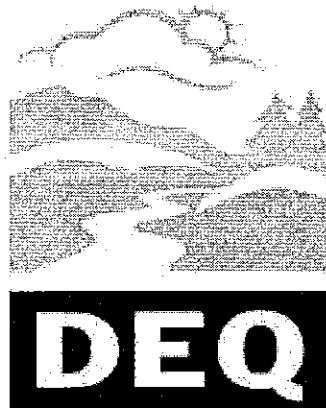


12/20/1974

**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

December 20, 1974

Sweptwing Restaurant, Redwood Room
1212 Southeast Price Road, Albany, Oregon

- 9:00
- A. Minutes of November 22, 1974 Commission Meeting
 - B. Program Activity Report for November 1974 -- Mr. Myles
 - C. Tax Credit Applications -- Mr. Myles
 - D. Oregon CUP Awards--Screening Committee Nominations -- Mr. Cannon
 - 1. Cascade Construction Company, Abernethy Plant, Portland, Oregon
 - 2. Kenneth H. Spies

AIR QUALITY

- E. Authorization for Public Hearings to Adopt Motor Vehicle Inspection Program Criteria -- Mr. Householder
- F. Motor Vehicle Inspection Program--Status Report -- Mr. Householder

ENFORCEMENT/SOUTHWEST REGION

- G. Gold Mining in Oregon--1974 Report -- Mr. Westfall

NORTHWEST REGION

- 10:00
- H. Public Hearing to Consider Permanent Adoption of Rules Pertaining to an Interim Policy for Approving New or Expanded Air Emission Sources in the Portland Metropolitan Area -- Mr. Kowalczyk
 - I. Browns Island (Marion County)--Solid Waste Status Report -- Mr. Fetrow

WATER QUALITY

- J. Teledyne-Wah Chang (Albany)--Status Report -- Mr. Ashbaker

LAND QUALITY

- 1:30
- K. Public Hearing on Proposed Rules Pertaining to Surety Bonds or Other Security Required by ORS 454.425 -- Mr. Spies

[over]

AIR QUALITY

2:30

- L. Public Hearing on Proposed Rules Pertaining to Veneer and Plywood Manufacturing -- Mr. Skirvin

- M. Variance Requests -- Mr. Bosserman
 - 1. Boise Cascade Lumber Co., Beaver Marsh
 - 2. Russell Industries, LaPine

- N. Authorization for Public Hearing Regarding Amendments to Indirect Sources Rules -- Mr. Vogt

[Tentative]

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 - 1. Boise Cascade Lumber Co., Beaver Marsh
 - 2. Russell Industries, LaPine
 - N. Authorization for Public Hearing Regarding Amendments to Indirect Sources Rules

ENVIRONMENTAL QUALITY COMMISSION

Attendance Record

Meeting of December 20, 1974 in Albany, Oregon

<u>Name</u>	<u>Organization</u>	<u>Address</u>
Robert Littlefield	Oregon Mining	Grants Pass Ore
Henry S. Cooper	Walnut Creek	Oregon
Robert F. Boweman	Robert Brown Associates	Walnut Creek, Calif.
Dealey Pearson	Independent Officer	11852 Police Rte McClain Ore
George H. Grimes	TERMINAL FLOUR MILLS CO.	PORTLAND, ORE
Cyrus Wymore	" " " "	" "
George Massie	Gold Prospectors Assoc	Eugene Ore
Jim P. [unclear]	Bobanac Mining	Eugene Ore
Al [unclear]	Gold Prospectors Assoc.	Corvallis, Oreg
JIM KUFFNER	REPRESENTING OREGON GEORGE PRESIDENT JASON BOE	CAPITOL BLDG, SALEM, OR
L. A. BRODERICK	CROWN ZINC MINING	WASH, ORE
V. R. Bradley		Salem, Oregon
J. T. [unclear]	Brooks-Scoble, Inc.	Bea, Oregon
Cliff Everett	Geologist	Trent, Oregon
Vivian Hogan	Prospector	Eugene Ore
Tom Emmett	DOGMI, Mineral Land Reclamation	Albany OR
B. E. Smith	Publishers Paper Co.	Portland Ore
PETER SCHWELL		Oregon City
MARK CHALWINSKI	GPAA	EUGENE, OR
IAN TIMM	Lian Co.	Albany
Jerry J. G.	Western Mining Council	Albany
Elen D. Carter	DEQ	PHD
GLEN HOSE	3165 DALLAS RD	SALEM

Peter

MINUTES OF THE SIXTY-THIRD MEETING

of the

OREGON ENVIRONMENTAL QUALITY COMMISSION

November 22, 1974

Public notice having been given to the news media, other interested persons and the Commission members as required by law, the sixty-third meeting of the Oregon Environmental Quality Commission was called to order by the Chairman at 9 a.m. on Friday, November 22, 1974, in Room 309 State Capitol, Salem, Oregon.

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

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

MINUTES OF THE OCTOBER 25, 1974 COMMISSION MEETING

Dr. Crothers asked that an addition be made to the October 25th minutes to include in Mr. Wayne Kuhn's testimony on the proposed interim policy for the Portland metropolitan area, Mr. Kuhn's statement that business would gladly absorb the cost of the low-sulfur residual fuel proposed for production by CIRI.

With that addition, it was MOVED by Mr. Somers, seconded by Dr. Crothers and carried to approve the minutes of the October 25, 1974 Commission meeting, held in Portland.

PROGRAM ACTIVITY REPORT FOR THE MONTH OF OCTOBER 1974

It was MOVED by Mr. Somers, seconded by Dr. Phinney and carried to give confirming approval to staff actions, as reported by Mr. Myles, regarding the 136 domestic sewage, 24 industrial waste, 29 air quality control, and ten solid waste management projects:

Water Quality Control - Water Quality Division (76)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 1-74	Springfield	Gateway Park, 3rd Addition	Prov. app.
10- 1-74	Green S.D.	Poteet sewer project	Prov. app.
10- 1-74	Eugene	Storey Blvd. sewer extension	Prov. app.
10- 1-74	NTCSA	C.O. #B-6, Sch. IV sewers	Approved
10- 2-74	Bly S.D.	C.O. #2 and 3 - STP project	Approved
10- 3-74	Sunriver	Mountain Village West No. II sewers	Prov. app.
10- 3-74	Grants Pass	C.O. #1 thru 10 - STP contract	Approved
10- 3-74	Milwaukie	C.O. #4 - Milwaukie int. project	Approved
10- 4-74	Veneta	Pioneer Park and Hunter Court sewers	Prov. app.
10- 4-74	Florence	20th Street sewer extension	Prov. app.
10- 4-74	Florence	Rhododendron Drive sewer	Prov. app.
10- 8-74	Scio	Pump Station relocation project	Prov. app.
10- 8-74	Odell S.D.	Lenz Road sewer system expansion	Prov. app.
10- 9-74	Bly S.D.	Mill Lunchroom sewer extension	Prov. app.
10- 9-74	Bend	Addenda Nos. 3 and 4 - grit works project	Approved
10-10-74	Sunriver	Sky Park Addition sewers	Prov. app.
10-11-74	Ashland	Revised Plans - Grandview Drive sewer	Prov. app.
10-11-74	Corvallis	Edgewood Park Estates, 2nd Addition sewers	Prov. app.
10-14-74	Portland	Gertz-Schmeer sewer system	Prov. app.
10-14-74	Tri-City S.D.	Phase 5 - sewer improvements	Prov. app.
10-15-74	Bly S.D.	C.O. #1 and 2, Schedule B	Approved
10-15-74	Arlington	C.O. #1 STP project	Approved
10-15-74	Astoria	Schedules A, B and C - 10 change orders	Approved
10-15-74	Eugene	Willagillespie Area sewers	Prov. app.
10-15-74	Seneca	C.O. #2 - sewage lagoon project	Approved
10-15-74	Black Butte Ranch	Pump Station No. 9	Prov. app.
10-15-74	Bend	Canyon Park, 1st Addn. sewers	Prov. app.
10-16-74	Metolius	Addenda No. 1 and 2 - sewerage project	Approved
10-17-74	Ontario	City Water Plant Sewer	Prov. app.
10-17-74	Tri-City	Addendum No. 1 - Phase V sewers	Prov. app.
10-18-74	Rogue River	Woodville Heights Subdivision sewers	Prov. app.
10-18-74	Lake County	Weyerhaeuser - Camp 9 - 0.8 acre non-overflow sewage lagoon	Prov. app.
10-18-74	N. Umpqua S.D.	Amacher Park sewers	Prov. app.
10-22-74	BCVSA	First Street and Orchard Home Drive sewers	Prov. app.

Water Quality Control - Water Quality Division (continued)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10-22-74	Gold Beach	11th Street sewer	Prov. app.
10-25-74	Central Point	Scenic Village Subdivision sewers	Prov. app.
10-25-74	Sutherlin	Orval Allen Property sewer extension	Prov. app.
10-28-74	Forest Grove	C.O. #2 STP project	Approved
10-28-74	Coos Bay	Sewer inspection and sealing - Phase 2	Prov. app.
10-28-74	Portland	C.O. #8 - STP project	Approved
10-28-74	BCVSA	White City - Cascade Village #16 sewers	Prov. app.
10-30-74	Warrenton	Hendrickson Mobile Home Park	Prov. app.
10-30-74	Astoria	C.O. #15 - Schedule A	Approved
10-30-74	Josephine County	Harbeck-Fruitdale; Brandy Lane and Fixen-Hansen sewers	Prov. app.
10-31-74	NTCSA	C.O. B-7 and B-8, Schedule IV sewerage project	Approved
10-31-74	Grants Pass	C.O. #11 - 14 - STP project	Approved

Water Quality Control - Northwest Region (60)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 3-74	West Linn	Portland Avenue L.I.D. sanitary sewers	Prov. app.
10- 3-74	Tualatin	Western Metro sewer extension (west of 65th Avenue)	Prov. app.
10- 3-74	Troutdale	Sanitary force main connection to a city manhole	Prov. app.
10- 3-74	Gresham	Casa-De-Lass sanitary sewers	Prov. app.
10- 4-74	Lake Oswego (Tryon)	Revised Forest Glen Subdivision sanitary sewers	Prov. app.
10- 8-74	Tualatin	Conrad veneer property sanitary sewers	Prov. app.
10 -9-74	Turner	A Sewerage Plan Report for Turner	Pending
10-14-74	Portland N.	Gertz-Schmeer sewerage system including lift stations, wastewater pump station and sanitary sewers	Prov. app.
10-14-74	CCSD #1 (Gladstone)	Monte Carlo Heights Subdivision sanitary sewer	Prov. app.
10-18-74	Salem (Willow and E. Salem Sewer and Drainage District 1)	Mackel Construction Company shopping center sanitary sewer at Silverton Road and Lancaster Drive	Prov. app.
10-18-74	Canby	N. Juniper Street and NE. 1st Ave. sanitary sewers	Prov. app.
10-22-74	Gresham	Gresham Clinic sanitary sewers	Prov. app.
10-22-74	Gresham	Camelot Plat 3 Subdivision sanitary sewers	Prov. app.
10-22-74	USA (Aloha)	Tanasbrook Development Neighborhood "C", sanitary sewer line C-1 revision, sanitary sewer line C-2	Prov. app.

Water Quality Control - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10-22-74	Independence	Independence Airpark final phase of 84 lots sanitary sewers	Prov. app.
10-23-74	West Linn	Hidden Springs Ranch No. 2 sanitary sewers	Prov. app.
10-24-74	St. Helens	Kaiser Gypsum Co., Inc., sanitary sewage disposal modifications	Prov. app.
10-25-74	USA (Durham)	Preliminary plans for Cedar Hills trunk sewer	Prov. app.
10-25-74	Twin Rocks S.D.	Stark Street sanitary sewer extension lots E-5 and E-5-1	Prov. app.
10-28-74	USA (Somerset West)	Somerset West Commercial Center sanitary sewer	Prov. app.
10-28-74	USA (Forest Grove)	Forest Grove STP C.O. #2	Prov. app.
10-29-74	Portland S.W.	S.W. Fairvale Court north of S.W. Pendleton Street sanitary sewer	Prov. app.
10-31-74	Tualatin	Revised Shawnee Plains sanitary sewers	Pending
10-31-74	Portland	S.E. Harnéy Street sanitary sewers	Pending
10-31-74	USA (Aloha)	Ray Sullivan sanitary sewer extension	Pending
10-31-74	USA (Beaverton)	Carolwood 1 sanitary sewers	Pending
10-31-74	USA (Aloha)	CO-JO No. 2 sanitary sewers	Pending
10-31-74	USA (Aloha)	Hyland Hills Center - Phase 1 construction sanitary sewers	Pending

Water Quality Control - Industrial Projects - Water Pollution Control Division (2)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 3-74	Ontario	<u>Ore-Ida Foods</u> wastewater control facilities	Prov. app.
10-21-74	Wasco	<u>T and H Farms</u> animal waste facilities	Prov. app.

Water Quality Control - Industrial Projects - Northwest Region (22)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 1-74	Yamhill County	<u>Austin Warner</u> animal waste disposal system holding tank	Approved
10- 1-74	Tillamook County	<u>Joe Davis</u> animal waste disposal system holding tank	Approved
10- 2-74	Tillamook County	<u>Gary Manning</u> animal waste disposal system holding tank	Approved
10- 3-74	Tillamook County	<u>William Gates</u> animal waste disposal system holding tank	Approved

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

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 3-74	Yamhill County	<u>Cascade Steel</u> wastewater control facilities modification	Approved
10- 3-74	Columbia County	<u>Ernest Obermeyer</u> animal waste disposal system holding tank	Approved
10- 4-74	Columbia County	<u>Francis Wright</u> animal waste disposal system holding tank	Approved
10- 4-74	Clackamas County	<u>Ted Wilson</u> animal waste disposal system holding tank	Approved
10- 4-74	Columbia County	<u>Ross Winans</u> animal waste disposal system holding tank	Approved
10- 4-74	Columbia County	<u>Melvin Kelley</u> animal waste disposal system holding tank	Approved
10- 7-74	Portland	<u>Pennwalt Corp.</u> asbestos settling ponds	Pending
10- 7-74	Tillamook County	<u>James Trent</u> animal waste disposal system holding tank	Approved
10- 7-74	Tillamook County	<u>Hugh Skarda</u> animal waste disposal system holding tank	Approved
10- 8-74	Washington County	<u>Gary Duyck</u> animal waste disposal system holding tank	Approved
10- 8-74	Washington County	<u>Robert Vandehey</u> animal waste disposal system holding tank	Approved
10- 8-74	Washington County	<u>Louis Hillecke</u> animal waste disposal system holding tank	Approved
10-17-74	Portland	<u>Bird and Son</u> study for recirculating cooling water	Approved
10-17-74	Portland	<u>Chipman Chemical</u> <u>Rhodia Defuser</u>	Approved
10-21-74	Columbia County	<u>Ronald W. Bone</u> animal waste disposal system holding tank	Approved
10-23-74	Willamina	<u>U.S. Plywood</u> water pollution abatement modification	Approved
10-29-74	Tillamook County	<u>Daryl Johnston</u> animal waste disposal system holding tank	Approved

Air Quality Control - Air Quality Control Division (8)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 4-74	Portland	<u>Tri-Met Employee Parking</u> 100-space parking facility	Req. add. info.
10- 9-74	Beaverton	<u>Hyland Hills Shopping Center</u> 471-space parking facility	Req. add. info.
10-10-74	Portland	<u>Presbyterian Church of Laurelhurst</u> 68-space parking facility	Cond. app.
10-10-74	Beaverton	<u>Payless Distribution Center</u> 156-space parking facility	Cond. app.
10-18-74	Springfield	<u>Carrow's Restaurant</u> 67-space parking facility	Cond. app.
10-21-74	Beaverton	<u>Tektronix, Inc.</u> modification to existing parking facilities	Cond. app.
10-22-74	Portland	<u>Burger King Restaurant</u> 57-space parking facility	Req. add. info.
10-25-74	Multnomah County	<u>Sommerwood</u> 588-space residential parking facility	Req. add. info.

Air Quality Control - Northwest Region (19)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 1-74	Yamhill County	<u>Publishers Paper, Newberg</u> new digester	Drafting letter of approval
10- 4-74	Multnomah County	<u>Rhodia-Chipman Division</u> dichlorophenol distillation expansion	Processing
10- 7-74	Multnomah County	<u>Medford Corporation</u> greenwood chip storage and distribution center	Processing
10- 8-74	Multnomah County	<u>Rich Manufacturing</u> baghouse	Approved
10- 8-74	Multnomah County	<u>Chamberlain's Pet Crematorium</u> cremation incinerator	Proposed permit being drafted
10-10-74	Washington County	<u>Western Foundry</u> control of furnace, sand handling, cleaning room	Approved
10-10-74	Multnomah County	<u>Ross Island Sand and Gravel</u> concrete batch plant	Approved
10-11-74	Clackamas County	<u>Oregon Portland Cement</u> paving of vehicular traffic areas	Drafting approval letters
10-11-74	Columbia County	<u>Charter Energy Company</u> new oil refinery	Evaluating trade- offs and effect on ambient air quality
10-15-74	Multnomah County	<u>ESCO - Plant #3</u> new 4-ton induction furnace	Reviewing emission cal- culations
10-16-74	Multnomah County	<u>Oregon Steel Mills, Front Street</u> baghouse with canopy	Awaiting info on hooding design and capture efficiency

Air Quality Control - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10-18-74	Multnomah County	<u>Portland Steel Mills</u> new steel mills	Drafting proposed permit
10-24-74	Multnomah County	<u>J. Arlie Bryant, Inc.</u> portable rock crusher	Proposed permit issued
10-28-74	Yamhill County	<u>Publishers Paper, Newberg</u> new hog fuel boiler	Approved
10-28-74	Multnomah County	<u>Columbia Independent Refinery, Inc.</u> oil refinery	Evaluating trade-off benefits
10-29-74	Multnomah County	<u>Layton Funeral Home</u> cremation incinerator	Evaluating source test results
10-29-74	Multnomah County	<u>Oregon Steel Mills, Rivergate</u> pellet metallizing	Reviewing emissions calculations
10-29-74	Multnomah County	<u>Teeples & Thatcher, Inc.</u> sawdust cyclones	Reviewing request to temporarily use existing cyclone while installing bag filter to exhaust inside building
10-31-74	Multnomah County	<u>Ross Island Sand and Gravel</u> concrete batch plant	Approved

Land Quality - Solid Waste Management Division (7)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 2-74	Marion County	<u>Woodburn Landfill</u> existing site, closure plan	Approved
10- 4-74	Benton County	<u>Coffin Butte Landfill</u> existing domestic site, operational plans	Prov. app.
10-14-74	Douglas County	<u>Camas Valley Transfer Station</u> new transfer station, construction and operational plans	Approved
10-18-74	Coos County	<u>Hempstead Sludge Lagoon</u> existing domestic site, construction plan	Approved
10-22-74	Curry County	<u>Agness Transfer Station</u> new transfer station, construction plans	Approved
10-23-74	Coos County	<u>Joe Ney Disposal Site</u> existing domestic site, operational plan	Prov. app.
10-24-74	Linn County	<u>Albany Landfill</u> existing domestic site, closure plan	Approved

Land Quality - Northwest Region (3)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10- 2-74	Marion County	<u>Woodburn Sanitary Landfill</u> new garbage landfill, operational plan	Approved

Land Quality - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
10-16-74	Multnomah County	<u>Resource Recovery ByProducts</u> new transfer station, operational plan	Approved
10-28-74	Clatsop County	<u>Crown Zellerbach - Lewis and</u> <u>Clark Log Sorting Yard</u> expansion of existing wood waste landfill, operational plan	Approved

TAX CREDIT APPLICATIONS

Mr. Myles presented the Department's review of the 11 tax credit applications submitted for this meeting and the tax credit application of Weyerhaeuser Company, Springfield (T-580) deferred from the October 25th meeting. With respect to the Weyerhaeuser application, Mr. Somers informed the Commission of the telephone call he received on November 15th from Mr. Jerry Harper, Environmental Manager of Weyerhaeuser's Oregon activities (Springfield). Mr. Harper subsequently sent Mr. Somers a package of materials pertaining to the tax credit application which Mr. Somers made a part of the permanent record of the meeting. In addition, Mr. Somers asked for confirmation that the furnace was constructed at the direction of the Department. Mr. Patterson of the Air Quality Division stated that Weyerhaeuser did install the furnace to meet departmental requirements.

Discussion followed on whether or not there was a net gain to the company from the new furnace since, as Mr. Somers pointed out, the Legislature directed the Commission to deduct from tax credits the benefits received by the applicants. Both Mr. Patterson and Mr. Allan Coleman, Technical Director at the Weyerhaeuser Springfield kraft mill, stressed that all kraft mills burn their liquor for fuel, as an economic necessity, in order to recover the chemicals. The furnace for which the tax credit application was made performs the same function as the furnaces it replaced but in addition better controls the odorous emissions resulting from burning kraft liquor. Mr. Harper pointed out that when the furnace was installed in 1969, it was the first of its kind in the area.

Dr. Crothers asked Mr. Harper if the furnace would have been purchased if there had not been a problem of pollution. Both Weyerhaeuser representatives replied negatively.

Mr. Somers maintained that the Commission had "to draw a line on furnaces that go into plants" and directed the staff to develop a formula for evaluating them in terms of the portion that goes into heating and the portion that goes into pollution control.

It was MOVED by Dr. Crothers, seconded by Mr. Somers and carried to approve 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-580	Weyerhaeuser Company, Paperboard Manufacturing	\$8,511.981.00
T-571	Kaiser Gypsum Company, Inc.	71,324.00
T-572	Kaiser Gypsum Company, Inc.	67,283.00
T-582	Timber Products	102,924.22
T-586	Georgia-Pacific Corporation	50,081.00
T-589	Georgia-Pacific Corporation, Toledo Division	40,605.00
T-597	Hanna Nickel Smelting Company	183,519.00
T-598	Hanna Nickel Smelting Company	2,513.639.00
T-599	Hanna Nickel Smelting Company	18,620.00
T-600	Hanna Nickel Smelting Company	21,414.00
T-601	Hanna Nickel Smelting Company	72,497.00

It was also the Director's recommendation to deny issuance of a tax credit certificate to Portland Mobile Home Court (T-547 with a claimed cost of \$25,182.00) and the Commission concurred with the recommendation.

PRESENTATION OF RENEWAL CUP PLAQUES

Renewal plaques for Oregon CUP recipients, American Can Company and Publishers Paper Company, for the calendar year 1975, were presented by Chairman McPhillips to Mr. George Wagner and Mr. Jim James of American Can, and Mr. Pete Schnell of Publishers.

Mr. McPhillips said that Pacific Northwest Bell was underwriting the cost of the Oregon CUP awards for 1974.

STATUS REPORT ON PROPOSED REFINERIES AND PROPOSED COMPANION FUELS USE POLICY

Mr. Kowalczyk said that three environmental impact statements had been received two weeks ago from Cascade Energy (Rainier) for a 30,000 barrel/day refinery, Charter Oil (Columbia County) for a 52,000 barrel/day refinery,

and Columbia Independent Refinery, Inc. (Portland) for a 100,000 barrel/day refinery. The status report to the Commission was a preliminary analysis of these documents.

Mr. Kowalczyk presented the staff report which was distributed to the Commission at the meeting. Mr. Kowalczyk explained that Table II was intended to illustrate potential demands for fuel oil to supply the operations listed and that these potential demands would probably exceed typical yearly projections for the future because of increased interruptible natural gas service.

Following the reading of the staff report, Dr. Phinney asked whether CIRI's possible difficulty in meeting ambient air criteria was projected with or without the benefit of tradeoffs. Mr. Kowalczyk replied that it was projected with tradeoffs included, but that at the 100,000 barrel/day capacity, the company possibly could impact on the downtown Portland area in terms of the 25 percent incremental increase in the margin of safety between the ambient standards and the ambient projections.

Mr. McPhillips called on witnesses who indicated they wished to comment on the staff report.

Mr. Roger Ulveling of Columbia Independent Refinery, said he had no major objections to the staff report and did not wish to comment at this time.

Dr. Wayne Kuhn, representing the Portland Chamber of Commerce, said he was pleased with the staff report and the proposed time table because "we are certainly interested in going forward with sound developments." He had two observations: He suggested that the ability of any of the three companies to financially and technically carry out their proposals should be included in the report; and he said he was acutely aware that there is a great deal of work underway throughout the petroleum industry on the question of sulfur reduction and that he is confident that by the second phase of expansion there will be sound technical methods for further reducing sulfur in fuels. He said the Chamber of Commerce of Portland is on record for supporting methods of reducing pollution and "very much in favor" of the work that is being done.

Mr. Herbert Bowerman of Robert Brown Associates (Carson, California), representing Charter Oil Company, said his company has been working on the

environmental assessment for Charter. With respect to the financial and technical viability of the company, referred to by Mr. Kuhn, Mr. Bowerman said that Charter is a very large company and has the expertise to make the proposed project work. He said the proposed refinery would be a new source of pollutants, but that the diesel fuel produced at the refinery and used for its operation would produce the lowest possible emissions. This diesel fuel would be made from North Slope crude oil expected to be available within three years which would coincide with the projected completion of the refinery at St. Helens.

Mr. McPhillips said that a letter to the Commission had been received from Mr. Lloyd Anderson, Executive Director of the Port of Portland, urging the Commission to expedite the issuance of a draft permit for Columbia Independent Refinery. (A copy of Mr. Anderson's letter has been made a part of the permanent record of the meeting.)

There were no further witnesses and no action was required by the Commission.

PROPOSED AMBIENT AIR STANDARD FOR LEAD

It was MOVED by Mr. Somers and seconded by Mrs. Hallock to dispense with the reading of the staff report and proceed directly to the Director's Recommendation. Mr. Cannon suggested that the Conclusions as well as the Director's Recommendation be read. Mr. Somers with the concurrence of Mrs. Hallock amended his motion accordingly. The motion was then voted upon and carried.

Mr. Johnson read the Conclusions and presented the Director's Recommendation, given below:

It is the recommendation of the Director that the following standard be adopted for concentrations of lead in the ambient air:

Standard: The lead concentration measured at any sampling station, using sampling and analytical methods on file with the Department, shall not exceed 5.0 ug/m^3 as an arithmetic average concentration of all samples collected during any one calendar month period. This standard if adopted shall become section 31-055 of the Oregon Administrative Rules. (Under-scored material added at the meeting.)

For purposes of discussion, Mr. Somers MOVED that the Director's recommendation be adopted; seconded by Dr. Phinney.

Mr. Somers commented on a letter from Mr. Charles J. Merten, Esq., on behalf of several petitioners, dated November 19, 1974, which was sent to each member of the Commission and made a part of the permanent record of the meeting, in which Mr. Merten proposed a standard of 2.0 ug/m^3 . He expressed dissatisfaction with the Department's proposed standard on the basis that it was not stringent enough. Mr. Somers asked Dr. Crothers about the human body's capacity to rid itself of lead accumulation. Dr. Crothers said that the body gets rid of lead very slowly but that it can be removed. He added that by far the most common source of lead poisoning outside of industry was lead-based paint, which is no longer used. He noted that the possibility of lead poisoning was further reduced by the requirement of lead-free gasoline for new model cars. He added that there are no recorded cases of lead poisoning in Oregon, and that the existing ambient lead levels throughout the state were well below 5.0 ug/m^3 except near freeways.

Commissioners discussed the possibility of a lower standard. Mrs. Hallock asked if 3.0 ug/m^3 had ever been exceeded. Mr. Johnson replied that only one monthly average overall on all the sampling done in the state had exceeded 3.0 ug/m^3 , and that was at a downtown Portland sampling station. He added that 5.0 ug/m^3 was the lowest level the Department could reasonably defend as contributing to a health hazard.

Mr. Somers asked whether the Commission would unduly restrict economic growth in the state if a standard of 3.0 ug/m^3 were adopted. Mr. Johnson replied that in the case of industries, restrictions would come in the permit conditions. Dr. Phinney observed then that restrictions in highway construction seemed necessary.

Dr. Crothers MOVED that the standard be amended to 4.0 ug/m^3 ; seconded by Mr. Somers.

Mrs. Hallock MOVED that the standard be amended to 3.0 ug/m^3 ; seconded by Dr. Phinney.

Voting on the latter amendment first, Mrs. Hallock and Dr. Phinney voted in favor, Dr. Crothers and Mr. Somers against. The Chairman broke the tie by voting in favor of the amendment.

The main motion was then voted upon and carried.

OSPIRG/NEDC PETITION ON SIGNIFICANT DETERIORATION OF AIR QUALITY

Mr. Somers MOVED to dispense with the reading of the staff report and to have Mr. Patterson comment on the petition submitted by the Oregon Student Public Interest Research Group (OSPIRG) and the Northwest Environmental Defense Center (NEDC) and respond to questions. There was no objection and the Chairman said the request would be granted as a matter of procedure. Mr. Patterson read the "Comments" portion of the staff report and discussion followed.

Mr. Patterson also noted that the Department had received a copy of a news release dated November 15, 1974, issued by the Sierra Club Legal Defense Fund, Inc., to the effect that the Sierra Club would resume its lawsuit against the EPA unless that agency enforces the Clean Air Act.

The Chairman called for public testimony, stating that the time limit for discussion of this agenda item would be held to an hour.

John S. Ullman, Ph.D., OSPIRG Staff Scientist, submitted a prepared statement which he read into the record (a copy has been attached to the permanent record of the meeting). In summary, Dr. Ullman's testimony was directed to OSPIRG's assertion "that Oregon can and should move immediately to prevent further deterioration of the state's clean air," and offered the following points in support of this view: the importance of protecting Oregon's scenic areas in order to prevent pollution levels approaching the federal secondary standard; the necessity for Oregon to adopt standards because "the EPA will soon adopt extremely weak regulations" which will be challenged in court by the Sierra Club; the insufficiency of present state regulations to protect clean air; the attraction of clean industry and the stimulation for developing clean energy sources that the maintenance of clean air should provide. Dr. Ullman then summarized the major features of the rules proposed by OSPIRG and responded to questions from the Commission members. He said the proposed rules were drafted by himself and

Neil Robblee of OSPIRG and were based on DEQ's statement to the EPA made in San Francisco in October 1973, and further that no other state has adopted standards. He said that the proposed rules represent a basic plan, that the specific limitations in the rules would have to be worked out, but that OSPIRG liked their basic idea of increment limitations and emissions ceilings as stated in their proposed rules.

Mr. Somers said that many people are concerned with this problem which affects the entire state and thought all interested parties should sit down, work out their differences, and submit proposed rules that would be subject to a public hearing. Dr. Ullman agreed that such a discussion would be worthwhile.

Mr. Thomas C. Donaca, representing the Air Quality Committee of the Associated Oregon Industries, said he disagreed with the petitioner's contention that Oregon has not lived up to its responsibilities as outlined in ORS 468.305, and that the proposed rules are aimed at further controlling the already controlled sources which have shown a decrease in particulate and sulfur dioxide emission levels. Mr. Donaca said that other area sources have continued to grow and the rules proposed would not alleviate the air quality problems they create.

