and one in the late fall, not on an annualized basis at all. This burning will continue without control until the metropolitan Service District in Portland is able to put together a viable solid waste program for the tri-county area. This commission should be giving all assistance to the Metropolitan Service District in the development of that program in order to get control of this open burning source.

VI. Power Plants were a minimal source and show a minimal rise--again a controlled source.

What Table 2 shows then is that total area sources continue to grow over the entire period of time whereas total point sources, primarily industrial, have already dropped from 16,000 tons a year to 7,100 tons a year, a reduction of 9,000 tons per year of particulate. Further, you are unable to determine the impact of sources in Washington, and you will place this further burden entirely on Oregon industry. Clearly then, a program which is designed only to control large industrial sources, will not provide you with the measurable improvement in air quality which you seek. The figures disclose clearly that it is not the controllable sources which are the problem, but it is your area sources, the automobile, the backyard burning and the field burning which you must control. They are subject generally to your jurisdiction and you must expend the energy and resources necessary to get effective control to all sources because equity and the need to maintain air quality in this area depend upon that kind of dedication by you.

Clearly, if Governor McCall desires that Oregon attract new non-polluting industry which had no major environmental impact but did require additional people, those people themselves, who are virtually untouched by environmental quality considerations would cause an increase in the area sources of which the public at large is the primary problem.

Turning to Table 3 on sulfur dioxide, we find approximately the same kind of a situation.

I. In fuel combustion we find significant increases in residential and commercial and virtually no increase in industrial emissions, the controlled sources.

II. Process loss sources, which are the controlled industrial sources, have already dropped from 17,100 tons to 4,200 tons.

III. There is a continuing growth in transportation.

IV. Solid waste contribution is virtually zero.

V. There is a continuing increase in miscellaneous sources noted as "other".

VI. Power plants show a small increase.

Again we find that the total area sources are still going up over the five-year period of time whereas the total point sources, primarily controlled industrial sources, have been curtailed from almost 22,000 tons down to 10,700 tons allowing for total reduction of sulfur dioxide from 33,000 tons per year to 23,000 tons per year.

Let me conclude this part of our testimony by simply pointing out that if there are good guys and bad guys then clearly these figures indicate that industry, which has cooperated in the development and execution of air quality programs, have carried the major burden for the improvement and maintenance of air quality--the public at large has not. We believe that you, the Commission, must face this problem squarely and undertake a broad-based program to gain control over the public sector and to provide answers so that the public can reduce their emissions as they desire to do. We believe they will be cooperative if you will turn your hand to that endeavor.

The previous portion of this testimony was not in any way intended to dissuade you from adopting the policy before but only to suggest that you exercise great care in its execution as it relates to your expectations as to what will be achieved. Particularly, you should pay attention to the economic impact that would occur as a result of this kind of decision over a long period of time, not only to industry, but to those people who hold jobs and seek jobs in this area.

With regard to the regulation, I would like to make the following comments:

I. In Section 32-005 Purpose, we believe that you should clearly indicate in that purpose that it is to control criteria for permit applications for new or expanded air contaminant sources which emit more than 10 tons of particulate sulfur dioxide per year. The policy is broader than the regulations state and should be clarified by the addition after the word "sources" in line 3 of the following words "which emit more than 10 tons particulate or sulfur dioxide per year."

II. In Rule 32-010 Definitions, we suggest that (3) include the exception contained on Page 3, namely that the definition should indicate that a new or expanded air contaminant source does not include those sources which emit 10 tons or less particulate or sulfur dioxide per year. We think it is bad drafting to use a definition which has a major exception to it somewhere else in the regulation. To clarify this, we would ask that in Line 4 after 1974, delete the period, insert a comma, and add the following words "except for those sources which emit 10 tons or less particulate or sulfur dioxide per year.". We would further suggest and recommend the deletion of Rule 32.025 Exceptions, as being unnecessary with the two changes we have just proposed.

Going back to Rule 32.005, Purpose, for one moment we wonder what is meant by the word "designs" in line 4? If it is simply a repetition of the present requirement that an applicant must provide site location and design of his control equipment and general information regarding the activity that is taking place in process that we have been providing in all applications to the Department of Environmental Quality there is no problem. If something else is meant by the word design such as complete engineering drawings then we must strenuously object because it is virtually impossible and much too expensive to provide entire process design if, in fact, the permit is not to be issued and the plant is not to be built. In some cases we are talking about hundreds of thousands of dollars. For the record we would clearly like to know what the word designs means and if it means more than what we have been submitting, then we request its deletion.

In Rule 32-020 Criteria, Subsection I, that paragraph we believe should be clarified in order to be consistent with the rest of the regulation. By this we mean that throughout the regulation we are talking about annual standards and we are talking about its application to particulate and sulfur dioxide. If you will read the paragraph you will see that while the rest of the rule talks in the above terms, they are not mentioned in that paragraph. For purposes of clarity, we would suggest that before the word "ambient" in line 1, there be inserted the word "annual" and after the word "stations" in line 2, insert the words "for particulate and sulfur dioxide". The paragraph would then read in part "Annual ambient air quality standards will not be exceeded at air sampling stations for particulate and sulfur dioxide projected by....."

In Subsection III of Rule 32-020 Criteria, we are concerned about the last sentence that says "the exact proportions shall be determined by the Commission". Our

interpretation of that portion of the regulation would mean that each permit issued would have to be reviewed by the Commission and approved by it with regard to that proportion which is to be allocated in each instance. The law under which you operate does not preclude you from doing this but in general it delegates to the Department the authority to issue permits and that your proper function is to review those permits on request for hearing. It appears to us that this would provide a complication for you and place an undue burden upon you. Therefore, we request the deletion of that particular sentence. However, if it is your desire to know how the progress is coming under the program it would be appropriate to indicate that it is the Department that is to determine the proportion but that the Department shall submit to you periodically the allocations which have been made against the particulate and sulfur dioxide limitations so that you can keep track of the progress under this regulation.

In the last paragraph of Rule 32.020 Criteria, which directs itself to the so-called trade-offs, we are concerned with the language in the next to the last sentence which says "can be (a) assured of implementation". We are uncertain what this would mean, or what an applicant would have to show. It is our general belief that the clean fuels which this commission is working on, and other similar policies are a better way of showing implementation than by ambiguous wording such as is proposed here. We therefore think that the words in line 5 of that paragraph "can be (a) assured of implementation and (b) "be deleted. The regulation would then read in part "...which may occur within the Portland metropolitan special air quality maintenance area, or portion thereof, which are attributable to the source seeking the permit." We think with this revision, the rule more clearly states to the applicant that which he can in fact justify to you, clarifies the paragraph, and meets the objective which you sought in having this kind of a policy inserted into this regulation.

One last point, would like to raise with regard to the monitoring program. While this was covered by the Port of Portland, we think it is essential that DEQ have in-house monitoring capability. This will require more equipment and manpower devoted to its monitoring programs than you are currently allowing for in your budgets. We think there should be as little dependence as possible on outside consultants because they must be budgeted well in advance and consultants generally require long time frames, while at the same time your department needs this information on an ongoing basis in order to maintain the kind of control that is necessary. This is a matter of major importance for you in your determination to maintain air quality and must be an issue of first priority for you.

If it is your decision here today to adopt this regulation, then again we request that you make the changes which we have requested in Rule 32-005 clearly indicating that it is limited to emissions of more than 10 tons of particulate and sulfur dioxide per year and in Rule 32-010 Definitions (3) that the exception for 10 tons or less particulate and sulfur dioxide per year be added into the definition and that Rule 32-025 Exceptions be deleted as unnecessary. Further, we request the language change in Rule 32-020 Criteria (1) which will clearly by adding the words "annual" and indicating that it is for particulate and sulfur dioxide will clarify that language and is an essential change and that the language of the last paragraph of Rule 32-020 dealing with "assured of implementation" be deleted.

TABLE 2

PROJECTED 1975 and 1985 PARTICULATE EMISSIONS

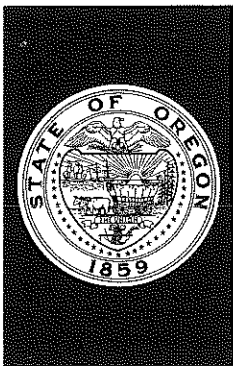
FOR THE PORTLAND STANDARD METROPOLITAN STATISTICAL AREA

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

TABLE 3

PROJECTED 1975 and 1985 SULFUR DIOXIDE EMISSIONS
FOR THE PORTLAND STANDARD METROPOLITAN STATISTICAL AREA

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



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KESSLER R. CANNON
Director

MEMORANDUM

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. E, October 25, 1974 EQC Meeting
Brooks Scanlon, Inc., Bend Oregon
Request for Time Extension for Log Handling
in Deschutes River

Background

1. Brooks-Scanlon owns a large sawmill in Bend, Oregon.
2. The sawmill is located adjacent to the Deschutes River. A section of the river about 1/2-mile long is used for log unloading, storage, and general log pond operations.
3. Some of the logs are put into the river by cranes working from cold decks on the river banks. Others were dumped into the river at three brow log dumps, but today only one dump is in operation and it is scheduled for closure.
4. The company periodically dredges the river in the vicinity of the brow log dump. They also have a debris removal system below the log slip which removes floating bark debris from the river.
5. The only extensive cold decking area available to Brooks-Scanlon is on the opposite side of the river from the mill. A smaller area may be available to the south and east, but is in close proximity to residential properties.
6. The company has received five waste discharge permits since January 1968. Each has required various water quality improvements aimed at the removal of all log handling from the Deschutes River or the provision of an approved method of equivalent control. Refer to Exhibit A for specific requirements and dates.
7. The numerous time extensions and modifications enumerated in Exhibit A have been made by the Department of Environmental



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Quality in response to various problems and objections voiced by Brooks-Scanlon. To this end, a final time extension was granted by the Department on December 18, 1973, which extended the time for compliance to October 1, 1975, but required an alternate proposal to the channel change by June 1, 1974. Rather than submit an alternate proposal, Brooks elected to submit a revised channel change proposal. The submittal was received on May 29, 1974. (Refer to Exhibit B for a summary of major relevant correspondence and events.)

8. In response to the Department's most recent requirement for dry log handling, the company submitted a proposal for a channel change on August 2, 1973. This proposal was deemed totally unacceptable by the Oregon Wildlife Commission and the Division of State Lands. The proposal was withdrawn.
9. Representatives from the Division of State Lands, the Oregon Wildlife Commission and the Department of Environmental Quality met with Brooks-Scanlon to work out the details of a more suitable channel change proposal. The major improvements included widening of the cross-section, creation of a natural stream bank in place of an engineered diversion, and plans for shoreline vegetation.
10. This and other meetings resulted in the submission of a revised channel change proposal by Brooks on October 29, 1973. The DEQ extended the implementation date to October 1, 1975 to conform with a realistic construction schedule.
11. After receiving tentative approval from the Division of State Lands, Brooks submitted a proposed construction timetable to the DEQ on May 29, 1974, in conformance with existing DEQ requirements. DEQ granted plan approval on August 7, 1974.
12. The Division of State Lands conducted a public hearing in Bend on August 20, 1974, concerning the proposal. Little adverse testimony was received.
13. On September 16, 1974, Brooks submitted to the DEQ a request for another time extension which is summarized below (refer to Exhibit C):
 - a. Extend existing Waste Discharge Permit Date from 9-30-74 to 9-30-75.
 - b. If extension granted, do not proceed with the DEQ approved plan.
 - c. If extension granted:
 - (1) maintain and operate existing debris control at maximum possible efficiency
 - (2) terminate all brow log dumping and use easy let down by 10-1-74

- (3) limit wet log volume to less than one million board feet by 11-1-74
 - (4) evaluate the effect of the new noise standards on present and proposed methods of operation
 - (5) retain an engineering firm to conduct a river study
 - (6) present preliminary study findings by 5-15-75 to DEQ and discuss alternative solutions
 - (7) submit by 9-1-75 a plan for removing all log handling from the Deschutes River or providing an alternative method of control by 10-1-76.
14. The Division of State Lands approved the channel change proposal on September 24, 1974.

Evaluation

1. The company's past log handling practices in the river have resulted in total blockage of the river surface in the area.
2. Brow log dumping generates significantly more debris than other, more acceptable methods; however, the company is phasing out brow log dumps.
3. A few improvements have been made to the surface debris collection system and substantial log decking has been implemented. Runoff waters from the decks have been diverted to a land disposal area.
4. The bark and debris removal system is relatively effective in removing surface floating bark and debris; however, significant quantities of sunken bark and debris can be seen escaping from the collection system at all times.
5. Investigation has revealed considerable bottom deposits of bark, debris, and logs in the vicinity of the log handling area and downstream through the City of Bend.
6. The company has been given nearly six years to solve its log debris problem; however, significant quantities of debris continue to escape the control devices, and large sludge deposits remain.
7. Complete utilization of the river for a log pond is not a proper use for a public waterway.
8. The Department has learned from experience that no debris control program is equivalent to dry log handling. The company has been granted numerous time extensions for formulating and implementing control programs. During the most recent extension, a removal/fill permit for the project was obtained from the Division of State Lands.

9. The environmental trade-offs, relative economics, and potential downstream impacts enumerated in Brooks-Scanlon's September 11, 1974, letter should have been thoroughly evaluated by Brooks during the many time extensions.
10. With regard to the noise regulations adopted by the Environmental Quality Commission, it has been demonstrated that the small log sawmill, a dry log facility, can operate in compliance with said standards. Noise complaints have consisted primarily of sources from the powerhouse, whistles, and air conveyance systems. Any proposal for dry log handling would involve an analysis of noise impacts.

Director's Recommendation

1. Brooks-Scanlon's request for a time extension from October 1, 1975 to October 1, 1976, should be denied.
2. Brooks-Scanlon should be instructed to proceed immediately with the approved plan for dry log handling.
3. Brooks-Scanlon should investigate the noise impacts of total dry log handling to determine what control measures may be needed.



KESSLER R. CANNON
Director

JEB:ss

attachments - 3

EXHIBIT A

Specific Permit Requirements and Compliance Dates

1. Temporary Permit Number TP-491

Issued : 1-19-68

Expired : 12-31-68

Required: Operations of waste treatment facilities and control programs at maximum efficiency.