Mr. Somers noted that the Commission does not have the authority to control all the factors, referred to by Mr. Donaca, which contribute to significant deterioration of the air.

Testimony had been submitted to the Commission prior to the meeting by Ms. Norma Jean Germond representing The League of Women Voters of Oregon, and by Mrs. Mary Ann Donnell, President of the Oregon Environmental Council (copies of which have been made a part of the permanent record). They had previously indicated they wished to testify at the meeting but instead asked that they be permitted to relinquish their time to Mr. Thomas Guilbert.

Mr. Guilbert stated that he concurred with Mr. Underwood's letter and with Mr. Donaca's statement that the Department had complied with ORS 468.305 but that compliance "doesn't exhaust the Commission's responsibility." He said that responsibility comes under federal law as interpreted by three levels of the federal courts in *Sierra Club vs. Ruckelshaus*.

Mr. Guilbert said that Section 110 of the Federal Clean Air Act, which requires the states to formulate implementation plans, has been interpreted to include the purposes clause of the Clean Air Act as set forth in *Sierra Club vs. Ruckelshaus*. Although the EPA approved Oregon's Clean Air Act Implementation Plan in May of 1972, it disapproved it in November 1972; that disapproval is still law. Oregon along with all other states is in violation of the federal law. Mr. Guilbert said that if the Commission wished to be in compliance with federal law, it should adopt rules on significant deterioration.

Dr. Crothers then MOVED that the petition be denied and further, that the Department be instructed to initiate the rulemaking process with due haste. The motion was seconded by Dr. Phinney and carried.

Other testimony on this matter, received by mail and made a part of the permanent record, included statements from Mr. Bruce Holser, Oregon State University; Mr. and Mrs. James Sloss, Portland; Pacific Power and Light Company, Portland; Northwest Pulp and Paper Association, Seattle; Portland Chamber of Commerce; Mr. Dan Wilson, Albany; and Dr. Robert Gay, Portland.

CHEM-NUCLEAR LICENSE APPLICATION

Mr. Wicks presented the staff memorandum report with the following recommendation of the Director:

The Director recommends that the Commission make its decision at the November 22, 1974 meeting on the issuance of the proposed license for Chem-Nuclear, Inc. It is further recommended that the Commission authorize the Director to formally notify Chem-Nuclear of the Commission's decision and of the applicant's right for a hearing if the license is refused.

Mr. John Mosser, a Portland attorney representing Chem-Nuclear, Inc., requested to be heard. He spoke to the question of whether there should be nuclear wastes, noting that this decision was first approached by the Commission two years ago. At that time the Commission said it would prefer not to have nuclear wastes but would consider them if they were economically necessary to make a viable site. He said that on November 26, 1973, the Commission adopted the Director's recommendation that nuclear wastes be permitted since they were necessary to make an economically viable site. Mr. Mosser said that if these earlier decisions were reversed, considerable time would have been expended for no purpose, since the Commission would be no closer to finding a site for environmentally hazardous wastes than it was several years ago when the law was passed.

Mr. Mosser conceded that nuclear wastes are not necessary in the sense that there is another site close by. But he added that the State of Oregon requires a different method of handling chemicals than any other state, and that in order to carry some of the overhead of the excessive costs of handling chemicals, Chem-Nuclear has said that a minimum of nuclear wastes was necessary. He said no environmental reason for refusing the inclusion of nuclear wastes has been shown. The company has proposed storing low-level radioactive wastes which deteriorate over time. The chemical life of hazardous chemical wastes, on the other hand, is infinite. Over time, the chemical wastes are a greater problem than the nuclear wastes.

Mr. Mosser concluded by stating that Chem-Nuclear "has tried to work with this Commission and the DEQ staff to meet what we understood was Oregon's desire for the highest type of operation for both nuclear and chemical wastes," and that the only way to operate the site to Oregon's standards would be to have some nuclear wastes permitted.

Mr. Jonathan Newman, a Portland attorney representing Nuclear Engineering, Inc., said he was available for questions, that his client's position had been clearly stated, and that there was no need for the site proposed by Chem-Nuclear.

Mrs. Hallock noted that the November 26th meeting referred to by Mr. Mosser, no commitment was agreed to by the Commission to permit radioactive wastes at the Chem-Nuclear site. Mr. Mosser concurred, stating that the Commission had not adopted a policy on that matter.

Dr. Phinney MOVED that the permit be amended to exclude the storage of radioactive wastes; seconded by Mrs. Hallock and carried. Dr. Crothers voted against the motion, saying that he was essentially voting against the exclusion of radioactive wastes.

Mr. McPhillips had to leave the meeting and Vice Chairman Crothers presided for the remainder of the afternoon.

Mr. Cannon said the staff would work with the applicant and submit a proposal to the Commission as to the best means of handling "this very real problem." He said a site must be acquired and the Department would ask the Legislature for the necessary funds to acquire a site and finance its operation.

Mr. Mosser said his client could not operate a chemicals only site without subsidy.

Mr. Somers MOVED that the staff look into another site and seek assistance from the Legislature if it was needed.

Mr. Mosser said his company would be interested either in operating its site on a subsidized basis for chemicals, in selling it to another operator, or in selling it to the state if the state wanted to operate it. He said Chem-Nuclear would be glad to cooperate because "it's been our desire to get a site for the state and any other site is going to take two years of geologic and hydrologic studies before you can use it."

The Commission agreed to leave out the word "another" and Mr. Somers amended his motion to state that the staff be instructed to look into a site and seek assistance from the Legislature if it was needed. There was no objection, and it was so ordered by unanimous consent.

PROPOSED RULES FOR INDIRECT SOURCES

Mr. Somers MOVED to accept the recommendation of the Director that the Environmental Quality Commission repeal OAR, Chapter 340, sections 20-050 through 20-070 and adopt in lieu thereof Rules for Indirect Sources and Maintenance of Air Quality Standards, sections 20-100 through 20-135, dated November 12, 1974. The motion was seconded by Mrs. Hallock and discussion followed.

Dr. Crothers commented that the staff report indicated that 40 percent of the permit applications received by the Department were for small parking lots of less than 50 spaces but that those applications accounted for only 7 1/2 percent of all the parking spaces applied for in the Portland area. He objected to the 50-space minimum requirement for a permit and to the inclusion of residential and apartment house parking lots.

Mr. Vogt explained that permits are required for parking lots of 50 or more spaces. Although parking facilities of this size are not large enough for individual air quality evaluations for the purpose of determining their effect on the Implementation Plan and the effect on the ambient air quality,

they may, in the aggregate, have an effect on air quality. He added that the conditions required for parking facilities of this size encouraged utilization of mass transit and that departmental review tended to control the proliferation of parking in given areas.

The Vice Chairman called for public testimony on the matter.

Mr. Fred VanNatta, representing the Oregon State Home Builders Association, noted for the record that he had worked with the Mobile Home Parks Association as well. He opposed the proposed rules on the basis of their "substantial impact" on the cost of the residential housing they would affect. Copies of his testimony were distributed to the members and one has been made a part of the permanent record. His testimony contained several questions, the answers to which he had previously discussed with the staff, for the purpose of clarifying the intent of the rules.

Mr. VanNatta voiced several objections to the definition of "associated parking." He said the definition could be construed to include on-street parking and parking that is connected by a public way as well as exclusions presently provided for in the rules. He suggested the addition of the language "off-street area or space" which was language recently added to the definition of "parking space."

Mr. VanNatta also objected to the 50-space cut-off standard in or within five miles of metropolitan areas and with conditions proposed by the Department for inclusion in the permits. He said that the EPA did not intend that its proposed Indirect Source rules would apply to single family tracts, and that the EPA has proposed a 1,000 space cut-off, where the state has proposed 50.

In reply to Mr. Somers' question concerning the number of 1,000-space parking lots in Oregon, Mr. VanNatta replied that the staff report indicated that some 50 percent of the spaces staff has reviewed in the last two years are in parking lots of 1,000 or more. Mr. VanNatta also questioned whether parking areas in multi-family residential dwellings contributed significantly to the deterioration of the ambient air in the area.

Mr. Cannon stated that the entire Portland downtown plan was based upon the premise that cars do affect the ambient air quality.

Mr. VanNatta said that the limitation of parking in the downtown Portland area was one thing, but that he was opposed to such limitations within five miles of a metropolitan area, particularly at places of residence.

Mr. Cannon stated that the Department has been working to limit pollution in a known area and must be able to limit it in the proposed surrounding areas as well.

Mr. Bruce Anderson, an attorney from Eugene, representing the Oregon Members of International Council of Shopping Centers (I.C.S.C.), distributed copies of a letter he prepared and which he summarized (a copy of which has been made a part of the permanent record). He said there are three major issues of concern: (1) consistent opposition by a wide range of public and private organizations to a number of requirements in the regulations, especially the 50-space minimum, and the effect they would have on commercial facilities; (2) the expected delay in implementation of the federal Indirect Source regulations from January 1, 1975 to mid-1975, because of an awareness that the proposed regulations would have "a minimal effect on air quality even if they work optimally [sic]"; (3) the analysis made by the National Academy of Sciences and the National Academy of Engineering, submitted to the Public Works Committee of the United States Senate "on the question of both the necessity and the effectiveness of other transportation controls, in particular indirect source controls, in place of, or in addition to, direct controls on the automobile."

Mr. Anderson objected to the minimum size of a facility for which a parking permit is required, noting that the DEQ proposed limits of 50 and 500, where applicable, and the EPA has proposed 1,000 and 2,000. He suggested 500 and 1,000. He asked the Commission not to apply the same figures to the rest of the state that have been applied to the Portland metropolitan area, noting that five miles outside Salem or Eugene is significantly different than five miles outside Portland.

Mr. Cannon said that if the federal government had some years ago done what it said it was going to do about the automobile, much of the present and proposed regulations would not be necessary. However, he said that the permit procedures are designed to see if there is some way to accommodate the automobile, which continues to be a major source of pollution, and still allow

developments to take place, at the same time meeting the standards in air quality "that we've committed ourselves to."

Mr. Anderson urged the Commission to carefully review the rules changes proposed by I.C.S.C. prior to adopting rules for the control of indirect sources, and asked that they not set regulations "that will drive small developers out and hurt the already hard hit construction industry."

Mr. Douglas Sowles, a member of the Environment Committee of Associated General Contractors, dealt with three specifics: (1) the requirement for estimating traffic in the tenth and twentieth years following completion of the facility--20-129(1)(a)--since it was not included in previous drafts nor mentioned in the public hearings; (2) clarification of the jurisdiction of the regional authorities; and (3) his objection to the 50-space minimum, preferring either 500 or 1,000.

Mr. Douglas Stevie, Senior Planner of the Oregon State Housing Division, distributed copies of a prepared statement which he read (a copy of which has been made a part of the permanent record). He spoke in opposition to the proposed rules, particularly sections 20-115(2)(a) and 20-130, pertaining to the inclusion of indirect sources in or within five miles of a municipality with a population of 50,000 or more, and to the issuance or denial of indirect source construction permits. He said these sections "will act to further shift the cost of general protection to lower income households by increasing overall housing costs."

Mr. Victor W. Shearer of Corvallis, President of the Mobile Home Parks Association and owner of Whispering Pines Mobile Lodge, objected to the inclusion in the permit requirements of mobile home parks in applicable areas. He said the regulations appear to be "unreasonable."

Mr. Ron Symons of Travelers Insurance Company (real estate loan division), Portland, objected to the 50-space minimum; the conditions for construction of an indirect source, as contained in the permit requirements; and the duration of the permit. He said that the Portland office of Travelers Insurance has provided mortgage loan money for over 30 shopping centers and other commercial properties, and one of their criteria is the economic viability of the facility in terms of good ingress and egress and adequate parking. He noted that

mortgage lenders usually require more spaces than the developer wants but which are often limited by the DEQ. He suggested that the minimum number of spaces for which a permit was required was too small but he did not offer a substitute figure.

Mr. Richard Hanson, Manager of Valley River Shopping Center in Eugene, expressed concern about the 50-space minimum, preferring that 50 be changed to 500 and 500 to 1,000. He said that shopping centers must work with transit authorities; but in response to a question from Dr. Crothers, stated that only about two percent of his shopping center's customers come by bus, although a bus arrives at the Center every 10 minutes. About 1,000 people visit the Center each week.

Mr. Glen Odell, consulting engineer from Portland, spoke in favor of the proposed rules. As a former staff employee of the DEQ, he said he was instrumental in drafting the parking and highway regulations two years ago. He said the staff initially wanted to get a handle on the automobile in a way the federal government was not and in a way in which land use control agencies refused to do. "DEQ's actions since that time have succeeded in a large measure if not in getting a handle on the automobile, at least in getting industries of all kinds and the general population at large to understand that the automobile is related to air pollution...."

He said that the staff has been reviewing 50-car parking facilities within five-mile limits of Salem, Eugene and Portland for the past 2 1/2 years and was "personally pleased" to see the staff undertake this revision of the regulations. He said the proposed rules form the options the DEQ has when it does approve parking facilities, and that these options have previously existed as staff guidelines. He said the regulations benefit the environment, applicants and industry, and that the requirement for master plan approval will help with regulating these indirect sources. Mr. Odell suggested that the minimum number of parking spaces in a facility for which a permit would be required could go to 100 "without hurting anything" although the staff seemed to think they could continue to handle the load with a 50-space minimum.

Mr. Odell said that good land use planning would eliminate the need for consideration of parking facilities in residential areas. In terms of

continued staff review of commercial facilities, Mr. Odell said he "couldn't be more supportive of it."

There were no other witnesses.

It was MOVED by Dr. Phinney and seconded by Mr. Somers to accept the Director's recommendation. Dr. Crothers called for a roll call vote. Voting in favor of the motion were Mrs. Hallock, Dr. Phinney and Mr. Somers; voting against the motion was Dr. Crothers who said the Department already has regulations to control indirect sources and further, that the minimum numbers for a permit were too small.

OPEN BURNING REGULATIONS--AUTHORIZATION FOR PUBLIC HEARING; and
WEYERHAEUSER COMPANY, SPRINGFIELD--REQUEST FOR PUBLIC HEARING

Action on these two agenda items was taken by a single motion made by Mr. Somers and seconded by Mrs. Hallock, to accept the Director's recommendations given below. There was no objection and it was so ordered by unanimous consent.

Open Burning Regulations, Authorization for Public Hearing:

It is the recommendation of the Director that a public hearing be authorized at the Environmental Quality Commission meeting to be held on January 24, 1974 [changed from December 20, 1974], for the purpose of taking public testimony prior to the adoption of proposed rule changes.

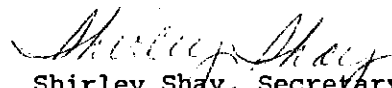
Weyerhaeuser Company Request for Public Hearing:

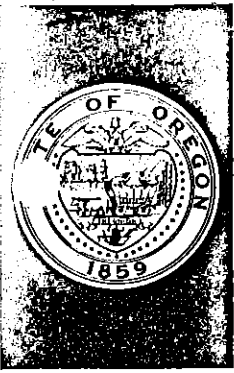
It is recommended that authorization to hold a public hearing on the proposed modifications to the Weyerhaeuser Company Air Contaminant Discharge Permit be granted.

OTHER BUSINESS

Mr. Somers asked about the status of the Wah-Chang plant in Albany. Mr. Sawyer said a full report would be presented to the Commission at its meeting in Albany on December 20th.

There was no further business and the meeting was adjourned at 3:50 p.m.


Shirley Shay, Secretary
Environmental Quality Commission



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KESSLER R. CANNON
Director

MEMORANDUM

Revised

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. B, December 20, 1974 EQC Meeting
November 1974 Program Activity Report

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

Water Quality

1. Seventy (70) domestic sewage project plans and specifications were reviewed:

WATER QUALITY DIVISION - 35 (see attachment #1)

Approval was given to ten (10) Change Orders and Addenda.

Provisional approval was given to 21 sewer projects and four (4) sewage treatment plant projects.

NORTHWEST REGION - 35 (see attachment #2)

Provisional approval was given to 30 sewer projects.

Three (3) sewer project plans are pending.

Two (2) sewer project plans were submitted to the Marion County Boundary Commission.

2. Four (4) industrial projects were reviewed:

NORTHWEST REGION - 3

Approval was given to two (2) projects:



Contains
Recycled
Materials

Robert Belozer Fryer Farm, Marion County
chicken rearing facilities

Proto Tool, Milwaukie
chrome plated rinse water treatment system

One (1) project is pending:

Kaiser Gypsum, St. Helens
bay study

MIDWEST REGION - 1

Provisional approval was given to

Donald Gabrielli, Linn County
animal waste facilities

Air Quality

Forty-one (41) air pollution control projects and parking facility proposals were reviewed:

AIR QUALITY DIVISION - 13

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

Permaneer, Douglas County
door jam plant installation

Georgia-Pacific, Coos Bay
veneer dryer emission scrubber system

Georgia-Pacific, Coquille
veneer dryer emission scrubber system

Georgia-Pacific, Toledo
veneer dryer emission scrubber system

Warm Springs Forest Products, Jefferson County
new wigwam burner installation

Fibreboard (Bate Plywood)
Air-Guard scrubber for veneer dryer emissions

Kogap, Jackson County
new veneer dryer (No. 3) installation

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

Farmers Insurance Group, Washington County
relocation of existing facility, 4 parking spaces added

Tualatin Plaza, Washington County
56-space parking facility

Pringle Creek Parking Facility, Marion County
Hilton Hotel, 520-space parking facility

State Motor Pool, Lane County
relocation of 175-space parking facility

Lincoln International, Clackamas County
phased warehouse parking facility

No action was taken on one (1) parking facility proposal since it is outside the jurisdiction of the Department:

Dammasch State Hospital, Clackamas County
100-space parking addition

NORTHWEST REGION - 28

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

Western Foundry, Washington County
scrubber to control cupola emissions

Publishers Paper, Newberg, Yamhill County
new digester

Oregon Steel Mills, Front Street, Multnomah County
ladle fume exhaust

Oregon Portland Cement, Clackamas County
paving of vehicular traffic areas

Teeples & Thatcher, Inc., Multnomah County
sawdust cyclones

Tillamook Creamery, Tillamook County
control whey dryer exhaust

ESCO - Plant #3, Multnomah County
new 4-ton induction furnace

Information was requested and received for seven (7) air pollution control projects and is being evaluated:

Resource Recovery Byproducts, Multnomah County
paper classifier--information on controls

Cascade Energy, Inc., Columbia County
oil refinery--emission information and EIA

Western Farmers, Multnomah County
control of truck receiving

Charter Energy Company, Columbia County
new oil refinery--evaluating tradeoffs and effect on ambient air

Triangle Milling, Multnomah County
dust control--drafting approval letter

Rhodia - Chipman Division, Multnomah County
dichlorophenol distillation expansion--drafting approval letter

AMAX Aluminum, Clatsop County
new aluminum reduction plant--information pertaining to issues
raised at public hearing

Additional information was requested for one (1) air pollution control
project:

Owens Corning, Multnomah County
fiberglass plant--awaiting information on more efficient controls
and tradeoffs

Five (5) air pollution control projects are being processed:

Pennwalt Corp., Multnomah County
expansion of chlorine-caustic soda manufacturing--reviewing
emission information

Oregon Portland Cement Company, Clackamas County
new aggregate lime storage bin

Zidell Explorations, Inc., Multnomah County
new secondary aluminum smelter--accepted for filing

Kaiser Permanente Medical Center, Multnomah County
controlled atmosphere incinerator--reviewing submitted application

Norwest Publishing, Multnomah County
control of heatset ink dryer--reviewing manufacturer's data

Four (4) permits were issued:

Ross Island Sand and Gravel, Multnomah County
concrete batch plant

Columbia Steel Casting, Multnomah County
new furnace and controls

Pacific Carbide, Multnomah County
new furnace

Schnitzer Steel Products, Multnomah County
wire incinerator

Two (2) proposed permits were issued:

Chamberlain's Pet Crematorium, Multnomah County
cremation incinerator

Portland Steel Mills, Multnomah County
new steel mill

Two (2) Notices of Construction were cancelled:

Pacific Building Materials, Washington County
concrete readymix plant

Milwaukie Plywood Clackamas County
vener dryer control

Solid Waste Management

Four (4) solid waste management project plans were reviewed:

SOLID WASTE MANAGEMENT DIVISION - 3

Approval was given to one (1) project plan:

Franklin Landfill, Lane County
existing site; operational and closure plans

Provisional approval was given to two (2) project plans:

Les Schwab, Crook County
new site; tire disposal site

Ladd Canyon Disposal Site, Union County
new site; operational plan

NORTHWEST REGION - 1

Approval was given to:

Willamina Lumber Company, Yamhill County
new wood waste landfill

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 November 1974.



KESSLER R. CANNON
Director

PROJECT PLANS

Water Quality Division

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

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
<u>Municipal Projects - 35</u>			
11-1-74	Green S.D.	Happy Valley Rd. - No. 26 sewer Crossing	Prov. Approval
11-1-74	Ashland	C. O. #2 STP	Approved
11-1-74	Unity	Sewage collection system & 7.74 acre non-overflow sewage lagoon system	Prov. Approval
11-4-74	Springfield	Minor Subdn sewers	Prov. Approval
11-4-74	Bend	Addendum No. 5 - grit chamber & septic tank dumping station	Approved
11-4-74	Gold Beach	Septic tank dumping station	Prov. Approval
11-4-74	Lincoln City	Careage Corp. nursing home sewer	Prov. Approval
11-8-74	Mosier	Sewage collection system & 0.085 MGD extended aeration STP	Prov. Approval
11-12-74	USA (Beaverton)	Allen Ave. sewer diversion	Prov. Approval
11-12-74	NTCSA	C.O. A-1 - Sch. IV	Approved
11-13-74	Josephine Co.	Harbeck-Fruitdale-South Allen Cr. Int. sewer	Prov. Approval
11-13-74	Junction City	Norman Park Subdn. Third Addn sewers	Prov. Approval
11-15-74	BCVSA	Valley Estates Subdn. sewers	Prov. Approval
11-15-74	BCVSA	Oak Grove Rd. sewer project	Prov. Approval
11-15-74	Gleneden S.D.	Sewerage system to Depoe Bay S.D.	Prov. Approval
11-18-74	Boardman	C.O. to contract for interim sewage facilities	Approved
11-19-74	BCVSA	Lozier Lane sewer project & Wilson Rd. sewer Lat. #1 south	Prov. Approval
11-21-74	Pendleton	Indian Agency sewer extension	Prov. Approval
11-25-74	North Bend	Newmark St. sewer	Prov. Approval
11-25-74	Springfield	Gateway St. sewer	Prov. Approval
11-25-74	Springfield	SWF Plywood pressure sewer line	Prov. Approval

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11-25-74	Coquille	East 13th St. sewer	Prov. Approval
11-25-74	USA (Forest Grove)	C. O. No. 3 - STP modifications	Approved
11-26-74	Bay City	C. O. B-8 - STP contract	Approved
11-26-74	Ashland	Mt. Ranch Subdn, Phase 1 sewers	Prov. Approval
11-26-74	Josephine Co.	Harbeck-Fruitdale S.D. - Alexander Drive sewer	Prov. Approval
11-26-74	Salem	Sludge truck purchasing documents	Prov. Approval
11-27-74	Corvallis	26th St. sewer replacement	Prov. Approval
11-27-74	Gold Beach	C. O. No. 1 - STP contract	Approved
11-29-74	Bly S.D.	C. O. Nos. 3 & 4 - Sch. B, STP contract	Approved
11-29-74	Warrenton	C. O. No. 1 - interceptor project	Approved

Sewers	21
C.O.	10
STP's	4
	<u>35</u>

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHWEST REGION OFFICE - Technical Services
Water Quality Division - Project/Plan Review

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

See attached sheets for disposition of each project.

Summary of projects

13 sanitary sewer plans received
18 sanitary sewer plans approved
4 sanitary sewer plans pending*

* Pending refers to scheduling for staff review relative to disposition of projects unless noted on attached sheets as "under study".

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

DEQ Staff Disposition

o.	Received Date	Location	Project	Engineer	Information	Approval Date	Action	By
362	9-25-74	USA (Sunset)	Extension to 114th Street L.I.D., Edwin J. Peterson property, sanitary sewers	Hilton Engineering Co.	2 plans	9-27-74	Prov. Approval	AHJ
363	9-16-74	Timberline Lodge Clackamas Co.	Timberline Lodge Sewage Effluent Seepage Bed	U.S. Department of Agriculture	2 plans	9-19-74	Prov. Approval	CHG
364	9-26-74	Tualatin	Shawnee Plains sanitary sewers	Compass Corp.	2 plans	10-3-74	Prov. Approval	AHJ
365	9-22-74	West Linn	Portland Ave. L.I.D. sanitary sewers	John W. Cunningham & Associates	2 plans	10-3-74	Prov. Approval	AHJ
366	9-26-74	Tualatin	Western Metro Sewer Extension (West of 65th Ave)	CH ₂ M Hill	1 plan	10-3-74	Prov. Approval	AHJ
367	9-11-74	Portland	P 8172.0 Tryon Creek infiltration/inflow analysis	City of Portland	2 plans	--	Pending (under study)	REG/P
368	10-1-74	Gresham	Casa-De-Lass sanitary sewers	Moffatt Nichol & Bonney, Inc.	2 plans	10-3-74	Prov. Approval	AHJ
369	9-30-74	Troutdale	Sanitary force main connection to a City Manhole	Sleavin-Kors	2 plans	10-3-74	Prov. Approval	AHJ
370	10-2-74	Lake Oswego (Tryon)	Revised Forest Glen subdivision sanitary sewers	Murray-McCormick Environmental Group	2 plans	10-4-74	Prov. Approval	AHJ
371	10-1-74	Tualatin	Conrad Venerer property sanitary sewer	Dorner & Tunks, Inc.	3 plans	10-3-74	Prov. Approval	AHJ

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
155	10-3-74	Salem (Willow) E. Salem Sewer & Drainage District 1	Mackel Construction Company Shopping Center sanitary sewer at Silverton & Lancaster Drive	--	2 plans	10-18-74	Prov. Approval	AHJ
372	10-10-74	CCSD#1 (Gladstone)	Monte Carlo Heights subdivision sanitary sewer	Martin Engineering Company	3 plans	10-14-74	Prov. Approval	AHJ
373	10-9-74	Turner	A Sewerage Plan Report for Turner	Clark & Groff	3 plans		Pending (under study)	RHF/ PDC
374	10-10-74	Salem (Willow)	Central Services Center near Interstate 5 & State Street sanitary sewers	Carkin and Sherman AIA and Westech Engineering	1 plan	11-1-74	Prov. Approval	AHJ
375	10-15-74	Canby	North Juniper Street and N.E. First Avenue sanitary sewers	Zarosinski - Tatone Engineering Inc.	2 plans	10-18-74	Prov. Approval	AHJ
376	10-15-74	St. Helens	Kaiser Gypsum Co., Inc. Sanitary Sewage Disposal Modifications	Whitely, Jacobsen and Associates	3 plans	10-24-74	Prov. Approval	AHJ LDP
377	10-16-74	Gresham	Gresham Clinic sanitary sewers	Wilsey & Ham	2 plans	10-22-74	Prov. Approval	AHJ
378	10-17-74	Gresham	Camelot Plat 3 subdivision sanitary sewers	Carl E. Green & Associates	2 plans	10-22-74	Prov. Approval	AHJ
379	10-17-74	USA (Aloha)	Tanasbrook Development Neighborhood "C", sanitary sewer line C-1 revision, sanitary sewer line C-2	Alpha Engineering	2 plans	10-22-74	Prov. Approval	AHJ

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

DEQ Staff Disposition

Received Date	Location	Project	Engineer	Infor- mation	Approval Date	Action	By
380 --	Independence	Independence Airpark final phase of 84 lots sanitary sewers	W. I. Peterson Engineering	--	10-22-74	Prov. Approval	AHJ
381 10-18-74	West Linn	Hidden Springs Ranch No. 2 sanitary sewers	Wilsey & Ham	2 plans	10-23-74	Prov. Approval	AHJ
382 10-21-74	USA (Durham)	Preliminary Plans for Cedar Hills Trunk Sewer	Stevens, Thompson & Runyan	2 plans	10-25-74	Prov. Approval	AHJ
383 10-23-74	Twin Rocks Sanitary District in Tillamook Co.	Stark Street sanitary sewer extension, lots, E-5, and E-5-1	W. F. Perley and Associates	2 plans	10-25-74	Prov. Approval	AHJ
384 10-24-74	USA (Somerset West)	Somerset West Commercial Center sanitary sewer	R.A.Wright Engineering	2 plans	10-28-74	Prov. Approval	AHJ
385 10-25-74	Portland S.W.	S.W. Fairvale Court north of S.W. Pendleton Street sanitary sewer	City of Portland	1 plan	10-29-74	Prov. Approval	AHJ
386 --	Portland N.	Gertz-Schmeer sewerage system including lift stations, wastewater pump station and sanitary sewers	City of Portland	2 plans	10-14-74	Prov. Approval	WQ-by CPH
387 10-31-74	Tualatin	Revised Shawnee Plains sanitary sewers	Compass Corp.	2 plans	11-5-74	Prov. Approval	AHJ
388 10-31-74	Portland (Columbia)	S.E. Harney Street sanitary sewers	City of Portland	1 plan	11-18-74	Prov. Approval	AHJ
389 10-31-74	USA (Aloha)	Ray Sullivan sanitary sewer extension	H.A. Mohr Engineers	2 plans	11-7-74	Prov. Approval	AHJ

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
390	10-31-74	USA (Beaverton)	Carolwood I sanitary sewers	Wilsey & Ham	2 plans	11-13-74	Prov. Approval	AHJ
391	10-31-74	USA (Aloha)	CO-JO No. 2 sanitary sewers	Harris-McMonagle	2 plans	11-8-74	Prov. Approval	AHJ
392	10-31-74	USA (Aloha)	Hyland Hills Center - Phase I Construction sanitary sewers	Robert E. Meyer Consulting Engineer	2 plans	11-8-74	Prov. Approval	AHJ
393	-	USA (Forest Grove)	Forest Grove STP Change Order No. 2	CH ₂ M/Hill	-	10-28-74	Prov. Approval	WQ-b CPH
394	-	Milwaukie	The Grove, phase I sanitary sewers	Harris & McMonagle	2 plans	11-6-74	Prov. Approval	AHJ
395	11-1-74	Troutdale	Autumn Park Subdivision sanitary sewers	Wilsey & Ham	2 plans	11-7-74	Prov. Approval	AHJ
396	11-4-74	USA (Aloha)	Torreyview On Site, Phase I, sanitary sewers	John W. Cunningham	2 plans	11-14-74	Prov. Approval	AHJ
397	11-6-74	Lake Oswego (Tryon)	L.I.D. 163, Lake Shore Road sanitary sewers	City of Lake Oswego	1 plan	11-18-74	Prov. Approval	AHJ
398	11-12-74	CCSD #1	Rainier Court sanitary sewers	R. A. Wright Consulting Engineer	2 plans	11-19-74	Prov. Approval	AHJ
399	11-15-74	Amity	Lateral A-2, sanitary sewer on Roth Street	John W. Cunningham	3 plans	11-21-74	Prov. Approval	AHJ
400	11-18-74	Salem (Willow)	Railroad Trunk-Phase II, Main Road-1 sanitary sewers	City of Salem	2 plans	11-25-74	Submitted to Marion - County Boundary Commission	RHF
401	11-15-74	Monmouth	Southwest Heights Addition No. 5 sanitary sewers	Clark & Groff	1 plan	11-22-74	Prov. Approval	AHJ

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

DEQ Staff Disposition

No.	Received		I N F O R M A T I O N R E C E I V E D			DEQ Staff Disposition		
	Date	Location	Project	Engineer	Information	Approval Date	Action	By
402	11-20-74	Hillsboro	Sewell Station sanitary sewer	Rolland Baxter	2 plans	11-22-74	Prov. Approval	AHJ
403	11-20-74	Tualatin	Revised 105th Street sanitary sewer	Gene T. Ginther	2 plans	11-22-74	Prov. Approval	AHJ
404	---	USA (Beaverton)	Revised Allen Avenue sewerage diversion	-----	---	11-12-74	Prov. Approval	WQ-b CPH
405	11-29-74	Gresham	Between S. E. Stark Street and S. E. 221st Avenue sanitary sewer	Milton R. Emerson	2 plans		Pending	AHJ
406	11-26-74	Canby	N. Cedar Street from 5th to Dahlia Place sanitary sewer	Zarosinski-Tatone Engineers	1 plan		Pending	AHJ

Memorandum

TO: Shirley Shay

December 6, 1974

FROM: John Kowalczyk

SUBJECT: Supplement to November 1974 Activity Report to EQC

Northwest Region Permit Work Output-Backlog
November 1974

	<u>Sources</u> <u>Req'd</u> <u>Permits</u>	<u>Appl.</u> <u>Rec'd</u> <u>(mo.)</u>	<u>Permits</u> <u>Drafted</u> <u>(mo.)</u>	<u>Permits</u> <u>Issued</u> <u>(mo.)</u>	<u>Appl. Pending</u> <u>Permits</u>		<u>Sources</u> <u>Under</u> <u>Regular</u> <u>Permit</u>
					<u>To Be</u> <u>Drafted</u>	<u>Permits</u> <u>Drafted</u>	
<u>Air Permits</u>							
Process	300	14	9	5	137	10	119
Fuel Burning	630	0	3	0	0	622	8
<u>Water Permits*</u>							
Industrial	157	0	9	0	20	108	39
Domestic	123	0	0	0	5	42	76
<u>Solid Waste Permits</u>							
General Refuse	26	0	0	0	6	0	20
Demolition	10	0	0	0	3	0	7
Industrial	15	0	2	0	3	2	10

*NPDES

DEPARTMENT OF ENVIRONMENTAL QUALITY
Northwest Region
Technical Services

Air Quality Division - Project/Plan Review

During the month of November, 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 Plan Reviews - Notice of Construction

3 Received
5 Pending (awaiting additional information requested)
7 Processing
9 Approvals
2 Cancelled

New Source Air Quality Permits

5 Received
2 Pending (awaiting additional information requested)
13 Processing
3 Proposed Permits Issued
3 Permits 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	Information Rec'd	Approval Date	Action	By
P144	11/9/73	Clatsop	AMAX Aluminum - New Aluminum Reduction Plant	JFK	12/26/73	11/26/74 ✓		Further information requested resulting from issues raised at public hearing	
P145	11/21/73	Multnomah	Union Carbide - #1 furnace Product Change	JAP	7/15/74	8/14/74		Proposed permit being drafted	
P146	11/23/73	Multnomah	Schnitzer Steel Products Wire Incinerator	JAP	6/28/74	8/7/74	9/30/74	✓ Issued permit 11/8/74	
P259	1/30/74	Multnomah	Columbia Steel Casting New furnace and controls	JAP	2/6/74	6/13/74	9/30/74	✓ Issued permit 11/7/74	
NC504	2/5/74	Multnomah	Western Farmers - Dust Control of Truck Receiving	JAP	3/21/74	11/5/74 ✓		Reviewing required information received on 11/5/74	
P267	2/28/74	Multnomah	Layton Funeral Home Cremation Incinerator	JAP	5/14/74	10/29/74		Evaluating Source Test Results	
NC513	3/26/74	Clackamas	Milwaukie Plywood - Veneer Dryer Control	JAP	6/17/74			✓ Cancelled 11/4/74	
P275-7	4/2/74	Multnomah	Columbia Independent Refinery Oil Refinery	JAP	4/30/74	10/28/74		Evaluating tradeoff benefits	
P282	4/15/74	Multnomah	Pacific Carbide New Furnace	JAP	5/17/74		9/30/74	✓ Issued permit 11/7/74	
NC520 P338	5/7/74 11/1/74	Multnomah	Resource Recovery Byproducts Paper Classifier	JAP	5/29/74	11/1/74 ✓		Reviewing information on controls submitted 11/1/74	

P = Permits
 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	Information Rec'd	Approval Date	Action	By
P294	5/31/74	Columbia	Cascade Energy, Inc. Oil Refinery	JAP	7/16/74	11/4/74 ✓		Reviewing submitted emission information and EIA	
NC542	6/12/74	Multnomah	Port of Portland Bulk Loading Facility	JAP	7/22/74			Awaiting information on controls (information will be received when Port approves project funding)	
P305	6/28/74	Multnomah	Owens Corning Fiberglass Plant	JFK	11/15/74 ✓			Awaiting information on more efficient controls and tradeoffs with respect to interim rule adopted 10/25/74	
P306	6/28/74	Multnomah	Portland Steel Mills New Steel Mill	JAP	7/17/74	10/18/74		Issued proposed permit 11/19/74	
NC539	7/9/74	Multnomah	Triangle Milling Dust Control	DDO	9/20/74	11/15/74 ✓		Drafting approval letter	
NC533	7/12/74	Washington	Pacific Building Materials Concrete Readymix Plant	DDO	9/6/74	11/2/74		✓ Cancelled.	
NC537	7/12/74	Yamhill	Publishers Paper - Newberg New Digester	DDO	9/26/74	10/1/74	11/1/74 ✓	Approved	
NC535	7/17/74	Marion	Boise Cascade - Salem New Washers	DDO	8/15/74			Awaiting final engineering design 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	Information Rec'd	Approval Date	Action	By
NC534	7/17/74	Marion	Boise Cascade - Salem New Digester	DDO	8/15/74			Awaiting final engineering design	
P317	7/18/74	Multnomah	Oregon Steel Mills - Rivergate Pellet Metallizing	DDO	9/16/74	10/29/74		Drafting air contaminant discharge permit	
NC543	7/24/74	Multnomah	Oregon Steel Mills - Front St. Baghouse with Canopy	DDO	10/16/74	11/15/74 ✓		Drafting approval letter	
NC548	7/31/74	Clackamas	Barton Sand and Gravel Rock Crusher	JAP	9/17/74			Awaiting information on final process design	
NC544	8/1/74	Multnomah	Oregon Steel Mills - Front St. Ladle Fume Exhaust	DDO			11/5/74 ✓	Approved	
NC545	8/8/74	Multnomah	Teeples & Thatcher, Inc. Sawdust Cyclones	DDO	8/27/74	10/29/74	11/8/74 ✓	Approved	
NC549	8/15/74	Washington	Western Foundry - Scrubber to Control Cupola Emissions	JAP			11/1/74 ✓	Approved	
P323	9/11/74	Columbia	Charter Energy Company New Oil Refinery	JAP	10/11/74	11/7/74 ✓		Evaluating tradeoffs and effect on ambient air quality	
P324	9/13/74	Multnomah	Chamberlain's Pet Crematorium Cremation Incinerator	JAP	9/19/74	10/8/74		✓ Issued proposed permit 11/14/74	
P325	9/17/74	Multnomah	The Oregon Humane Society Cremation Incinerator	JAP				Proposed permit being drafted	
NC556	9/27/74	Clackamas	Oregon Ready-Mix Concrete Batch Plant	DDO	12/2/74			New Source - Mailed out permit application	

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	Information Rec'd	Approval Date	Action	By
NC561	10/4/74	Multnomah	Rhodia-Chipman Division Dichlorophenol distillation expansion	DDO	11/15/74	11/25/74 ✓		Drafting approval letter	
P340	10/7/74	Multnomah	Medford Corporation Green wood chip storage and distribution center	JAP				Processing	
P333	10/10/74	Multnomah	Ross Island Sand & Gravel Concrete Batch Plant	JAP				Issued proposed permit 11/4/74	
NC558 NC559 NC560	10/11/74	Clackamas	Oregon Portland Cement Paving of vehicular traffic areas	DDO			11/5/74 ✓	Approved	
NC562	10/15/74	Multnomah	ESCO - Plant #3 New 4 ton induction furnace	DDO			11/18/74 ✓	Approved	
NC563	11/1/74	Tillamook	Tillamook Creamery - Control whey dryer exhaust	RHF			11/14/74 ✓	Approved	
P343	11/4/74	Multnomah	Pennwalt Corp. - Expansion of chlorine-caustic soda mfg.	DDO				Reviewing emission information	
NC564	11/5/74	Clackamas	Oregon Portland Cement Co. New agg. lime storage bin	DDO				Drafting approval letter	
P342	11/12/74	Multnomah	Zidell Explorations Inc. new secondary aluminum smelter	JAP				Accepted for filing on 11/15/74	
P348	11/22/74	Multnomah	Kaiser Permanente Medical Center - Controlled atmosphere incinerator	JAP				Reviewing submitted application	
NC565	11/27/74	Multnomah	Norwest Publishing - Control of heatset ink dryer	DDO				Reviewing manufacturers data	



State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

SOLID WASTE MANAGEMENT DIVISION

To: E. A. Schmidt

Date: December 4, 1974

From: W.H. Dana

Subject: Summary of Activities, Program Operations Section, November 1974

I. Permits

- A. Regular Permits issued - - - - - 4
 - 1. Curry County - Agness Transfer Station
 - 2. Linn County - Albany Landfill (renewal)
 - 3. Multnomah County - Resource Recovery Byproducts (issued by NWRO)
 - 4. Polk County - Fishback Hill (renewal by NWRO)
- B. Permits Amended - - - - - 2
 - 1. Clatsop County - Lewis & Clark Log Sorting Yard (issued by NWRO)
 - 2. Josephine County - Kerby Landfill
- C. Proposed Permits Mailed - - - - - 5
 - 1. Crook County - Les Schwab Tire Disposal Site
 - 2. Curry County - Agness Disposal Site
 - 3. Polk County - Willamette Industries, Dallas (issued by NWRO)
 - 4. Yamhill County - Willamina Lumber Co. (issued by NWRO)
 - 5. Union County - Ladd Canyon Disposal Site
- D. Proposed Permit Amendments Mailed - - - - - 1
 - 1. Klamath County - Crescent Landfill

II. Plan Review

- A. Construction and/or Operational Plans Approved - - - - 4
 - 1. Crook County - Les Schwab Tire Disposal Site
 - 2. Lane County - Franklin Landfill
 - 3. Union County - Ladd Canyon Disposal Site
 - 4. Yamhill County - Willamina Lumber Co. (approved by NWRO)

III. Field Investigations

- A. Domestic Waste Sites - - - - - 3
 - 1. Gilliam County - Arlington Disposal Site
 - 2. Sherman County - Tsubota Dump
 - 3. Umatilla County - Pendleton Landfill

IV. Other

- A. Prepared lists of permits to be written, by region, prior to July 1, 1975.
- B. Reviewed copies of site operational reports from permittees. Distributed copies to regions. Set up central report filing system.
- C. Submitted monthly permit data report to EPA



State of Oregon
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 SOLID WASTE MANAGEMENT DIVISION

INTEROFFICE MEMO

To: E. A. Schmidt

Date: December 9, 1974

From: W. H. Dana

Subject: Work Projects Pending - November 30, 1974

I. PERMITS

A.	Incomplete Permit Applications Pending - - - - -	15
1.	Existing Sites - - - - -	8
2.	New Disposal Sites - - - - -	7
B.	Complete Permit Applications Awaiting Staff Action -	33
1.	Existing Disposal Sites - - - - -	30
2.	New Disposal Sites - - - - -	3
C.	Temporary Permits Pending - - - - -	128
1.	Domestic Sites - - - - -	113
2.	Industrial Sites - - - - -	15

II. PLANS

A.	Operational Plans for Permitted Sites Pending - - - -	4
B.	Operational Plans for Non-permitted or Temporarily permitted Sites Pending - - - - -	152

AIR QUALITY CONTROL SUMMARY OF ACTIVITIES FOR NOVEMBER, 1974

Project Plans	
Plan reviews received	12
Plan reviews completed	13

Surveys	
Area surveys	3
Industrial surveys	21
Source tests	1

Computer Programs	
Computer programs completed	2

Meteorological Report	
Number of days on Alert Status	0
Number of days under Air Stagnation Advisory	5

Permit Activities	
Permit Applications received	4
Permits issued	11
Public Hearings held	0
Notice of Intent to Issue Permits	17
Permits revised, reissued	1

Summary of AQCD permits by source categories

	Received*	Issued	Pending
Wood products	210	86	124
Minerals and Metals	164	60	104
Pulp and paper	13	12	1
Miscellaneous	88	20	68

*Includes applications for renewals

Source Compliance Evaluations	
Source tests received and/or reviewed	7

Regulation Revisions in process	3
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Tax Credits	
Review reports prepared	13



ENVIRONMENTAL QUALITY COMMISSION

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

TOM McCALL
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Salem

RONALD M. SOMERS
The Dalles

—
KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Status Report on Air Quality Control Division Workload

Attached is a status report of the various projects in the Air Quality Control Division as of December 1, 1974. This status report includes special projects and ongoing programs including air contaminant discharge permit applications and source tests.

KESSLER R. CANNON
Director

HMP - 12/19/74



Contains
Recycled
Materials

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	4/5/74	Toledo	Georgia-Pacific veneer dryer emission-control	Burkart	Notice/Const.		Approved 11/15/74
2	7/29/74	Glide	Little River Box Hog fuel boiler	"	"	9/27/74	Completed and approved
3	12/7/73	Medford	Boise Cascade - Leckenby scrubber for veneer dryer emissions control	"	" "		
4	3/1/74	Bandon	Rogge Mills, stud mill const.	"	" "		
5	6/28/74	North Bend	Weyerhaeuser Cyclo screen separator	"	" "		
6	8/5/74	Grants Pass	Agnew Plywood Veneer dryer emission control	"	" "		
7	8/15/74	North Bend	Weyerhaeuser - veneer dryer emission control (Air-Air condenser)	"	" "		
8	9/13/74	Klamath Falls	Weyerhaeuser - veneer dryer emissions control	"	" "		
9	11/4/74	Dillard	Permaneer door jamb plant	"	"		Approved 11/8/74
10	10/31/74	Medford	Kogap veneer dryer	"	"		Approved 11/26/74
11	11/29/74	Brookings	Brookings Plywood - veneer dryer modifications	"	"		Approved 12/4/74
12	10/74		Fibreboard (Bate Plywood) veneer dryer emission control	"	"		Approved 11/15/74

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	8/28/74	Dee	Champion International	Burkart	Permit compl.	9/18/74	H. F. boiler in compliance. Letter to be answered
2	9/13/74	North Bend	Weyerhaeuser	"	Compliance status	9/13/74	Letter to be answered
3			Veneer Dryer emissions control program	"	Special Project		

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	9/30/74	Gold Beach	Champion International Cyclone test	Burkart	Source test		To be reviewed
2	7/5/74	Glendale	Robert Dollar - bark dryer	"	" "		" "
3	6/10/74	Medford	Timber Products Dryer, boilers, cyclones	"	" "		" "
4	12/31/73	Medford	Boise-Cascade, cyclones	"	" "		" "
5	3/5/73	Redmond	Brooks Willamette, cyclones				Review completed 10/18/74
6	10/2/73	Redmond	Brooks Willamette, HF boilers				Review completed 10/18/74
7	5/29/74	Redmond	Brooks Willamette, HF Boiler				Review completed 10/18/74
8	12/74	Bend	Brooks Willamette, cyclones				Review completed 12/4/74
9	5/24/73	Bend	Brooks Willamette, HF Boilers				Review completed 10/17/74
10	11/14/72	Redmond	Brooks Willamette, HF Boilers				Review completed 10/18/74
11	9/26/73	Kerby	Cabax Mills, H.F. boiler				Review completed 12/4/74
12	3/28/73	Cascade Locks	Cascade Locks Lumber H.F. boiler				Review completed 11/74
13	7/72	Dillard	Dillard Lbr., H.F. boiler				Review completed 11/74
14	6/73	Drain	Drain Plywood, H.F. boiler				Review completed 12/4/74
15	6/11/73	Drain	Drain Plywood, cyclones				Review completed 11/74

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Engineering Services
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
16	8/8/74	Hines	Edward Hines Lumber Co. cyclones	Burkart	Source test		Reviewed 11/74
17	1/15/74	Hines	Edward Hines Lumber Co. Hog fuel boiler	"	" "		Reviewed 11/74
18	3/23/72	Gardiner	International Paper - cyclones	"	" "		Reviewed 12/4/74
19	11/22/72	Chiloquin	D. G. Shelter Lbr., HF boiler	"	" "		Reviewed 12/4/74
20	4/17/73	K. Falls	Modoc Lumber, HF boiler	"	" "		Reviewed 11/74
21	4/12/73	White City	Olsen-Lawyer, HF boiler	"	" "		Reviewed 12/4/74
22	4/72	Medford	Medford Corp., cyclones	"	" "		Reviewed 10/22/74
23	9/21/73	White City	Permaneer - cyclones	"	" "		Reviewed 10/22/74
24	2/2/73	Glendale	Robert Dollar Co. - cyclones	"	" "		Reviewed 10/25/74
25	4/19/73	"	" " - HF boilers	"	" "		Reviewed 10/25/74
26	4/72	Grants Pass	So. Oregon Plywood - cyclones	"	" "		Reviewed 12/4/74
27	7/72	Roseburg	Sun Studs - H.F. boiler	"	" "		Reviewed 12/4/74
28	5/5/73	"	" " H.F. boiler	"	" "		Reviewed 12/4/74
29	1/3/72	Grants Pass	Tim Ply - Cyclones	"	" "		Reviewed 10/22/74
30	9/17/74	Grants Pass	Tim Ply - H.F. boiler	"	" "		To be reviewed

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
31	9/17/74	Medford	Timber Products - HF boiler	Burkart	Source Test		To be reviewed
32	9/17/74	"	" ", dryer and sander-dust scrubbers	"	" "		" "
33	11/17/71	"	" " cyclones	"	" "		Review completed
34	10/6/71	"	" " cyclones	"	" "		Review completed
35	11/17/71	"	" " H. F. Boiler	"	" "		Review completed
36	1/73	Gold Beach	U.S. Plywood - H.F. boiler	"	" "		Review completed
37	4/10/73	Lebanon	U.S. Plywood - rotary dryer	"	" "		Review completed
38	4/12/73	Port Orford	Western States Plywood H. F. boiler	"	" "		Review completed
39	6/71	Pilot Rock	U.S. Gypsum - stacks, cyclone	"	" "		To be reviewed
40	3/27/73	" "	" ", H. F. boiler, cyclones	"	" "		" "

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	11/20/73	Brookings	Brookings Plywood, EI 8-0015	Burkart	Permit Appl.		Permit issued 11/74
2	8/1/74	Gold Beach	Pacific Teollisuus, Appl. 473	"	"	"	Permit issued 10/74
3		Medford	SWF Plywood, Appl 469	"	"	"	Variance approved by EQC. Permit Public Hearing- scheduled for 9/23/74
4	12/3/73	Brookings	South Coast Lumber, Appl 317	"	"	"	
5	11/20/73	Glide	Little River Box, App. 276	"	"	"	Permit issued 11/74
6	11/8/73	Drain	Smith River Lbr. App. 259	"	"	"	
7	12/6/73	Central Pt.	LA-Pacific, App 346 (Cheney Forest Products)	"	"	"	
8	11/20/73	Grants Pass	SH&W Lumber, App. 275	"	"	"	
9	12/6/73	Grants Pass	WEBCO (App. 343) (Brown Bros. Lumber)	"	"	"	
10	12/6/73	Alicel	Peacock Lumber, App. 363	"	"	"	
11	6/1/73	Union	Ronde Valley Lumber, App 178	"	"	"	

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
12	4/2/74	Bandon	Rogge Lumber, App. 436	Burkart	Permit Appl.		
13	4/2/74	Bandon	Rogge Lumber, Appl. 435	"	" "		
14	11/20/73	Bandon	Moore Mill & Lbr. App. 277	"	" "		
15	12/6/73	Broadbent	Alder Pacific, Appl. 350	"	" "		
16	1/18/74	Lakeside	Bohemia, Appl. 406	"	" "		
17	12/6/73	Myrtle Pt.	Leep Logging, Appl. 347	"	" "		
18	12/3/73	Langlois	R. D. Tucker, Appl. 334	"	" "		
19	4/2/74	Sixes	Rogge Lumber, Appl. 437	"	" "		
20	11/20/73	Riddle	C & D Lumber, Appl. 274	"	" "		
21	9/18/73	Dillard	Dillard Lumber, Appl. 245	"	" "		
22	11/20/73	Sutherlin	L & H Lumber, Appl. 284	"	" "		
23	1/18/74	Reedsport	Reedsport Mill, Appl. 407	"	" "		
24	11/8/73	Drain	Mt. Baldy Mill, Appl. 261	"	" "		
25	12/6/73	Myrtle Cr.	Green Valley Lumber, App. 355	"	" "		
26	12/18/73	Reedsport	Bohemia, Appl. 385 (Bolon Is. Division)	"	" "		

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
27	12/6/73	Reedsport	Schafer Lumber, Appl. 344	Burkart	Permit Appl.		
28	12/28/73	Riddle	D.R. Johnson Lumber, App. 394	"	" "		
29	1/10/74	Riddle	Herbert Lumber, App. 401	"	" "		
30	5/17/73	Central Pt.	Double Dee Lumber, App. 150	"	" "		
31	12/3/73	Central Pt.	Steve Wilson Co.	"	" "		
32	12/18/73	Central Pt.	Mt. Pitt Co., Appl. 381	"	" "		
33	5/8/73	White City	Eugene Burrill Lumber, App. 119	"	" "		
34	11/14/73	Grants Pass	Morris Lumber, App. 264	"	" "		
35	11/27/73	Grants Pass	Lew Merrill Lbr., App. 290	"	" "		
36	1/10/74	Grants Pass	So. Ore. Lumber, App. 403	"	" "		
37	12/6/73	Grants Pass	Grants Pass Moulding, App. 367	"	" "		
38	5/7/74	Pendleton	Blue Mtn. Forest Prod. Appl. 455	"	" "		
39	5/10/73	Pendleton	Harris Pine Mills, App. 131	"	" "		
40	6/7/73	Pilot Rock	Kerns Furniture, App. 190	"	" "		

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
41	11/20/73	Athena	S & G Lumber, App. 271	Burkart	Permit Appl.		
42	6/6/73	LaGrande	Boise Cascade, App. 184	"	" "		
43	6/6/73	Joseph	Boise Cascade, App. 185	"	" "		
44	12/3/73	Lostine	Starner Lumber, App. 332	"	" "		
45	11/27/73	Wallowa	Victor & Sons, App. 302	"	" "		
46	7/22/74	Wallowa	Rogge Lumber, App. 470	"	" "		

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	8/7/74	LaGrande	Boise Cascade - permit rev.	Bosserman			To be reviewed
2	8/26/74	Coquille	Roseburg Lumber, compliance schedule change	"			" "
3	8/1/74	Grants Pass	Four Ply - permit revisions	"			" "
4	8/1/74	Brookings	Four Ply - permit conditions	"			" "
5	8/29/74	Medford	Timber Products, T582	"	Tax credit		Request information
6	8/28/74	Creswell	Mazama Timber, T581	"	" "		Awaiting CPA's report

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	EI # Information	Approval Date	Action
1	12/27/73	Baker	Ellingson Timber, App. 391	Bosserman	01-0004		To be issued
2	5/31/73	Grants Pass	Mountain Fir Lumber, App. 170	"	17-0011		Permit drafted 9/74
3	9/19/73	Lakeview	Louisiana Pacific, App. 246	"	19-0004,0016		To be issued
4	9/26/73	Baker	Ellingson Lumber, App. 247	"	01-0003		" "
5	6/13/73	Prineville	Hudspeth Pine, App. 208	"	07-0004		"
6	6/7/73	Prineville	Ochoco Lumber, App. 189	"	07-0005		"
7	1/25/74	Roseburg	Roseburg Shingle, App. 419	"	10-0026		"
8	11/20/73	Dillard	Round Prairie Lumber, 281	"	10-0027		"
9	1/25/74	Prairie City	Prairie City Timber, App. 422	"	12-0003		"
10	6/11/73	Cascade Locks	Cascade Locks Timber, 198	"	14-0005		"
11	12/3/73	Ashland	Bellview Moulding, App. 322	"	15-0070		"
12	12/18/73	White City	Cascade Wood Products, 377	"	15-0005		"
13	11/27/73	Madras	Brightwood Corp., App. 301	"	16-0003		"
14	6/18/73	Grants Pass	Spalding & Son, App. 213	"	17-0013		"
15	12/3/73	Cave Junction	Rough & Ready Lbr., 309	"	17-0018		"
16	1/15/74	Selma	M & Y Lumber, App. 405	"	17-0019		"

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	EI No. Information	Approval Date	Action
17	11/8/73	Bly	Weyerhaeuser Co, App. 257	Bosserman	18-0037		To be issued
18	6/7/73	Klamath Falls	Modoc Lumber, App. 191	"	18-0009		"
19	5/14/73	Lakeview	Lakeview Lumber, App. 141	"	19-0006		"
20	7/30/73	Toledo	Publishers Forest Prod. 233	"	21-0011		"
21	11/8/73	Toledo	Guy Roberts Lbr., Appl. 160	"	21-0013		"
22	1/25/74	Philomath	3-G Lumber, App. 421	"	21-0029		"
23	2/13/74	Spray	Heppner Lumber, App. 428	"	35-0004		"
24	12/3/73	Bunker Hill	Coos Head Timber, App. 338	"	06-0074		"
25	11/20/73	Coos Bay	Pierce Lumber, Appl. 267	"	06-0004		"
26	11/27/73	Prineville	Clear Pine Mouldings, 296	"	07-0001		"
27	12-18-73	Prineville	Coin Millwork, Appl. 373	"	07-0002		"
28	6/4/73	Prineville	Consolidated Pine, App. 181	"	07-0003		"
29	5/31/73	Prineville	Pine Products Corp. 169	"	07-0006		"
30	11/14/73	LaPine	Russell Industries, App. 265	"	09-0031		"
31	12/18/73	Bend	Cascade Forest Prod., 382	"	09-0014		"
32	11/27/73	Bend	Oregon Trail Wood Prod. 307	"	09-0033		"
33	12-6-73	Bend	F & F Products, App. 360	"	09-0010		"

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	EI No. Information	Approval Date	Action
34	5/30/74	Bend	Bend Millwork, Appl. 462	Bosserman	09-0015		To be issued
35	11/20/73	Bend	Oregon Woodwork, App. 283	"	09-0016		"
36	5/7/74	Bend	Northwood Corp. App. 453	"	09-0046		"
37	1/18/74	Bend	DeSoto/Kerns, Appl. 409	"	09-0036		"
38	11/20/73	Redmond	Ponderose Moulding, App. 269	"	09-0017		"
39	12/3/73	Redmond	Whittier Moulding, App. 335	"	09-0018		"
40	12/18/73	Redmond	Boyle Mfg., Appl. 383	"	09-0019		"
41	12/3/73	Redmond	Oregon Fir Supply, Appl. 341	"	09-0009		"
42	6/13/73	Glendale	Superior Lumber, Appl. 206	"	10-0048		"
43	12/6/73	Roseburg	Keller Lumber, Appl. 345	"	10-0019		"
44	12/6/73	Prairie City	Taynton, Appl. 359	"	12-0018		"
45	6/6/73	John Day	San Juan Lumber, Appl. 186	"	12-0004		"
46	5/7/74	Long Creek	Blue Mtn. Forest Prod., 456	"	12-0022		"
47	11/14/73	Cascade Locks	Gorge Lumber, Appl. 263	"	14-0010		"
48	6/14/73	Neal Creek	U. S. Plywood, Appl. 211	"	14-0009		"
49	1/22/74	Hood River	Krieg Millwork, Appl. 413	"	14-0007,0002		"
50	12/6/73	White City	Alder Mfg., Appl. 349	"	15-0060		"

AIR QUALITY CONTROL DIVISION

Program - Engr. Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	EI No. Information	Approval Date	Action
51	1/22/74	White City	Delah Timber Prod., 415	Bosserman	15-0009		To be issued
52	5/22/73	White City	So. Oregon Dry Kiln, 152	"	15-0053		"
53	11/27/73	White City	Olson-Lawyer Lbr., 294	"	15-0046		"
54	11/20/73	White City	Medford Moulding, App. 285	"	15-0037		"
55	11/27/73	White City	Oregon Cutstock, Appl. 305	"	15-0047		"
56	11/20/73	Talent	Fountain Lumber, Appl. 280	"	15-0013		"
57	6/7/73	Ashland	McGrew Bros. Sawmill, 188	"	15-0016		"
58	11/20/73	Ashland	Parson Pine Prod., App. 268	"	15-0035		"
59	11/27/73	Ashland	Bigfoot Wood Prod., 287	"	15-0086		"
60	6/11/73	Chiloquin	D. G. Shelter, Appl. 199	"	18-0016		Draft to typing 10/1/74
61	7/9/73	Chemult	Boise Cascade, Appl. 227	"	18-0019		Draft to typing 10/1/74
62	11/27/73	Malin	Loveness Co., Appl. 292	"	18-0007		To be issued
63	4/25/74	Klamath Falls	Jeld Wen, Appl. 447	"	18-0059		"
64	11/27/73	K. Falls	Chris Moulding, Appl. 298	"	18-0028		Draft for approval 10/2/74 To be issued
65	1/10/74	K. Falls	Jeld Wen, Appl. 400	"	18-0006		"
66	11/27/73	Yachats	Dahl Lumber, Appl. 303	"	21-0021		"
67	12/18/73	Newport	Paul Barber Hardwoods 387	"	21-0020		"

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	EI No. Information	Approval Date	Action
68	5/29/73	Tygh Valley	Tygh Valley Lbr., App. 163	Bosserman	33-0008		To be issued
69	12/3/73	Maupin	Mountain Fir Lbr., App. 316	"	33-0009		"
70	6/8/73	Kinzua	Kinsua Corp., Appl. 194	"	35-0002		"