2. Waste Discharge Permit Number 376

Issued : 2-28-69

Expired : 9-30-70

Required: a. Plans and timetable by 6-1-70 for termination of log handling in the Deschutes, or
b. Provide year around control of debris equivalent to dry handling

(1) Plans and timetable by 6-1-70

(2) Implement by 7-31-70

3. Waste Discharge Permit Number 855

Issued : 12-3-70

Expired : 12-31-71

Required: a. Submit feasibility study and report by 10-30-71 concerning feasibility of relocating Deschutes River
b. If channel change feasible, include program for completion of change by 6-31-72
c. If channel change not feasible, submit alternative program and timetable for fully effective debris control.

4. Waste Discharge Permit Number 1395

Issued : 12-27-72

Expired : 9-30-74

Required: a. Immediately abandon upper log dump
b. Remove all log handling from Deschutes or provide approved method of equivalent control

(1) Plans by 10-1-73

(2) Implement by 10-1-74

c. Permit Addendum Number 1 modified item 6 above, as follows:

(1) Plans by 11-1-73

(2) Implement by 10-1-74

5. Special DEQ Extension Letter (12-18-73) modified Permit Addendum Number 1, above, by extending the required implementation date to 10-1-75.

EXHIBIT B

Summary of Major Relevant Correspondence and Events

<u>Event</u>	<u>Initiator</u>	<u>Recipient</u>	<u>Date</u>	<u>Subject</u>
1.	DEQ	Brooks	11-30-67	DEQ offers assistance in formulating plan
2.	DEQ	Brooks	6-30-68	Notice of hearing in Klamath Falls re: Brooks log handling
3.	Brooks	DEQ	2-19-69	Proposed initial debris control (booms and clean-up of accumulated debris)
4.	DEQ	Brooks	10- 1-69	Inspection report
5.	Brooks	DEQ	6-29-70	Summary of bark cleanup activities
6.	Brooks	DEQ	10-14-71	Statement that channel change not feasible
7.	DEQ	Brooks	11- 9-71	Requested details of Brook's feasibility study
8.	Brooks	DEQ	12-21-71	Submitted feasibility study
9.	DEQ	Brooks	6- 8-72	EQC Agenda Item
10.	DEQ	DEQ	12-12-72	Hearing in Bend
11.	DSL	Brooks	6-27-73	Desired channel change details
12.	Brooks	DSL	7- 2-73	First channel change proposal
13.			8-29-73	DEQ, OWC, DSL met with Brooks in Bend
14.			10-19-73	DEQ, OWC met with Brooks in Bend
15.	Brooks	DSL	10-29-73	Brooks submits second channel proposal
16.	Brooks	DEQ	12--3-73	Requests extension of implementation date to 10-1-75
17.	DEQ	Brooks	12-18-73	Extension to 10-1-75 granted
18.	Brooks	DEQ	5-29-74	Second channel change timetable modifications submitted
19.	DEQ	Brooks	7- 7-74	Plan approval for channel change
20.			7-20-74	DSL Hearing, Bend
21.	Brooks	DEQ	9-11-74	Brooks requests time extension for further study
22.	DSL	Brooks	9-24-74	Removal/Fill permit issued



September 11, 1974

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
SEP 16 1974

Mr. John Borden
Department of Environmental Quality
State Office Building
N. Highway 97
Bend, Oregon 97701

BEND DISTRICT OFFICE

Dear John:

Confirming and elaborating on the discussions in our office on Monday with you, Kessler Cannon, Fred Bolton, Hal Sawyer and Robert Schimmick, we request a one-year extension of our waste discharge permit #1395 from September 30, 1974 to September 30, 1975. If the Commission approves this request, we will not proceed with our plan, submitted to you on May 29, 1974 and approved by you on August 7, 1974, to move the Deschutes River in the coming year.

The reasons for this request at this late date are that we have recently become concerned about the downstream effects of moving the river and about the impact of the new DEQ noise standards on our proposed operation.

Specifically, our lawyers and engineers recommend that we do not proceed with the river move until we have completed a study of the Deschutes River to determine existing conditions and to project changes likely to be caused by the move. Such a study will either validate our concerns or will allow us to proceed with the move with confidence we will not cause adverse effects downstream.

Our river move proposal contemplated greatly increased dry log handling activity reasonably close to a residential area. We have not evaluated the impact of the new DEQ noise regulations on this proposed operation and we believe we must do so before proceeding.

In addition to our concerns about downstream effects and noise, which have only recently assumed importance, we remain opposed to moving the river for the following reasons:

1. **Environmental Trade-Offs:** In the past five years we have substantially reduced the amount of bark and debris we add to the Deschutes River. Against the complete elimination of debris must be weighed the negative impacts of increased noise and dust, dirtier fuel to our power house and its effect on air quality and our increased use of fuel for log stackers.

2. Economics: The project will cost us \$1,250,000 initially and increase our log handling costs in the future by an estimated \$100,000 per year with no offsetting benefits. Such economics are even more unattractive given the current condition of the highly competitive lumber industry.

If the Commission grants the one-year extension of our waste discharge permit, we would suggest the following conditions to the permit:

1. We will continue to maintain and operate our existing debris control equipment at maximum practical efficiency.
2. By October 1, 1974, we will cease the use of our one remaining brow log dump and will place all logs in the river either with a decking crane or a log stacker.
3. By November 1, 1974, we will limit the volume of logs in the river at any given time to less than one million board feet compared to a maximum volume in the river during the last two years of two million board feet and a maximum in 1970 of four million board feet.
4. In cooperation with the DEQ staff, we will evaluate the effect of the new noise standards on our present and proposed method of operation.
5. Brooks-Scanlon will retain an independent engineering firm to obtain data throughout the coming year on the Deschutes River from the rapids above the Brooks-Scanlon mill to the north unit diversion dam north of Bend. This data will include stream flow information, qualitative and quantitative analyses of bark, debris, suspended and dissolved solids in the river flow, and quantitative and qualitative analyses of river bed deposits.

This study will define the present condition of the river, will allow us to determine the magnitude of the Brooks-Scanlon generated bark and debris problem and will enable us to project probable changes to this stretch of river to be caused by the river move or other potential solutions.

Throughout this study, Brooks-Scanlon will communicate and cooperate with the DEQ staff.



6. By May 15, 1975, Brooks-Scanlon will present preliminary findings from these studies and discuss alternative solutions with the DEQ staff.
7. By September 1, 1975, Brooks-Scanlon will submit a plan for removing all log handling from the Deschutes River or providing an alternative method of control by October 1, 1976.

We believe this proposal makes sense for all concerned. We will be available to discuss it with you further at your convenience.

Sincerely,

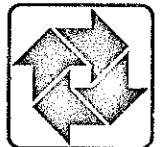


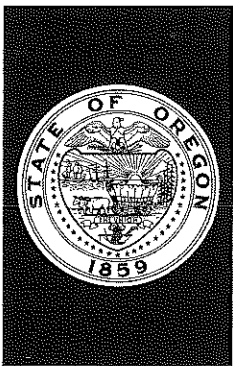
Michael P. Hollern
President

MPH/cc

cc: William S. Cox
Division of State Lands

Hal Sawyer
Department of Environmental Quality





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MEMORANDUM

To : Environmental Quality Commission

From : Shirley Shay

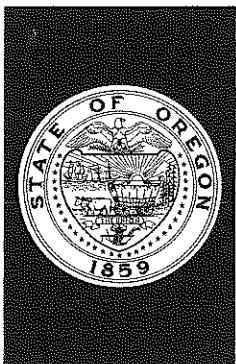
Subject: Agenda Item No. F, October 25, 1974 EQC Meeting

Portland Transportation Control Plan--Tri-Met Status Report

This will be presented by the Tri-Met staff.



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KESSLER R. CANNON
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MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. H, October 25, 1974 EQC Meeting

Proposed Public Hearing to Consider the Adoption of Rules
Pertaining to Surety Bonds for Sewage Treatment Facilities

BACKGROUND

ORS 454.425 requires every person, except a public officer acting in his official capacity or any political subdivision, proposing to construct facilities for the collection, treatment or disposal of sewage to file with DEQ a surety bond of a sum required by the Commission, not to exceed \$25,000. Any residential structure serving not more than four families is exempt from this requirement. The Commission, by rule, may exempt other classes of dwellings or municipalities.

The department may permit the substitution of other security for the bond, in such form and amount as the Commission considers satisfactory.

The purpose of the bond or other security is to assure that construction will be carried out in accordance with plans approved by DEQ and that following construction the facilities will be properly operated and maintained.

CONCLUSIONS

To implement the requirements of ORS 454.425 certain rules should be adopted by the Commission which prescribe the requirements and procedures for the filing, maintenance and termination of surety bonds or other approved equivalent security, and the type and amount of security to be filed.



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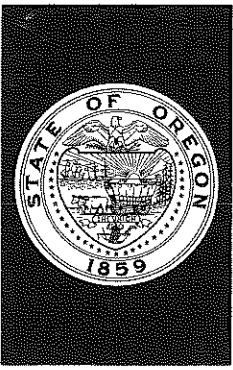
RECOMMENDATION

It is the Director's recommendation that authorization be granted to hold a public hearing at the earliest possible time to consider the adoption of proposed rules pertaining to surety bonds or other security for construction, operation and maintenance of sewage collection, treatment or disposal facilities.



KESSLER R. CANNON
Director

KHS:vt
10/14/74



ENVIRONMENTAL QUALITY COMMISSION

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

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KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item I, October 25, 1974 EQC Meeting

Rules Pertaining to (a) Prior Construction Permits or Approvals Issued Prior to January 1, 1974, for Construction of Subsurface Sewage Disposal Systems, and (b) Standard Specification for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields

BACKGROUND

At previous meetings of the Commission temporary rules regarding the above subject were adopted. It is now necessary that they be replaced by permanent rules in order that they can continue to be in force and effect.

The temporary rule pertaining to prior construction permits or approvals has been codified and published by the Secretary of State as subsection (8) of section 71-015, pages 79 and 80, OAR Chapter 340. It has been in effect since June 26, 1974.

The temporary rule pertaining to homogeneous perforated bituminized fiber pipe for septic tank disposal fields was adopted at the September 20, 1974 Commission meeting. It is now in effect and consists of amended Section II.D. of Appendix E and a new Appendix L of the Standards for Subsurface Sewage and Nonwater-carried Waste Disposal contained in Subdivision 1, Division 7, OAR Chapter 340.

CONCLUSIONS

There are still many individual lots and also specific lots in subdivisions located throughout the state for which permits have not yet been issued for construction of subsurface sewage disposal systems even though such lots since June 26, 1974 have been eligible for permits under the temporary rule pertaining to prior approvals.



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Materials

Under the existing temporary rule applications for the permits must be submitted prior to July 1, 1975 and construction must be completed by July 1, 1976. In order to continue the eligibility of these lots until these aforementioned deadlines it is proposed that the temporary rule be replaced with a permanent rule of identical wording.

Likewise, in order to continue in effect the standard specification for homogeneous perforated bituminized fiber pipe for septic tank disposal fields it is proposed that the temporary rule adopted at the September 20, 1974 Commission meeting be replaced with a permanent rule of the same wording.

RECOMMENDATION

It is the Director's recommendation that the present temporary rules pertaining to (a) Prior Construction Permits or Approvals Issued Prior to January 1, 1974, for Construction of Subsurface Sewage Disposal Systems, and (b) Standard Specification for Homogeneous Perforated Bituminized Fiber Pipe for Septic Tank Disposal Fields be approved and adopted as permanent rules and that they be filed promptly with the Secretary of State and become effective 10 days after publication by that office.



KESSLER R. CANNON
Director

KHS:vt
10/14/74

Attachments A & B - Copies of
temporary rules

Temporary Rule Pertaining to Prior Permits or Approvals for
Construction of Subsurface Sewage Disposal Systems

(Adopted by the EQC June 21, 1974 and filed with Secretary of State June 26, 1974)

OAR Chapter 340

71-015 (8) Prior Construction Permits or Approvals. All permits or written approvals involving site evaluations issued prior to January 1, 1974 shall be accepted under these rules as valid for construction of a subsurface sewage disposal system providing they expressly authorize use of such facilities for an individual lot or for specific lot within a subdivision, they were issued by a representative of a state or local agency authorized by law to grant such approval, and they were issued in accordance with all rules in effect at the time. No person having a valid prior permit or approval meeting the above requirements shall commence construction of a subsurface sewage disposal system until he has made application for a construction permit required by ORS 454.655, has paid the permit fee required by ORS 454.745 and has received a construction permit from the Department. Construction shall conform as nearly as possible with the current rules of the Commission. Before operating or using the system the permittee shall obtain a "Certificate of Satisfactory Completion" as required by ORS 454.665. If it is not possible for construction to be in full compliance with the current rules of the Commission the Certificate of Satisfactory Completion must contain a statement notifying the permittee or owner that the system is substandard and therefore, may not operate satisfactorily and that if it fails and necessary repair cannot be made in accordance with current rules of the Commission the system may have to be abandoned.

Application for construction permits under this rule shall be made prior to July 1, 1975 and construction shall be completed by July 1, 1976. All permits and written approvals issued prior to January 1, 1974 shall expire on July 1, 1975.

TEMPORARY RULE

(Adopted September 20, 1974)

Amend Section II.D. of Appendix E of the Standards for Subsurface Sewage and Nonwater-Carried Waste Disposal contained in Subdivision 1, Division 7, OAR Chapter 340, to read as follows:

- "D. Bituminized fiber of which both solid pipe and fittings must meet ASTM (American Society for Testing and Materials) Specification D 1861-69 which is designated Appendix M and by this reference is made a part of these regulations. Perforated bituminized fiber pipe shall meet ASTM Specification D 2312-73 which is designated Appendix L and by this reference is made a part of these regulations. Each length of pipe and each fitting shall be marked with the nominal size, the manufacturer's name or trademark, or other symbol which clearly identifies the manufacturer and the appropriate ASTM standard number above. Markings on pipe shall be spaced at intervals not greater than two (2) feet. In addition to the markings required above, each manufacturer of bituminized pipe shall state, in writing, to the Department that he certifies that the pipe to be distributed for use in absorption facilities within the State of Oregon shall comply with all requirements of this section. In addition, all bituminized pipe that is to be installed as part of an absorption facility shall comply with the following requirements:

The pipe shall have two rows of holes spaced one hundred twenty (120) degrees apart and sixty (60) degrees on either side of a center line. A line of contrasting color shall be provided on the outside of the pipe the full length along the line furthest away and parallel to the two rows of perforation. The holes of each row shall not be more than five (5) inches on center and shall have a minimum diameter of one-half (1/2) inch."