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	4/15/74	Coos Bay	Georgia Pacific, log chipper	Bosserman	Notice of Construction		
2	4/4/74	Coos Bay	Geo. Pac., truck dumper	"	"		
3	4/24/74	Dillard	Roseburg Lumber, particle pre-dryer	"	"		
4	8/10/74	Bend	Bend Millwork, cone collectors	"	"		
5	8/9/74	Bend	Northwood, spray booths	"	"		
6	6/24/74	John Day	Edward Hines, H.F. boiler	"	"		
7	5/26/74	Dillard	Roseburg Lumber, truck dump	"	"		
8	5/10/74	Dillard	Round Prairie Lbr., H.F. boiler	"	"		
9	4/9/74	Roseburg	Raintree Wood Products, cyclones	"	"		
10	6/28/74	Nyssa	Amalgamated Sugar, boiler	"	"		
11	7/23/74	Lakeview	Fremont Sawmill, boilers	"	"		
12	8/23/74	Pilot Rock	Louisiana=Pac., boilers	"	"		

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
			NO ACDP APPLICATIONS RECEIVED				
1		Coos Co.	Arago Cedar - SIC 2429	Bosserman	06-0042	No permit needed	Letter to be sent
2		Coos Co.	Weyerhaeuser, SIC 2492	"	06-0051	12/14/73	"
3		Coos Co.	Acme Wood Products, SIC 2499	"	06-0018		"
4		Coos Co.	Rose City Archery, SIC 2499	"	06-0069		"
5		Crook Co.	Burnet Box, SIC 2441	"	07-0009		"
6		Douglas Co.	Dillard Veneer, SIC 2430	"	10-0011	Closed	(see #245 for Dillard Lbr.)
7		Douglas Co.	Duco-Lam, Inc., SIC 2433	"	10-0060	Probably no permit needed	Letter to be sent
8		Douglas Co.	B. F. Cleat & Slat, SIC 2441	"	10-0008	"	"
9		Douglas Co.	Poteet Wood Prod., EI 2442	"	10-0062	"	"
10		Douglas Co.	A. F. Saar, SIC 2499	"	10-0065		"
11		Grant Co.	Edward Hines, SIC 2421	"	12-0021	See 12-0001	"
12		Jefferson	Warm Springs Forest Prod. Warm Springs. SIC 2421	"	16-0001		Meeting arranged 9/24/74
13		Jefferson	Warm Springs Forest Prod. Madras SIC 2430	"	16-0008		"
14		Josephine	Cabax Mills Lbr, SIC 2421	"	17-0005		Letter to be sent

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	EI No. Information	Approval Date	Action
			NO ACDP APPLICATIONS RECEIVED				
15		Josephine	Diamond Indus., SIC 2431	Bosserman	17-0046	Probably does not need permit	Letter to be sent
16		Klamath	D. G. Shelter, SIC 2421	"	18-0016	App. rec.	"
17		Klamath	A.L. Pennington, SIC 2441	"	18-0055	Not needed	"
18		Klamath	Hudson Lumber, SIC 2499	"	18-0022		"
19		Klamath	Paint Rock Cedar, SIC 2421	"	18-0022	Sold	"
20		Lake	Dame Lumber, SIC 2431	"	19-0005		Received 8/20/74 (o 29)
21		Lake	Oregon Windor, SIC 2431	"	19-0008		See Lakeview Lumber Permit
22		Lincoln	Toledo Shingle, SIC 2429	"	21-0015		Letter to be sent
23		Umatilla	Exterior Wood, SIC 2429	"	30-0034		"
24		Umatilla	Harris Pine Mills, SIC 2421	"	30-0005	App. rec.	"
25		Wasco	J. H. Baxter, SIC 2491	"	33-0003		"

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Engineering Services

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	4/12/74	St. Helens	Boise Cascade, condensible and non-condensable gas systems, Tax Credit T-550.	Clinton			Requested additional info
2	7/24/74	Toledo	Georgia Pacific No. 1 electrostatic precipitator, Tax Credit No. T-531R	Clinton		10/25/74	Approved
3	7/24/74	St. Helens	Kaiser Gypsum Co., baghouse, Tax Credit No. T-572	Clinton		11/22/74	Approved
4	7/24/74	St. Helens	Kaiser Gypsum Co. scrubber, Tax Credit No. T-571	Clinton		11/22/74	Approved
5	9/18/74	Portland	Terminal Flour Mills Co. baghouses. Tax Credit No. T-585	Clinton			Report written
6	9/23/74	Toledo	Georgia-Pacific Corp. scrubber, Tax Credit T589	Clinton		11/22/74	Approved
7	9/30/74	Newberg	Publishers Paper Co., blow stack emission control tax credit T-591	Clinton			Report written
8	9/30/74	Oregon City	Publishers Paper Co., smoke density recorder Tax Credit No. T-594	Clinton		11/22/74	Approved
9	9/30/74	Oregon City	Fourth stage venturi for Publishers Paper Co. Tax Credit No. T-595	Clinton			Report written

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
10	10/15/74	Wauna	Crown Zellerbach, non-condensable system revision Tax Credit T-603	Clinton			
11	11/26/74	Oregon City	Publishers Paper Co., Blow stack emission control Tax Credit T-608	"			
12	11/26/74	Toledo	Georgia Pacific Corp. No. 2 smelt dissolving tank vent scrubber, Tax Credit T-610	"			
13	11/26/74	Toledo	Georgia Pacific Corp. No. 2 smelt dissolving tank vent scrubber, Tax Credit T-611	"			
14	11/26/74	Toledo	Georgia Pacific Corp. KKP vent line, Tax Credit T-612	"			
15	11/26/74	Toledo	Georgia Pacific Corp. MKP spill tank, Tax Credit T-615	"			

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	9/18/74	Halsey	American Can Co. lime mud oxidation system plan	Clinton			Under review
2		Albany	Pesticide research project	Clinton			Equipment has been ordered and I have started collecting the equipment in one location.
3			5 test report reviews	Clinton			
4			Policy on permit violations	Clinton			

AIR QUALITY CONTROL DIVISION

Program -Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	11/27/73	Metolious	Gourmet Food Products, Inc.	Clinton	Permit Appl.		Visited site, to prepare permit
2	4/22/74	Pendleton	Pendleton Community Hospital	"	" "		" " "
3	12/6/73	Pendleton	St. Anthony Hospital	"	" "		" " "
4	11/14/73	John Day	Blue Mountain Hospital	"	" "		" " "
5	5/7/74	Burns	Harney County Hospital	"	" "		" " "
6	4/24/74	Nyssa	Malheur Memorial Hospital	"	" "		" " "
7	12/3/74	LaGrande	Eastern Oregon State College	"	" "		" " "
8	4/26/74	Nyssa	Albertson Land & Cattle	"	" "		" " "
9	12/6/73	Newport	Pacific Communities Hospital	"	" "		" " "
10	1/29/74	Toledo	New Lincoln Hospital	"	" "		" " "
11	12/18/74	Reedsport	Lower Umpqua Hospital	"	" "		" " "
12	11/27/73	Bandon	So. Coos General Hospital	"	" "		" " "
13	10/29/73	Pendleton	General Foods Corporation	"	" "		" " "
14	10/29/73	Pendleton	General Foods Corporation	"	" "		" " "
15	4/22/74	Pendleton	Eastern Oregon Hospital and Training Center	"	" "		" " "

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
16	5/31/73	Medford	Morton Milling Co.	Clinton	Permit Appl.		Visited site, to prepare permit
17	5/25/73	Central Point	Grange Coop Supply	"	" "		" " "
18	6/1/73	Roseburg	Box J Pellet Co.	"	" "		" " "
19	5/29/73	Grants Pass	Josephine Growers Co-op	"	" "		" " "
20	4/5/73	Boardman	Eastern Oregon Farming	"	" "		To prepare permit
21	4/29/74	Coos Bay	Bay Area Hospital	"	" "		"
22	5/31/73	Klamath Falls	Full Circle, Inc.	"	" "		"
23	5/31/73	Roseburg	Douglas County Farm Bureau	"	" "		"
24	4/16/74	Enterprise	Wallowa Memorial Hospital	"	" "		"
25	1/23/74	Medford	Rogue Valley Memorial Hosp.	"	" "		"
26	5/22/74	Island City	Pioneer Flouring Mills Co.	"	" "		"
27	12/27/73	Roseburg	V. A. Hospital	"	" "		"
28	12/3/73	Hermiston	Lamb-Weston, Inc.	"	" "		"
29	12/6/73	Hermiston	Union Pacific Railroad	"	" "		"
30	11/20/73	Hood River	Diamond Fruit Growers	"	" "		"
31	12/3/73	Hood River	Hood River Mem. Hospital	"	" "		"
32	5/13/74	Umatilla	Umatilla Hospital	"	" "		"

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
33	4/24/74	Hermiston	Good Shepherd Hospital	Clinton	Permit Appl.		To prepare permit
34	11/27/73	The Dalles	Columbia Park Hospital	"	" "		"
35	12/6/73	The Dalles	The Dalles General Hospital	"	" "		"
36	6/4/73	The Dalles	Sunshine Biscuits, Inc.	"	" "		"
37	5/17/74	Grants Pass	So. Oregon General Hospital	"	" "		"
38	3/1/74	White City	3M Company	"	" "		"
39	7/23/74	Ontario	Andrews Seed Co.	"	" "		"
40	4/10/74	Roseburg	Douglas Community Hosp.	"	" "		"
41	11/27/73	Lakeview	Lake Hospital District	"	" "		"
42	12/3/73	Medford	Harry and David	"	" "		"
43	12/18/73	Medford	Providence Hospital	"	" "		"
44	11/20/73	Klamath Falls	Presbyterian Intercommunity Hospital	"	" "		"
45	4/10/74	Grants Pass	Josephine General Hospital	"	" "		"
46	10/26/73	Grants Pass	State Highway Division	"	" "		"
47	12/7/73	Roseburg	Mercy Hospital	"	" "		"
48	12/6/73	Redmond	Central Oregon Dist. Hosp.	"	" "		"

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
49	12/6/73	Roseburg	Pacific Building	Clinton	Permit Appl.		To prepare permit
50	1/7/74	Ashland	Ashland Community Hospital	"	" "		"
51	12/18/73	Ashland	So. Oregon College	"	" "		"
52	6/14/73	McNary	John Mansville Products	"	" "		"
53	10/22/74	Eagle Point	So. Ore. Tallow Co., Inc.	"	" "		"
54	10/29/74	North Bend	Menasha Corporation	"	" "		"
55	11/8/74	Klamath Falls	Klamath Tallow Co.	"	" "		"

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Engineering Services
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Permit Applic. EI No.	Approval Date	Action
1		Durkee	Oregon Portland Cement	J. A. Broad	01-0027		Pending review, to prepare permit
2		Huntington	Oregon Portland Cement	"	01-0015		Pending review "
3		Redmond	Central Oregon Pavers	"	09-0050		
4		Bend	Central Oregon Pumice	"	09-0024		Pending inspection, to issue Permit
5		Roseburg	Umpqua Sand & Gravel	"	10-0091		Pending inspection "
6		Roseburg	Roseburg Sand & Gravel	"	10-0044		Completed 10-14-74 Pending inspection "
7		Riddle	Mining Minerals & Mfg.	"	10-0066		Pending review, to prepare permit
8		Cascade Locks	Hood River S&G & Redimix	"	14-0012		Pending inspection, to issue permit
9		Jacksonville	Sasco Gravel	"	15-0089		Pending inspection "
10		Klamath Falls	Klamath Rock Products	"	18-0047		Pending inspection "
11		Hermiston	Rohde Sand & Gravel	"	30-0055		Pending inspection "
12		Boardman	Ready Mix Sand & Gravel	"	30-0046		Pending inspection "
13		Pendleton	Rogers Construction(Airport)	"	30-0047		
14		Pendleton	Morrison Knudsen	"	30-0053		Pending inspection "
15		Pendleton	Rogers Const. (Pendleton)	"	30-0068		Pending inspection "
16		Hermiston	E. S. Schnell	"	30-0069		Pending inspection "

AIR QUALITY CONTROL DIVISION
 INFORMATION RECEIVED

Program - Engineering Services
 DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Permit Appl. EI No.	Approval Date	Action
17		Island City	R. D. Mac	Broad	31-0020		Pending insp., to issue permit
18		Portable	Jarl Construction	"	37-0069		Pend. review, to prepare permit
19		Portable	C. H. Stinson	"	37-0073		Pending review " "
20		Portable	Klamath Road Department	"	37-0019		Pending review " "
21		Portable	J. C. Compton	"	37-0065		
22		Portable	So. Oregon Aggregate	"	37-0067		Pend. insp., to issue permit
23		Banden	Bullard Sand & Gravel	"	06-0003		Completed 9-18-74
24		Grants Pass	Copeland Paving	"	17-0001		Pending review " "
25		Klamath Falls	George Stacy	"	18-0060		Pending review " "
26		Klamath Falls	Klamath Rock Products	"	18-0012		Pending review " "
27		Malheur Co.	Ontario Asphalt Paving	"	23-0001		Pending review " "
28		Milton-Free water	Ready Mix Sand & Gravel	"	30-0002		Completed 9-24-74
29		Umatilla Co.	Percy E. Jellum	"	30-0003		Pending review " "
30		Hermiston	E. S. Schnell	"	30-0071		Pending review " "
31		Pendleton	Rogers Const. (Airport)	"	30-0066		Completed 10-14-74
32		Pendleton	Rogers Const. (Mission)	"	30-0067		Completed 10-14-74

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Permit Appl. EI No.	Approval Date	Action
33		Portable	L. W. Vail	Broad	37-0068		Completed 9/18/74
34		Portable	J. C. Compton	"	37-0078		Completed 9/9/74
35		Portable	Coos County	"	37-0031		Completed 10-4-74
36		Portable	L. W. Vail	"	37-0043		Moved out of Oregon
37		Portable	L. W. Vail	"	37-0041		Sold
38		Portable	L. W. Vail	"	37-0025		Completed 9-18 74
39		Portable	J. C. Compton	"	37-0022		Sold
40		Portable	Peter Kiewit & Sons	"	37-0024		Completed 9/24/74
41		Portable	S. D. Spencer	"	37-0052		Moved out of state
42		Portable	Oregon St. Highway RE 64	"	37-0003		Phased out
43		Portable	Oregon St. Highway RE 65	"	37-0004		Completed 9-26-74
44		Portable	Babler Brothers	"	37-0021		Completed 9-16-74
45		Portable	Rogue River Paving	"	37-0028		Completed 10-3-74
46		Portable	Tillamook Co. Rd. Dept.	"	37-0034		Sent to NWRO
47		Portable	B & D Paving	"	37-0047		Completed 8-26-74
48		Portable	Klamath Paving	"	37-0051		Completed 9-13-74

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Engineering Services
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Permit Appl. EI No.	Approval Date	Action
49		Baker	Baker Redi Mix	Broad	01-0028		Pend. review-to prepare permi
50		Crook Co.	Ochoco Redi Mix	"	07-0011		Pending review " "
51		Curry Co.	Pacific Redi Mix	"	08-0021		Pending review " "
52		Curry Co.	Ferry Creek Rock & Conc.	"	08-0030		Pending review " "
53		Deschutes Co.	Bend Redi Mix	"	09-0038		Pending review " "
54		Deschutes Co.	Redmond Redi Mix	"	09-0039		Pending review " "
55		Douglas Co.	Beaver State Redi Mix	"	10-0098		Pending review " "
56		Douglas Co.	Tri City Redi Mix	"	10-0087		Pending review " "
57		Douglas Co.	Umpqua Redi Mix	"	10-0086		Pending review " "
58		Douglas Co.	Jimelcrete	"	10-0095		Pending review " "
59		Douglas Co.	Pre Mix Concrete Pipe	"	10-0096		Pending review " "
60		Douglas Co.	Bohemia Umpqua Div.	"	10-0103		Pending review " "
61		Hood River Co.	Hood River S & G	"	14-0015		Pending review " "
62		H. Rvr. Co.	Hood Rvr. S & G & Redimix	"	14-0016		Pending review " "
63		Jackson Co.	M. C. Liniger	"	15-0071		Pending review " "
64		Jackson Co.	Pine St. Redi Mix	"	15-0082		Pending review " "
65		Jackson Co.	Tru Mix Leasing	"	15-0090		Pending review " "

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Permit Appl. EI No.	Approval Date	Action
66		Jackson Co.	M. C. Liniger	Broad	15-0062		Pend. review-to prepare perm
67		Josephine Co.	Davidson Redi Mix	"	17-0041		Pending review " "
68		Josephine	Gilbert Rock & Redi Mix	"	17-0048		Pending review " "
69		Josephine	Mel Barlow	"	17-0051		Pending review " "
70		Josephine	Gary L. Peterson	"	17-0053		Pending review " "
71		Klamath Co.	Klamath Redi Mix	"	18-0042		Pending review " "
72		Klamath Co.	Concrete Products Ind.	"	18-0041		Pending review " "
73		Lincoln Co.	Ocean Lake Redi Mix	"	21-0030		Pending review " "
74		Lincoln Co.	Ocean Lake Redi Mix	"	21-0034		Pending review " "
75		Lincoln Co.	Lincoln Redi Mix	"	21-0035		Pending review " "
76		Lincoln Co.	Lincoln Redi Mix	"	21-0028		Pending review " "
77		Malheur Co.	Oregon Concrete Products	"	23-0014		Pending review " "
78		Malheur Co.	RTP Concrete	"	23-0015		Pending review " "
79		Malheur Co.	Flynn Sand and Gravel	"	23-0013		Pending review " "
80		Morrow Co.	Ready Mix Sand & Gravel	"	25-0014		Pending review " "
81		Umatilla Co.	Ready Mix Sand & Gravel	"	30-0057		Pending review " "

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Permit Appl. EI No.	Approval Date	Action
82		Pendleton	Pendleton Redi Mix	Broad	30-0019		Pend. review-to prepare permi
83		Umatilla Co.	Central Cement	"	30-0020		Pending review " "
84		Union Co.	R. D. Mac	"	31-0010		Pending review " "
85		Wasco Co.	Tygh Valley Sand & Gravel	"	33-0017		Pending review " "
86		Wasco Co.	The Dalles Concrete	"	33-0019		Pending review " "
87		Portable	Acme Vickery	"	37-0077		Pending review " "
88		Portable	Bohemia-Umpqua Division	"	37-0063		Pending review " "
89		Portable	Ready Mix Sand & Gravel	"	37-0054		Pending review " "
90		Portable	ACCO Contractors	"	37-0055		Pending review " "
91		Portable	Bi State Redi Mix	"	37-0056		Pending review " "
92	9-10-74	Portable	O'Hair Construction Co.	"	37-0072		Completed 9-11-74
93	9-30-74	Waldport	Eckman Creek Quarries	"	21-0043		Completed 10-2-74
94	9-30-74	Waldport	Far West Paving	"	21-0044		Completed 10-2-74
95	9-10-74	Ft. Klamath	O'Hair Construction Co.	"	37-0071		Completed 9-11-74
96	9-10-74	Portable	Curry County Crushers	"	37-0081		Completed 10-7-74
97		Portable	Ore. State Highway Dept.	"	37-0002		Comp. 9-26-74

AIR QUALITY CONTROL DIVISION

Program - Engineering Services

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
98	9-19-74	Portable	J. C. Compton	Broad	37-0044		Comp. 9-23-74
99	9-23-74	Portable	O'Hair Construction Co.	"	37-0083		Comp. 11-1-74
100	10-8-74	Portable	Deschutes RediMix	"	37-0026		Comp. 11-4-74

AIR QUALITY CONTROL DIVISION

Program - Engineering Section

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	10/7/74	Riddle	Hanna Nickel Smelting Co. Tax Credit T-587	Broad	10-0007	11/4/74	Approved
2	"	"	Hanna Nickel Smelting Co. T-598	"	"	11/5/74	Approved
3	"	"	Hanna Nickel Smelting Co. T-599	"	"	10/31/74	Approved
4	"	"	Hanna Nickel Smelting Co. T-600	"	"	10/31/74	Approved
5	"	"	Hanna Nickel Smelting Co. T-601	"	"	10/30/74	Approved

AIR QUALITY CONTROL DIVISION

Program - Indirect Sources

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	7/22/74	Clackco	Clackamas Town Center	RMJ/RLV	E.A. requested		
2	7/22/74	Mulco	Mt. Hood Mall	RMJ/RLV	E. A. Requested		
3	8/26/74	Mulco	Randall Construction	RMJ	Application to be amended		
4	2/25/74	Mulco	MacDonalds Restaurant	RMJ/RLV	Add'l info requested		
5	7/8/75	Mulco	Safeway Stores Shopping Center	RMJ	"		
6	4/19/74	Clackco	Lincoln International Center	RMJ/RLV	"	11/25/74	
7	7/30/74	Mulco	Presbyterian Church of Laurelhurst	RMJ	"		Approve pending explanation of discrepancy in number of spaces
8	7/2/74	Mulco	McCormick Dock	RMJ/RLV	Info requested		
9		Washco	Lloyd Properties, Inc.	RMJ	Need applic.		
10	6/24/74	Mulco	Owens-Corning Fiberglas	RMJ	Info requested		

AIR QUALITY CONTROL DIVISION

Program - Indirect Sources

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Status or Information	Approval Date	Action
11	4/3/74	Mulco	Columbia Independent Refinery	RMJ	Applic. request		
12	7/2/74	Washco	Payless Distribution Center	RMJ	Transit rec.		
13	8/29/74	Marion Co.	Pringle Creek Parking	RMJ			Info rec'd 10/1/74 Starting review.
14	9/25/74	Washco	Tualatin Plaza - 54 spaces	RMJ	Approval	10/25/74	Approval schedule.
15	9/26/74	Mulco	Rivergate North Shopping Cen.	RMJ		10/26/74	
16	9/26/74	Washco	Farmers Insurance Modification to existing	RMJ	Applic. rec.	11/5/74	
17	9/15/74	Washco	Tektronix	RMJ/REV	Requested add'l info	ASAP	Approve with conditions
18	9/18/74	Washco	Sunset West Shopping Center	RMJ	Add'l info req.		
19	9/4/74	Mulco	Tri-Met	RMJ	Needs land use approval		
20	10/28/74	Mulco	Sommerwood	RMJ	Add'l info requested	11/25/74	
21	11/1/74	Mulco	Argay Square Shopping Cen.	RMJ	"	12/1/74	
22	11/7/74	Lane Co.	Eugene Motor Pool	RMJ		11/7/74	
23	11/7/74	Mulco	Aldean Construction	RMJ	Add'l info requested	12/7/74	

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Indirect Sources
Program - Technical Services
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
24	11/26/74	Multnomah	LDS Church, 182nd Ave.	RMJ	Appl. rec.		
25	11/25/74	Mulco	Jantzen Village Apts.	"	"		
26	11/2/74	Mulco	LDS Church, 16th Ward	"	"		
27	11/21/74	Washco	Pacific NW Tennis Club	"	"		
28	11/15/74	Mulco	Robt. Randall Apts.	"	"		

AIR QUALITY CONTROL DIVISION

Program - Indirect Sources

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1a			Lead Standard	RMJ	Report completed		Standard adopted by EQC
2a			Federal Register Search	RMJ	Continuing Program		Review as needed
3a			CRAG, Transportation Committee, Watchdog Comm.	RMJ/RLV	"	"	
4a			Hearings, informational meeting, etc. for various indirect sources	RMJ	"	"	

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Program Development
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	9/24/74	Portland	Revision of Pollution Particle Index¹ portion of daily air pollution advisory	RBP	Statistical re-evaluation	ASAP completed	Revision of active program
2	Indeterminate	Portland	Terwilliger H.V. Pb study	RBP	Summary report	ASAP completed	Review of data and environmental factors for possible use in setting Pb standard. Some statistical review.
3	March 74	Statewide	Implementation, review of operation of Air Quality Assurance Program as required by EPA	RBP	Operational review, statistical	Continuing	Statewide program to validate methods used to collect and report sample data
4	March 73	Statewide	Operation and execution of Emergency Action Plan for Alert, Emergency and Warning levels of pollutants according to guidelines in Federal Register and OSIP.	RBP	Levels of high pollutants	Continuous	Surveillance of pollutant levels at statewide sampling sites. Consultation with EPA, Regional agencies, DEQ staff, U.S. Weather Bureau. Determine and recommend declaration of Alert if conditions warrant. Recommend termination of episode conditions when normal levels return.
5	March 73	Statewide	Data handling and validation of accuracy. Inspection of values, trends and summaries. Distribution of same to designated agencies and other parties.	RBP	Data review and distribution. Recall of past data	Continuous	Raw Lab data inspection. Review of data after data processing. Transmittal.

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Program Development
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
6	Apr. -Oct. 1973 and	The Dalles	Make summary report of sample results for ambient air F ⁻ levels measured at sampling sites	RBP	Summary report	ASAP	Review of data and weather conditions at location during ambient sampling. Some statistical review.
7	Aug. 74	Portland and Rainier	H.V. and PFO sampling at Rainier for particulates originating from Power Plant in State of Washington	NWRO and part-time RBP	Data collection and review. Transmittal to NWRO	Indeterm.	Dependent on information furnished by NWRO. Review of sampling sites and methods. contact with SWAPCA personnel.
8	July 74	Salem Boise Cascade	Air monitoring at Salem for SO ₂ , PFO, H.V. and sticky paper. Determine extent and level of B.C. emissions.	NWRO and part-time RBP	Network plans, equipment, correct procedures	Continuous	Dependent on information furnished by many staff members involved outside main DEQ office. Check with EPA.
9	March 73	Portland Portland	Rewrite and update E.A. plan presently being used Information on various air quality connected subjects requested by phone calls, written correspondence or staff members	RBP RBP	New contacts revised procedures Air sampling procedures, methods, types of instruments, etc. data requests.	ASAP Continuing	 Requests from private consultants, other government agencies and interested individuals.

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Program Development-
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
10	Aug. 74	Portland	Supervise operation of Dept. daily air pollution advisory. Answer questions concerning what it means and obtaining information on levels at various times during the day.	RBP	P.R. for TV newspapers and Public Info program	Continuing	Daily reports to TV, news media and staff member Secretaries handle actual work and transmittal of info.
11	Mar. 73	Portland	Miscellaneous assignments which are not part of long range plan. Usually do not require extensive time.	RLV/HMP	Misc. as needed	Continuing as needed	Dependent on need
12	10/31/74	Portland	Summarize Air Quality Assurance Data	RBP	Field data, lab data, operational data	Dec. 15-31, 1974	Review and evaluate efficiency of Air Monitoring Program based on possible maximum effective success rate.
13	Nov. 1974	Portland	Arrange for monitoring trailer use in Portland and Willamette Valley	RLV/HMP	Determine of need and production of useful data for DEQ	ASAP	Write letter, review requests
14	12/74	Centralia Washington	Description of PP&L Power generating facility with data and process info.	RLV/HMP	For DEQ files	By 1/1/75	Collecting necessary information for outline report
15	11/74	Portland	Tri Met "Free Zone" CO study with CAS and Laboratory.	CAS/RBP	Site location for CO	Indefinite	Start Jan. 75 to time when resurvey is indicated

AIR QUALITY CONTROL DIVISION

Program - Program Development

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	Jan. '74	Designated AQMA's	AQMA Plan Development	C.Simons	Coordinated program with COG's, ODOT, EPA, CAC's, etc.	Pending EPA approval	Ongoing program to be completed by June, 1975. Draft to be prepared by February, 1975.
2	Oct. '72	Portland	Portland Transportation Control Strategy Implementation	C.Simons	Coordinated implementation of approved strategies	Approved by EQC	Ongoing program to be completed by July 1, 1975.
3		As required by I.S. regulations	Developed by Revised Parking Facility Guidelines to conform with new proposed Indirect Source Rules.	C.Simons	Presently being revised	Pending EQC approval of I.S. regulations	To be completed by Jan. '75
4		Portland	Prepare agenda for Citizens' Watchdog Committee on TCS	C.Simons	To keep Committee abreast of TCS activities		Monthly meetings.
5	Sept. '74	Portland	Represent DEQ on CRAG Air Quality Technical Committee	C.Simons	To coordinate land use, transportation air quality plans.		Monthly meetings.
6	Nov. '74	Portland	Represent DEQ on Ad Hoc Committee on Shopping Centers	C.Simons	To develop land use environmental criteria for Shopping Centers		Periodic

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
7	Sept. '74	Portland	Represent DEQ on CRAG Transportation Committee	C.Simons	To review & comment on all transportation projected effect by A-95 & 3C Processes		Monthly meetings.
8		Portland	Review of Applications for Parking Facility Permits	C.Simons	Review all applications submitted	As required by regulations	Review all applications as required by OAR 20-050 thru 20-070.
9		Portland	Review of draft EIS on transportation projects	"	Prepare DEQ comments as part of A-95 process		Ongoing program
10	Start 11/74	Portland	Coordination of TriMet Transit Incentive Program with DEQ Revised Indirect Source Guidelines	"	Develop, coordination mechanisms for new IS regulations		Periodic meetings. Program to be developed by Jan. 1975
11	Nov. 1974	Portland	Evaluation of Tri-Met Free Fare Zone on downtown air quality	"	Review CO data for downtown. Monitor CO data during start-up period		Coordinate ambient CO data with downtown traffic flows

AIR QUALITY CONTROL DIVISION

Program - Field Burning/Meteorology

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1			Field Burning	LDB		Completion Expected 10/10/74	
2			Slash burning review	LDB		2/1/74	
3			Open burning regulations	LDB	Public Hearing	12/24/74 1/24/75	
4			PGE Boardman site application	LDB			
5			Field burning report 1974	LDB		1/1/75	
6			Daily burning announcements and weather records	LDB		Continuous 365 days per year	
7			Field burning law recommendations	LDB		12/25/74	
8			Episode forecasts	LDB		as occurring	
9			EMSU	LDB		1/15/75	Implementation

AIR QUALITY CONTROL DIVISION

Program - Program Development

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	10/1/74	Portland	Present model package - update - modification - Application	W.B.C.	Calibration, validation, application of existing EPA Model pack for Portland and other areas of interest.		Familiarization with the computing facilities, with the Oregon State Model pack with the available data base. Simulation testing, calibration and validation using input parameter data base and output monitoring data.
2	10/1/74	Portland	Emissions Inventory	WBC	Development and maintenance of an "up to date" emissions inventory.		Familiarization with present system. Development of logistical procedures necessary for successful maintenance.
3	10/1/74	Portland	Oregon-Washington Diffusion Modeling Study	WBC	Be an integral participant in the development, operation, calibration, sensitivity and other facets of the production of a usable air quality simulation model for the Portland/Vancouver study area		Work in direct connection with the prime and sub-contractors in all phases of model development, as participant and reviewer as conditions dictate.

AIR QUALITY CONTROL DIVISION

Program - Program Development

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
4	11/1/74	Portland	Present model package EPA UNAMAP Series	WBC	PTDIS PTMAX PTMPT are all modified for our system.		In house capability to use EPA Air Quality Models is now available.
5	11/1/74	Portland	Present model package - emission factors	WBC	EMFAC		Written and compiled and validated
6	12/1/74	Portland	Users Manuals for PTDIS PTMAX PTMPT	"	Necessary input and output and formats		Rough draft form
7	12/1/74	Portland	Use of model package by NWRO	"	Verification runs		Coordination with NWRO on duplicate runs of model pack
8	12/1/74	Portland	EI System	"	Prodding for data		Memo's to regions to assist in EI time schedule by getting the data in.

AIR QUALITY CONTROL DIVISION

Program - Data Processing

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1	9/16/74		CSDS - Write a program to produce extended forecasts of compliance data	Hawthorne	Needed ASAP		Completed 10/1/74
2			VID - Write a program to analyze average cost of repair for motor vehicle inspection program	Hawthorne			Completed 10/17/74
3	10/23/74		Write a program to convert old format of data (3 cards/test) to the new format (2 cards/test)	Hawthorne	Needed ASAP		Completed 10/29/74
3			EI - complete conversion of EI data into new format	Hawthorne	Needed ASAP		Completed 11/8/74
			Update current EI files and generate annual print-out	Hawthorne	Data required from regions		Completed 12/3/74
			Design logic for edit step of new EI system. Code programs and debug	Hawthorne			Tentative completion 1/15/75
			Visit Regions concerning new EI and provide assistance relative to implementation of new system.	Hawthorne Crews			Completed 12/1/74
			Begin learning PL/I for use in new EI System	Hawthorne Rendar			

AIR QUALITY CONTROL DIVISION

Program - Data Processing

INFORMATION RECEIVED

DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
4			AQDMA - Assist in analysis of EPA suggested methodology for analyzing ambient data as part of AQMA's	Rendar and Hawthorne			Preliminary results by 2/1/74
5			MDS - Write a program to summarize by station by month by year all data on the meteorological master files	Hawthorne			Completed 11/10/74
6			Motor vehicles a. Edit MV file b. Run statistics by model-year group c. Punch cards for OSU stat runs	"	In process		Tentative completion 12/18/74

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

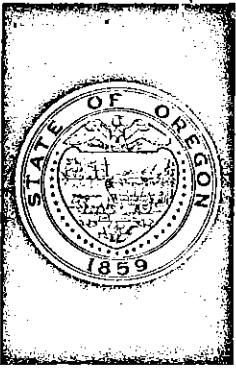
Program - Data Processing
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Approval Date	Action
1			CSDS	Hawthorne	On-going		Monthly update and generate forecast
2			MDS	Hawthorne	On-going		Monthly update
3			EI	Hawthorne	On-going	October	Completed conversion of 197 data to new format
				Hawthorne		October	Begin system design for new system
4			Air Quality Data System update, printouts, EPA reports, statistical analysis	Rendar	On-going Monthly, quarterly throughout year		
5	September		Meteorological Data System X-tabulation printouts	Rendar	completed	12/5/74	Currently being debugged
6			Extend Whittaker-Henderson method to HV sites	Rendar/ Hawthorne	In process		Preliminary results comp. 12/1/74
7			Look into EPA statistical tests of significance	Rendar/ Hawthorne	Start Nov. or Dec.		Will try to evaluate applicability to our ambient data
8			Look into PL/I	"	In process		Will be writing part of EI a future ambient programs in PL/I

AIR QUALITY CONTROL DIVISION
INFORMATION RECEIVED

Program - Program Development
DEQ Staff Disposition

No.	Received Date	Location	Project	Review Engineer	Information	Expected comp. Date	Action
1			Revising E.I. data and format to be somewhat compatible with NEDS and more efficient for our use.	RCH		Dec. 1974	Completed
2			Reviewing NESHAPS	RCH		12/15/74	Handled by Norm Edmisten
3			Source search for users of vinyl chloride or poly vinyl chloride	RCH		12/30/74	
4			Odor survey of Publishers Paper mill, Newberg, Ore.	RCH		Jan-Feb. 1975	Ongoing
5			Emission Inventory update	RCH			Ongoing
6			Working with OSPIRG'S proposed rules for significant deterioration	RCH		11/20/74	Completed
7			Revising and updating listing of 100 ton sources	RCH		11/20/74	Completed
8			Revising and updating listing of 25-100 ton sources	"		1/10/75	



ENVIRONMENTAL QUALITY COMMISSION

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The Dalles

KESSLER R. CANNON
Director

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

Tax Credit Applications

Attached are review reports on 13 Tax Credit Applications. These applications and the recommendations of the Director are summarized on the attached table.

KESSLER R. CANNON

AHE

December 9, 1974

Attachments

Tax Credit Summary
Tax Credit Review Reports (13)



Contains
Recycled
Materials

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>
George F. Joseph & Estate of Victor H.M. Joseph dba Modoc Orchard Company	T-579	Overhead sprinkling system	\$103,965.17	More than 40% and less than 60%	Issue
Terminal Flour Mills Company	T-585	Two baghouses	33,322.28	80% or more	Issue
Publishers Paper Company Newberg Division	T-591	Sulfur dioxide emissions con- trol system	575,174.00	80% or more	Issue
Publishers Paper Company Dwyer Division	T-592	Baghouse and water spray system	81,009.00	80% or more	Issue
Publishers Paper Company Dwyer Division	T-593	Rader tube control device	17,817.00	80% or more	Issue
Publishers Paper Company Oregon City Division	T-595	Venturi scrubber (fourth stage of sulfur dioxide collection system)	257,620.00	80% or more	Issue
Crown Zellerbach Corporation Wauna Division	T-603	Addition to digester relief gas system	215,674.00	80% or more	Issue
Brooks-Scanlon, Incorporated Bend Division	T-606	Modifications to boilers #1 & #2 (in new powerhouse) and steam system	363,386.00	80% or more	Issue
Publishers Paper Company Oregon City Division	T-608	Digester pumpout system	2,413,714.00	80% or more	Issue
Publishers Paper Company Dwyer Division	T-609	Scrubber which cleans exhaust from four veneer dryers	116,977.00	80% or more	Issue
Georgia-Pacific Corporation Toledo Division	T-610	Wet scrubber which collects par- ticulate from No. 2 smelt dissolving tank vent	67,903.00	80% or more	Issue
Georgia-Pacific Corporation Toledo Division	T-611	Wet scrubber which collects par- ticulate from No. 3 smelt dissolving tank vent	70,655.00	80% or more	Issue

TAX CREDIT APPLICATIONS

Page 2

<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>
Georgia-Pacific Corporation Toledo Division	T-612	System which collects & ducts odorous gases from modified kraft process and brown stock washer vacuum pumps	\$ 85,366.00	80% or more	Issue

Appl T-579

Date 12-6-74

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

1. Applicant

Mr. George F. Joseph & Estate of Victor H. M. Joseph
dba Modoc Orchard Company
P. O. Box 56
Medford, OR 97501

The applicant operates a 297-acre orchard on Modoc Road north of Central Point.

2. Description of Claimed Facility

The claimed facility is described to be an overhead sprinkling system on the remaining 60 acres of orchard not covered by the sprinkling system in Applications T-212, T-339, and T-476.

The facility was completed and put into service during April 1974.

Certification is claimed under the 1969 Act. The percentage claimed for pollution control was not specified.

Facility cost: \$103,965.17 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility serves to provide the frost protection for 60 acres of trees by replacing or eliminating the need for some 1000 orchard heaters. In addition, the facility provides irrigation by sprinklers instead of by flooding the entire 60 acres. (The applicant has previously obtained certification for similar 80-acre, 90-acre and 67-acre systems of overhead sprinklers, Tax Credit Applications T-212, T-339 and T-476, respectively.)

Since the facility claimed in this application (T-579) does contribute to both reducing atmospheric emissions and increasing production, only a portion of it can be certified under the 1969 Act. In order to establish the percentage of the system allocable to pollution control, the company has provided data on hours and days of both heating and irrigation for those years that the previously installed systems were operated. The data submitted for the years 1971-1974 indicate that the average hours of orchard heating (55.5 hours per season) is approximately 43% of the total hours of operation. There was an average of 75 hours of irrigation per season. Although these numbers are subject to many variables, they are considered to be sufficiently representative to make the desired determination for this particular application. (It is well established that the required amount of frost protection usually varies among orchards and often within a given orchard.)

It is concluded that the facility operates to a substantial extent for reducing atmospheric emissions and that the portion of the cost allocable to pollution control should be 40% or more and less than 60%. (This is the same as the conclusion reached in Applications T-212, T-339, and T-476 which were previously certified.)

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$103,965.17, with more than 40% and less than 60% of the cost allocable to pollution control, be issued for the facility claimed in Tax Application T-576.

EGW:mh

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

1. Applicant

Terminal Flour Mills Co.
Municipal Terminal No. 4
Portland, Oregon 97203

The applicant owns and operates a flour mill at Portland, Oregon.

2. Description of Claimed Facility

The facilities described in this application are two baghouses which collect flour dust emitted in the milling and transport operations at the flour mill.

Facility cost: \$33,322.28 (Accountant's certificate was provided).

The facilities were placed in operation in January, 1974. Certification is claimed under the 1969 Act with 100% allocable to pollution control.

3. Evaluation of Application

The company was required to install the two baghouses as the first stage of Consent and Order No. 72-27 issued by the Columbia-Willamette Air Pollution Authority. The claimed facilities replaced cyclones which were not adequate in controlling emissions.

The plans and specifications for the two baghouses were reviewed and approved by Columbia-Willamette Air Pollution Authority. The Department has inspected the claimed facilities and has found that they are operating satisfactorily. Baghouses are the highest and best practicable control of emissions from this type of source. The cost of operating the baghouse is more than the value of the material collected. Therefore, it is concluded that the facilities were installed and are operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$33,322.28 with 80% or more allocated to pollution control be issued for the facilities claimed in Tax Credit Application No. T-585.

Appl T-591

Date December 2, 1974

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

1. Applicant

Publishers Paper Company
Newberg Division
Newberg, Oregon 97132

The applicant owns and operates a bleached sulphite pulp and paper mill at Newberg, Oregon. The chemical pulp production capacity of this mill is 250 ton/day.

2. Description of Claimed Facility

The facility described in this application is a system which controls sulfur dioxide emissions from the digester blowpit. The system consists of a liquid seal on the blow stack and diverts the blow gases to a condenser-accumulator where the steam is condensed. The non-condensable gases are conveyed from the condenser to two scrubbers in series for the control of sulfur dioxide.

Facility cost: \$575,174.00 (Accountant's certificate was provided).

The facility was placed in operation in March, 1974. Certification is claimed under the 1969 Act and the percentage claimed is 100%.

3. Evaluation of Application

This facility was installed in response to the Sulfite Pulp Mill Regulation (OAR, Chapter 340, Section 25-360 2 (a) & (b)) which required that digester blow system emissions not exceed 0.2 pounds of sulfur dioxide per minute per ton of unbleached pulp as a 15 minute average or 800 ppm as an hourly average. Prior to the installation of this system the digester blow gases were emitted directly to the atmosphere. The installation of the claimed facility has reduced digester sulfur dioxide emissions by 9000 pounds per day (from 9100 lb/day to 100 lb/day). Plant site sulfur dioxide emissions were reduced to 2880 lb/day.

The plans and specifications for the facility were reviewed and approved by the Department. The sulfur dioxide emissions of the system are currently below the regulation limits.

The cost of operating the claimed facility is greater than the value of the sulfur collected. Therefore, it is concluded that the system was installed and is operated for pollution control.

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

1. Applicant

Publishers Paper Company
419 Main Street
Oregon City, Oregon 97045

The applicant owns and operates a plywood plant at 6637 SE 100th Avenue, Portland.

2. Description of Claimed Facility

The facility claimed in this application is described as a baghouse and water sprays for reducing wood particulate emissions from existing cyclones. The claimed facility includes:

1. A baghouse - Carter Day Model 144RJ72.
2. Alterations to cyclones.
3. Adding a water spray.
4. Controls, wiring, piping.

The facility was completed and put into operation in April 1974. Certification is claimed under the 1969 Act. The percentage claimed for pollution control is 100%.

Facility cost: \$81,009.00 (Accountant's certification was provided).

3. Evaluation of Application

This facility was installed as a result of requests from CWAPA for Publishers to lower particulate emissions. CWAPA reviewed and approved the plans on 3-27-73 by N/C 386. The claimed facility made a significant contribution in lowering emissions from this plant.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$81,009.00 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-592.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$575,174.00 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-591.

CRC:mh

Date December 6, 1974

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

1. Applicant

Publishers Paper Company
419 Main Street
Oregon City, Oregon 97045

The applicant owns and operates a plywood plant at 6637 SE 100th Avenue, Portland.

2. Description of Claimed Facility

The facility claimed in this application is described as a Rader tube control device consisting of:

1. Rader RF filter.
2. Belt conveyor.
3. Electric motors for higher air pressure.

The facility was completed in August 1973 and placed in operation in September 1973. Certification is claimed under the 1969 Act. The percentage claimed for pollution control is 100%.

Facility cost: \$17,817.00 (Accountant's certification was provided).

3. Evaluation of Application

This facility was installed to reduce sanderdust emissions from the plant's sanderdust cyclones. The plan was reviewed and approved by the Department's Northwest Regional Office on 11-12-73 by N/C 463. The Rader tube filter has been working effectively since September 1973 in controlling sanderdust emissions from this plant.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$17,817.00 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Application T-593.

PBB:mh

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

1. Applicant

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

The applicant owns and operates a bleached sulphite pulp and paper mill located in Oregon City. The pulp production capacity of the mill is 230 T/day.

2. Description of Facility

The facility described in this application is a venturi scrubber which was added as a fourth stage of sulfur dioxide collection system on the recovery furnace.

Facility cost: \$257,620.00 (Accountant's certificate was provided).

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

3. Evaluation of Application

This facility was installed in response to the Sulphite Pulp mill regulation (OAR, Chapter 340, Section 25-360 2 (b)) which required that mill site emissions not exceed 20 pounds of sulfur dioxide per ton of unbleached pulp produced and that recovery furnace sulfur dioxide emissions not exceed 800 ppm as an hourly average. Prior to the installation of this scrubber, recovery furnace emissions were controlled by three venturi scrubbers in series.

The installation of the claimed facility has reduced recovery furnace sulfur dioxide emissions by 2750 pounds per day (from 3830 lb/day to 1080 lb/day) to a monthly average of 100 ppm. Plant site sulfur dioxide emissions were reduced to a monthly average of 10,520 pounds per day. Particulate emissions were also reduced by 70 pounds per day (from 520 lb/day to 450 lb/day).

The plans and specifications for the facility were reviewed and approved by the Department. The sulfur dioxide and particulate emissions of the recovery furnace are currently in compliance with the regulatory limits.

The cost of operating the claimed facility is greater than the value of the sulfur material collected. Therefore, it is concluded that the system was installed and is operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$257,620.00 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-595.

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

1. Applicant

Crown Zellerbach Corporation
Wauna Division
Clatskanie, Oregon 97016

The applicant owns and operates a bleached Kraft pulp and paper mill at Wauna, Oregon. The chemical pulp production capacity of this mill is 750 tons per day.

2. Description of Facility

The facility described in this application is a system which includes a condensor, a steam separator and associated other equipment (pumps, piping and instrumentation). This equipment was added to the digester relief gas system to provide continuous treatment.

Facility cost: \$215,674.00 (Accountant's certificate was provided).

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

3. Evaluation of Application

This facility was installed to bring the digester relief gas system into compliance with the Kraft Pulp Mill regulation (OAR, Chapter 340, Section 25-165 (1) (d) (A)) which required that digester non-condensibles be treated by incineration or equivalent treatment.

The facility described in this application is a modification to the existing digester relief gas system. The original system (Tax Credit No. T-51) was incapable of condensing all of the condensable gas due to insufficient capacity. The pressure would cause the safety valve to trip emitting untreated gases to the atmosphere. The modifications claimed in this application solved this problem. The installation of this facility was not associated with a production increase nor does it represent the capability to do so.

The plans and specifications for the facility were reviewed and approved by the Department. The facility is currently operating satisfactorily. Continual compliance with the Kraft mill regulation requires the installation of an alternate incinerator, which will be installed by July 1, 1975.

There is no economic return provided by this installation. Therefore, it is concluded that the equipment was installed and is operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$215,674.00 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-603.

CRC:mh

App1 T-606

Date 12/6/74

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

1. Applicant

Brooks - Scanlon, Inc.
Bend Division
P. O. Box 1111
Bend, Oregon 97701

The applicant owns and operates a large sawmill and planing mill, generating some of its electricity by its hogged fueled boilers, in Bend, Oregon.

2. Description of Facility

The claimed facility is a whole series of independent modifications to boilers #1 and #2 (in the new power house) and steam system. The claimed reasons for these modifications were to reduce the amount of steam needed to even out its rate of usage, and to improve combustion efficiency. This was done only to allow continuous boiler operation below the maximum steaming rates corresponding to the maximum allowed emission limits.

Modifications were:

- a. Boiler Filter and Feedwater System.
- b. Boiler Fuel Feed System.
- c. Modulating Kiln Controls.
- d. Fly Ash Removal System.
- e. Reroute 150 psi Steam Lines.
- f. Steam Line Flow Meters.
- g. Multiclone Rebuild.
- h. Miscellaneous.

Facility Cost: \$363,386.00 (Accountant's certification was provided).

The facility modifications were completed in December 1972. Source Tests run in October 1972 show compliance with regulations at steaming rates stated in Air Contaminant Discharge Permit 09-0001 dated 4/25/74. Certification is claimed under the 1969 Act. The percentage claimed is 100%.

3. Evaluation of Application

The modifications were made in response to the Department's program to reduce Brooks - Scanlon's emissions to within OAR Chapter 340, Sections 21-015 and 21-020 limits. The Department reviewed and approved the program plan on September 20, 1971 and on June 19, 1972.

This mill has shown a significant improvement and is presently operating within the emission limits. As shown by Brooks - Scanlon computations, the costs of making steam and using it have gone up. Therefore there are no profit-making returns from these modifications, and it is concluded that the installation was installed solely for air pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$363,386.00 be issued for the facility claimed in Tax Application T-606 with 80% or more allocated to pollution control.

PBB:df

Date 12-4-74

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

1. Applicant

Publishers Paper Company
Oregon City Division
419 Main Street
Oregon City, Oregon 97045

The applicant owns and operates a bleached sulphite pulp and paper mill located in Oregon City. The chemical pulp production capacity of the mill is 230 tons per day.

This application was received November 22, 1974.

2. Description of Facility

The facility described in this application is a digester pumpout system which controls digester blowpit sulfur dioxide emissions. This system bleeds off or reduces the pressure of the digesters and ducts all the gases to a scrubber. The pulp is pumped out of the digester after the pressure has been reduced.

The facility was placed in operation in October, 1974.

Facility cost: \$2,413,714 (Accountant's certification was provided). Certification is claimed under the 1969 Act with 100% allocated to pollution control.

3. Evaluation of Application

The claimed facility was installed in response to the Sulphite Pulp Mill regulation {OAR, Chapter 340, Section 25-360 (2)(a) & (b)} which required that digester blow system emissions not exceed 0.2 pounds of sulfur dioxide per minute per ton of unbleached pulp as a 15 minute average or 800 ppm as an hourly average and plant site emissions not exceed 20 pounds of sulfur dioxide per ton of unbleached pulp produced. Prior to the installation of this system, the digester blow gases were emitted directly to the atmosphere.

The installation of the claimed facility has reduced average digester sulfur dioxide emissions by 9,840 pounds per day (from 9,900 lb/day to 60 lb/day). The current average emissions are 0.33 pounds per ton and 44 ppm. The average mill site sulfur dioxide emissions are now 6.1 pounds per ton or 1,070 pounds per day. Thus, the mill is now in compliance with the regulatory limits.

T-608

December 4, 1974

Page 2

The plans and specifications for the facility were reviewed and approved by the Department. The installation of this system, in combination with the fourth stage venturi scrubber on the recovery furnace, has brought the mill into compliance with the SO₂ emission limits.

The value of the sulfur material recovered by the claimed facility does not come close to covering the operating expenses. Therefore, it is concluded that the system was installed and is operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$2,413,714 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-608.

CRC:ahc
12-06-74

State of Oregon
Department of Environmental Quality
TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Publishers Paper Company
419 Main Street
Oregon City, Oregon 97045

The applicant owns and operates a plywood mill, known as its Dwyer Division at 6637 SE 100th Avenue, in Portland, Oregon.

2. Description of Claimed Facility

The claimed facility is described as a scrubber which cleans the exhaust from 4 veneer dryers. The scrubber is composed of:

1. Foam generators (8)
2. Ductwork
3. Collection plenums
4. Fans (2)
5. Pumps (4)
6. Steel tanks (2)

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

Facility cost: \$116,977.00 (Accountant's certification was provided).

3. Evaluation of Claimed Facility

The claimed facility was installed as a part of the mill's compliance program approved by the Department and outlined in the company's Air Discharge Permit.

The scrubber is a low (4 inches of H₂O pressure drop) energy type. It utilizes a caustic water solution to scrub and saponify the oils and hydrocarbons, producing foam within the unit.

Scrubbing is accomplished by the trapping of the stack gas within the bubbles. There the gas is cooled, condensing the hydrocarbons, which can contact the solution, as the bubbles form and reform in the turbulent air. The hydrocarbons are ultimately captured and dissolved into the solution. The solution is batch cleaned as needed in one of the tanks.

A pilot scale model of the scrubber did reduce dryer exhaust opacity to less than 5% opacity as observed by DEQ from December 1973 to May 1974. The full scale model, operated briefly in November, demonstrated the capability to hold the blue haze emissions below 20% opacity.

The scrubber functions to control the veneer dryer emissions thereby producing a substance which has almost no use. It is planned to burn it in the plant's boilers.

Since the plywood plant has been closed (for lack of business) the scrubber will not be in continuous service until the plant re-opens, perhaps in May 1975.

It is concluded that the fuel value of the material collected is negligible and that 100% of the scrubber's cost is allocable to pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$116,977.00 with 80% or more allocable to pollution control be issued for the facility claimed in Tax Application T-~~609~~609.

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

1. Applicant

Georgia-Pacific Corporation
Toledo Division
P. O. Box 580
Toledo, Oregon 97391

The applicant owns and operates an unbleached Kraft pulp and paper mill at Toledo, Oregon. The chemical pulp production capacity of the mill is 1250 tons/day.

2. Description of Facility

The facility described in this application is a wet scrubber which collects particulate from the Number Two smelt dissolving tank vent.

Facility cost: \$67,903.00 (Accountant's certificate was provided).

The facility was placed in operation in February, 1974. Certification is claimed under the 1969 act with 100% allocated to pollution control.

3. Evaluation of Application

This facility was installed in response to the 1969 Kraft Pulp Mill Emission Regulation (OAR, Chapter 340, Section 25-165 (2) (c)) which required that smelt dissolving tank vent particulate emissions not exceed 0.5 pounds per air dried ton of pulp produced by May 1, 1975. The claimed facility replaced a demister pad which could not meet the regulations. The additional chemicals collected by the new scrubber do not pay for the installation.

The plans and specifications for the facility were reviewed and approved by the Department. The particulate emissions are currently below the May 1, 1975, limits and were reduced by an average of 198 pounds per day (from 318 lb/day to 120 lb/day). It is concluded that the scrubber was installed and is operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$67,903.00 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-610.

CRC:mh

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

1. Applicant

Georgia-Pacific Corporation
Toledo Division
P. O. Box 580
Toledo, Oregon 97391

The applicant owns and operates an unbleached Kraft pulp and paper mill at Toledo, Oregon. The chemical pulp production capacity of the mill is 1250 tons/day.

2. Description of Facility

The facility described in this application is a wet scrubber which collects particulate from the Number Three smelt dissolving tank vent.

Facility cost: \$70,655.00 (Accountant's certificate was provided).

The facility was placed in operation in February, 1974. Certification is claimed under the 1969 act with 100% allocated to pollution control.

3. Evaluation of Application

This facility was installed in response to the 1969 Kraft Pulp Mill Emission Regulation (OAR, Chapter 340, Section 25-165 (2) (c)) which required that smelt dissolving tank vent particulate emissions not exceed 0.5 pounds per air dried ton of pulp produced by May 1, 1975. The claimed facility replaced a demister pad which could not meet the regulations. The additional chemicals collected by the new scrubber do not pay for the installation.

The plans and specifications for the facility were reviewed and approved by the Department. The particulate emissions are currently below the May 1, 1975, limits and were reduced by an average of 198 pounds per day (from 318 lb/day to 120 lb/day). It is concluded that the scrubber was installed and is operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$70,655.00 with 80% or more of the cost allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-611.

CRC:mh

Date December 5, 1974

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

1. Applicant

Georgia-Pacific Corporation
Toledo Division
P. O. Box 580
Toledo, Oregon 97391

The applicant owns and operates an unbleached kraft pulp and paper mill at Toledo, Oregon. The chemical pulp production capacity of the mill is 1250 tons per day.

2. Description of Facility

The facility described in this application is a system which collects and ducts odorous gases from the modified kraft process and the brown stock washer vacuum pumps so that they can be incinerated, or if the incineration system fails, released in the main stack.

Facility cost: \$85,366.00 (Accountant's certification was provided).

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

3. Evaluation of Application

The facility was installed in response to the Kraft Pulp Mill Emission Regulation, (OAR, Chapter 340, Section 25-165 1(d) "Noncondensibles" and 1(e) "Other Sources") which requires the control of Total Reduced Sulfur emissions from digesters and washers.

This facility controls emissions from the newly installed Modified Kraft process and from two existing washer vacuum pump exhausts and an existing washer filtrate tank exhaust. The emissions from the existing equipment were not controlled prior to the installation of this facility.

The plans and specifications for the facility were reviewed and approved by the Department. The facility has been inspected by the Department and is operating satisfactorily.

There is no economic return provided by this installation. Therefore, it is concluded that the equipment was installed and is operating for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$85,366.00 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-612.

CRC:kok

TAX CREDIT APPLICATIONS ADDENDUM

<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>
Stauffer Chemical Company	T-552	Lined pond to prevent ground water contamination	\$37,998	80% or more	Issue
Publishers Paper Company Tillamook Division	T-590	Utilization of hogged non-pulpable residuals as fuel to produce steam	461,373	100%	Issue

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

1. Applicant

Stauffer Chemical Company
4429 North Suttle Road
Portland, Oregon 97217

The applicant owns and operates a herbicide and aluminum sulfate production facility at Portland, Oregon.

2. Description of Claimed Facility

The facility described in this application is a lined pond which prevents ground water contamination from the aluminum sulfate process.

Facility cost: \$37,998 (Accountant's cost schedule was provided.)

The facility was placed in operation in August 1973.

The percentage claimed is 100 percent.

3. Evaluation of Application

The company was required by the Department of Environmental Quality to install control and recirculation facilities to eliminate the discharge of alum tank wash waters to the Columbia River. The wastewater recirculation pond is lined with a nylon material and allows no discharge to public waters.

The plans and specifications for the facility were reviewed and approved by the Department of Environmental Quality. The Department has inspected the facility and has found that it is operating satisfactorily. Although the pond collects solids which are of no value to the company, the clarified water is recirculated through the alum production process. It is concluded that the facility was installed and is operated for pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$37,998.00 be issued for the facility claimed in Tax Credit Application No. T-552 with 80 percent or more allocated to pollution control.

State of Oregon
Department of Environmental Quality
TAX RELIEF APPLICATION REVIEW REPORT

Appl. T590

Date 11/11/74

1. Applicant

Publishers Paper Company

419 Main Street

Oregon City, Oregon 97045

The applicant owns and operates a lumber mill at Tillamook, Oregon.

2. Description of Claimed Facility

The claimed facility utilizes hogged non-pulpable residuals from lumber manufacturing operations as a fuel to produce steam. The facility consists of:

- a. One hog fuel boiler
- b. Boiler feed system
- c. Hog, including drive motor.
- d. 36" suspended permanent magnet
- e. Fire protection spinkler system.
- f. Foundation

Construction of the claimed facility was initiated December 1972 and it was placed in operation in October 1973. The construction was fully completed in June 1974. Certification is claimed under the 1973 Act as amended 1974 (ORS 468.165(b)) with 100% of the cost allocated to pollution control for utilization of what would otherwise be a solid waste.

Facility Cost: \$461,373.00 (Accountant's certification was attached to application.)

3. Evaluation of Application

Prior to installation of the claimed facility, 125 barrels/day of Bunker C high

sulfur, residual oil were burned to provide process steam, non-pulpable solid wastes originating from the applicant's lumber manufacturing facilities (approximately 100 units/day) were burned in a wigwam burner. This facility was built for several reasons:

- a. To phase out the wigwam burner in response to DEQ's regulatory air quality program.
- b. To utilize the solid waste which had been burned in the wigwam burner rather than landfill it.
- c. To virtually eliminate large emissions of sulfur oxides and carbon monoxide which are characteristic of the Bunker C fuel oil.
- d. To reduce the costs of oil burned in the former facility and avoid high maintenance costs of operating a wigwam burner.

The claimed facility appears to meet the test of ORS 468.165(b) for a facility, the substantial purpose of which is to utilize by burning a material which would otherwise be solid waste. Under the solid waste portion of the statute, a facility either meets the test for 100% tax credit eligibility or fails the test as not eligible. It is also clear that at the time the decision was made to construct the facility there was no alternative productive use for the wood wastes.

4. Director's Recommendations

It is recommended that a Pollution Control Facility Certificate be issued for the claimed facilities in Application T-590, such certificate to bear the actual costs of \$461,373.00 with 100% allocable to pollution control.

TAX CREDIT APPLICATIONS ADDENDUM NO. 2

<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>
Modoc Orchard Company Klamath Orchard	T-573	Overhead sprinkling system on 43 acres of orchard	\$50,381.02	More than 40% and Less than 60%	Issue

Date December 16, 1974

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

1. Applicant

Mr. George F. Joseph & Estate of Victor H. M. Joseph
dba Modoc Orchard Company
P. O. Box 56
Medford, Oregon 97501

The applicant operates an orchard on S. Stage Road south of Medford.

2. Description of Claimed Facility

The claimed facility is described to be an overhead sprinkling system on 43 acres of orchard.

The facility was completed and put into service during April, 1974.

Certification is claimed under the 1969 Act. The percentage claimed for pollution control was not specified.

Facility cost: \$50,381.02 (Accountant's certification was provided).

3. Evaluation of Application

The claimed facility serves to provide the frost protection for 43 acres of trees by replacing or eliminating the need for some 1500 orchard heaters. In addition, the facility provides irrigation by sprinklers instead of by flooding the entire 43 acres. (The applicant has previously obtained certification for similar systems of overhead sprinklers, Tax Credit Applications T-212, T-339 and T-476).