AMERICAN SOCIETY FOR TESTING AND MATERIALS

1916 Race St., Philadelphia, Pa., 19103

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**Standard Specification for
HOMOGENEOUS PERFORATED BITUMINIZED
FIBER PIPE FOR SEPTIC TANK DISPOSAL
FIELDS¹**

This Standard is issued under the fixed designation D 2312; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval.

1. Scope

1.1 This specification covers standard strength homogeneous perforated bituminized fiber pipe and fittings for use as exfiltration lines for septic tank effluent in absorption-disposal fields.

NOTE—The values stated in U.S. customary units are to be regarded as the standard.

2. Applicable Documents**2.1 ASTM Standards:**

D 2314 Testing Homogeneous Bituminized Fiber Pipe²

3. Materials and Manufacture

3.1 Pipe and couplings shall be composed of a bituminous compound reinforced with an interwoven fibrous structure. The fibrous material shall be thoroughly impregnated. The wall of the pipe shall be dense and homogeneous, without seams or laminations, and with a smooth interior surface free of obstructions and rough or flaky areas. Bends and fittings shall be of the same material as the pipe, or of a material having equal or better physical and chemical characteristics.

3.2 Pipe and fittings shall use either of the following joint systems:

3.2.1 *Type T/ Joints*—Pipe and fittings shall be provided with accurately machined or molded tapered joints, and a taper-sleeve coupling shall be provided for each length of pipe and for each fitting. The slope of the taper in both pipe and coupling shall be 2 deg (4 deg included angle) (see Fig. 1).

3.2.2 *Type BJ Joints*—Pipe and fittings shall have squarely cut ends, and a split-collar or internal coupling shall be provided for each length of pipe and for each fitting.

4. Chemical Requirements

4.1 The specimen shall show no evidence of softening or disintegration when tested in accordance with Method D 2314.

5. Physical Requirements

5.1 *Resistance to Flattening*—The deflection shall be not more than 3% when tested in accordance with Method D 2314, loaded with 80 lb/ft. (1168 N/m).

5.2 *Crushing Strengths*—The requirements for dry and wet crushing strength shall be not less than 800 lb/ft (11 680 N/m) with a maximum deflection of 0.5 in. (12.7 mm), when tested in accordance with Method D 2314 with flat-plate assembly.

5.3 *Water Absorption*—The maximum water absorbed shall be not more than 2% of the original weight, calculated to the nearest 0.1%, when tested in accordance with Method D 2314.

5.4 *Heat Resistance*—The specimen shall show no appreciable decrease in vertical diam-

¹This specification is under the jurisdiction of ASTM Committee D-8 on Bituminous and Other Organic Materials for Roofing, Waterproofing, and Related Building or Industrial Uses.

Current edition approved Jan. 29, 1973. Published April 1973. Originally published as D 2312 - 64 T. Last previous edition D 2312 - 69.

²Annual Book of ASTM Standards, Part 11.



D 2312

eter, and no appreciable exudation of the bituminous saturant when tested in accordance with Method D 2314.

5.5 *Kerosine Resistance*—Specimens shall meet the dry crushing strength requirements specified in 5.2, when tested in accordance with Method D 2314 with flat-plate assembly.

6. Dimensions

6.1 *Type TJ Pipe and Couplings*—The dimensions of pipe and couplings shall be as specified in Fig. 1.

6.2 *Type BJ Pipe and Collars*—The inside diameter and wall thickness of Type BJ pipe shall be identical to Type TJ pipe (see Fig. 1), but the pipe shall be finished with square cut butt ends, and a split-collar or internal coupling shall be provided for each pipe length.

6.3 *Bore*—The bore shall be straight and circular in cross section as determined by passing a 36-in. (914-mm) long mandrel, $\frac{1}{4}$ in. (6.4 mm) smaller in diameter than the nominal diameter of the pipe, freely through the bore of the pipe.

6.4 *Perforations*—The perforations in both Type TJ and Type BJ pipe shall be circular, $\frac{5}{8} \pm \frac{1}{16}$ in. (15.9 \pm 1.6 mm) in diameter and arranged in 2 rows parallel to the axis of the pipe. The perforations shall be spaced approximately 3 in. (76 mm) center to center along the rows. These rows may be 90 to 125 deg apart.

7. Sampling

7.1 From each lot to be tested or fraction thereof representing one size of product, select at random a number of lengths equivalent to

one half the cube root of the total number of lengths included in the lot, except that in lots of 1000 lengths or less, five lengths shall be taken. If one half the cube root, as calculated, proves to be a fractional number, express it as the next higher whole number. Test specimens shall not include damaged pipe. Tapered joints shall not be included.

8. Basis of Acceptance

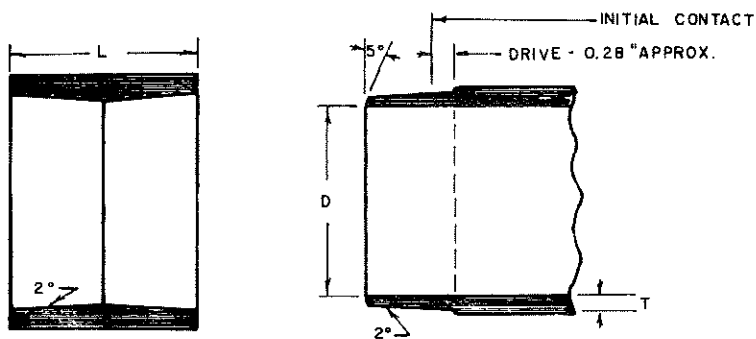
8.1 The lot shall be acceptable under the physical and chemical test requirements (see Section 4 and Section 5) when all test specimens conform to the test requirements. Should 20% or less of the test specimens fail to meet any of the test requirements, then the supplier will be allowed a retest on two additional specimens for each specimen that failed, and the lot shall be acceptable if all these retest specimens meet the respective tests.

8.2 If any, but not more than 20%, of the specimens fail to meet the requirements of the specification other than those of physical and chemical test, the supplier may cull the lot and eliminate whatever quantity of pipe he desires, and must so mark those pipe that they will not be considered part of the lot. The required tests and inspection will be made on the balance of the order and they shall be accepted if they conform to the specified requirements.

9. Marking

9.1 Each length of pipe shall bear the manufacturer's identification. The markings shall be indented or stenciled on the exterior barrel of the pipe and shall be plainly legible.

ASTM D 2312



Dimensions, in. (mm) Note: 0.28 in. = 7.1 mm

Nominal Perforated Pipe Size	3	4	6
<i>D</i> —Min inside dia	3.00 (76.2)	4.00 (101.6)	6.00 (152.4)
<i>T</i> —Min wall thickness	0.23 (5.8)	0.24 (6.1)	0.34 (8.6)
<i>L</i> —Min length of coupling	2.50 (63.5)	3.30 (83.8)	4.00 (101.6)

FIG. 1 Dimensions of Tapered Joint for Pipe and Coupling.

By publication of this standard no position is taken with respect to the validity of any patent rights in connection therewith, and the American Society for Testing and Materials does not undertake to insure anyone utilizing the standard against liability for infringement of any Letters Patent nor assume any such liability.

NOTICE OF PUBLIC HEARING

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE OF OREGON

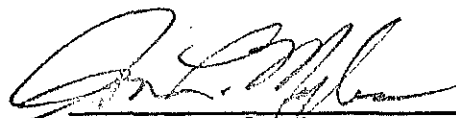
NOTICE IS HEREBY GIVEN that the Environmental Quality Commission will hold a public hearing beginning at 10:30 a.m. on the 25th day of October, 1974, in the Yellow Room, Moore Hotel, 125 South Oregon Street, Ontario, Oregon, for the purpose of considering the adoption of administrative rules pertaining to prior construction permits or approvals involving site evaluations issued prior to January 1, 1974, for construction of subsurface sewage disposal systems, and to a standard specification for homogeneous perforated bituminized fiber pipe for septic tank disposal fields.

These rules were previously adopted by the Commission as temporary rules.

Copies of the proposed rules are available for public inspection at or may be obtained upon request from, the Department of Environmental Quality, Subsurface Sewage Systems Division, 1234 S. W. Morrison Street, Portland, Oregon 97205 (telephone 229-5381) prior to the hearing.

Any interested person desiring to submit written testimony concerning this matter may do so by forwarding it prior to the hearing to the Department at 1234 S. W. Morrison Street, Portland, Oregon 97205, or may appear and submit testimony or be heard orally at the hearing scheduled for the above date.

Dated this 17th day of September, 1974.



Ron L. Myles
Deputy Director

MINUTES OF THE SIXTY-SECOND MEETING
of the
OREGON ENVIRONMENTAL QUALITY COMMISSION

October 25, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the sixty-second meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9 a.m. on Friday, October 25, 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 and Ronald M. Somers. Absent because of illness was Dr. Grace S. Phinney.

The Department was represented by Director Kessler R. Cannon; Deputy Director Ronald L. Myles; Assistant Directors Frederick M. Bolton (Enforcement), Wayne Hanson (Air Quality), Harold L. Sawyer (Water Quality), and Kenneth H. Spies (Land Quality); Regional Administrators Verner J. Adkison (Midwest), Richard P. Reiter (Southwest), and E. Jack Weathersbee (Northwest); staff members C. Kent Ashbaker, John E. Borden, William R. Bree, Glen D. Carter, John E. Core, Dr. Robert L. Gay, Gary L. Grimes, Thomas G. P. Guilbert, John F. Kowalczyk, Judith A. Moore, Jack A. Payne, Stephen R. Sander, Ernest A. Schmidt, Shirley Shay, Mylan Synak, R. Dennis Wiancko and Patrick H. Wicks; Chief Counsel Raymond P. Underwood.

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

MINUTES OF THE SEPTEMBER 20, 1974 COMMISSION MEETING

It was MOVED by Mrs. Hallock, seconded by Mr. Somers and carried to approve the minutes of the sixty-first meeting of the Commission, held in Portland on September 20, 1974.

PROGRAM ACTIVITY REPORT FOR THE MONTH OF SEPTEMBER 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 29 domestic sewage, 18 industrial waste, 43 air quality control, and one solid waste management projects:

Water Quality Control - Water Quality Division (29)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9- 4-74	Warrenton	Addendum No. 3 - interceptor sewer	Approved
9- 4-74	Milwaukie	C. O. #3 - Milwaukie interceptor	Prov. app.
9- 4-74	McMinnville	C. O. #1 - 7th Street interceptor sewer	Prov. app.
9- 6-74	Bend	Addendum #1 - grit facilities project	Approved
9- 6-74	Sutherlin	sewer extension - health hazard	Prov. app.
9- 9-74	NTCSA	effluent polishing equipment	Prov. app.
9-10-74	Beverly Beach State Park	grading plans - sewage lagoon project	Prov. app.
9-13-74	Stayton	Wilco Road sewer	Prov. app.
9-16-74	McMinnville	Cozine Section - West-Southwest interceptor sewer	Prov. app.
9-16-74	Port of Morrow	Schedules B & C - wastewater irrigation project	Prov. app.
9-17-74	Klamath Falls	Americana Subdivision sewers	Prov. app.
9-17-74	BCVSA	Ross Lane sewer	Prov. app.
9-17-74	Springfield	57th Street sewer	Prov. app.
9-17-74	Ashland	Kimberlee Subdivision	Prov. app.
9-19-74	Bunker Hill Sanitary Dist.	C. O. #1 - P.S. contract	Approved
9-20-74	North Bend	Fir Street, Pine Street and Oak Street sewers	Prov. app.
9-23-74	BCVSA	Mayfair Market sewer	Prov. app.
9-23-74	Springfield	sewer projects SP-161 and SP-78	Prov. app.
9-23-74	Bend	Meadowview Estates, 4th Addn. sewers	Prov. app.
9-23-74	BCVSA	Bi-Mart sewer	Prov. app.
9-23-74	BCVSA	Hull Subdivision sewer - Central Point	Prov. app.
9-24-74	Veneta	5th Street sewer	Prov. app.
9-26-74	Toledo	Goddard Addn. No. 2 sewers	Prov. app.
9-26-74	Bend	Addendum #2 - grit works project	Approved
9-26-74	Bly	C. O. #1 - STP project	Approved
9-30-74	Hood River	Port of Hood River pump station	Prov. app.
9-30-74	Sublimity	sewage collection system	Prov. app.

Water Quality Control Industrial Projects - Northwest Region (15)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9- 5-74	Tillamook County	<u>Joe Davis</u> animal waste disposal system holding tank	Pending

Water Quality Control Industrial Projects - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9-10-74	Marion County	<u>Jesse Grieser Dairy Farm</u> animal waste disposal system holding tank	Approved
9-13-74	Washington County	<u>Steven Vandehey</u> animal waste disposal system holding tank	Approved
9-13-74	Washington County	<u>Robert Vandehey</u> animal waste disposal system holding tank	Approved
9-13-74	Multnomah County	<u>Chipman Chemical</u> Rhodia Defuser	Pending
9-16-74	Yamhill County	<u>Austin Warner</u> animal waste disposal system holding tank for livestock	Pending
9-16-74	Washington County	<u>Robert Kauer, Jr.</u> animal waste disposal system holding tank	Approved
9-16-74	Tillamook County	<u>William Gates</u> animal waste disposal system holding tank	Pending
9-17-74	Tillamook County	<u>Gary Manning</u> animal waste disposal system holding tank	Pending
9-18-74	Yamhill County	<u>Dayton Feed Yard</u> lagoon for animal waste	Approved
9-18-74	Yamhill County	<u>Richard Kimball</u> animal waste disposal system holding tank	Approved
9-19-74	Marion County	<u>A & H Dairy</u> animal waste disposal system holding tank	Approved
9-23-74	Tillamook County	<u>Hugh Skarda</u> animal waste disposal system holding tank	Pending
9-23-74	Multnomah County	<u>Atlantic Richfield</u> ARCO upgrading 0.1 water separation facilities	Approved
9-24-74	Tillamook County	<u>James Trent</u> animal waste disposal system holding tank	Pending

Water Quality Control Industrial Projects - Water Quality Division (3)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9-16-74	Coos Bay	<u>Union Oil Company of California</u> modification and new facilities	Prov. app.
9-16-74	Eugene	<u>C. A. Stechelín, Woodside Stables</u> animal waste facilities	Prov. app.
9-18-74	North Bend	<u>Herman V. Lilienthal Dairy Farm</u> animal waste facilities	Prov. app.