Since the facility claimed in this application (T-573) does contribute to both reducing atmospheric emissions and increasing production, only a portion of it can be certified under the 1969 Act. In order to establish the percentage of the system allocable to pollution control, the company has provided data on the average hours and days of both heating and irrigation for those previous years for which this information was available. The data submitted for the years 1969 to 1974 indicate that the average hours of orchard heating (68 hours per season) was approximately 30% of the total hours of use. There was an average of 168 hours of irrigation per season. Although these numbers are subject to many variables, they are considered to be sufficiently representative to make the desired determination for this particular application. (It is well established that the required amount of frost protection usually varies among orchards and often within a given orchard.)

It is concluded that the facility operates to a substantial extent for reducing atmospheric emissions and that the portion of the cost allocable to pollution control should be 40% or more and less than 60%. (This is the same as the conclusion reached in Applications T-212, T-339 and T-476 which were previously certified.)

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$50,381.02, with more than 40% and less than 60% of the cost allocable to pollution control be issued for the facility claimed in Tax Application T-573.

EGW:kok



ENVIRONMENTAL QUALITY COMMISSION

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TOM McCALL
GOVERNOR

December 10, 1974

B. A. McPHILLIPS
Chairman, McMinnville

MEMORANDUM

GRACE S. PHINNEY
Corvallis

To: Environmental Quality Commission

JACKLYN L. HALLOCK
Portland

From: Director

MORRIS K. CROTHERS
Salem

Subject: Agenda Item No. D-1, December 20, 1974 EQC Meeting

RONALD M. SOMERS
The Dalles

Oregon CUP Award Application, Cascade Construction Company

KESSLER R. CANNON
Director

Background

Cascade Construction Company has been nominated for an Oregon CUP Award. The Asphalt Paving Association which made the nomination notes that Cascade Construction Company has won a national award for its environmental control efforts.

Cascade Construction Company operates at two sites: the Abernethy Plant which is the subject of the national award and a smaller plant at Rivergate which is leased from another company.

Pollution control equipment at the Abernethy Plant is described by the company as follows:

1. An 85,000 CFM baghouse was installed to clean the exhaust gases from the rock dryer. Scavenger air to pick up fugitive dust from the plant building and blue smoke from the track loading area is also fed into this baghouse for cleaning. The baghouse replaces a former wet system which cleaned the exhaust gases within present limits but created the problem of dirty water being wasted into the Willamette River. No water is wasted into the Willamette at the present time. The baghouse, during a test after 40,000 tons of material had been dried, produced air with a grain loading of approximately 0.02 grains per SCFM.
2. The water system formerly used to clean the exhaust gases is now used to feed a new sprinkler system on the rock stockpiles. This system is used sparingly except during dry windy conditions since any excess water in the rock has to be removed by the dryer prior to use in the asphaltic concrete.



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3. Diesel is commonly used to spray on the truck beds to prevent the asphaltic concrete from sticking to the bed. The company has eliminated the use of diesel for this purpose and are using non-pollutant products although the cost has been increased considerably, When diesel was used, any excess usually was washed into the river during rain storms.
4. To prevent oil products from spills, drippings from vehicles and the usual contaminants around mechanical operations from reaching the river, the company dug a trench on the river bank and filled it with sand which filters the oil wastes. A sump system was installed to catch oil wastes from the shop operations and fueling area and preventing them from reaching the river. A log boom along the river also is a secondary backup to these systems as it catches the petroleum products spills which then can be pumped out or dispersed with chemicals.
5. Yard maintenance is a constant ongoing operation. A water truck is used to settle dust, and a pickup broom is used to gather spilled rock and road dust.
6. A beautification program was started with the planting of trees, shrubs, roses, and ivy along the river bank, trees and shrubs around the stockpiles and washing or painting the plant when required.
7. A Hauck silent burner was installed in the dryer. This has decreased the noise level around the plant and is beneficial to their plant when required.

The Rivergate plant is a small plant on which the company has made no particular effort beyond what is required for compliance with DEQ rules.

Staff comments the main improvement at the Abernethy Plant has been installation of bagfilter on rock dryer to replace venturi scrubber which periodically violated standards. The bagfilter installed about July 1973 operated very little until this spring due to contractor strikes last year. Shortly after sustained operation the baghouse (bags) failed and excessive emissions occurred for several weeks until a new type bag was recently installed. The manufacturer of these bags had indicated a much longer life for the bags than Cascade Construction Company experienced. The company is in the process of negotiations with their supplier to determine who is responsible for the cost of replacing the bags. Since the failure of the bags was not Cascade Construction Company's fault, DEQ would probably have been willing to consider a compliance schedule allowing time for Cascade to obtain replacement bags from the supplier. However, the company went ahead and ordered replacement bags at its own expense, and will make its own arrangements about recovering this expenditure since they felt it would not be acceptable to allow excessive emissions to continue while they waited to determine what actions the supplier was going to take.

It should be noted that improvements such as landscaping and noise suppression are entirely voluntary on the part of the company. DEQ has no requirements whatsoever related to visual pollution, and noise requirements were not yet adopted as of the date of the application. The company has made particular efforts to control dust, ordinarily associated with asphalt operations by paving their entire area and by constantly wetting down the dust and sweeping even though they are located in an industrial area where complaints about noise, dust, and lack of landscaping would be unlikely.

Numerous compliance inspections have been made by Northwest Region staff including a stack particulate emission test on October 9th. Results of this test indicated the baghouse was continuing to perform at a very high degree of collection efficiency (particulate emission rate of 0.03 grains/SCFM). All other relevant environmental control aspects of the plant (i.e., control of fugitive dust from roadways and stockpiles, solid waste disposal, and noise) have been continually maintained at an exceptional level. In summary, the Northwest Region staff is of the opinion the Abernethy asphaltic concrete batch plant is, from all environmental aspects, by far the best of any such plant in the region and possibly in the State of Oregon.

All available means of providing highest and best practicable environmental control have been utilized and continually maintained and the plant should be considered a model for all other plants of its type which historically have been associated with numerous dust problems.

In regard to the Rivergate plant, modifications have been made to the particulate emission control system and the plant has operated in compliance with Department rules when production rate is maintained within reasonable limits. The waste water treatment system built by Rivergate Rock Products, which will eliminate waste water discharge from the Rivergate asphaltic concrete plant, is scheduled to become operational this week.

Evaluation

As indicated above, the Cascade Construction Company, Abernethy Plant is outstanding, and in the opinion of the staff would fully qualify for the Oregon CUP Award.

In addition, it appears that all reasonable efforts have been made to improve the Rivergate Plant on St. Helens Road. As noted in the July 17th memo, the company has less control over environmental problems since the plant is leased from another company. Note that in the earlier memo there was mention of discharge to the Willamette which has now been eliminated.

In previous deliberations involving CUP nominees where one phase of a company's operation was outstanding, the Committee has taken the position that a CUP Award could reflect environmental excellence at a particular plant site so long as none of a company's subsidiary or related operations were out of compliance with environmental requirements

(for example American Can Company received the Award for its Halsey Plant without regard to evaluation of several can plants operating within the State).

Recommendation

Based on its outstanding efforts in environmental control at the Abernethy Plant, as evidenced by repeated compliance checks as well as obvious visual improvements, the Oregon CUP Awards Screening Committee has recommended an Oregon CUP Award to Cascade Construction Company for its Abernethy site.



KESSLER R. CANNON
Director

BJS:kok

Attachment: Memorandum of July 17, 1974 to Oregon CUP Screening Committee
from Staff Liaison



ENVIRONMENTAL QUALITY COMMISSION

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TOM McCALL
GOVERNOR

December 10, 1974

B. A. McPHILLIPS
Chairman, McMinnville

MEMORANDUM

GRACE S. PHINNEY
Corvallis

To: Environmental Quality Commission

JACKLYN L. HALLOCK
Portland

From: Director

MORRIS K. CROTHERS
Salem

Subject: Agenda Item No. D-2, December 20, 1974 EQC Meeting

RONALD M. SOMERS
The Dalles

Oregon CUP Award Nomination, Kenneth H. Spies

KESSLER R. CANNON
Director

Background

Kenneth H. Spies, Assistant Director of the Department of Environmental Quality for Land Quality, has been nominated by Director Kessler Cannon for an individual Oregon CUP Award.

Mr. Spies came to the Oregon State Sanitary Authority (predecessor of the DEQ) as one of the first full time professional employees November 1, 1941. At that time there were only two full time positions -- Mr. Spies and one secretary.

More than any other single staff member he has lent continuity to Department activities and shepherded the development of Oregon's environmental programs through 33 years of change and growth.

During that time, Oregon has become world-famous for its cleanup of the Willamette River and its dedication to environmental effluence. The staff has grown until today it has 220 employees.

Evaluation and Comment

Awards such as the Oregon CUP are frequently given for an outstanding achievement or a series of achievements which has already drawn public recognition. Too often, the day in and day out efforts of the dedicated career employee go unnoticed. An Oregon CUP Award to Mr. Spies would be an opportunity to recognize such an employee for long and devoted service.

Recommendation

The Oregon CUP Screening Committee has recommended consideration of Kenneth H. Spies for an Oregon CUP Award; the Director recommends that the award be made.

KESSLER R. CANNON
Director



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TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item E, December 20, 1974, EQC Meeting.
Authorization for Public Hearings to adopt
Motor Vehicle Inspection Program Criteria

ORS 481.190, as amended by the 1974 Special Session, reads in part as follows:

- (1) Motor vehicles registered within the boundaries, existing on the effective date of this 1974 Act, of the metropolitan service district formed under ORS chapter 268 for the metropolitan area, as defined in subsection (2) of ORS 268.020, which includes the City of Portland, Oregon, shall be equipped, on and after July 1, 1975, with a motor vehicle pollution control system and shall comply with the motor vehicle pollutant, noise control and emission standards adopted by the commission pursuant to ORS 468.370.
- (2) The division shall not issue a registration or renewal of registration for a motor vehicle subject to the requirements of subsection (1) of this section unless the division receives, with the registration or renewal of registration, a completed certificate of compliance. The certificate must be signed by a person licensed and qualified pursuant to ORS 468.390, and must be dated not more than 90 days prior to the motor vehicle registration or renewal of registration date.

Thus, this law necessitates that the EQC adopt and have vehicle inspection program regulations in effect, including licensing procedures for inspectors, by no later than July 1, 1975. Since the law provides that an inspection certificate may be obtained up to 90 days prior to the motor vehicle registration or renewal of registration date, it would be preferable if the regulations and procedures for issuance of inspection certificates were in effect by April 2, 1975. In any event, it is the conclusion of the Department staff that early finalization of



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the inspection program criteria is desirable so as to provide the automotive service industry and the motoring public with sufficient advance notice of the program requirements.

The Department requests authorization to schedule public hearings to receive testimony regarding proposed inspection program criteria, including licensing of inspectors. It is proposed that hearings be held by a hearings officer and that one be scheduled in each of the effected counties (Clackamas, Multnomah, and Washington) plus an additional hearing in the City of Portland. This type of schedule would provide an opportunity to more thoroughly familiarize the public with the inspection program and offer ample opportunity for public comments regarding the proposed criteria. It is intended that these hearings be held early enough so that the commission could consider the proposed criteria and the testimony received during the public hearings at the commission meeting of March 28, 1975, in Portland.



KESSLER R. CANNON
Director



DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

December 9, 1974

KESSLER R. CANNON
Director

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. F, December 20, 1974, EQC Meeting.
Status Report, Vehicle Inspection Program

The attached Status Report is intended as resource material for Environmental Quality Commission members. The Department staff will present an oral report on the vehicle inspection program status at the December 20th meeting.

Attach.



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DEPARTMENT OF ENVIRONMENTAL QUALITY

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TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. F, December 20, 1974
Environmental Quality Commission Meeting
Status Report, Vehicle Inspection Program

Purpose

The purpose of this report is to provide the Environmental Quality Commission with a background summation to the development of the Department's vehicle emission control inspection program, a review of the current status of this program, and - by way of appendix - a reference summation on the status of similar programs in some other areas of the country.

Background

Motor Vehicles have been recognized as a major air pollution source in many areas of the country since the work of Dr. A. J. Haagen-Smit established that "Los Angeles' smog" was an atmospheric photochemical reaction involving products of automobile exhaust. Additionally, it has long been known that carbon monoxide was present in major quantities in automobile exhaust and that this pollutant could cause adverse health effects when present in sufficient concentrations.

As a result of the photochemical smog studies, California adopted standards which required new cars sold in California, beginning with the 1961 models, to be equipped with control systems to restrict the amount of engine crankcase fumes vented to the atmosphere. By 1964, most new cars sold in the United States were equipped with positive crankcase ventilation (PCV) systems to control crankcase fumes, and California had begun a program which required many used cars within the state to be equipped with crankcase fume control systems.

Beginning with the 1966 model year, California established exhaust emission standards for new automobiles sold in California. These standards set the maximum allowable concentrations of carbon monoxide and hydrocarbon gases in the engine exhaust, and required that a test fleet for each basic production model be emission tested during a specified driving cycle and testing procedure. Compliance with the standards had to be certified prior to that model being offered for sale in California.



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During 1966, the Department of Health, Education, and Welfare issued national motor vehicle emission standards applicable to 1968 and later model year new vehicles. These national standards were based upon the California exhaust emission standards and testing procedures, and further required closed engine crankcase systems to prevent the escape of any crankcase fumes to the atmosphere.

Federal legislation through the Clean Air Amendments of 1970 included several provisions which affected motor vehicle emission control programs. Most directly were the requirements that the allowable emissions of carbon monoxide and hydrocarbon gases from 1975 model year automobiles be reduced 90% from that allowed for 1970 model year cars, and that standards for nitrogen oxides emissions be set at a level 90% below the emission rate from 1971 model cars. The amendments further required the Environmental Protection Agency to establish national ambient air standards for various pollutants, and required the state governments to develop implementation plans for achieving compliance with the national standards.

During 1971 the Environmental Protection Agency established national ambient air standards for various pollutants, including carbon monoxide, and developed the criteria for development of state implementation plans to meet those standards. Also in 1971, Oregon Legislation was adopted which directed the Department of Environmental Quality to develop a periodic motor vehicle emission inspection program.

In January 1972, Governor McCall submitted Oregon's Implementation Plan to the Environmental Protection Agency. This plan included provisions for both transportation control measures and a periodic motor vehicle inspection program to help bring automotive related pollutants into compliance with national standards.

At this time also, the Department recommended formation of a Technical Advisory Committee comprised of automotive or related industry associations and affected governmental agencies to provide assistance and information in the development of the vehicle emission control inspection program. This committee held its first meeting in February 1972, and by the first of August 1972, submitted to the Director, then Mr. L. B. Day, a report on motor vehicle emission control inspection. This report concluded that an inspection program would be effective in controlling emissions and that state-owned and operated inspection stations would be the most practical and effective inspection system. The committee recommended that the inspection program be made operational in Clackamas, Multnomah, and Washington Counties; that fleet operators be permitted to inspect their own vehicles; and that the program utilizes state-owned and operated inspection stations.

At its October 25, 1972 meeting, the commission reviewed a comprehensive staff report regarding motor vehicle emission control activity. This report contained several recommendations from the Director for commission approval. These recommendations, which the commission did approve, were:

1. Approval of the basic concept of a vehicle inspection program as outlined in the report.
2. Authorization for the Director to
 - a. Proceed with arrangements to hold a public hearing to designate those counties in which the program would be enacted.
 - b. Prepare necessary legislative proposals to provide specific authorization and funding for state operated inspection facilities.
 - c. Request funds from the Emergency Board to initiate a pilot vehicle inspection program.

The basic concept of the inspection program outlined in the staff report was that of state operated facilities conducting annual emission control tests in the four county Portland Metropolitan area. Meeting the standards of the testing program was a requirement for vehicle license renewal as specified in the Oregon laws, passed by the 1971 Legislative Session.

In late December 1972, the Director, Mr. Day, forwarded to Governor McCall the report from the Technical Advisory Committee, the staff report presented to the commission at their October 25, 1972, meeting, and a Projection Report which summarized the basic concept and design of the projected system and inspection procedure. This projection report also noted in some detail the legislative and funding requirements for the program and outlined an implementation schedule. Mr. Day's covering memorandum to these reports noted that the program could be expanded in an orderly manner to a statewide program after gaining experience in the four county Portland-Metro area, and projected that the Motor Vehicle Division be responsible for administration and operation of the overall program, with the Department responsible for the establishment of the criteria, procedure and standards of the inspection program. A \$5 inspection fee was deemed necessary to make the program self-supporting.

The Commission at its meeting of March 2, 1973, adopted a regulation to initiate the inspection program in Clackamas, Columbia, Multnomah, and Washington counties beginning January 1, 1974. This regulation was adopted pursuant to ORS 481.190.

The 1973 Oregon Legislature considered a bill to make specific modifications to the 1971 series of laws pertaining to the vehicle emission control inspection program. This bill would have explicitly allowed state owned and operated inspection stations and would have increased the allowable inspection fee to a \$10 maximum so as to make the program self supporting from receipt of inspection fees. This bill was passed by the House on the last day of the session, but was referred back to committee in the Senate in the last hours of the session and there "died." The Department's budget, however, was approved including the cost of the inspection program. This budget was based upon an annual inspection fee of \$5 and further a \$1 million appropriation from the Motor Vehicle Account was provided for start-up costs and necessary cash flow requirements of the program.

Following failure of legislation to allow for an increased inspection fee, the Director, Mr. O'Scannlain, requested the State Emergency Board to authorize the Department to expend the appropriation provided the inspection program by the 1973 Legislative assembly. Approval for this action was granted by the State Emergency Board at this meeting of August 15, 1973. The Board suggested that Columbia County be deleted from the inspection program requirements. At the commission meeting of November 26, 1973, a public hearing was held to consider deleting Columbia County from the inspection program requirements and to extend the effective date of the program to May 31, 1974. The commission did authorize these rule changes.

The most recent direct action of the commission regarding the inspection program was its hearing of January 25, 1974, to consider adoption of criteria for certification of motor vehicle pollution control systems. The criteria proposed for initial adoption by the commission at this hearing was designed to preclude approval of retrofit devices as certifiable systems. The commission approved the proposed initial criteria.

In February, 1974, the Special Legislative Session considered and favorably acted upon a bill of the type considered during the regular session. This legislative action provided for an increase in the allowed inspection fee to \$5 so as to make the program self supporting, restricted the area of the program to the boundaries of the Metropolitan Service District (MSD), required an annual inspection rather than just at time of license renewal, and set the start-up date as July, 1975. This legislatively set date clearly provides opportunity for legislative review by the 1975 Session prior to mandatory enactment of the program.

Current Status of Oregon Program

Following the State Emergency Board action in August, 1973, which authorized the Department to proceed with implementation of a development program, arrangements were undertaken to fill six inspector positions and to order four sets of inspection equipment including infra-red exhaust gas analyzers and chassis dynamometers. The inspector positions were filled, the initial equipment received in December, 1973, and very preliminary engineering study testing begun. This testing was undertaken in the Wade Building which had been obtained on a \$1 rental agreement from the Highway Division.

While testing of public vehicles began in January of this year, it was found that the testing conducted in that month did not provide sufficiently reliable data for our use due to equipment calibration and operational errors. As such, all reported data values are based on testing conducted from February, 1974, forward. In the period of February-March-April, just over 1,300 emission tests were conducted. In the period of May through August, two mobile inspection units were sent out to test fleet owned vehicles. These mobile units were based upon the two used small Post Office vans that the Department had earlier purchased. The vans were sent to staging areas of fleet-owned vehicles to conduct the tests. Fleets tested included federal, state, county, and municipal governmental units, as well as a number of the utility companies. Just over 2,200 vehicle tests were conducted during this period.

In July bid specifications for the exhaust gas analyzers to be used in the regulatory inspection program were finalized and a request for bids prepared. This bid specification incorporated many features determined to be necessary or desirable as a result of various equipment and operational difficulties encountered in the development stages of the program. These features include improvements in sampling response time, improved calibration methods, reduced sensitivity to climatic conditions, improvements in the sample handling system to reduce water entrainment and analyzer overloading, and provision for digital display of the test values so as to reduce possibility of a reading error by an inspector. The bid award for this analyzer equipment went to Sun Electric Corporation and initial delivery of four of the eleven units in the bid was made in November. Delivery of all eleven units is to be completed in December.

In July also, the bid specifications for an inspection station at the 90th and Southeast Powell Street site in Portland were finalized. The bid process began in August and was completed in November, at which time construction began. This \$75,000 facility, scheduled for completion in February, 1975, is designed to be able to conduct dynamometer emission testing and is sufficiently sized for vehicle safety inspection to be undertaken if required.

The Powell facility site itself is owned by the Highway Division and had been acquired as part of Mt. Hood Freeway right-of-way. The site location was a subject of concern to members of the State Emergency Board and was reviewed thoroughly during their consideration of the program.

In September this year, the Department began public testing at a rented site on 57th and East Burnside Street in Portland, replacing the Wade Building operation. The mobile unit testing operation was also changed at this time to emphasize testing of privately owned vehicles. Additional inspection personnel had been hired, thus filling 18 of the 24 authorized inspector positions. As a result of this changed emphasis over 14,500 emission tests were conducted during the period of September, October, and November. As part of this enlarged testing operation, the Department provided bumper stickers to those vehicles which "passed" the tests. Reaction to the bumper stickers has been extremely favorable; in fact, it appears that for a number of people the bumper stickers are a genuine incentive to have their vehicle tested. It should be noted that "passing" or "failing" is based upon emission numbers called "interim idle standards." These numbers have no legal status, but it was discovered early in the testing program that few people cared what the numbers were that were measured, but wanted only to know if they passed or failed. As such, numbers thought to be reasonable as a first estimate of simple emission criteria were developed and have now been used for a number of months. Almost one-half of the vehicles tested have idle emissions greater than these interim criteria, as is illustrated in Table 1.

The data collected in the pilot program is manually being put onto computer cards and then onto computer tape, in which form it can be readily analyzed. The data is being analyzed to assist in the development of proposed regulatory criteria and to help ascertain the emission reduction

benefits resulting from corrective repair of detected high emission vehicles. This data, as well as the information gained from the "Failed" form questionnaire mailback, is also being reviewed to obtain some base information on the type and cost of repairs undertaken on failed vehicles.

Table 2 is a summation of the returned questionnaire information. Most of the reports show that carburetor adjustments were made. Since the majority of vehicles not passing the interim criteria have excessive idle CO readings, carburetor adjustment is a correct adjustment or repair technique for those vehicles.

The majority of vehicle owners returning the questionnaire report a repair of \$10 or less, and 75% reported a repair cost of \$50 or less. Due to the voluntary status of the program and the relatively small sample size, this repair cost information may be biased toward lower average repair costs than might be experienced in a regulatory program. The report Mandatory Vehicle Emission Inspection and Maintenance completed by the Northrop Corporation in December 1971 under a State of California contract, projected average repair costs of \$26.70 to \$36.00 for the Key-Mode and idle mode type of emission tests. The questionnaire returns give an average repair cost of under \$22.

It should be noted that Oregon law provides no recourse for a vehicle owner who is unable to afford required repairs other than to cease using or to sell the vehicle.

The Department is attempting to keep the automotive service industry located within the inspection program area apprised of program developments. The primary means of accomplishing this is through an Information Bulletin which is periodically sent out. Approximately 1,200 automobile dealers, independent garages, service stations, or related individuals are included on this mailing. A copy of the most recent bulletin is included in this report. Response to the bulletin by the service industry has been good.

With regard to legislative matters, the Department has been advised that legislation will be introduced this session to return the motor vehicle licensing period to a yearly base. Such a change would be beneficial to the inspection program operations. Under current law, the Department is responsible for collecting the inspection fee at the inspection site. A legislative change so as to make the Motor Vehicles Division responsible for collecting this fee at the time of registration renewal is desirable. The Division of Motor Vehicles reports that they are unable to define the MSD boundaries and thus unable to precisely enforce the registration requirements. The Department is unaware of any specific legislation dealing with this matter, but it is presumed that this matter will be amongst those discussed as part of a legislative review of the program.

In summation of the current program status: 22 of 24 authorized inspector positions have been filled, all eight authorized office and supervisory personnel positions are filled, three of the originally projected four mobile inspection units are in operation, a fourth mobile unit will be operational in January, the one inspection facility projected to be newly constructed is under construction in Multnomah County and is scheduled for completion in February, an unused service station site in Clackamas County is being evaluated as to the possibilities of modifying it for use as an inspection facility,

no site has yet been located in Washington County, over 19,000 emission tests have been conducted and the data recorded, the test data obtained is being used to help finalize the proposed pass/fail criteria and to ascertain costs and emission reductions that can be attributable to an inspection/maintenance program.



KESSLER R. CANNON
Director

RCH:pf
12/6/74

TABLE I

SUMMARY OF PRIVATELY OWNED VEHICLES *

Tested in Sept., Oct., & Nov., 1974

Number of Tests at Burnside Facilities	6305
Number Tested by Mobile Units	8233
Total Number of Tests Conducted	14538

Interim Oregon Idle Emission Criteria

	<u>CO%</u>	<u>HC ppm</u>
Pre 1968 vehicles	6	1200
1968-1969	5	600
1970-1971	4	500
1972-1974	3	350

BURNSIDE FACILITIES	Number of Vehicle Tests	% Passed				
			CO	HC	Both	Other
Pre 1968 vehicles	2354	53	25	7	7	8
1968-1969	1040	56	26	4	7	7
1970-1971	1038	54	31	4	6	6
1972-1974	1873	55	33	3	6	3
Total	6305	54	28	5	7	6
MOBILE UNIT TESTING						
Pre 1968 vehicles	2820	53	19	12	9	8
1968-1969	1427	51	20	10	11	7
1970-1971	1565	50	26	6	12	6
1972-1974	2421	51	20	7	17	4
Total	8233	51	21	9	13	6
TOTAL ALL VEHICLES	14538	53	24	7	10	6

* Includes less than 1% publicly owned vehicles

TABLE II

SUMMARY OF RETURNS FROM DEQ VEHICLE INSPECTION MAIL BACK CARDS

Through November, 1974

648 Cards Received Represents 9.5% Response For Cars Failed During That Time Period

INFORMATION RECEIVED

	Pre-68	68-69	70-71	72-74	Total
Under \$10	58	53	46	48	51
\$10 - 30	14	14	18	19	16
\$30 - 50	10	11	8	14	11
\$50 - 70	5	2	5	4	4
\$70 - 90	1	7	2	4	3
Over \$90	4	4	5	2	4
Did not respond to question	8	9	16	9	11
*	*		*		*

Estimated Average Dollar Cost of Repairs Reported on Mail Back Cards For November, 1974 \$21.52

	Pre-68	68-69	70-71	72-74	Total
Carburetor adjustment	91	88	86	89	87
Electrical tune-up	30	30	27	29	29
Spark plugs replaced	27	15	19	21	21
Valve grind	3	4	4	1	3
Engine overhaul	1	2	-	-	1
Other	9	11	8	11	10
*	*		*		*

Completed Repair Work, Percent

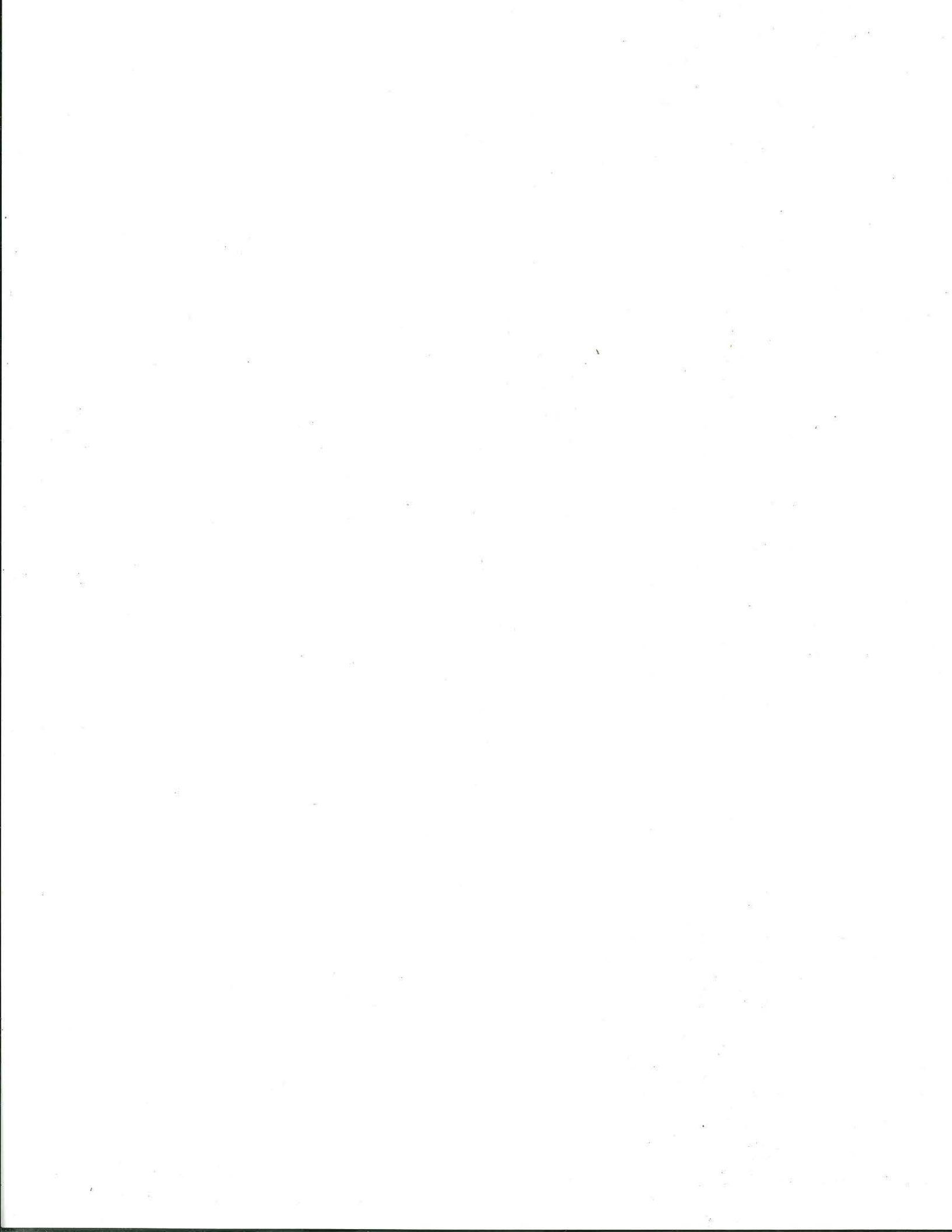
	Pre-68	68-69	70-71	72-74	Total
Dealership Service Department	15	18	21	47	28
Independent Garage	21	11	16	7	14
Service Station	19	15	19	12	16
Self	30	26	21	19	24
Other	7	2	4	4	5
Did not respond to question	8	28	19	11	13

Customer Satisfaction With Repairs

44% Responded YES

7% Responded NO

49% Did Not Answer This Question





DEPARTMENT OF ENVIRONMENTAL QUALITY

VEHICLE INSPECTION DIVISION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-6235

INFORMATION BULLETIN

74310

The Department has expanded its vehicle emission testing operations to include both testing by mobile units and at a stationary facility on 57th and East Burnside St. in Portland. The inspection station (5724 E. Burnside) is open seven days a week and starts testing at 10:00 every morning. On weekdays, the station is open until 10:00 at night, on Saturdays until 8:00 p.m., and on Sundays until 7:00 p.m.

The mobile units' testing schedule for the remainder of 1974 is:

Portland Community College, Sylvania Campus, November 4-9; OMSI, November 10; Clackamas Community College, November 12-16; Washington Square Shopping Center, November 17; Mt. Hood Community College, November 18-23; the old Mt. Hood National Forest Service Offices at 340 N.E. 122nd, Portland, November 24th; Milwaukie, 13939 McLoughlin Blvd. at Courtney Rd., November 25 - December 1 (except Thanksgiving Day). The operating hours at all these sites will be 10:00 a.m. - 6:00 p.m. Starting December 2, the mobile units will be at the Lloyd Center, N.E. 15th and Multnomah. Testing will start at 10:00 a.m. every day and continues until 10:00 p.m. weekdays, 8:00 p.m. Saturday, and 7:00 p.m. on Sundays. The units will not operate on Christmas or New Year's Day.

#

(over)

Over 16,000 emission tests have been conducted so far, including almost 2,000 tests on government vehicles. In approximately 7,000 of these tests, the vehicle owner volunteered to have the vehicle dynamometer tested.

#

The emission test results are being studied to help develop standards for the mandatory inspection program beginning in July, 1975. It is expected that hearings will be held in the three effected counties during the first of 1975 to consider adoption of the regulatory criteria and standards. Later bulletins will provide details on the proposals and the hearings.

#

The emission test results' summary for October, 1974, are attached. Note that the majority of "failures" are due to excessive carbon monoxide emissions. These failures can often be corrected by carburetor adjustments. The failures listed as "Other" include smoky cars and tampering or removal of emission control equipment in violation of Oregon law (ORS 483.825).

#

Presented on the reverse side of the October test summary is a chart showing the range in idle carbon monoxide emissions found in cars tested earlier in the year. This study shows that a number of older cars had lower idle carbon monoxide emissions than some newer cars. Also, a number of newer cars emit quite high levels of carbon monoxide at idle. However, the average or mean idle emission values are considerably lower for newer model year cars with emission controls than for pre-emission controlled cars. It should be noted that the failure rates are about the same for newer cars as for older cars, as shown on the October test summary, even though the idle emission criteria being used for newer cars are much lower than for older cars.

#

The Department regularly is asked about who has infra-red test equipment. Consideration is being given to preparing a list, which could be regularly updated, of the dealerships, independent garages, and service stations in the area which have this equipment. Please send us your comments.

SUMMARY OF PRIVATELY OWNED VEHICLES *

Tested in October, 1974

Number Tested Burnside Facilities 2360
 Number Tested by Mobile Unit 4172
 Total Number of Privately Owned Vehicles Tested 6532

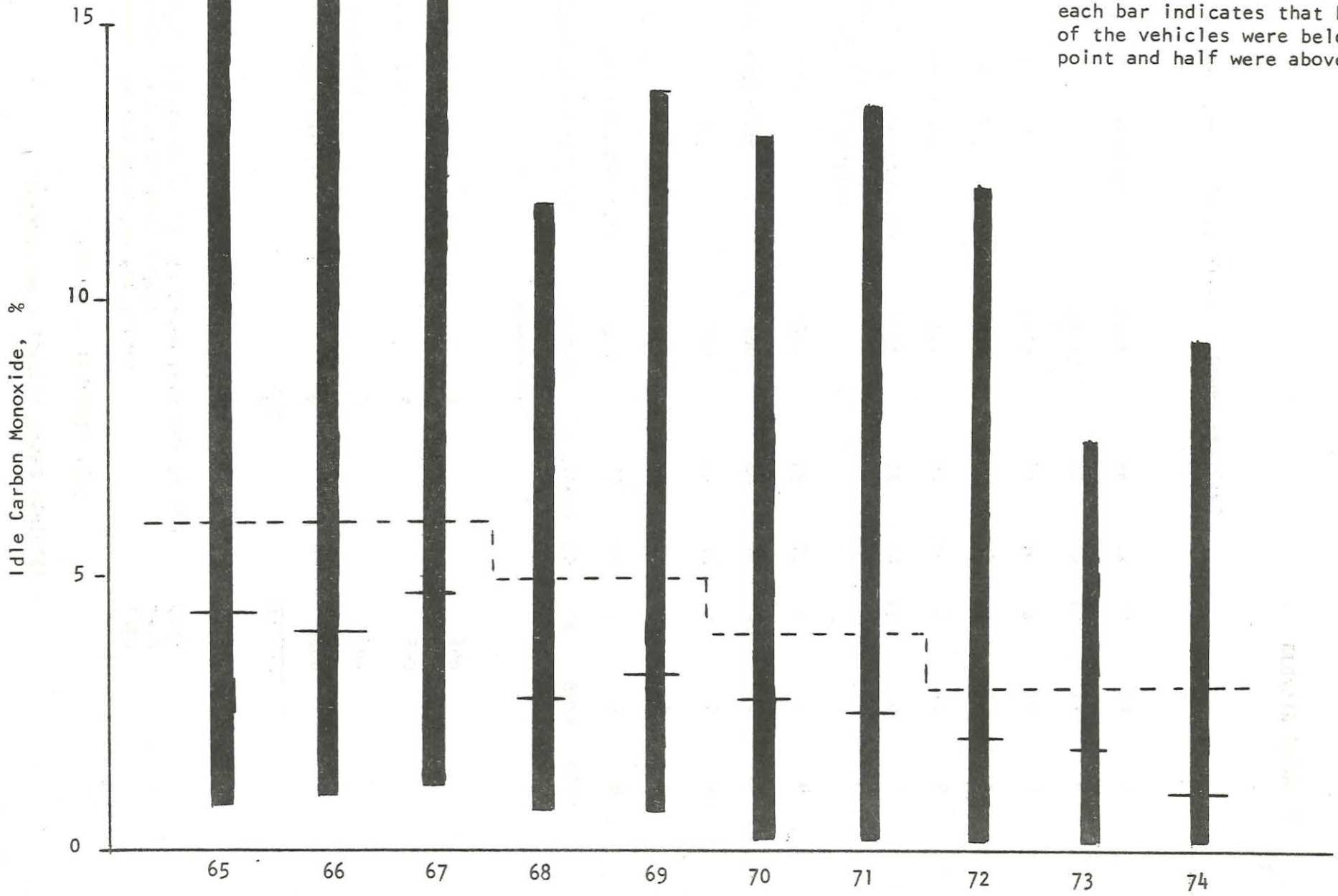
Interim Oregon Idle Emission Criteria

	<u>CO%</u>	<u>HC ppm</u>
Pre 1968 vehicles	6	1200
1968-1969	5	600
1970-1971	4	500
1972-1974	3	350

BURNSIDE FACILITIES	Number of Vehicles Tested	% Passed	CO	HC	Both	Other
Pre 1968 Vehicles	870	53	23	8	7	9
1968-1969	404	59	25	4	6	7
1970-1971	386	54	33	4	5	4
1972-1974	700	59	32	3	5	2
Total	2360	56	28	5	6	6
MOBILE UNIT TESTING						
Pre 1968 Vehicles	1406	52	19	14	9	7
1968-1969	733	53	18	9	13	6
1970-1971	819	49	25	9	13	4
1972-1974	1214	54	20	8	16	3
Total	4172	52	20	10	13	5
TOTAL ALL VEHICLES	6532	54	23	8	10	5

*Includes less than 1% publicly owned vehicles

A bar chart showing idle carbon monoxide ranges for various model year vehicles tested by DEQ. The dashed line shows DEQ's interim pass/fail limits. The line through each bar indicates that half of the vehicles were below that point and half were above.



APPENDIX

The purpose of this appendix is to outline the status of motor vehicle emission control inspection programs in the Western states, as well as in a few other areas the Department is aware that there has been some progress in the development of such programs.

Albuquerque, New Mexico

There is no motor vehicle emission control inspection program in New Mexico. A statewide brake and light safety inspection does exist and is conducted in private repair facilities.

The 1973 New Mexico legislative session considered two measures pertaining to vehicle emission inspection, but neither were enacted. In May 1973, the state Environmental Improvement Agency notified the Albuquerque Department of Environmental Health that a transportation control strategy (TCS) was required for that area.

A TCS study contract for Albuquerque was completed by the TRW Corporation in December 1973. The University of New Mexico was also contracted to undertake a study on pass/fail criteria, and as part of this conducted a testing program for three months.

Proposed legislation has been prepared for the 1975 legislative session to establish a mandatory emission control inspection program for the Albuquerque area using special inspection - only - facilities. The local agency expects EPA to promulgate rules requiring inspection if the state fails to act. In any case, they expect vehicle testing to begin by July 1976.

State of Arizona

The State of Arizona has recently awarded a contract to the Hamilton Standard Division of United Aircraft Corporation for the establishment and operation of a network of official inspection stations for emission testing of motorized vehicles in Maricopa and Pima Counties. All in-use vehicles, unless specifically exempt by law, registered in Maricopa and Pima Counties are required to meet emission inspection requirements starting January 1, 1976. Total program costs including State Administrative costs are required, by Arizona State law, not to exceed five dollars for each vehicle tested.

Over 600,000 vehicles are registered in Maricopa County and over 200,000 in Pima County. Phoenix is the major metropolitan area in Maricopa County and Tucson in Pima County. Vehicles over 15 years old are exempt from the inspection requirements; however, trucks and motorcycles are not exempt. New vehicles receiving title registrations for the first time are exempt as are electrical powered vehicles.

The state has not yet established the regulatory emission control criteria for the program. Visual inspection to determine that emission control devices installed on the vehicle are connected is to be one requirement though. The emission test procedure is based upon loaded-mode tests using dynamometers and it is estimated that the criteria will fail approximately 40% of the vehicles tested. Diesel fueled vehicles will be inspected for excessive smoke.

The State of Arizona has no existing vehicle safety inspection program. The bid request did require the contractor to demonstrate that provisions are made for including safety inspections in the emission test lanes.

State of California

The State of California utilizes a multifacet approach to motor vehicle emission control. One program is that of requiring more stringent emission standards than federal requirements for new vehicles sold in California. This program includes assembly line testing of vehicles to be sold in California.

A second program is conducted by the Highway Patrol. This involves an idle emission test as part of the random roadside vehicle inspection operations. Vehicles failing the emission tests must have the enforcement document cleared by a licensed Motor Vehicle Pollution Device Installation and Inspection Station. During the first quarter of 1974, 240,100 vehicles were emission tested by the Highway Patrol with 23% found to exceed the State Air Resources Board roadside idle emission standards.

California has also used retrofit, that is the installation of pollution control systems to vehicles not so originally equipped, as a control technique. This was originally begun in the mid 1960's with a requirement that crankcase fume control systems be added to certain vehicles. In order to insure that the approved systems were properly installed, the state required that a licensed station either install the system or inspect the installation for correctness. At the present time, California is involved with a retrofit program for control of nitrogen oxides.

A fourth control approach under development in California is an annual emission inspection program. Inspection criteria for this program have been established utilizing loaded-mode (dynamometer) test procedures. This program is legislatively restricted to the greater Los Angeles area and is to be preceded by a trial program. This trial program must be completed by the end of 1975. During the trial program operation vehicles will be required to be inspected upon change of registration. By no later than December 31, 1976, all non-exempt vehicles must be inspected upon initial registration and at each renewal of registration.

City of Chicago

The City of Chicago is currently operating on a motor vehicle inspection program on a non-mandatory basis. This program is funded from the city motor vehicle license fee, which has been increased to cover the additional cost. The program is presently using 18 mobile inspection lane units and employs 90 people including 80 inspectors. The current city ordinance requires that the Chicago inspection program becomes mandatory beginning May 31, 1975.

Over 350,000 idle emission tests have been conducted. The overall failure rate has been 30% for both privately owned vehicles and fleet vehicles, even though fleet vehicles must meet more stringent requirements. The units operated by Chicago work on a seven day week schedule and the inspectors are scheduled on a four ten day work basis. The inspection units are automated and each one utilizes a mini-computer. The inspection criteria are as follows:

Private Vehicle Class	% CO	ppm Hydrocarbons (HC)
pre-1968	6	1,000
1968-1969	5	600
1970-1974	4	500

Cincinnati, Ohio

The City of Cincinnati has operated a city motor vehicle inspection program since 1937 or 1938. The city owns one test station which incorporates five inspection lanes. One of these lanes is reserved for truck use. The safety inspection program has been a twice a year requirement with each inspection costing \$1.75. Defects must be corrected within 30 days.

The present plans for Cincinnati to have an emission inspection program operational January 1, 1975. The inspection program will be charted to a once per year requirement to both safety and emission control and will have a \$5.00 charge. The city has received two exhaust gas analyzers and has five on order. The emission test proposed is an idle test using the following criteria:

Vehicle Class	% CO	ppm Hydrocarbons (HC)
pre-1968	6	1,000
1968-1969	5	600
1970-1974	4	500
1975	1.5	50

State of Colorado

A motor vehicle safety inspection program is currently in force in the State of Colorado. The Department of Revenue is responsible for enforcement of the safety inspection program, which is conducted by the privately owned automotive service industry. There is no mandatory emission control inspection program, although the Department of Health is operating a two lane facility in Denver and conducting engineering type emission test studies. One lane conducts idle tests and the other conducts loaded moded tests. This facility is equipped with a mini-computer and the daily test results are put on punch tape so that they can be easily and rapidly analyzed.

Legislative proposals for mandatory vehicle emission inspection has been prepared for consideration by the 1975 Legislative session, which convenes in mid-January. The proposed legislation would provide for instituting of the program July 1, 1976, within the framework of the existing safety inspection program. A \$6 to \$8 charge for the emission inspection alone is anticipated.

State of Idaho

Motor vehicles registered in the State of Idaho are subject to an annual safety inspection. This program began in 1968, utilizes licensed garages to conduct the inspections and to issue the certificates, and is enforced by the Department of Law Enforcement.

No TCS requiring a vehicle inspection/maintenance program is necessary in Idaho.

State of Montana

No TCS required in Montana.

State of Nevada

The State of Nevada is currently operating an inspection program in Las Vegas and the surrounding county. This program requires that an inspection sticker be received prior to registered ownership change of vehicles in the effected area. The burden of obtaining a sticker is placed upon the buyer, excepting in the case of used car dealer transactions where it is the responsibility of the car dealer to obtain the sticker prior to retail sale of a vehicle. This particular provision is currently in court. The program was initiated in February of this year and enforcement was improved upon in July.

Inspection stickers are obtained from private repair facilities licensed to issue such stickers. Fleet operations, defined as ownership of three or more vehicles, are allowed to self-inspect. The inspection criteria require all emission control equipment to be intact and operational, and further that the vehicles meet the following emission levels at hot idle and at a 2500 rpm no-load condition:

Vehicle Class	% CO	ppm HC
pre-1968	7.5	1200
1968-1969	5	600
1970-1974	4	400

A public hearing is scheduled for January 15, 1975, to consider idle emission criteria for 1975 and newer vehicles. The proposed criteria are:

Vehicle Class	% CO	ppm HC
Catalytic Equipped	0	0
Non-Catalytic	2	200

In the situation of engine changes, Nevada has taken the position that the engine year determines the vehicle requirements.

State of New Jersey

The State of New Jersey initiated a state owned and operated vehicle safety inspection program in 1938. The inspection is currently on an annual basis and the program is operated by the Division of Motor Vehicles. The system consists of 39 permanent inspection stations with 69 lanes to handle a vehicle population of about 3.3 million cars, 620,000 commercial vehicles, and 60,000 motorcycles. The inspection stations range in size from one to four lanes. Each lane has four work stations and six assigned inspectors.

Into this safety program the state added an idle emission test requirement for light duty vehicles. Emission inspection began on July 1, 1972, on an educational basis with no requirement that a vehicle be brought into compliance. Regulatory enforcement of the emission standards began in February, 1974. The current idle emission standards result in an 11% reject rate and are as follows:

Vehicle Class	% CO	ppm HC
pre-1968	10	1600
1968-1969	8	800
1970-1974	6	600

Regulations currently require that more stringent idle emission standards be enforced starting February 1, 1975. This date may be delayed until June while a review of the entire process of failed vehicle re-inspection is completed. If the date is delayed, it is intended to go directly to the third phase criteria. The third phase idle emission criteria are:

Vehicle Class	% CO	ppm HC
pre-1968	7.5	1200
1968-1969	5.0	600
1970-1974	4.0	400

Repair cost information gathered during the first year of operation in New Jersey by means of a return card questionnaire showed that 30% of the vehicle owners reporting had repair costs of \$10 or less. For 85%, the repair cost was \$50 or less. The average repair cost is currently estimated to be around the \$25-\$30 range.

The Department of Environmental Protection has also evaluated automotive service industry exhaust gas analyzers and has developed procedures for approving such units.

State of Texas

The State of Texas requires motor vehicles to pass an annual safety inspection. This program, begun in 1951, is enforced by the Department of Public Safety. The inspections are conducted in private garages licensed for this purpose. Over 16,200 facilities are licensed, with approximately 25,000 mechanics involved. The Department of Public Safety has a staff of 120 assigned to this program.

There is no specific vehicle emission inspection program in Texas, although emission control equipment operation is supposed to be checked as part of the safety inspection. The State of Texas had filed a court suit against EPA promulgation of transportation control strategy rules; however, the court held that the EPA promulgation of a vehicle inspection maintenance program was valid. As such, the state is proceeding to develop this program and to incorporate it within the existing safety inspection program. Projected start-up date is June 1976. Legislative authority is, however, still required for implementation.

State of Utah

A motor vehicle safety inspection program is currently operated in the State of Utah within the private automotive service industry. Legislative authority for an emission inspection program does exist; however, funding has not been provided. The Department of Health has assigned a position and obtained some equipment to develop background information. A funding request for state operated inspection stations in the four county Salt Lake City area is to be presented to the legislature this coming session.

State of Washington

The State of Washington has three areas in which a TCS is necessary. In two of these areas, the Seattle and Spokane metropolitan areas, vehicle inspection/maintenance programs have been proposed. The Washington Department of Ecology is considering seeking legislative authority to operate one voluntary inspection station in each of these two areas. The

Department is presently engaged in a voluntary data acquisition program with certain fleet operations and limited public testing programs. The criteria being used for these tests are:

Vehicle Class	% CO	ppm HC
pre-1968	6	1600
1968-1969	3	800
1970-1974	2	600
1975	1	300

State of Wyoming

Motor vehicles registered in the State of Wyoming are subject to an annual safety inspection. These inspections are conducted by private garages licensed by the state. This program was begun in 1967 and is administered by the Department of Revenue.

No TCS required in Wyoming.



ENVIRONMENTAL QUALITY COMMISSION

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The Dalles

KESSLER R. CANNON
Director

TO: Environmental Quality Commission

FROM: Director

SUBJECT: Agenda Item G, December 20, 1974, EQC Meeting

Staff Report - GOLD MINING IN OREGON

BACKGROUND:

The tremendous increase in the value of gold during the last two years (from \$35 per ounce to nearly \$200 per ounce) has created a substantial increase in mining activities throughout Oregon. The greatest increase in activity comes from people who seek recreation along with monetary returns from their labor. These people spend weekends and vacations moving from stream to stream searching for a few flakes of gold much as the hunter or fisherman moves about searching for the "big one" that usually gets away.

Because the "recreational" miner's time is limited, they tend to be mobile, thereby primarily using equipment that is easily carried from one site to another. Such equipment includes picks and shovels, gold pans, small sluice boxes and small suction dredges powered by light-weight gasoline motors. Very little damage to water quality results from this type of mining with the exception of damage to fishery resources, particularly habitat disturbance, during critical parts of the year.

There has also been an increase in the number of larger mining operations becoming active. Many of these claims became inactive years ago because it was no longer economically feasible to continue. It now appears profitable to reopen many of these old claims.

The larger mining operations characteristically use heavy earth-moving equipment and are much less mobile than the "recreational" miners. These large operations have the greatest potential for damaging water quality.

In an effort to identify the many placer and suction dredging operations throughout Oregon, the Department requested assistance from other State and Federal agencies, including the Oregon Wildlife Commission,



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Oregon Department of Forestry, Oregon Department of Geology and Mineral Industries, United States Forest Service, and the Bureau of Land Management. The response to that request has been very encouraging, with many new mining operations being identified. In addition, these agencies are reporting new mining activities to DEQ on a continuous basis. Without this inter-agency cooperation, an effective surveillance program would be difficult, at best, with our existing manpower.

It would be very difficult to enumerate the exact number of registered claims and active mining operations. However, the following quotation from the Bureau of Land Management District Office in Medford will give an indication of the potential scope of mining in South West Oregon:

"The active placer mining operations are generally a small percentage of the potential. On the Medford District administered lands, approximately 2,100 mining claims are considered active. In addition to those on Bureau of Land Management lands, a considerable number of operations occur on private lands. The problem could be one of great magnitude if the price of gold continues to rise."

Based on this past year's activities, DEQ staff have identified at least fifty (50) placer operations which present an immediate water quality concern.

It should also be noted that the United States Forest Service (USFS) has just adopted new regulations pertaining to mining on their lands, which should be of great help in insuring protection of Oregon's water quality. These regulations became effective on September 1, 1974, and require that all persons wishing to prospect or mine on USFS lands file a notice of intent. If the USFS determines upon preliminary review that the operation will cause significant disturbance to the surface resources it can require the miner to submit mining plans for approval as well as furnishing a bond commensurate with the expected cost of rehabilitating the area after mining or prospecting.

Gold mining activity in Oregon is found primarily in two regions of the State; northeastern and southwestern Oregon. These two areas differ in soil types and weather conditions, and, therefore, mining activities differ as to time of year and amount of water quality problems produced. For example, a miner in northeastern Oregon would normally have to wait for the Spring snow runoff period to have adequate water to use, and would stop operations in late summer due to low water supply, or be forced to recirculate the available water. A miner in southwestern Oregon would depend more on rainfall to supply water for his needs. Therefore, the only time he could not operate would be during the dry summer season and flood periods during the winter. In addition, the soil types of northeastern Oregon seem to be primarily decomposed granite which tends to settle out of suspension much faster than the clay-type soils found in much of southwestern Oregon.

Gold exists naturally in two forms - lode and placer gold. Lode gold is physically bound to rock and is removed by crushing the ore and

subjecting it to a smelting process. Placer gold is "free" gold found in the form of nuggets, flakes or dust. Placer gold is separated from its surroundings (clay, gravel and sand, etc.) by various methods, all of which are based on the principle that gold has a greater density (i.e., heavier for a given volume) than the surrounding materials. The separation is accomplished by washing the gold-bearing materials with water through a sluice box, which is a series of artificial riffles. Lighter materials such as sand, gravel and clay particles pass over the riffles, thus remaining in the flow of water while the heavier materials, such as gold, small sand particles and "black" sand containing iron, settle out and are retained behind the riffles. This heavy material is further refined by using a conventional gold pan to remove all but the gold and black sand. Nuggets and larger flakes of gold can then be removed by hand (or tweezers) while the small flakes and dust, often called "colors", can later be removed with the help of liquid mercury. At this time, the impact on water quality from using liquid mercury in this refining process is unknown and further research is needed.

Sluice boxes may range in size from a small two-foot trough to a very large box built in a stream channel through which the entire flow of the stream is funneled. The lighter materials remaining suspended in the flow of water passing through these sluice boxes can lead to water quality problems when the wash water is returned uncontrolled and/or untreated to the stream.

The magnitude of a mining waste-water disposal problem depends on the type of soils encountered and the size of the operation. Since gold is heavy, it tends to work its way downward through clays and gravel to the solid bedrock. The soil layer found over the gold-bearing bedrock is referred to as the "overburden" and must be removed to get at the richer gold-containing soil nearest the bedrock. Heavy earth-moving equipment such as tractors, backhoes and hydraulic "giants" are used by miners to remove this overburden. A hydraulic "giant" (or monitor) is a large swivel-mounted nozzle that shoots water, under high pressure, into the overburden, thus washing it downstream through a large sluice box. When the overburden contains a high content of clay-type soils, such as is commonly found in southwestern Oregon, the receiving stream can become muddy for several miles downstream. The clay particles are very fine and tend to stay in suspension for long periods of time. Some mining operations occur in gravel that is relatively free of clay and silt. Wash waters from this type of operation normally clears up a short distance downstream since the soil particles are heavier and settle out quickly.

DISCUSSION:

The adverse effects on water quality from placer mining operations take several forms:

- A. Aesthetic - Streams are muddy (turbid) at times of the year when they should be clear. Recreation, including water contact sports, is impaired.

- B. Fishing - Downstream fishing is ruined when a clear stream becomes muddy (more than 25 JTU discourages fishing). Also, normal migration patterns can be altered due to blockage of the stream channel.
- C. Siltation - Silt impairs the exchange of oxygen needed by salmonoid eggs in the gravel and suffocates aquatic insect larvae. It can act as an abrasive, causing tissue damage to external fish membranes. The silt may also render good spawning gravel unusable for future use.
- D. Destruction of Spawning Beds - The removal or displacement of usable spawning gravel by heavy equipment can reduce the fish production of the stream and change natural stream channels.
- E. Water Supplies - Domestic and irrigation water supplies can be endangered due to water pump damage or interference with proper treatment and chlorination practices.

The mining activities that the Department of Environmental Quality (DEQ) is most concerned with are placer operations that use water as an integral part of the gold removing process. For the purposes of this report, recommended actions regarding suction dredges will be discussed separately.

A. Current DEQ Permit Programs

The Department can issue two types of permits depending upon the nature of the mining operation.

- (1) A State DEQ waste discharge permit is issued only when there is no direct discharge to public waters. An example of this type of operation would be where all of the water used in the mining operation is either recycled or allowed to enter settling basins which have no direct overflow (the water is filtered through the gravel, thereby removing the suspended soil particles.) However, if the filtration is not adequate, resulting in violation of turbidity standards, then an NPDES permit would be necessary.
- (2) A National Pollution Discharge Elimination Systems (NPDES) permit (required by Public Law 92-500 for all point source discharges) is issued by DEQ when there is a direct discharge to the public waters and requires that State and Federal water quality standards are maintained. An example would be an operation which, due to geographic limitations, is not able to provide settling basins large enough to achieve complete filtration of the waste water.

B. DEQ Compliance Program

Enforcement of violations of permit requirements has not been adequate to date due to several factors.

- (1) Most miners feel that State and Federal pollution control laws do not apply to their operations, claiming that the old general mining laws of 1872 give them "grandfather" rights to use the water as they see fit. Therefore, few miners have ever applied for a waste discharge permit.

It should be noted, however, that a class action suit was filed in U. S. District Court in March, 1973, against the State of Oregon and the State DEQ by Harry Steward and Arthur Davies on behalf of placer gold miners in Jackson, Josephine and Curry counties charging, among other things, that their constitutionally protected private water and mineral rights had been violated. This suit was dismissed in favor of the State of Oregon and the State DEQ in both the U. S. District Court and the Ninth Circuit Court of Appeals.

- (2) Considerable mining activity occurs in remote mountainous regions of the State away from the major population and industrial areas which have been higher priority areas of pollution control. In the past, the DEQ did not have the staff or special equipment necessary to insure compliance with State and Federal water quality standards due to the amount of travel required on poorly maintained roads. To a great extent, these limitations of staff and equipment still exist.
- (3) Many miners in the Rogue River basin still feel that the only State agency controlling mining activities in their area is the Rogue River Coordination Board (RRCB). This board was originally formed in 1939 to coordinate placer mining activities with sports fishing activities with regard to turbidity caused by mining. Although there appears to be conflicting State jurisdiction over the water quality of the Rogue River basin, Attorney General Lee Johnson, on July 9, 1970, ruled that the Department of Environmental Quality, having control of water quality standards for all waters of the State, had the higher authority regarding water quality in the Rogue basin, unless the RRCB made regulations (for turbidity only) that were more restrictive. It appears that the only useful purpose of the board as it exists today is for public relations between the miners and fishermen.
- (4) When violations of permits or water quality standards have occurred, DEQ staff have been unable to pursue compliance requirements to the fullest extent possible. This was primarily due to other higher priorities and lack of manpower.
- (5) The majority of gold mining operations today are fairly mobile and portable, thereby making them difficult to monitor or observe. Small suction dredges and sluice boxes are popular with weekend recreationalists who normally do not stay long in any one spot.

One of the major problems foreseen by the DEQ staff in implementing an effective permit program for placer operations will be the lack of voluntary compliance with State and Federal permit requirements by many miners, thus, making it necessary to use legal procedures (i.e., civil penalties, criminal complaints, etc.) in forcing compliance. This will be time-consuming and costly. Also, past experience in southwest Oregon has shown that some miners can be very uncooperative and it may be necessary to request Oregon State Police assistance during some violation investigations. During the past year DEQ staff have been told to leave one active mining claim while conducting routine surveillance activities.

C. Division of State Lands Fill and Removal Permit Program

The Oregon Division of State Lands (DSL) requires a fill and/or removal permit for any operation (gravel removal, mining, etc.) that moves more than fifty (50) cubic yards of material within the "bank-full" level of a streambed. Most small dredges and sluice box operations probably would not be required to apply for this permit, but larger operations would need this permit in addition to an NPDES or DEQ waste discharge permit. As with DEQ, the DSL lacks sufficient manpower to adequately insure compliance to their regulations.

D. Current DEQ Policy Regarding Suction Dredges

A large percentage of the "recreational" miners are using portable suction dredges. Many of these miners are from other states, such as California and Nevada, that presently require permits to enter streams during times of the year when operations are least likely to cause injury to fishery resources.

When such a person contacts DEQ regarding requirements for operating a suction dredge in Oregon's waters, it has been the Department's policy that the miner contact the local Oregon Wildlife Commission fishery biologist having jurisdiction in the area wishing to be mined. In this way, the streams are protected from entry during critical spawning times. The Department has also reserved the right to deny access to a stream if the suction dredge causes excessive turbidity or becomes a public nuisance.

E. Current Regulations on Suction Dredging in Other States

During May, 1974, DEQ staff requested information on placer mining regulations (including suction dredges) currently being enforced in Oregon's neighboring states. Most of the responding State agencies felt that placer mining activities were being adequately controlled by their water quality regulations and did not warrant any special concern. Two states, California and Nevada, did give special attention to suction dredges. Copies of their reply to DEQ are attached to this report (Appendix A).

Basically, both California and Nevada use the same approach in controlling access to streams by issuing permits, administered by the State's Department of Fish and Game, which designate when, where and the type of equipment to be used in suction dredging. The main emphasis in issuing these permits is for the protection of anadromous fish spawning areas. The only apparent difference in the two State permit programs is that California is more explicit in defining the open or closed areas of the State. Approximately 3,600 permits were issued by the California Department of Fish and Game in 1973.