Air Quality Control - Northwest Region (31)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9- 4-74	Multnomah County	<u>J. Arlie Bryant, Inc.</u> portable rock crusher	Req. add. info.
9- 6-74	Washington County	<u>Pacific Building Materials</u> concrete readymix plant	Req. add. info.
9-10-74	Multnomah County	<u>C. H. Stinson, Inc.</u> portable asphalt paving plant	Special permit issued
9-11-74	Clatsop County	<u>AMAX Aluminum</u> new aluminum reduction plant	In process
9-11-74	Columbia County	<u>Charter Energy Company</u> new oil refinery	In process
9-13-74	Columbia County	<u>Multnomah Plywood</u> veneer dryer control	Approved
9-13-74	Multnomah County	<u>Cargill, Inc.</u> grain handling dust control	Approved
9-16-74	Multnomah County	<u>Portland State University</u> new boiler	Approved
9-16-74	Multnomah County	<u>Oregon Steel Mills, Rivergate</u> pellet metallizing	Req. add. info.
9-17-74	Clackamas County	<u>Barton Sand and Gravel</u> rock crusher	Req. add. info.
9-17-74	Multnomah County	<u>The Oregon Humane Society</u> cremation incinerator	In process
9-18-74	Multnomah County	<u>Fry Roofing</u> fume control of storage tanks	Approved
9-18-74	Multnomah County	<u>Fry Roofing</u> Volney felt mill control wood flour	Approved
9-18-74	Clackamas County	<u>Globe Union</u> lead remelt furnace	Approved
9-19-74	Multnomah County	<u>Flintkote Company</u> filter for sand handling	Approved
9-19-74	Multnomah County	<u>Chamberlain's Pet Crematorium</u> cremation incinerator	Req. add. info.
9-20-74	Clatsop County	<u>Crown-Zellerbach, Wauna</u> scrubber for lime kiln	Approved
9-20-74	Multnomah County	<u>Cook Industries</u> grain terminal	Final permit issued
9-20-74	Multnomah County	<u>Triangle Milling</u> dust control	Req. add. info.
9-23-74	Columbia County	<u>Crown-Zellerbach, Columbia City</u> hog fuel boiler with scrubber	Approved
9-25-74	Columbia County	<u>Boise Cascade, St. Helens</u> Venturi for #1 and #2 lime kilns	Approved
9-26-74	Multnomah County	<u>B. W. Feed Company</u> bakery waste processing	Approved
9-26-74	Multnomah County	<u>ESCO</u> new powder burn-out booth	Approved
9-26-74	Columbia County	<u>Niedermeyer-Martin Company</u> pole peeling facility	Approved
9-26-74	Yamhill County	<u>Publishers Paper, Newberg</u> new digester	Req. add. info.
9-26-74	Yamhill County	<u>Publishers Paper, Newberg</u> new hog fuel boiler	Req. add. info.

Air Quality Control - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9-27-74	Multnomah County	<u>East Side Plating Works</u> two bag collectors and scrubber	Approved
9-30-74	Multnomah County	<u>Western Wood Industries</u> chip bin and transfer cyclone	Approved
9-30-74	Multnomah County	<u>Schnitzer Steel Products</u> wire incinerator	Proposed permit issued
9-30-74	Multnomah County	<u>Columbia Steel Casting</u> new furnace and controls	Proposed permit issued
9-30-74	Multnomah County	<u>Pacific Carbide</u> new furnace	Proposed permit issued

Air Quality Control - Air Quality Division (12)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9- 5-74	Multnomah County	<u>Tri-Met</u> 100-space employe parking facility	Req. add. info.
9-10-74	Washington County	<u>Tanasbourne Phase 1</u> 705-space parking facility	Cond. app.
9-12-74	Clackamas County	<u>Clairmont Mall</u> 700-space parking facility	No action required (outside EQC jurisdiction)
9-18-74	Multnomah County	<u>Good Samaritan Hospital</u> 54-space parking facility	Cond. app.
9-19-74	Multnomah County	<u>Owens-Corning Fiberglas</u> 200-space parking facility	Req. add. info.
9-19-74	Morrow County	<u>Gourmet Foods</u> installation of a potato fryer and emissions control scrubber	Cond. app.
9-19-74	Douglas County	<u>Melrose School</u> installation of a distillate oil-fired boiler	Approved
9-20-74	Multnomah County	<u>LDS Church</u> 102-space parking facility	Amended approval
9-20-74	Washington County	<u>Weigel Apartments</u> modification of existing parking facility	Amended approval
9-23-74	Lane County	<u>Plaza 12 Condominiums</u> 70-space parking facility	Cond. app.
9-23-74	Lane County	<u>Weyerhaeuser Company</u> process changes to improve No. 3 recovery furnace black liquor oxidation	Approved
9-23-74	Multnomah County	<u>I-405 Parking</u> 340-space parking facility, municipally owned	Cond. app.

Land Quality - Solid Waste Management Division (1)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
9-16-74	Lane County	<u>Creswell Landfill</u> existing domestic site; operational plan	Approved

The Commission requested monthly status reports from the program directors with detail on any action taken with respect to permit applications.

TAX CREDIT APPLICATIONS

Mr. Myles presented the Department's review of the seven tax credit applications deferred from the September 20, 1974 Commission meeting as well as the five tax credit applications submitted for this meeting. The Commission approved the issuance of tax credit certificates for the following applicants for the pollution control facilities described in the following applications and bearing the costs as listed with 80 percent or more of the cost in each case being allocated to pollution control:

<u>App. No.</u>	<u>Applicant</u>	<u>Claimed Cost</u>
T-541	American Can Company, Halsey Mill	\$ 73,501.00
T-569	Weyerhaeuser Company, Wood Products	273,755.00
T-570	Southern Oregon Plywood, Inc.	61,299.87
T-574	Gemco Wood Products, Inc.	18,225.93
T-575	Weyerhaeuser Company, Paperboard Manufacturing	15,344.00
T-576	Weyerhaeuser Company, Paperboard Manufacturing	36,071.00
T-531R	Georgia-Pacific Corporation, Toledo Division	1,059,151.00
T-577	Weyerhaeuser Company, Paperboard Manufacturing	79,382.00
T-578	Consolidated Foods Corporation, dba B. P. John Furniture	12,908.00
T-583	Edward Hines Lumber Company	28,600.12

It was the Director's recommendation to deny issuance of a tax credit certificate to Robert E. Oja, dba Oja's Super Market (T-568 with a claimed cost of \$3,150) and the Commission concurred with the recommendation.

Consideration of T-580, Weyerhaeuser Company, Paperboard Manufacturing (with a claimed cost of \$8,511.981.00) was deferred until the staff engineer who had prepared the review was available to answer questions.

PORTLAND METROPOLITAN AREA INTERIM EMISSION POLICY

Mr. Kowalczyk summarized the September 20, 1974 staff report on this subject and reviewed the October 25, 1974 staff report, adding the following words to the proposed rule, 32-020(1): "Ambient air quality standards will not be exceeded at air sampling stations and adjacent areas projected by the Department's March 1974, report on Designation of Air Quality Maintenance Areas to be in compliance with such standards. A copy of the Department's March 1974, report on Designation of Air Quality Maintenance Areas is on file in the Department's Portland office." (addition underscored)

In discussing the status of the permit applications now on file with the Department and their disposition should the temporary rule be adopted, Mr. Cannon stated that those meeting the criteria of the temporary rule would be processed.

The Chairman called for witnesses:

Mr. Walter Hitchcock, Environmental Coordinator, Port of Portland, distributed copies of a prepared statement which he read into the record. (A copy is made a part of the permanent record of the meeting.) In summary, Mr. Hitchcock's testimony stated that the Port supported the policy until a comprehensive ten-year maintenance plan was completed. The Port reiterated its belief that "economic and community benefits should be considered in the allocation decision making process." The Port requested provision for a second grain elevator with the current considerations and following adoption of the policy to act expeditiously on all pending permit applications. It was again suggested that a comprehensive air quality study be undertaken before the ten-year maintenance plan was formulated. Mr. Hitchcock said that the Port believes that continued growth could be accommodated during the time in which the study is conducted by instituting additional particulate and sulfur dioxide reduction plans and recommended that the Commission direct the Department "to formulate these emission reduction plans and to determine the anticipated improvements in air quality" and that these improvements could then be incorporated into the interim policy prior to final adoption.

Mr. Thomas C. Donaca, Counsel for Associated Oregon Industries (AOI), distributed copies of a prepared statement which he summarized. (A copy is made a part of the permanent record of the meeting.) Mr. Donaca said that AOI concurred with the Port of Portland's recommendations regarding the interim policy. His testimony contained an analysis of the projected 1975 and 1978 particulate emissions for the Portland standard metropolitan statistical area, based on 1970 and 1975 information contained in Table 2 of the staff report presented at the September 20, 1974 meeting. He said that the figures he cited "disclose clearly that it is not the controllable sources which are the problem, but it is your area sources, the automobile, the backyard burning and the field burning which you must control." He then discussed the AOI-recommended amendments to the proposed temporary rules.

Mr. Wayne Kuhn, a registered professional engineer representing the Portland Chamber of Commerce, commended the staff for preparing a "sound, forward-looking policy which incorporates, justifies tradeoffs" and referred specifically to Columbia Independent Refinery (CIRI). He stated that these tradeoffs should result in substantial gain and benefit to the Portland metropolitan area in air quality. (A copy of Mr. Kuhn's testimony was received by mail and made a part of the permanent record.)

Mr. John Mosser, a Portland attorney representing Portland Steel Mills, urged adoption of the rules so as to avoid any further delays in processing permit applications. He referred specifically to his client's permit application and said that he had recently filed with the Department a study on the tradeoffs with this plant. The study shows that the difference in producing new steel from ore rather than steel from scrap (as done by Portland Steel Mills) amounts to 24.7 trillion BTU per year. "The difference between this plant and what the company is already doing amounts to 18.7 trillion BTU per year which is four percent of the total energy use of Oregon, six percent of the total Oregon petroleum energy use, more than 11 percent of the energy necessary to power all industrial, agricultural, state and local government activities in the state, and the equivalent of enough electricity to continuously power over 180,000 average Oregon homes." He said, however, that these are the kinds of tradeoffs that cannot be localized into the Portland airshed.

Mr. Somers and Mr. Mosser discussed the process used by Portland Steel Mills and the possible relocation of the plant closer to an electrical generating source. Mr. Mosser said that an electric furnace does the initial melt but basically fossil fuels are used prior to the product's entering the rolling mill. He also said that because the plant uses primarily scrap, its location near deep water and rail and truck transportation is essential.

Mr. Mosser asked the Commission to authorize the Department to proceed with issuance of the company's permit application. Mr. Cannon said that the Department can continue to process the permit and determine whether or not it fits the temporary rule requirements. Mr. Weathersbee pointed out that unless the Commission specifically authorized the permit at this time, it could not be issued.

Mrs. Sharon Roso, representing the North Portland Citizens' Committee, distributed copies of prepared testimony (a copy has been made a part of the permanent record) which contained the priorities that came out of the North

Portland Citizens' Committee conference of October 5, 1974. Mrs. Roso stated that the Committee supported the interim policy but not the policy of tradeoffs.

Mr. Roger Ulveling, Planning Coordinator for Columbia Independent Refinery (CIRI), distributed copies of prepared testimony which he summarized. (A copy has been made a part of the permanent record.) He supported the adoption of the temporary rule and felt that CIRI could comply with it.

Mr. Somers and Mr. Ulveling discussed the type of emissions controls for CIRI. Mr. Ulveling said that the particulate emissions were submicron in size and there was no technology presently available to handle them. Regarding further controls for sulfur dioxide emissions, Mr. Ulveling said that his company was willing to investigate any economically feasible technology to reduce these emissions as well as particulate emissions. He said that in order to reduce the sulfur dioxide emissions substantially, the company revised its original proposal to use one-half percent sulfur residual fuel oil exclusively and currently planned to add distillate fuels and some refinery gas. He said, "We're trying to reach a point where it is economically possible to provide fuels to this area and still meet the standards of the state." He said his company would produce a cleaner burning fuel which if used in the area could lower the total projected sulfur dioxide emissions by 9,000 to 10,000 tons, but that it was up to the Commission whether or not a clean fuels policy was proposed.

There were no further witnesses.

Mr. Kowalczyk provided the information on what comprised the "miscellaneous other emissions" referred to in the staff report. These are emissions from ships in the Portland harbor, barges, railroads and aircraft.

Mr. Somers MOVED the adoption of the new criteria with the following amendments: In 32-005, following the word "and" and before the word "designs" insert the word general; in 32-020(1), following the word "stations" and before the word "projected" insert the words and adjacent areas between sampling stations for particulates and sulfur dioxide; and in 32-020(3), following the word "proportion" change "shall" to may. The motion was seconded by Mrs. Hallock and carried.

BROOKS-SCANLON, Bend, Oregon

Prior to presenting the staff memorandum report, Mr. Borden showed slides of the company's log-handling and storage practices in the past as well as

currently. He then read the Director's recommendations:

1. Brooks-Scanlon's request for a time extension from October 1, 1975 to October 1, 1976, should be denied.
2. Brooks-Scanlon should be instructed to proceed immediately with the approved plan for dry log handling.
3. Brooks-Scanlon should investigate the noise impacts of total dry log handling to determine what control measures may be needed.

Mr. Somers asked Mr. Borden about the possibility of the company's changing the channel and having a completely self-contained pond. Mr. Borden said this could be a suitable alternative. However, Mr. Ashbaker pointed out that the new EPA regulations concerning log ponds might prohibit discharging from the pond through several months of the year. He also said that a pond might not provide sufficient storage space for the company.

Speaking in behalf of the company was Mr. Michael Hollern, President. He asked for an additional year's study because of the new noise standards adopted by the Commission and because of the economic impact on the company of the proposed channel change. He also expressed concern about the downstream effects of moving the river. He said that until recently the Department staff had insisted that Brooks-Scanlon remove the logs from the Deschutes River, and had the company had some indication that they could use the river, they could have done more sooner.

Following the luncheon recess, the Chairman continued with the agenda item. Mr. James E. Bussard, President, Century West Engineering Corporation (the engineering firm retained by Brooks-Scanlon to assist them with the project), told the Commission that the Company was asking not to relocate the river and to explore alternate solutions and work out guideline requirements to meet them. He said the alternate proposal--to remove log storage and log handling from the river by developing a small infeed reservoir--could be achieved by October 1, 1975, thus eliminating the need for the requested year's extension.

Commenting on the EPA regulations, Mr. Vlastelicia said that if water from the pond is returned to the river, it must be treated to a fairly high degree in order to comply with the state as well as national requirements for the maintenance of water quality standards.

DEQ staff and representatives of the company indicated they would meet with the Oregon EPA officials to determine the requirements of the EPA regulations.

Mr. Sawyer responded to the delay in issuance of the NPDES permit for Brooks-Scanlon by stating that the only issue was what deadline to use. Mr. McPhillips suggested using the October 1, 1975 date in the compliance schedule.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to deny the company's application for an extension of time and to require a progress report on the new plan proposal by January 15, 1975.

TRI-MET STATUS REPORT

Mr. Steve McCarthy, Assistant General Manager for Tri-Met, discussed the commitment made by the District 18 months ago to radically accelerate its expansion program to assist in efforts to meet clean air goals, focusing on a goal of 50 percent increase in ridership into and out of the Portland central business district by June 1, 1975. Several of these programs have changed and Mr. McCarthy summarized the changes and the District's progress in meeting its goals.

Tri-Met's ridership projection for 1974-75 calls for an increase of 12 percent, bringing the total increase since 1970-71 to 37.3 percent. The District still hopes to meet its 50 percent increase. Future plans call for 80 new buses, 715 shelters, new fare programs including a monthly transferrable \$13 pass, park and ride lots, and the transit mall.

Mr. McCarthy concluded by stating that the Tri-Met board will consider proposed tax increases designed to raise money to permit operation of the system at a level needed to meet the clean air goals, and that if the money was not available, Tri-met would not run the system at the proposed increased levels.

CHEM-NUCLEAR, INC.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried to dispense with the reading of the staff report on this matter since consideration of the license application would be deferred to the Commission's November 22nd meeting.

Mr. Wicks noted that a copy of the Attorney General's opinion had been distributed to the Commission and that essentially it reaffirmed the earlier opinion that the Department does have the authority to issue a license.

Even though the matter could not be decided at this meeting, the Chairman asked if there were witnesses who wished to address this agenda item.

Mr. John Mosser, a Portland attorney representing Chem-Nuclear, Inc., objected to the limitation in the proposed permit on the amount of nuclear waste to be disposed of at the proposed site. He said that in view of the 40 million cubic foot capacity of the site, the limitation of 150,000 cubic feet per year was an arbitrary figure imposed by the staff which prevented the flexibility needed by a licensee to operate the site economically (Chem-Nuclear had requested a capacity of 250,000 cubic feet per year). He added that the applicant would not be interested in further pursuing the permit if this limitation could not be changed. Mr. Mosser said the applicant hoped for a decision by November since the wastes presently on the site would either have to be buried soon or repackaged at considerable cost.

Mrs. Hallock asked Mr. Mosser if a sense of the Commission on this issue would be helpful. Dr. Crothers spoke in support of a change in the limitation since the wastes being considered for disposal at the site were low level radioactive wastes. Mrs. Hallock and Mr. Somers indicated opposition to changing the limitation. The Chairman pointed out that the matter could not be put to a vote at this meeting.

Mr. Jonathan Newman, a Portland attorney representing Nuclear Engineering, emphasized that the Richland, Washington site was adequate to handle all the radioactive wastes from Oregon, and that the DEQ staff report again stated that there is no need for a radioactive waste disposal site in Oregon. He said his client did not question the need for a toxic chemical waste disposal site in Oregon.

Mr. Cannon responded to questions by Dr. Crothers concerning limiting the amount of radioactivity in the area rather than limiting the amount of radioactive waste. He said that the limitation on radioactivity in the license and in the control and management of the site was based on the amount of radioactivity that would be emitted and impinge upon someone who would be there. He recommended that at an appropriate time the Commission take action on the permit before them.

Mr. Mosser said that Chem-Nuclear had no objection to the limitation on the amount of radioactivity, only to the amount of waste permitted to be stored.

It was MOVED by Mr. Somers, seconded by Dr. Crothers and carried that the Commission consider the next item on the agenda.

PROPOSED PUBLIC HEARING TO CONSIDER ADOPTION OF RULES PERTAINING TO SURETY BONDS FOR SEWAGE TREATMENT FACILITIES

It was MOVED by Dr. Crothers, seconded by Mrs. Hallock and carried to approve the Director's recommendation that authorization be granted to hold a public hearing at the earliest possible time to consider the adoption of proposed rules pertaining to surety bonds or other security for construction, operation and maintenance of sewage collection, treatment or disposal facilities.

RULES PERTAINING TO (a) PRIOR CONSTRUCTION PERMITS OR APPROVALS ISSUED PRIOR TO JANUARY 1, 1974, FOR CONSTRUCTION OF SUBSURFACE SEWAGE DISPOSAL SYSTEMS, AND (b) STANDARD SPECIFICATION FOR HOMOGENEOUS PERFORATED BITUMINIZED FIBER PIPE FOR SEPTIC TANK DISPOSAL FIELDS

Mr. Spies reported on the public hearing held on this date in Ontario, Oregon, by Mr. James Van Domelen, DEQ Regional Engineer (Pendleton), for the purpose of considering for permanent adoption the temporary rules previously adopted by the Commission. Four people were in attendance and two testified:

Mr. Ray Huff, Malheur County sanitarian, stated that his office had issued permits under the prior rule and had no suggested changes.

Mr. Baum, an engineer with Douglas County, said that although they had had problems with the temporary rule, he had no suggested changes.

Based on the testimony presented, it was recommended that the two temporary rules be adopted as permanent rules and that they be filed promptly with the Secretary of State and become effective 10 days after publication by that office.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried, that the Director's recommendation be approved, and the rules adopted as permanent rules.

OTHER BUSINESS

1. It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried that the Director be given all necessary power to seek resolution of the problems in Lincoln County.
2. The matter of the Weyerhaeuser Company tax credit application, T-580, deferred from the morning session, was again considered. Mr. Charles Clinton

of the DEQ staff explained the economic analysis for the tax credit application which is for a low-odor recovery furnace that replaced the existing recovery furnace. Because the Commission still had questions about the primary purpose of the installation, Mr. Somers MOVED that the matter be deferred until the November meeting so that the staff could respond to the questions; seconded by Mrs. Hallock and carried.

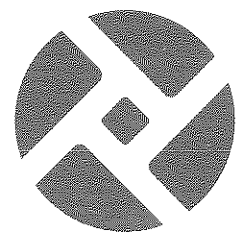
There was no further business to be brought before the Commission, and the Chairman adjourned the meeting at 3:10 p.m.



Shirley Shay, Secretary
Environmental Quality Commission

Addition to the Minutes, by motion of Dr. Crothers on November 22, 1974:

on page 8, in the testimony of Wayne Kuhn, as a last sentence, include: Mr. Kuhn stated that business would gladly absorb the cost of the low-sulfur residual fuel proposed for production by CIRI.



October 25, 1974

B.A. McPhillips, Chairman
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POLICY FOR APPROVING NEW OR EXPANDED AIR EMISSION SOURCES IN THE
PORTLAND METROPOLITAN AREA

This letter is a continuation of Port comments on the interim air pollution policy. We support this policy until completion of a comprehensive ten year maintenance plan. We still believe that economic and community benefits should be considered in the allocation decision making process. Perhaps the Economic Development Department could provide the necessary assistance to DEQ in its consideration of future applicants.

The Interim Policy provides for little additional growth during the next eight months because existing permit applicants will probably use up the allocated room. Within this context, as you will recall, I indicated at the last hearing the strong probability of a second grain elevator in the Rivergate area. This facility is critical in its long-term impact on the Oregon economy.

We request again that you include provision for this source within your current consideration because it's the type of facility where no alternative sites are available. It requires the river proximity. Even with this inclusion, orderly regional growth is being disrupted and the interim policy will result in significant economic uncertainties for the next several years. We also recognize the need for caution in continued allocation of our air shed resource and the need for firm guidelines on which DEQ can act in issuing air emission permits. Following adoption of the policy, DEQ should take expeditious action on all pending permit applications.

We further recognize that severe limitations in available air quality data will exist, even after completion of your current study effort. The formulation of a ten year maintenance plan on this data is extremely risky because of continued inaccuracies in air quality projections and inadequate information for formulating additional emission reduction plans. A comprehensive air quality study should be undertaken and, when completed, the ten year maintenance plan formulated. The Port will support your efforts in obtain-

B. A. McPhillips
October 25, 1974
Page 2

ing adequate funding for this study from the state legislature or the federal government. The undertaking of a comprehensive air quality study is certainly a valid reason to request a delay in the preparation of the ten year maintenance plan. Further, a mechanism is certainly needed whereby local government and DEQ exchange data and expertise for use in the local planning process and during the ten year maintenance plan preparation.

Some growth must occur during the two to three years that a comprehensive air quality study would take. This can be accomplished by instituting additional particulate and sulfur dioxide reduction plans. Although sufficient data does not exist on which the precise air quality improvement may be determined, enough data exists today on which to determine the minimum improvements that will be realized from these reduction strategies. We recommend that you direct DEQ to formulate these emission reduction plans and to determine the anticipated improvements in air quality. These improvements could then be incorporated into the interim policy you are considering for adoption in the next 120 days. You may further wish to adopt the additional reduction strategies at that time.

This approach allows time for the development of adequate air quality data and the formulation of a ten year maintenance plan, as well as providing additional room on which continued orderly regional development may occur. Approval of the interim policy without taking the action necessary to institute additional emission reduction strategies and undertake a comprehensive air quality study will be highly disruptive to the regional economy.



Edward G. Westerdahl II
Executive Director

TESTIMONY OF ASSOCIATED OREGON INDUSTRIES
BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
October 25, 1974

Relating to Subdivision II Criteria for Approval of New Air Contaminant Sources in the Portland Metropolitan Special Air Quality Maintenance Area

My name is Thomas C. Donaca, Counsel for Associated Oregon Industries and I am here today on behalf of AOI's Air Quality Committee

At the outset let me state that we concur with the Port of Portland's proposals to you regarding the steps which should be taken to complete this phase of the implementation program. We believe the Port's suggestions are thoughtful and meaningful in the sense that if they are pursued by this commission they will provide the agency with greater capability to meet the anticipated air quality needs of this maintenance area as well as providing additional solutions which are needed in maintaining air quality in the future.

However, and without departing from that support, we believe it is important that we review some of the material presented by your staff at the last hearing, as it relates to the proposal before you. Attached you will find Table 2, the projected 1975 and 1985 particulate emissions for the Portland standard metropolitan statistical area. Using only the 1970 and 1975 columns we find some very important information.

I. Under fuel combustion residential and commercial particulate emissions have continued to rise over the five year period yet industrial emissions, which are the controlled emissions, have dropped some 400 tons per year which allows for a total reduction in particulate matter from fuel combustion over the five year period.

II. With regard to process loss sources, which are the totally controlled industrial sources, we find the reduction from 14,100 tons to 6,100 tons.

III. With regard to transportation equipment, we find a general increase.

IV. Under solid waste, we find general reductions across the board and particularly with regard to wigwam waste burners, a controlled industrial source.

V. Under miscellaneous sources, field burning shows a drop but these are shown on an annualized basis. The field burning is not an annual figure since it all occurs in a six week period normally when we may well be experiencing air quality problems in the metropolitan area. Forest fires, too, do not occur on an annualized basis but occur generally in the late fall when fire conditions prevail. Slash burning contribution we believe may be high because more and more of the residual slash is being chipped. The value of chips has risen and will probably maintain their high value and we think this figure may now be overstated. We are not certain whether backyard burning is placed in the "other" category or whether it was under open burning. However, backyard burning occurs during only two months, one in the early spring and one in the late fall, not on an annualized basis at all. This burning will continue without control until the metropolitan Service District in Portland is able to put together a viable solid waste program for the tri-county area. This commission should be giving all assistance to the Metropolitan Service District in the development of that program in order to get control of this open burning source.

VI. Power Plants were a minimal source and show a minimal rise--again a controlled source.

What Table 2 shows then is that total area sources continue to grow over the entire period of time whereas total point sources, primarily industrial, have already dropped from 16,000 tons a year to 7,100 tons a year, a reduction of 9,000 tons per year of particulate. Further, you are unable to determine the impact of sources in Washington, and you will place this further burden entirely on Oregon industry. Clearly then, a program which is designed only to control large industrial sources, will not provide you with the measurable improvement in air quality which you seek. The figures disclose clearly that it is not the controllable sources which are the problem, but it is your area sources, the automobile, the backyard burning and the field burning which you must control. They are subject generally to your jurisdiction and you must expend the energy and resources necessary to get effective control to all sources because equity and the need to maintain air quality in this area depend upon that kind of dedication by you.

Clearly, if Governor McCall desires that Oregon attract new non-polluting industry which had no major environmental impact but did require additional people, those people themselves, who are virtually untouched by environmental quality considerations would cause an increase in the area sources of which the public at large is the primary problem.

Turning to Table 3 on sulfur dioxide, we find approximately the same kind of a situation.

I. In fuel combustion we find significant increases in residential and commercial and virtually no increase in industrial emissions, the controlled sources.

II. Process loss sources, which are the controlled industrial sources, have already dropped from 17,100 tons to 4,200 tons.

III. There is a continuing growth in transportation.

IV. Solid waste contribution is virtually zero.

V. There is a continuing increase in miscellaneous sources noted as "other".

VI. Power plants show a small increase.

Again we find that the total area sources are still going up over the five-year period of time whereas the total point sources, primarily controlled industrial sources, have been curtailed from almost 22,000 tons down to 10,700 tons allowing for total reduction of sulfur dioxide from 33,000 tons per year to 23,000 tons per year.

Let me conclude this part of our testimony by simply pointing out that if there are good guys and bad guys then clearly these figures indicate that industry, which has cooperated in the development and execution of air quality programs, have carried the major burden for the improvement and maintenance of air quality--the public at large has not. We believe that you, the Commission, must face this problem squarely and undertake a broad-based program to gain control over the public sector and to provide answers so that the public can reduce their emissions as they desire to do. We believe they will be cooperative if you will turn your hand to that endeavor.

The previous portion of this testimony was not in any way intended to dissuade you from adopting the policy before but only to suggest that you exercise great care in its execution as it relates to your expectations as to what will be achieved. Particularly, you should pay attention to the economic impact that would occur as a result of this kind of decision over a long period of time, not only to industry, but to those people who hold jobs and seek jobs in this area.

With regard to the regulation, I would like to make the following comments:

I. In Section 32-005 Purpose, we believe that you should clearly indicate in that purpose that it is to control criteria for permit applications for new or expanded air contaminant sources which emit more than 10 tons of particulate sulfur dioxide per year. The policy is broader than the regulations state and should be clarified by the addition after the word "sources" in line 3 of the following words "which emit more than 10 tons particulate or sulfur dioxide per year."

II. In Rule 32-010 Definitions, we suggest that (3) include the exception contained on Page 3, namely that the definition should indicate that a new or expanded air contaminant source does not include those sources which emit 10 tons or less particulate or sulfur dioxide per year. We think it is bad drafting to use a definition which has a major exception to it somewhere else in the regulation. To clarify this, we would ask that in Line 4 after 1974, delete the period, insert a comma, and add the following words "except for those sources which emit 10 tons or less particulate or sulfur dioxide per year.". We would further suggest and recommend the deletion of Rule 32.025 Exceptions, as being unnecessary with the two changes we have just proposed.

Going back to Rule 32.005, Purpose, for one moment we wonder what is meant by the word "designs" in line 4? If it is simply a repetition of the present requirement that an applicant must provide site location and design of his control equipment and general information regarding the activity that is taking place in process that we have been providing in all applications to the Department of Environmental Quality there is no problem. If something else is meant by the word design such as complete engineering drawings then we must strenuously object because it is virtually impossible and much too expensive to provide entire process design if, in fact, the permit is not to be issued and the plant is not to be built. In some cases we are talking about hundreds of thousands of dollars. For the record we would clearly like to know what the word designs means and if it means more than what we have been submitting, then we request its deletion.

In Rule 32-020 Criteria, Subsection I, that paragraph we believe should be clarified in order to be consistent with the rest of the regulation. By this we mean that throughout the regulation we are talking about annual standards and we are talking about its application to particulate and sulfur dioxide. If you will read the paragraph you will see that while the rest of the rule talks in the above terms, they are not mentioned in that paragraph. For purposes of clarity, we would suggest that before the word "ambient" in line 1, there be inserted the word "annual" and after the word "stations" in line 2, insert the words "for particulate and sulfur dioxide". The paragraph would then read in part "Annual ambient air quality standards will not be exceeded at air sampling stations for particulate and sulfur dioxide projected by....."

In Subsection III of Rule 32-020 Criteria, we are concerned about the last sentence that says "the exact proportions shall be determined by the Commission". Our

interpretation of that portion of the regulation would mean that each permit issued would have to be reviewed by the Commission and approved by it with regard to that proportion which is to be allocated in each instance. The law under which you operate does not preclude you from doing this but in general it delegates to the Department the authority to issue permits and that your proper function is to review those permits on request for hearing. It appears to us that this would provide a complication for you and place an undue burden upon you. Therefore, we request the deletion of that particular sentence. However, if it is your desire to know how the progress is coming under the program it would be appropriate to indicate that it is the Department that is to determine the proportion but that the Department shall submit to you periodically the allocations which have been made against the particulate and sulfur dioxide limitations so that you can keep track of the progress under this regulation.

In the last paragraph of Rule 32.020 Criteria, which directs itself to the so-called trade-offs, we are concerned with the language in the next to the last sentence which says "can be (a) assured of implementation". We are uncertain what this would mean, or what an applicant would have to show. It is our general belief that the clean fuels which this commission is working on, and other similar policies are a better way of showing implementation than by ambiguous wording such as is proposed here. We therefore think that the words in line 5 of that paragraph "can be (a) assured of implementation and (b) "be deleted. The regulation would then read in part "...which may occur within the Portland metropolitan special air quality maintenance area, or portion thereof, which are attributable to the source seeking the permit." We think with this revision, the rule more clearly states to the applicant that which he can in fact justify to you, clarifies the paragraph, and meets the objective which you sought in having this kind of a policy inserted into this regulation.

One last point, would like to raise with regard to the monitoring program. While this was covered by the Port of Portland, we think it is essential that DEQ have in-house monitoring capability. This will require more equipment and manpower devoted to its monitoring programs than you are currently allowing for in your budgets. We think there should be as little dependence as possible on outside consultants because they must be budgeted well in advance and consultants generally require long time frames, while at the same time your department needs this information on an ongoing basis in order to maintain the kind of control that is necessary. This is a matter of major importance for you in your determination to maintain air quality and must be an issue of first priority for you.

If it is your decision here today to adopt this regulation, then again we request that you make the changes which we have requested in Rule 32-005 clearly indicating that it is limited to emissions of more than 10 tons of particulate and sulfur dioxide per year and in Rule 32-010 Definitions (3) that the exception for 10 tons or less particulate and sulfur dioxide per year be added into the definition and that Rule 32-025 Exceptions be deleted as unnecessary. Further, we request the language change in Rule 32-020 Criteria (1) which will clearly by adding the words "annual" and indicating that it is for particulate and sulfur dioxide will clarify that language and is an essential change and that the language of the last paragraph of Rule 32-020 dealing with "assured of implementation" be deleted.

TABLE 2

PROJECTED 1975 and 1985 PARTICULATE EMISSIONS

FOR THE PORTLAND STANDARD METROPOLITAN STATISTICAL AREA

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

TABLE 3

PROJECTED 1975 and 1985 SULFUR DIOXIDE EMISSIONS

FOR THE PORTLAND STANDARD METROPOLITAN STATISTICAL AREA

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



PORTLAND CHAMBER OF COMMERCE

No. D

524 S. W. FIFTH AVENUE • PORTLAND, OREGON 97204
AREA CODE 503 229-9411

October 25, 1974

May I commend the staff for preparing a sound, forward looking policy which incorporates justified tradeoffs that, in the case of CIRI, should result in substantial gain and benefit to the Portland Metropolitan area in air quality.

An environmental myopia under the original policy would eliminate an operation that should result, overall, in a most substantial gain in reducing the SO₂ content of the atmosphere in the Metropolitan area; and this is what is basically desired. Production of a low sulfur, heavy fuel in a modern new refinery should more than offset, in fact will permit a reduction in the SO₂ content of the atmosphere in the area --- a real gain. Burning of residual fuel of significant sulfur content is a major contribution, today, to the SO₂ in the air.

Portland as an economic center must be permitted to grow but the Chamber of Commerce agrees that this growth should not be at the sacrifice of good air quality. When a facility can contribute to the overall air quality as CIRI can by producing a fuel that will decrease significantly the SO₂ content of the air in the Metropolitan area, it should be permitted to construct the refinery and make this contribution.

As I stated, the Chamber of Commerce agrees with the proposed policy incorporating justified tradeoffs and urges that the policy be adopted.

Wayne E. Kuhn
Professional Engineer

WK:mmf

NORTH PENINSULA - ENVIRONMENT 74

LAKES * LANDS * LIVABILITY

A North Portland Conference

PRIORITIES

**Compiled by Sharon Rose
North Portland Citizen's Committee**

On October 5, 1974, NPCC sponsored a conference called N. Peninsula, Environment 74, Lakes, Lands & Livability. The conference was concerned with that area North of Columbia Blvd. and West of N. Portland Road, including Rivergate, Terminal 6, St. Johns Landfill, Columbia Slough, Smith and Bybee Lakes, Schnitzer property Upland Ind. Park North, and all other industrial and recreational property in the area, and the effect of all of these on North Portland residential area.

We heard from the Corps of Engineers, Port of Portland, City Landfill Director, MSD, DEQ, Wildlife Comm., Multnomah County Planning Bureau, Multnomah County Park Bureau, Portland Planning Bureau, Portland Park Bureau, Tri-Met, Recycling Info. Office, CRAG, and Schnitzer.

The conference was designed to find out agency plans for and needs of that area, and for local people and agency people to ask specific questions regarding lakes, land and livability, e.g. traffic generation and patterns, air quality outlook, recreational uses, noise generation, water quality, funding possibilities, recycling possibilities and mass transit potential.

The culmination of the conference was when local people, along with a few agency people, mapped their priorities and answered un-mappable questions. On Tuesday, October 7, at a meeting announced at the conference, the outcome of the conference was synthesized and prioritized and follows in two forms. First, the priorities as they apply to specific agencies and plans:

PORT OF PORTLAND

Ideas for consideration by the Port Commission, hopefully for inclusion in the Policy on Rivergate.

1. Second access to Rivergate. We felt that some plan for secondary access should be formalized and sponsored by the Port. Any of the following might be compatible with the North Portland area, none of the following were denounced.
 - A. Water level route, Swan Island to Rivergate, with a combined railroad road overpass at Crawford under the St. Johns Bridge (Cathedral Park)

and with safe accesses to the Willamette River from this road.

B. New Suttle Road (Terminal 6 Road) across Slough and connecting with Columbia Blvd. (Buffered)

C. Railroad cut road from Swan Island to Columbia Blvd., N. Portland Road.

We would also like a feasibility study of a new Willamette River bridge, out of Rivergate, perhaps 2 or 3 lanes, perhaps toll.

2. Serious consideration to Columbia Slough plug at Union Pacific trestle, open to fresh water from the Columbia River.

3. Dredge sand from lakes that has encroached from fill activities at PRI, new Terminal 6 road and RR overpass. Consider diking areas to be filled in future to protect lakes and recreation areas.

4. Air quality and land use

Air quality should be prime concern. We feel the Port's marketing practices encourage polluting industries in the interior, i.e. capital intensive low employee density, with little to offer in positive incentives except lots of land. We suggest the following:

A. Bring in "clean" industry.

B. Encourage local firms to expand into Rivergate.

C. Don't give plus points to low employee firms.

D. No construction or site preparation until local permits have been received.

E. Adopt a policy of public concern, contrary to statements in Lycan report regarding polluting industry finds as an incentive when a public agency gives them tacit approval (site prep., etc.)

F. Port plans for Rivergate should be compatible with and in conjunction with CRAG and LCDC.

G. Prior to plan adoption, Port should prepare environmental as well as economic Impact Statement.

- H. Treat the North Portland Peninsula as a natural resource rather than an area for dumping industry unwanted in cleaner areas, or a site for maximum development, or maximum profit.
- I. Accelerate activities at Terminal 4 and 6, and marine oriented activities in area. (We do not consider PRI marine oriented)
- J. Consider Land Banking major portions of interior for possibilities of future clean industry needs in area. Possible mass transit or bridge could lead to higher employment density in future.

CITY OF PORTLAND AND MULTNOMAH COUNTY

Priorities and ideas for consideration of City Engineer, City and County Planning, Capital Improvements Budget, Traffic Engineer and Park Bureaus.

COLUMBIA BOULEVARD - CITY ENGINEER

Two alternatives to Columbia Blvd. improvement were looked at. Neither seemed probable, or possible, or likable. The consensus was for immediate rebuilding of Columbia Blvd., the total distance from Burr Avenue to Rivergate, Lombard. We feel strongly that in the area from Burr west to PP&L substation the road should be rebuilt to the north of present site, in city owned property adjoining Upland Industrial Park, and that a buffer, closing some streets to Columbia Blvd. in this area should be placed adjacent to the neighborhood on the south. We would like an area for bike and pedestrian path between buffer and private property. A fence on the north side across from George school would help pedestrian safety.

We understand this would cause closing some streets to Columbia Blvd., and we concur in the need for this. At points where neighborhood access is necessary left turn lanes should be considered, with perhaps a light at North Midway - the only street that goes clear across.

LAND FILL - CITY ENGINEER

We would like to see a plan to eliminate or close the St. Johns Landfill site within 10 years, and in any case not to go any farther than Phase II on the present plan. We should prefer a greater city effort in terms of recycling for reuse, separation before pickup of paper, glass, cans etc. We do not think the MSD plan for shredding for landfill deposit makes much sense. It is a terrific use of energy to do the same thing that is being done. The substations could better be used as recycling center with that unrecusable portion only to be dumped, burned or used for fertilizer (along with sewage sludge). There are sites available for construction debris.

We also feel the city should charge a premium for out of county garbage, in an effort to get other counties to fast decide and implement their own solid waste plans.

Any decision regarding the landfill should be very protective of the lakes, and should help, rather than hinder their future use.

LAND USE, CITY & COUNTY PLANNING BUREAUS

We heartily concur with Farm Forest (City) and F₂ Community Service (County) for zoning in and around the lakes and slough. We feel this is the only way to prevent that area from industrial encroachment, even and especially concerning the landfill. FF with a conditional use for landfill is a much more reasonable approach to that problem than M₁, which could then revert to some other heavy, polluting industrial use.

We do not concur with the Port's request for total M₁ zoning in Rivergate. Rather than giving flexibility, it would give license to bring in the heaviest kinds of industry throughout, and would not make it necessary for Port marketing to search out lighter industrial users. We would also like the City and County to get behind the idea of land-banking for future needs in the Rivergate interior.

We would request the City and County not give fill permits, or building permits until proper air quality permits have been issued, and that they enforce that policy.

We feel the City and County should look at assessment procedures regarding privately held FF land, past and present. Perhaps informing private owners of the possibility of an open space in perpetuity designation would enhance possibilities of this natural recreation area.

We request maximum area and depth of lakes, with zoned buffers along North of slough and between lakes and industry.

RECREATION AND USE OF LAKES & SLOUGH

CITY AND COUNTY PARK BUREAUS

The primary concensus at the Conference and every meeting we have held in the past about the lake areas, was and is for natural recreation. No Motorized rides, no speed boats, no motorcycles; passive recreation, with bicycle and hiking paths, rowboats, canoes, sailboats, perhaps allow at most a 5-horse-power motor on a boat on Smith lake to allow those people who cannot physically manage a person powered boat to fish.

We look for wildlife conservation, keeping the lakes a place where water fowl and migratory birds will come. We would like to see the lakes open to fresh water from the Columbia River to maintain water quality and lake levels. We would like to encourage public ownership of the lakes and surrounding areas.

Not many cities, or Urban areas are fortunate enough to have fishing lakes within 10 minutes of downtown. Portland once had several lakes, Ramsey, Giles and smaller ones have all been filled for industrial property. We consider Smith and Bybee Lakes as natural resources, and the last chance to save what was once in plentiful supply, family oriented outdoor recreation close to the entire metropolitan population.

We look for rest areas, picnic areas, paths and docks, but no organized game areas, such as ball fields.

COLUMBIA SLOUGH -- CORPS OF ENGINEERS

We feel all the criteria for flood control can be met by plugging the slough at the Union Pacific trestle. We do not feel it should be closed at the mouth, within 1500 ft. of the Willamette.

We would like to see the slough cleaned up, and kept open to fresh water from the Columbia, introduced at a 45° angle somewhere west of the golf course.

We would like limitations on motorized boats, no matter where it is closed. We believe it should be buffered on the north, and that buffering should be encouraged on the south, and we feel public access in several places is essential. It is a public waterway.

We also hope the Corp with whoever sponsors the project, will consider keeping an opening from Smith Lake to the Columbia River, for level maintenance and water quality, and that a policy of public access is adopted for the lakes also.

M.S.D. PLAN

We concur that the Moore Dry Kiln property is the best place for a collection center in North Portland, but do not agree that milling is the best handling of solid waste. A policy of source separation would enable that site to be used for a recycling depot, with trucks separately gathering paper, glass, metals and wet garbage, for reuse, rather than collectively for landfill.

We do not see the need for a new road north of the slough from North Portland Road to the landfill. It would not remove more than a very small percentage of trucks from Columbia Blvd. and rather than creating recreation access, would prohibit it for many years. It would also eliminate the greenway buffer area between the slough and the lakes.

We do not see the M.S.D. plan at all as conservation minded, but rather as doing in a very costly way, both in terms of money and energy, that which is already being done -- landfilling.

AIR, WATER AND NOISE POLLUTION CONTROL

DEPT. OF ENVIRONMENTAL QUALITY

We support the interim policy on air quality --EXCEPT -- we do not believe the policy on trade-offs is in the best interest of North Portland or the entire Portland and Willamette Valley area. The policy is based on potential cleanup of the airshed, including use of cleaner fuels, and to negate that potential by first allowing huge air polluting plants in, does not make sense. The refinery for instance, will put more pollutants into the air than can possibly be taken out in the airshed by use of the refinery's product.

We hope that the DEQ will adopt a firm policy, such as proposed without tradeoffs, so the Port and other industry and developers will know just what the constraints are and will know that they cannot hope for stretching of the rules.

We hope that air pollution permits are given on the basis of ability to comply with said permit, and that if any industry can't or won't comply it be either stiffly fined or shut down until it can or will.

We request that levels of pollution from present operations not be used as a guide for new plants, that each plant should be able to take the most efficient steps to eliminate or decrease air pollutants that is possible, not just practicable.

We feel the goal of the DEQ should be to improve the quality of the air shed for all time, not just so that new sources can foul it up to the same levels. The cleanup of the Willamette River was a cleanup for all time, and has not stopped industrial use of the river.

We hope every effort is being made to cooperate, and to get cooperation from Washington's Dept. of Environmental Quality, and industry north of the Columbia.

We hope the DEQ will not again use such a procedure in granting a permit as was used with the PGE Harborton Plant, that of setting permit levels that the industry said they could achieve, without any basis in fact that they could achieve it. We are also asking the City, County and Port not to allow site preparation or to give building permits to any industry that must apply for an air discharge permit until such permit is issued. This would negate the argument, as with Harborton, that "the plant is built, you only have to give us a permit".

We are also concerned with noise control in this area, and look for rapid enforcement of the DEQ adopted industrial noise regulations.

We believe no industry should be allowed to pollute, in any way, any of the water, Willamette River, Columbia River, Columbia Slough, Smith or Bybee Lakes.

We feel the DEQ should make arrangements for cleanup of the Columbia Slough, and enforce a policy of no pollution there.

OTHER GENERAL PRIORITIES

City Water Bureau:

Roll Run water for fire protection at Rivergate is a waste, that Willamette River water should be used for this purpose.

Port:

There should be some public access to the Columbia River through Rivergate.

County Parks:

There could be a roadside rest area on the northeast side of Smith Lake.

City Planning:

That North Portland should be re-zoned, more to residential, and with greater care.

City Parks:

Quit giving permits for Rivergate Rock to dig out the Forest Park hillside.

State Highway Commission:

Study possibility of new Willamette River bridge from Rivergate to St. Helens Road.

CRAG:

Back the federal funds requests for Columbia Blvd. rebuilding.

LCDC:

Consider North Portland Peninsula an area of concern.

Tri-Met:

Consider special transportation for Rivergate and Swan Island, perhaps rail or water based.

North Portland Residents:

1. Favor federal, state and local land use legislation.
2. Work with all agencies to accomplish the goals we have identified.
3. Speak up at public hearings.
4. Work together for budget items in support of these goals.
5. Work for improvements in community and zoning upgrading.

Thank you to all North Portlanders and agency people who helped so much in making this community plan a reality.

COLUMBIA BLVD.

Move North to railroad ?

Heavy traffic move to North with buffer ?

On railroad line

On present road, perhaps on railroad

perhaps North of Slough

North of Slough 2

South of Railroad track 5

Existing Columbia Blvd. 11
Rebuilding
moving 80 to 100 ft North
closing streets' access

1. Widen with buffer on south side majority
2. Fence for safety majority
3. Restrict pedestrian traffic majority
4. Lower speed rate opposed
5. Light to get across Columbia yes
6. Residential traffic buffer opposed
7. Path south of buffer yes
8. No left turns (restrict left turns
9. Left turn lanes (" " "

LANDFILL EXPANSION

1. Plan to eliminate landfill in not more than 10 years -- go no further than Phase II -- check lake levels
2. Recycle to the ultimate for reuse at present dumpsite
3. Any solution should help lakes
4. Charge more for out of county garbage

Second Access to Rivergate, Terminal 4 Areas

- 7 1. Water level route - Swan Island to Rivergate
(public access 50 ft for every 300 ft.)
- 7 Under bridge at Crawford - overpass over tracks and road thru park
2. New Terminal 6 road (off North Portland Road) across lower slough
(with high bridge) with public access
3. Circle route plus
- Majority 4. Cut road Swan Island to Columbia Blve.
(1 no)

Other

1. New bridge across Willamette

LAND USE

1. Farm and Forest - great. Conditional use on Ph I and II
Smith and Bybee - Mocks Bottom, Cooperage property
2. No more heavy industry
3. Accelerate Terminal 4 & 6 activities - marine oriented
4. Land bank interior
5. Cease giving permits for Rivergate rock
6. Favor federal, state and local land use legislation
7. LCDC should put Rivergate one of highest priorities
8. Upgrade and rezone North Portland
9. Port should not try to profit so much from Rivergate area
10. City, County should look at assessments on FF land, past and present

LAKE USE

1. Roadside camp

Greenway along Columbia (besides Kelley Point Park)

WATER RESEVOIR FOR FIRE PROTECTION AT RIVERGATE SHOULD BE RIVER WATER.

SLOUGH

1. Slough open to U.P. trestle (minority clear open)
2. Limited motorized boats
3. Slough cleaned up -- enforced by DEQ
4. Open to fresh water from Columbia - 45 degree angle - this side of golf course
5. Buffer where possible -- mandatory on North.
On south side, industry should be encourage to put buffer.

LAKES

1. Limit motorized boats - no more than 5 h/p
2. Wildlife conservatory
3. Reclamation of sand from Port operation -- dike
4. Public access to both for recreation
5. Fresh water in lakes and level content maintained
6. Passive - non motor recreation around lakes
7. Bicycle and hiking trails
8. Encourage public ownership
9. Maximum areas and depths of lakes
10. Buffers between lakes and industrial
11. Port dredge sand

AIR QUALITY

1. Bring in clean industry --- Port
2. Don't consider employment factor - Port
3. No trade offs -- DEQ
4. Don't compare industry present pollution with new industry plan - DEQ
5. Encourage local firms
6. Should keep improving air shed - not increase pollution
7. Cooperation with Washington
8. Treat area as natural resource rather than all kinds of a dump, or a site for maximum development or profit maximization.
9. Don't repeat Harborton
10. Enforce noise controls
11. Industry should not be allowed to add any pollution to waterways.
12. Port policy of public concern
13. Port be responsible to CRAG
14. No construction or site preparation before permits.
15. Port plan should have environmental impact.

Presentation to be Made October 25, 1974 to the Environmental Quality Commission by Roger A. Ulveling

Agenda Item - D. Interim Policy for Approving New or Expanded Air Emission Sources in the Portland Metropolitan Area--Proposed Adoption of Temporary Rule

I am Roger Ulveling, Planning Coordinator for Columbia Independent Refinery, Inc. (CIRI), a subsidiary of Pacific Resources, Inc. of Honolulu. As all of you are aware after last month's commission meeting, our permit applications were filed with the Department of Environmental Quality on April 2, 1974 and are under consideration by DEQ.

I would like to take this opportunity to commend the DEQ staff with whom we have been working closely for a policy which should benefit the community in terms of cleaner air without hurting the economy.

Columbia Independent Refinery is confident that it can meet the standards as proposed in this policy. The one point which we feel is still somewhat vague deals with interpretation of net emission in terms of the assurance of implementation. We feel in our case that such assurance rests with commission adoption of a cleaner fuels policy. The tradeoff, in fact, develops as a result of the implementation of such cleaner fuels policy made possible by the location of Columbia Refinery in the Portland Metro-

politan area.

In addition, I wish to point out that in the remarks preceding the proposed rule there is mention of a refinery as a possible source of naphtha feedstock for a Synthetic Natural Gas Plant proposed by the local natural gas distribution company. Current Federal Energy Administration regulations preclude the use of naphtha, a controlled product, for SNG feedstock. On July 31 of this year, the FEA issued a special rule as an appendix to Title 10 Section 211.29 of the Code of Federal Regulations (CFR) which rule precludes use of naphtha and other liq. Petroleum Prods. as SNG feedstock.

The adoption of this policy will allow the Department of Environmental Quality staff to proceed immediately with the processing of our permits.

Thank you very much. If you have questions, I would be pleased to answer them.

No. E

Presentation on Behalf of Brooks-Scanlon, Inc.
To The Environmental Quality Commission

Portland, Oregon, October 25, 1974

By: Michael P. Hollern, President, Brooks-Scanlon, Inc.
James E. Bussard, President, Century West Engineering Corp.

Mr. Hollern:

On Monday, September 9, 1974, several Brooks-Scanlon representatives met with Mr. Cannon and other Department of Environmental Quality staff members. We expressed our serious concerns about the River Move program, including the unknown downstream effects and the impact of the new Department of Environmental Quality noise standards. We also repeated our objections about the poor environmental trade-offs and the very bad economics for us of the River Move proposal. We asked for an additional year of study. We were encouraged at that meeting on September 9 to write a letter explaining our position and making a request for a one-year delay. ~~The Director seemed understanding and sympathetic to our position.~~ We wrote the letter on September 11, 1974. We next heard from the Department last Friday, October 18, when we were given a copy of the Director's memorandum to the Commission recommending denial of our request.

That letter and the Director's recommendation came as a ~~com-~~
~~plete~~ surprise to us. It is apparent we have a very serious problem. Because we were not expecting the negative recommendation of the Director, we have had less than a week to prepare for this meeting. As described to us by your counsel, the Department has not acted on our request for a waste discharge permit, but has referred the matter to the Commission for comment and guidance before

taking action. Our purpose today is to plead our case directly to the Commission and to urge you to accept our proposal of September 11, 1974, ~~rather than the negative recommendation of the Director.~~

We would like first to review and comment on the report you have received from the Director. As an overall observation, the tone of the report ^{POATRAYS} ~~makes~~ Brooks-Scanlon ^{AS} ~~seem to be~~ a foot-dragging, uncooperative company with little or no concern for the environment. ^{IT IS NOT IN KEEPING WITH HISTORICAL FACT} I deeply resent that tone. [^] I do not like to be put in the position ~~I am in today~~ of defending actions which ~~should~~ require no defense.

As a matter of corporate policy for many, many years, we have been truly concerned with the environmental impact of our actions and with improving the environment and the quality of life in the communities in which we operate. We are proud of our achievements in air quality improvement, in land use planning and in water quality improvement.

We value our reputation as a good corporate citizen. For that reason, we do not take lightly the challenge we are making today to the Director's recommendation. We recognize that it is supposedly bad public relations for a company to ^{OPPOSE} ~~fight against~~ the Department of Environmental Quality. In this case, regrettably, we believe we have no other choice.

The report from the Director is divided into three parts: Background, Evaluation, and Recommendations. The Background is incomplete. We suggest adding the following:

1. Brooks-Scanlon has been using the Deschutes River for log transportation since 1915. During that almost 60-year period, to the best of our knowledge, we have received no more than three complaints about bark and debris in the river. Bark removal equipment was first installed in 1960.
2. In spite of considerable testing above and below Brooks-Scanlon's mill, the Department of Environmental Quality has been unable to show that Brooks-Scanlon's operations have a harmful chemical or biological effect on water quality. Studies we have made and other private studies have produced the same answer.
3. As a result of actions taken by Brooks-Scanlon since 1968, substantially less bark and debris now escape downstream.

the Department's

The Evaluation section of ~~your~~ report consists of subjective observations and individual opinions; it contains no quantified objective evidence, ~~whatsoever~~. Furthermore, we take issue with the statement that "the Department has learned from experience that no debris control program is equivalent to dry log handling". We believe that satisfactory alternatives ~~may~~ exist.

The Director's evaluation also says, "The environmental trade-offs, relative economics, and potential downstream impacts enumerated in Brooks-Scanlon's September 11, 1974 letter should have been thoroughly evaluated by Brooks during the many time extensions." I'll grant that we waited too long to change our position on the River Move proposal and I take full responsibility, ~~for not resisting sooner~~. However, I submit there are some new elements and certainly some changed conditions which have a major bearing on our evaluation. The new factors which make us now oppose the river move include:

1. Concern about downstream effects of moving the river; we don't feel we know all the answers about the impact downstream and we ~~understand~~ ^{BELIEVE} the Department of Environmental Quality and the State of Oregon are not willing to indemnify us against any action which might be taken against us by downstream property owners. 35-010
2. The River Move proposal contemplated greatly increased dry log handling activity reasonably close to a residential area. We have not evaluated the impact of the new Department of Environmental Quality noise regulations on this proposed operation and we believe we must do so before proceeding.
3. Economics: In the forest products industry today, money is much scarcer than it has been in the recent past. Interest

have decreased
costs are higher, profits ~~way down~~ if they haven't turned to losses. Many small companies, and perhaps some large ones, are fighting for survival. Because of current lumber market conditions, we are not operating our Bend manufacturing plant all next week. ~~This means over~~ 500 employees will be idled for a week. In addition, we have reduced our wood products remanufacturing employment from 400 a year ago to 175 today.

It is not a pleasant situation, and it shouldn't be surprising that we resist more strongly than before spending money we don't have, more than a million and a quarter dollars, to do a project of doubtful environmental benefit, which will make us less competitive and cost us even more money every year in the future.

It seems to me that the statement in the Director's report, "The environmental trade-offs, relative economics, and potential downstream impacts enumerated in Brooks-Scanlon's September 11, 1974 letter should have been thoroughly evaluated by Brooks during the many time extensions" is like saying, "After a certain date we will accept no new evidence, no matter how persuasive it may be". This position on the part of the Department seems illogical and inconsistent with the generally fine reputation that the Department of Environmental Quality staff has earned.

The Director recommends that a time extension be denied, that Brooks-Scanlon be instructed to proceed immediately with the

approved plan for dry log handling.

Perhaps in a different time, when the economy of the lumber industry was in better health, we would have acquiesced ~~if the IN~~ ^{Commission supported} the Director's recommendation. We would have moved the ^{current route of} Deschutes River, avoided this conflict today, and swallowed our very real concerns about the environmental ^{TRADEOFFS} ~~benefits~~ of this project. Today we face a different situation. We cannot simply acquiesce and we ask the Commission to consider our proposal very carefully.

With me today is Mr. James E. Bussard, President of Century West Engineering Corporation, the engineering firm we have retained to assist us with this project. Mr. Bussard is an engineering graduate from Oregon State University and has been a consulting engineer since 1963. He will describe the present situation, and suggest a possible alternate solution we hope to refine and propose during the study period.

Mr. Bussard:

Background

Brooks Scanlon, Inc. by letter dated September 11, 1974, requested that the Department of Environmental Quality consider a one-year extension of their existing waste discharge permit , conditional on providing continued progress for removing log handling activities from the Deschutes River as defined by seven (7) points of their proposal.

The fifth point of the proposal was to retain an independent engineering firm to evaluate the present condition of the river, and to analyze the potential solutions. Century West Engineering Corporation was retained for that purpose. Century West Engineering Corporation is a consulting firm specializing in Environmental Engineering with emphasis on water quality control. Century West Engineering utilizes its own testing laboratory, Century Testing Laboratories, Inc. for testing and research purposes.

Century West Engineering had previously been retained by Brooks Scanlon, Inc. to help solve zoning, noise and dust control problems that evolved from other phases of operation.

In August of 1974 Brooks Scanlon was uncovering operational and secondary problems as they began to implement detail planning of their proposed plan to relocate the river. At that time Century West Engineering was asked to review the entire plan. *Mr. Ned Dempsey, our sanitary engineer, made a review of the pending project.*

~~Century West Engineering~~ Upon examination of the proposed plans, we advised against proceeding with construction based on the following findings:

1. The Department of Environmental Quality had requested that Brooks Scanlon, Inc. remove their log handling activities from the river.
2. Brooks Scanlon, without exhaustive analysis, proposed to relocate the river.
3. The Department of Environmental Quality approved the proposal, their role being to advise if a given proposal satisfies the performance standards and not to provide alternate solutions and recommendations.
4. Upon review of the proposed plan, operational problems became apparent and plant yard reorganization would be required resulting in additional revisions of special log handling procedures.
5. Potential downstream siltation caused by creating a new channel has initiated public unrest.
6. Additional dry-yard operations would add to the dust and noise conditions currently under attack by adjacent residential areas.
7. No consideration had been given to energy requirements.
8. Adequate provisions had not been made for solid wastes from wet deck operations.

Based on the consolidated facts, ~~Century West Engineering~~ we recommended that to proceed with the proposed plan, without complete evaluation, would result in a process of continual construction to satisfy operational adjustments on a trial and error basis, and would not necessarily be the most practical method possible.

After considering the unique characteristics of the Deschutes River, and the engineering evaluation that has transpired, it is apparent that other alternatives are available which may be more desirable from both an environmental aspect as well as the economic point of view.

There is no question in the mind of Century West Engineering that Brooks Scanlon, Inc., is genuinely interested in a timely solution to the problem. The time extension is not a delay, but an absolute approach to a practical control method.

A probable alternate solution, as an example, is to remove log storage and log handling from the river by the development of a small infeed reservoir designed to meet the peak hourly production requirements. The development of this method would require provisions for the following functions:

1. Construction of the small reservoir to be independent of the river.
2. Provide for complete screening of all water before discharging water back to the river.
3. Reorganize log handling activities to minimize log transportation.
4. Provide for minimum wet deck operation.
5. Provide for liquid waste disposal resulting from yard expansion requirements.
6. Minimize dust and noise problems.
7. Provide for solid waste removal of yard debris.
8. Major clean-up of the existing river bank and channel from accumulations of bark and debris.
9. Examine additional use of residue material for power plant fuel.

Alternate solutions other than a complete channel change would benefit wildlife by preserving existing trees and foliage as well

as existing aquatic conditions. The reduced hazard of silting in Mirror Pond is obvious.

DIRECTION OF THE ENGINEERING EVALUATION

The engineering required to satisfy the performance standards and guidelines would be directed toward the following scope of work:

Collection of relevant information, development of methodology and timely implementation to achieve compliance with best practicable and best available control technology as they are known today, allowing flexibility with respect to the complexity and practicability of control technologies that are cost effective and will result in favorable quality of water.

The evaluation of the alternate solution would be based on various uses of the Deschutes River Water such as irrigation, recreational, wildlife, fisheries, public drinking supplies and other relevant characteristics of water quality control, namely chemical, physical and biological.

The alternate solution must satisfy associated control requirements and environmental trade-offs. It must provide for a timely construction schedule. It must satisfy downstream impacts. It must have public acceptance.

Therefore, the engineering evaluation conducted over the extension period will cover the following:

1. Provide for implementation of a step-up of existing debris control equipment at maximum practical efficiency as per item one (1) of Brooks Scanlon's letter of September 11, 1974.

2. Provide for timely check-off points and exchange of data and solutions with the DEQ as per item six (6) of the September 11, 1974, letter.
3. Provide for timely construction of control provisions as per item seven (7) of the September 11, 1974, letter.
4. Continue testing of water quality for effectiveness of control methods.

The Engineer will provide methodology and factual conclusions that are commensurate with the performance standards and guidelines established for the Timber Products Processing Industry yet providing opportunity for future refinements to achieve appropriate environmental benefits.

We believe that the Commission will be satisfied and that Brooks-Scanlon and the residents of the Deschutes Basin will also be satisfied.

Mr. Hollern:

We honestly believe this proposal makes a great deal of sense for you and for us. Before we attempt to answer any questions you may have, let me state our legal position as I understand it:

1. Our waste discharge permit expired on September 30, 1974, but my letter of September 11, 1974 constituted application for renewal of that permit and therefore our old permit remains in force until the Department or the Commission acts on our application.
2. If the Commission denies our request, our old waste discharge permit remains in effect until we have exhausted all legal remedies. After that, we will have no waste discharge permit and we must therefore cease all operations of our Bend plant which require such a permit. Our Bend Division directly employs about 700 people. We wish to have the presentation we have made today considered a supplement to our application.

I assume legal counsel for the Commission or the Department of Environmental Quality will correct me if they do not agree with this interpretation of our legal position.

Thank you for listening to our presentation. We would be happy to try to answer any questions you may have.

7. Good like opportunity to review this alternate thoroughly.
3. ~~Two~~ months is sufficient time. If it checks out & your staff agrees - fully operational by 10-1-75

James - Why didn't we propose this before?

- AEO said "~~get out~~": by handling only alt."

We accepted that one shouldn't have.

New factors: we can't move since w/o further study.

OUTLINE: DEQ Presentation

1. On April 13, 1973, about 1½ years ago, the District committed itself to radically accelerating its expansion program to assist DEQ, S,C,M & F agency efforts to meet clean air goals. Our program, contained in Mr. Roberts' letter to Director O'Scannlain, focused on a goal of a 50% increase in ridership into and out of the Portland CBD by June 1, 1975. We proposed at that time a series of specific program items which collectively were designed to achieve the ridership goal. We have changed several of these programs, and will be changing others soon. We have learned that there are better, cheaper, more effective ways to help people get around than by some of the programs we proposed then.

2. Our progress: (CHART)

- a. Prior to the base period (1970-1971) there was an uninterrupted 20-year decline in ridership.
- b. In 1970-71, daily person-trips to and from downtown Portland stabilized at 49,290.
- c. In 1971-72, ridership increased to 49,519 - a .5% increase.
- d. In 1972-73, it increased by 6% to 52,253.
- e. In 1973-74, the increase was 23.3% to 60,777 (our estimate at the time the letter was written was 55,000).
- f. Our projection for 1974-75, is for an increase to 67,687, an increase of 12% and a total increase of 37.3% over the 4-year period.
- g. Our projection is based on our revenue forecast projection, so naturally it is conservative. The full impact of our fare programs is uncertain. I expect it to be a great deal more than 12%. We may make the full 50%.

- h. Further, we are making inroads in to the modal split - 1/73 - 6/73: 15.5/84.5
9/74: 18.4/81.6

*choice of mode
between
car, bus or train*

*De Lene Carr
study*

3. A word about calculations:

Our figures are derived from daily revenue figures and converted into a % DT ridership figure by applying the constant 83% derived from the DLC report. Thus, the projected average daily DT rider figure for this year is based on a system average (yearly) ridership of 81,550 (91,268 F. - 69,125 Aug.). We are doing a line-by-line count of DT as opposed to other riders, and by December will have a new figure. Preliminary counts show little variation, however.

4. A few other indicia of progress:

- a. Tri-Met revenue passenger increase

Jan - Aug 1974	-	15.7%
<u>Jan - Aug 1973</u>		
- b. % increase for bus system serving cities over 500,000 pop. (same period) - 8.58%
- c. % increase for all cities systems reported to ATA, (same period) - 6.4%
- d. The basic health of the system is illustrated by its ability to absorb last winter's energy crisis. We had ridership increases of up to 30% over the same month the year before, capacities of up to 150% and one day ran all but 3 pieces of equipment.

5. Our increase over the last 4 years has been rapid and in large part, successful.

Some other figs:

- a. Average weekday miles up 69% (51,444).
- b. Drivers up 46% (634-433).
- c. Buses up from 287 to 342 with 80 more due to arrive any day. (Most of original buses had to be replaced.) Average bus age has gone from 22 years to 5 years.
- d. Ridership, system-wide, up 29%.
- e. Ridership for the first 17 days of October is up 17% over ridership last October same period. This is w/o gas crisis, bad weather, expensive programs. *>26% Monday*
- f. Our ridership is cyclical, annually, but even this October it is averaging 82,855 compared to the 84,675 Feb. 1974 average (gas crisis).

Important thing about some many of these figs is that they are not the result of our new vehicles pro - a few thousand more vehicles, clear bus, drivers, roads

6. Even more important are our plans for the near future:

- a. 80 new buses.
 - (1) - 24: / 16 peak lines (hw 3-4 min.).
 - (2) - 20: new demands (+) fare program.
 - (3) - 13 / 5 new lines:
 - (a) Sunset
 - (b) OC Local
 - (c) Beaverton Local
 - (d) Gresham Expr.
 - (e) Canby
 - (4) - 10 for new lines.
- b. Shelters - 715
 - (1) First one - December
 - (2) Bid price - \$2200 (not \$3600) 2/3 fed., so cost to Tri-Met is \$700+.
 - (3) Place to wait out of rain.
 - (4) *This is better service to people*

But some people not going to P&D

- c. 3 new fare programs/Marketing - expect big increases.
 - (1) FF - 35¢ system-wide; (*longest trip:*)
 - (2) FZ - 15% commuter mode change; 5 million sales stimulation, *etc.* → 2500 car trips a day eliminated; cooperative evaluation proposed. *City / DEQ / C.C. Nov. 7*
 - (3) Pass - \$13; transferable; marketing *techniques*.

- d. Suppl. P&R
 - (1) 40 lots by first of year.
 - (2) Demand exists.

- e. Mall -
 - now: work on the f/e, prep K docs.*
 - bid July*
 - contr. Sept.*
 - compl. - Fall 1977*
 - on schedule*

7. Why is the program working so well; and why is it still short of the goal?

- (a) The basic reason is that the cheap, simple devices to get people on the bus work well; people can't afford the second car.
- (b) The key to getting people to ride the bus is to provide:
 - (1) Clean buses,
 - (2) Courteous, well-trained drivers,
 - (3) Good schedules: convenient / frequent / on time.
- (c) We have been doing this:
 - (1) Reduced headways, 5 - 7 min. rush hours; 10 min. days.
 - (2) Sat/Sun/nite improvements - examples
 - (3) Improved routes: new communities, more schools, hospitals, old people's homes, industrial areas.
- (d) *(w) daily study of routes*
Virtually all of the improvements listed in our letter have been completed. A few have not, and the most important of these is the STS.

9. The STS as seen by the Board at the time of our April 1973 letter, was a plan for 7 relatively expensive parking, transfer and express bus facilities located around the edge of the city. We talked of expenses totalling 25 million, of which about 5 would be local match.

We made a commitment to have them operating by June 1975. That commitment was wildly optimistic, and failed to take into account the fact that any stations and corridors constitute major transportation decisions by ODOT, County and City, and simply cannot move ahead of the wishes of the jurisdictions involved. Mt. Hood Freeway transfer or substitution decisions necessitate a region-wide decision. Tri-Met cannot impose expensive, relatively high level station site development or corridor improvements w/o the agreement of all jurisdictions involved.

Further, we are learning that most of what we want to accomplish with these stations (buses, corridors, express) can be accomplished for more cheaply using existing parking lots. After all, what do we need more parking lots for.

We have, about to be launched, a 15 week, \$500,000 Study involving several different consultant firms and about a dozen of our own staff. We are seriously considering stopping the Study, focusing our efforts largely on obtaining supplemental (existing) park-and-ride lots in each of the corridors, running express, high frequency service from those corridors, and learning as we go along. We would still plan for long-term, higher cost solutions in the corridors, but we would do it more slowly, in cooperation with CRAG, ODOT and other governmental units. We expect a very high pay-off soon with intensive short-run parking lot procurement.

In short, we will spend less money on consultants and planners, use already existing facilities, and the presently planned improvements of gov't. and private groups, and provide greater ridership increases and better service to move people over the short run.

10. Financial needs.

a. presently planned programs to clean air, carry more people will cost us approximately \$50 > present projected revenues + tax levels.

b. to move ahead w/ improved schedules, new routes, we need more money.

c. The proposed tax increases to be considered by the board at its next two meetings are designed to raise enough money to enable us to operate the system at a level needed to meet these clean air goals.

d. We will not have a deficit. If we do not get the money, we will not run the system at increased levels.

11.