CONCLUSIONS:

A. Proposed DEQ Staff Recommendation for Control of Placer Operations

Current State and Federal regulations require that mining operations having a discharge to public waters (direct or indirect) apply to the Department of Environmental Quality for an appropriate waste discharge permit prior to operating mine. At this time very few of the major mining operators have applied for permits even though they were on the initial NPDES mailing list. Since it is likely that most mining activity will resume next January or February (coincident with availability of water), the staff would recommend the following course of action:

- (1) A certified letter be sent to all known operators of active placer claims explaining the State and Federal permit requirements and supplying them with appropriate application forms.
- (2) If applications are received, Department staff shall review each application on its own merit in regard to water quality standards, effluent limitations, mixing zones, etc. to ensure that State water quality standards will be met outside of the mixing zone. Current standards most directly related to mining activities address turbidity levels and siltation.
- (3) If no response is received within thirty (30) days, attempt to personally contact the operators, explaining the permit requirements and possible legal penalties for non-compliance.
- (4) If a mining activity resumes without having applied for the appropriate permits, the regional staff, the enforcement division and legal counsel should meet and decide the next course of action (civil penalty, criminal complaint, etc.) depending on the circumstances in each case.

Based on past experience, the DEQ staff feels that the many miners will not voluntarily comply with current regulations. This will probably change in time, but may initially require considerable enforcement activity on the part of Department Staff and EQC (appeals on permit conditions and/or permit denials.)

- (5) The Department should coordinate enforcement activities with other State and Federal agencies (i.e., Division of State Lands, Department of Forestry, Forest Service, Bureau of Land Management, etc.).

B. Proposed DEQ Staff Recommendations for Control of Suction Dredges

Those people contacting DEQ regarding permit requirements for suction dredges represent only a few of the total number of miners actually using this type of equipment. While many people are aware of the need to protect water quality when using suction dredges, they fail to realize the potential for damaging spawning gravel.

Therefore, in an effort to afford greater protection for Oregon's fishery resource, the Oregon DEQ staff make the following recommendations for control of suction dredges:

- (1) The Director of DEQ should approach the Director of the Oregon Wildlife Commission requesting his opinion as to the suitability of a state-wide permit program being adopted and administered by the OWC similar to programs now being used by California and Nevada Fish and Game departments.
- (2) If a favorable reply is received from the OWC Director, then the directors of DEQ and OWC should appoint appropriate staff members to a committee for formulating legislation pertaining to the use of suction dredges. Upon adoption of a permit program by the OWC, the Department should administratively exempt suction dredges from needing a State water quality permit.
- (3) If an unfavorable reply is received from the OWC Director, then the DEQ Director should appoint appropriate staff members to formulate policies and regulations to be administered and enforced by DEQ.
- (4) After tentative policies and regulations have been formed, public hearings should be scheduled. These meetings should be held in locations close to centers of mining activities, that is, in northeastern and southwestern Oregon. As soon as public testimony has been analyzed, a final draft of the regulations shall be prepared and presented before the Environmental Quality Commission for their action.
- (5) Until new regulations are formulated, the Department should continue its policy of requiring suction dredge operators to get written permission from the OWC and comply with DSL fill and removal permits when deemed necessary.

DIRECTOR'S RECOMMENDATIONS:

- A. DEQ staff proceed as rapidly as possible to reinitiate the permit application process on all placer operations, except suction dredges
- B. The Director arrange necessary meetings with the OWC regarding a permit program for suction dredges. If concurrence is received, DEQ staff will assist in preparation of appropriate legislation.
- C. If OWC concurrence is not received, DEQ staff should proceed to formulate policies and regulations for suction dredges to be administered and enforced by DEQ.

RTW:ss

Attachments



Kessler R. Cannon
Director



MIKE O'CALLAGHAN
GOVERNOR

STATE OF NEVADA

DEPARTMENT OF FISH AND GAME

1100 VALLEY ROAD, RENO, NEVADA • TELEPHONE 784-6214

MAIL: P.O. BOX 10678, RENO, NEVADA 89510



GLEN K. GRIFFITH
DIRECTOR

IN REPLY REFER TO:

June 25, 1974

Mr. R. Terry Westfall
Southwest Regional Office
1000 S.E. Stephens Street
Roseburg, Oregon 97470

Dear Mr. Westfall:

At the present time we have not been having problems in connection with placer mining activities and with our existing water pollution laws, I feel that we can prevent such operations if they allowed any material to go into our streams which would be deleterious to fishlife. However we have had substantial interest in suction dredging.

I am sending a copy of Section 503.425 of our Fish and Game laws which gives our Department the authority to have some control over this activity. I am further sending you copies of our application form, our permit form and informational sheet pertaining to suction dredging operations.

The seasons we have set up for dredging are dependent upon the species involved. Generally speaking, however, they are as follows: with those streams having both spring and fall spawning species of fish, the season in which we allow dredging is from June 1 through September 30. On those having only spring spawning species, the season is June 1 through December 31 and those having only fall spawning species have a season from March 1 through September 30.

I trust that this information may be of interest and help to you.

Sincerely,

GLEN K. GRIFFITH, DIRECTOR

By:

Thomas J. Trelease, Chief
Division of Fisheries

TJT:vh
Encs:

PERMIT TO OPERATE SUCTION DREDGE

TO WHOM IT MAY CONCERN:

In accordance with Section 503.425 of our Fish and Game laws, a copy of which is attached,

Name of Applicant

Address

is authorized to operate the following described vacuum or suction dredge

Make Model Size

Waters and seasons in which the above described dredge may be operated:

Waters (Streams or Lakes)

Seasons

This permit is issued only for the operation of the dredge as it pertains to fishlife. It does not give authorization for the permittee to trespass upon lands owned by private individuals and is subject to the landowners permission over which the permittee may have to pass to gain access to his area of operation.

This permit may be cancelled in the event damages to fisheries resources are found to occur.

Glen K. Griffith, Director
NEVADA DEPARTMENT OF FISH & GAME
P.O. Box 10678, Reno, Nv. 89510

Dated: _____

Application Form
for
Dredging Permit
Nevada Department of Fish and Game

Applicants Name: _____

Address: _____

Make of Dredge: _____

Model of Dredge: _____

Size of Dredge: _____

Location(s) where dredge is anticipated to be used. Streams or lakes are to be specified. Dredging seasons will be assigned to the waters depending on the individual streams or lakes involved and the species of fish found in them and appear on the permit issued.

<u>Stream or Lake</u>	<u>County</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Signature

Date

Send to: Nevada Department of Fish and Game
P.O. Box 10678
Reno, Nevada 89510

NEVADA DEPARTMENT OF FISH AND GAME
P.O. Box 10678
Reno, Nevada 89510

503.425 DREDGING OPERATIONS: PERMITS: UNLAWFUL ACTS.

1. Prior to any person's using any vacuum or suction dredge equipment in any river, stream or lake of this state, he shall submit an application to the department specifying the type and size of equipment to be used and its location. If the department determines that such operations will not be deleterious to fish it shall issue a permit to the applicant.

2. It is unlawful for any person to:

- (a) Conduct such dredging operations without securing a permit;
- (b) Operate any equipment other than that specified in the permit; or
- (c) Conduct such operation outside the area designated on the permit. (Added to NRS by 1969,1368)

NOTE:

In specifying the location, indicate the portion of a stream in which operations are anticipated to be conducted. For example, Carson River in one mile section above Cradlebaugh Bridge.

Also, In issuing permits, the department designates the time of year when such dredging operations may be conducted to avoid damage to egg deposits of the species of fish involved in the stream in which the dredging operations are to be conducted.

Nevada Department of Fish and Game
P.O. Box 10678
Reno, Nev. 89510

INFORMATION LEAFLET
DREDGING OPERATIONS

Section 503.425 of Nevada Revised Statutes States:

503.425 Dredging operations: Permits; unlawful acts.

1. Prior to any person's using any vacuum or suction dredge equipment in any river, stream or lake of this State, he shall submit an application to the Department specifying the type and size of equipment to be used and its location. If the Department determines that such operations will not be deleterious to fish it shall issue a permit to the applicant.
2. It is unlawful for any person to:
 - (a) Conduct such dredging operations without securing a permit;
 - (b) Operate any equipment other than that specified in the permit; or
 - (c) Conduct such operation outside the area designated on the permit.

To be in conformance with this above section it is the objective of the Nevada Department of Fish and Game to prevent undue damage to fisheries resources by allowing dredging operations on Nevada waters only during the periods when eggs or embryonic young or the habitat are not vulnerable. This depends upon the species of fish present in the waters involved and water temperatures that prevail. Some species of fish spawn primarily in the spring, others primarily in the fall.

In order to obtain a permit for dredging operations, the following information should be supplied to the Nevada Fish and Game Department when applying for a permit:

1. Type of dredge which will be used.
2. Size of dredge which will be used.
3. Location (streams or lakes or portions thereof) in which dredge will be used.

There is no charge for a dredging permit.

STATE WATER RESOURCES CONTROL BOARD

ROOM 1015, RESOURCES BUILDING
1416 NINTH STREET • SACRAMENTO 95814



Terry Red

JUL 8 1974

Mr. Richard P. Reiter
Regional Administrator
Department of Environmental Quality
Southwest Regional Office
1000 S. E. Stephens Street
Roseburg, Oregon 97470

Dear Mr. Reiter:

Your letter of May 15, 1974 requests information concerning California's approach to control of water pollution due to gold mining.

California has not to date faced any significant water quality degradation as a result of placer mining for gold. Our Central Valley Regional Water Quality Control Board, which has jurisdiction over most of the areas of the state susceptible to placer mining, reports that it has between twelve and fifteen outstanding permits for discharges from placer mines but that very few of these mines operate on a regular basis.

When a permit is issued for placer mining, it generally contains two major provisions: (1) that the effluent from the washing operation contain no more than .2 ml/liter of settleable solids and (2) that the discharge not result in an increase of more than 10 percent in the turbidity of the receiving waters.

California has experienced a recent upsurge in the amount of gold mining using suction dredges. Regulation of suction dredging is generally handled by the Department of Fish and Game although the nine Regional Water Quality Control Boards have concurrent jurisdiction to issue permits or take enforcement action. Under the program of the Department of Fish and Game, approximately 3,600 permits for operation of suction dredges were issued in 1973. The Department's permit application distinguishes between dredges with intakes greater than 12 inches in diameter and those with intakes less than 12 inches. The majority of the permits issued are for dredges in the latter category. These smaller dredges result in very minor effects on water quality, particularly since most suction dredging is done in fast-water areas where little silt can




accumulate. Further, in critical locations for spawning of anadromous fish, suction dredging is prohibited for all or part of the year. These locations are listed on the permit application form, a copy of which is enclosed.

Failure to obtain a permit for suction dredging or to abide by the terms of the permit is a misdemeanor under Section 5653 of the California Fish and Game Code. Regional Water Quality Control Boards also have power to seek judicial relief, including an injunction and fines of up to \$10,000 per day, against anyone who discharges pollutants, including silt, in violation of certain sections of the California Water Code. I have enclosed a copy of pertinent parts of that code. Sections 13304 and 13385 should be of particular interest to you.

Should you have any further questions concerning California's water quality control program, please let me know.

Sincerely,



for
Bill B. Dendy
Executive Officer

Enclosures

PREPARE IN DUPLICATE
PLEASE PRINT

RESOURCES AGENCY OF CALIFORNIA
DEPARTMENT OF FISH AND GAME

APPLICATION FOR PERMIT TO OPERATE VACUUM OR SUCTION DREDGE

I hereby make application for a (check one) Standard* Special**
permit to use a vacuum or suction dredge for the calendar year of _____,
or for the remaining portion of the year from the date of permit issuance.

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

Type of Operation: (check one) Mining Other

Explain "Other", if checked _____

*Standard Permit - A standard permit is valid only for use of dredges with an intake diameter of 12 inches or less and in waters open to dredging. A standard permit may be issued by any one of the regional offices or by headquarters office.

**Special Permit - Dredges with an intake larger than 12 inches in diameter, or any dredge operated in waters otherwise closed to dredging, may be used only with a special permit issued by the regional office of the region in which the water is located. If a special permit is desired, fill in the following:

Size of dredge _____ Waters and locations where you desire to dredge
(list range, township, section where possible) _____

I hereby certify that I have read the provisions of Section 5653 of the California Fish and Game Code and Section 228, Title 14, California Administrative Code, and that I understand and agree to be bound by all the terms set forth in the permit issued pursuant to the above named sections.

Date of Application _____

Signature of Applicant _____

(See Regulations on reverse)

DO NOT WRITE IN THE SPACE BELOW - FOR OFFICIAL USE ONLY

VALIDATION:

Date _____ Permit Number _____ Permit Valid During _____

The applicant is hereby authorized to operate a vacuum or suction dredge with intake diameter of 12 inches or less in waters of this state in accordance with the attached list of open and/or closed waters. Such list is a part of this permit.

Signed _____

Title _____

RESOURCES AGENCY OF CALIFORNIA

DEPARTMENT OF FISH AND GAME

LIST OF OPEN AND/OR CLOSED AREAS-FOR USE WITH STANDARD PERMIT
(SPECIAL PERMITS NOT VALID IN THESE WATERS UNLESS SO SPECIFIED
IN THE SPECIAL PERMIT)

FOR THE CALENDAR YEAR 1973

CALIFORNIA IS DIVIDED INTO FIVE ZONES WHICH ARE LISTED BELOW WITH THE DATES WHEN SECTION AND VACUUM DREDGING IS PERMITTED IN EACH ZONE.

ZONE A	CLOSED WATERS -- NO DREDGING PERMITTED AT ANY TIME
ZONE B	OPEN TO DREDGING FROM JULY 1 THROUGH AUGUST 31.
ZONE C	OPEN TO DREDGING FROM JULY 1 THROUGH SEPTEMBER 30.
ZONE D	OPEN TO DREDGING FROM MAY 15 THROUGH SEPTEMBER 30.
ZONE E	OPEN TO DREDGING THROUGHOUT THE YEAR.

COUNTY AREAS ARE INCLUDED IN ONE OR MORE OF THE ABOVE ZONES. IN ADDITION TO THE ZONE OR ZONES LISTED OPPOSITE COUNTIES BELOW, MOST COUNTIES AS INDICATED BY AN ASTERISK (*) HAVE SOME FURTHER DETAILED RESTRICTIONS OR ADDITIONAL OPEN WATERS.

THESE FURTHER RESTRICTIONS OR ADDITIONAL OPEN WATERS ARE LISTED ALPHABETICALLY ON THE FOLLOWING PAGES BY STREAM OR WATER WITH THE PARTICULAR APPLICABLE COUNTY SHOWN BY PARENTHESES ().

IF THE COUNTY IS NOT LISTED BELOW, IT IS IN ZONE E.

ALPINE	ALL WATERS ZONE C.
AMADOR*	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
BUTTE *	ZONE C.
CALAYERAS *	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
DEL NORTE	ZONE D, EXCEPT KLAMATH RIVER WHICH IS ZONE E.
EL DORADO*	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
FRESNO*	ZONE E.
HUMBOLDT*	ZONE D.
IMPERIAL *	ZONE E.
INYO	ZONE A.
KEERN*	ZONE E.
LASSEN	ZONE D.
LOS ANGELES*	ZONE E.
MADERA *	ZONE E.
MARIPOSA*	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
MERCED*	ZONE E.
MODOC	ZONE D.
MONO	ZONE A.
NEVADA*	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
ORANGE*	ZONE E.
PLACER*	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
PLUMAS*	ZONE C.
RIVERSIDE *	ZONE E.
SACRAMENTO*	ZONE E.
SAN BERNARDINO*	ZONE E.
SAN JOAQUIN*	ZONE E.
SHASTA*	ZONE D.
SIERRA *	ZONE C.
SISKIYOU*	ZONE D.
STANISLAUS*	ZONE E.
TEHAMA*	ZONE D.
TRINITY*	ZONE D.
TULARE*	ZONE E.
TUOLUMNE*	EAST OF HIGHWAY #49 IS ZONE C, REMAINDER ZONE E.
YUBA *	ZONE E.

SEE FOLLOWING ALPHABETICAL LISTING OF STREAMS, LAKES OR RIVERS.

(CONTINUED)

ALL WATERS IN NATIONAL PARKS AND NATIONAL MONUMENTS ARE ZONE A.

AMERICAN RIVER (SACRAMENTO COUNTY). FROM A POINT APPROXIMATELY 3 MILES UPSTREAM FROM THE WATT AVENUE BRIDGE UPSTREAM TO NIMBUS DAM IS ZONE B.

AMERICAN RIVER, NORTH FORK (EL DORADO AND PLACER COUNTIES). FROM FOLSOM RESERVOIR UPSTREAM TO MOUTH OF HUMBURG CANYON (T15N R11E S3) IS ZONE E.

AMERICAN RIVER, NORTH FORK OF THE NORTH FORK (PLACER COUNTY). FROM ITS JUNCTION WITH THE NORTH FORK OF THE AMERICAN RIVER UPSTREAM TO THE RAWHIDE MINE FOOTBRIDGE (T15N R11E S33) IS ZONE E.

AMERICAN RIVER, MIDDLE FORK (EL DORADO AND PLACER COUNTIES). FROM ITS JUNCTION WITH THE NORTH FORK OF THE AMERICAN RIVER UPSTREAM TO THE CONFLUENCE WITH THE RUBICON RIVER IS ZONE E.

AMERICAN RIVER, NORTH FORK OF THE MIDDLE FORK (PLACER COUNTY). FROM ITS JUNCTION WITH THE MIDDLE FORK OF THE AMERICAN RIVER UPSTREAM TO THE BRIDGE ON THE MICHIGAN BLUFF (DEADWOOD) LAST CHANCE TRAIL (T15N R12E S32) IS ZONE E.

AMERICAN RIVER, SOUTH FORK (EL DORADO COUNTY). FROM FOLSOM RESERVOIR UPSTREAM TO THE HIGHWAY 50 CROSSING AT RIVERTON IS ZONE E.

AMERICAN RIVER, SOUTH FORK TRIBUTARIES (EL DORADO COUNTY). ALL TRIBUTARIES TO THE SOUTH FORK OF THE AMERICAN RIVER FROM FOLSOM RESERVOIR UPSTREAM TO CHILL BAR BRIDGE (T11N R10E S35) ARE ZONE E, EXCEPT FOR WEBER CREEK ABOVE HIGHWAY 50 CROSSING WHICH IS ZONE C.

BEAR RIVER (NEVADA AND PLACER COUNTIES). FROM HIGHWAY 49 UPSTREAM TO BUTCH FLAT POWERHOUSE (T16N R10E S27) IS ZONE E.

BUTTE CREEK (BUTTE COUNTY). FROM SUTTER COUNTY LINE UPSTREAM TO COVERED BRIDGE ON HONEY RUN GRADE IS ZONE E. FROM COVERED BRIDGE ON HONEY RUN GRADE (T22N R2E S25) UPSTREAM TO CENTERVILLE POWERHOUSE (T22N R3E S25) IS ZONE B. FROM CENTERVILLE POWERHOUSE UPSTREAM TO THE INTAKE OF CENTERVILLE DITCH (T23N R3E S10) IS ZONE E.

CALAVERAS RIVER AND TRIBUTARIES (CALAVERAS COUNTY). FROM HIGHWAY 49 UPSTREAM TO THE COUNTY ROAD CONNECTING THE TOWNS OF MOUNTAIN RANCH AND WEST POINT ARE ZONE E.

CARSON RIVER, EAST FORK AND TRIBUTARIES (ALPINE COUNTY). FROM ITS CONFLUENCE WITH BAGLEY VALLEY CREEK (T9N R21E S27) UPSTREAM IS ZONE A.

COLORADO RIVER TRIBUTARIES (IMPERIAL, RIVERSIDE AND SAN BERNARDINO COUNTIES). ALL SIDE SLOUGHS AND TRIBUTARIES OF THE COLORADO RIVER ARE ZONE A. MAIN CHANNEL IS ZONE E.

COSUMNES RIVER (SACRAMENTO, AMADOR AND EL DORADO COUNTIES). FROM THE WESTERN PACIFIC RAILROAD BRIDGE ABOUT 1/2 MILE ABOVE MOUTH UPSTREAM TO THE LATROBE HIGHWAY BRIDGE IS ZONE B. FROM THE LATROBE HIGHWAY BRIDGE UPSTREAM TO THE CONFLUENCE WITH THE NORTH AND MIDDLE FORK OF THE COSUMNES RIVER IS ZONE E.

COSUMNES RIVER, NORTH FORK (EL DORADO COUNTY). FROM ITS JUNCTION WITH THE MIDDLE FORK OF THE COSUMNES RIVER UPSTREAM TO THE BRIDGE ON THE SOMERSET-PLEASANT VALLEY ROAD IS ZONE E.

COSUMNES RIVER, MIDDLE FORK (EL DORADO COUNTY). FROM ITS JUNCTION WITH THE NORTH FORK OF THE COSUMNES RIVER UPSTREAM TO BAKERS FORD ON THE AUKUM-SOMERSET ROAD IS ZONE E.

COSUMNES RIVER, SOUTH FORK (AMADOR AND EL DORADO COUNTIES). FROM ITS JUNCTION WITH THE MIDDLE FORK OF THE COSUMNES RIVER UPSTREAM TO THE COUNTY ROAD BRIDGE AT RIVER PINES IS ZONE E.

DEEP CREEK AND TRIBUTARIES (SAN BERNARDINO COUNTY). FROM THE MOUTH UPSTREAM IS ZONE A

DEER CREEK (NEVADA COUNTY). FROM PONDEROSA WAY BELOW ROUGH AND READY FALLS (T15N R7E S13) UPSTREAM TO HIGHWAY 49 IS ZONE C.

FEATHER RIVER (BUTTE COUNTY). FROM ITS CONFLUENCE WITH HONCUT CREEK (T17N R3E S27) UPSTREAM TO THE FEATHER RIVER HATCHERY FISH BARRIER DAM (T19N R4E S8) IS ZONE B.

FEATHER RIVER, NORTH FORK (BUTTE AND PLUMAS COUNTIES). FROM OROVILLE RESERVOIR UPSTREAM TO ITS CONFLUENCE WITH THE EAST BRANCH OF THE NORTH FORK FEATHER RIVER IS ZONE E.

FEATHER RIVER, EAST BRANCH OF THE NORTH FORK (BUTTE COUNTY). FROM THE JUNCTION WITH THE NORTH FORK OF THE FEATHER RIVER UPSTREAM TO THE CONFLUENCE OF INDIAN AND SPANISH CREEKS IS ZONE E.

FEATHER RIVER, WEST BRANCH OF THE NORTH FORK (BUTTE COUNTY). FROM OROVILLE RESERVOIR UPSTREAM TO THE HEAD DAM OF THE UPPER MIOCENE DITCH (T23N R4E S30) IS ZONE E.

FEATHER RIVER, MIDDLE FORK (BUTTE AND PLUMAS COUNTIES). FROM OROVILLE RESERVOIR UPSTREAM TO ITS CONFLUENCE WITH NELSON CREEK (T23N R10E S16) IS ZONE A.

(CONTINUED)

PLUMMER RIVER, SOUTH FORK (BUTTE AND PLUMAS COUNTIES). FROM GROVILLE RESERVOIR UPSTREAM TO LITTLE GRASS VALLEY DAM (T22N R0E S01) IS ZONE E.

GREENHORN CREEK (NEVADA COUNTY). FROM THE MOUTH UPSTREAM TO BUCHEYE ROAD (T16N R10E S19) IS ZONE E.

HILY JIM CREEK (CHARGE COUNTY). FROM THE MOUTH UPSTREAM IS ZONE A.

HUMBUS CREEK (NEVADA COUNTY). FROM THE MOUTH UPSTREAM IS ZONE E.

INDEPENDENCE CREEK (NEVADA AND SIERRA COUNTIES). FROM INDEPENDENCE LAKE UPSTREAM IS ZONE A.

KANAKA CREEK AND TRIBUTARIES (SIERRA COUNTY). FROM THE MOUTH UPSTREAM IS ZONE E.

KAWeah RIVER AND TRIBUTARIES (TULARE COUNTY). FROM TERMINUS DAM UPSTREAM IS ZONE C.

KERN RIVER AND TRIBUTARIES (KERN AND TULARE COUNTIES). FROM ISABELLA DAM UPSTREAM IS ZONE C.

KINGS RIVER AND TRIBUTARIES (FRESNO COUNTY). FROM THE HIGHWAY 180 BRIDGE AT CENTERVILLE UPSTREAM IS ZONE C.

* KLAMATH RIVER (DEL NORTE, HUMBOLDT AND SISKIYOU COUNTIES). FROM THE MOUTH UPSTREAM TO THE JUNCTION OF THE SCOTT RIVER IS ZONE E.

LITTLE ROCK CREEK AND TRIBUTARIES (LOS ANGELES COUNTY). FROM THE SYCAMORE CAMP GROUND IN ANGELES NATIONAL FOREST UPSTREAM IS ZONE A.

MACKLIN CREEK (NEVADA COUNTY). FROM ITS CONFLUENCE WITH THE MIDDLE FORK YUBA RIVER (T19N R12E S16) UPSTREAM IS ZONE A.

MERCED RIVER (MERCED COUNTY). FROM THE SANTA FE RAILWAY BRIDGE (BETWEEN BALISCO AND CREASY) UPSTREAM TO THE CROCKER-HUFFMAN DAM IS ZONE B.

MOKELUMNE RIVER (AMADOR, CALAVERAS, AND SAN JOAQUIN COUNTIES). FROM LOCKEFORD UPSTREAM TO PARDEE DAM IS ZONE B. FROM PARDEE DAM UPSTREAM TO THE CONFLUENCE OF THE NORTH AND MIDDLE FORKS IS ZONE E.

MUD CREEK (BUTTE COUNTY). FROM ITS JUNCTION WITH BIG CHICO CREEK UPSTREAM IS ZONE E.

ROCK CREEK (BUTTE COUNTY). FROM ITS JUNCTION WITH BIG CHICO CREEK UPSTREAM TO THE BUTTE-TEHAMA COUNTY LINE IS ZONE E.

RUBICON RIVER (PLACER COUNTY). FROM ITS JUNCTION WITH THE MIDDLE FORK OF THE AMERICAN RIVER UPSTREAM TO THE GEORGETOWN DIVIDE-RALSTON RIDGE ROAD CROSSING (T13N R12E S7) IS ZONE E.

SACRAMENTO RIVER (TEHAMA AND SHASTA COUNTIES). FROM THE SQUAW HILL BRIDGE (BETWEEN CORNING AND VINA) UPSTREAM TO KESWICK DAM IS ZONE A.

SACRAMENTO RIVER (BUTTE COUNTY). ZONE E.

SAN GABRIEL RIVER, EAST FORK AND TRIBUTARIES (LOS ANGELES COUNTY). FROM CATTLE CANYON UPSTREAM IS ZONE A.

SAN GABRIEL RIVER, WEST FORK AND TRIBUTARIES (LOS ANGELES COUNTY). FROM RILCON GUARD STATION UPSTREAM IS ZONE A.

SAN JOAQUIN RIVER AND TRIBUTARIES (FRESNO AND MADERA COUNTIES). FROM THE NORTH FORK-AUBERRY ROAD BRIDGE UPSTREAM IS ZONE C.

SANTA ANA RIVER AND TRIBUTARIES (SAN BERNARDINO COUNTY). FROM THE MOUTH OF BEAR CREEK UPSTREAM IS ZONE A.

SANTIAGO CREEK (ORANGE COUNTY). WITHIN THE CLEVELAND NATIONAL FOREST IS ZONE A.

SCOTCHMAN CREEK (NEVADA COUNTY). FROM THE MOUTH UPSTREAM IS ZONE E.

SHADY CREEK (NEVADA COUNTY). FROM THE MOUTH UPSTREAM IS ZONE E.

SHIRTTAIL CREEK (PLACER COUNTY). FROM ITS JUNCTION WITH THE NORTH FORK OF THE AMERICAN RIVER UPSTREAM TO THE MOUTH OF REFUGE CANYON (T14N R10E S9) IS ZONE E.

STANISLAUS RIVER (CALAVERAS, TUOLUMNE, SAN JOAQUIN AND STANISLAUS COUNTIES). FROM THE SANTA FE RAILWAY BRIDGE UPSTREAM TO GOODWIN DAM IS ZONE B.

STEEPHOLLOW CREEK (NEVADA COUNTY). FROM THE MOUTH UPSTREAM TO CAMELS HUMP ROAD (T15N R10E S6) IS ZONE E.

* TRINITY RIVER (HUMBOLDT AND TRINITY COUNTIES). FROM ITS CONFLUENCE WITH THE KLAMATH RIVER UPSTREAM TO THE JUNCTION OF THE NORTH FORK IS ZONE E.

TUOLUMNE RIVER (STANISLAUS COUNTY). FROM THE WATERFORD BRIDGE UPSTREAM TO LA GRANGE DAM IS ZONE B.

VOLCANO CREEK (PLACER COUNTY). FROM MOSQUITO RIDGE ROAD (T14N R11E S30) UPSTREAM TO PARAGON MINE TAILINGS DUMP (T14N R11E S30) IS ZONE E.

WEBER CREEK (EL DORADO COUNTY). FROM HIGHWAY 50 CROSSING UPSTREAM IS ZONE C.

WOLF CREEK (NEVADA COUNTY). FROM THE TARR DITCH DIVERSION (T15N R0E S10) UPSTREAM IS ZONE C.

YUBA RIVER (YUBA COUNTY). FROM A POINT 4 MILES EAST OF MARYSVILLE UPSTREAM TO ENGLEBRIGHT DAM IS ZONE B.

YUBA RIVER, NORTH FORK (SIERRA AND YUBA COUNTIES). FROM THE CONFLUENCE OF THE MIDDLE FORK OF YUBA RIVER UPSTREAM TO THE JUNCTION WITH FIDDLE CREEK IS ZONE E.

YUBA RIVER, MIDDLE FORK (NEVADA, SIERRA AND YUBA COUNTIES). FROM THE CONFLUENCE OF THE NORTH FORK OF YUBA RIVER UPSTREAM TO THE JUNCTION WITH KANAKA CREEK IS ZONE E.

YUBA RIVER, SOUTH FORK (NEVADA AND YUBA COUNTIES). FROM ITS JUNCTION WITH THE YUBA RIVER UPSTREAM TO EDWARDS CROSSING (T17N R0E S17); AND THE SOUTH FORK OF THE YUBA RIVER FROM ITS JUNCTION WITH POORMANS CREEK UPSTREAM TO THE GREY EAGLE MINE (T17N R11E S11) ARE ZONE E.

* SECTION 5800, FISH AND GAME CODE. (A) IT IS UNLAWFUL TO CONDUCT ANY MINING OPERATIONS IN THE TRINITY AND KLAMATH RIVER FISH AND GAME DISTRICT BETWEEN JULY 1ST AND NOVEMBER 30TH EXCEPT WHEN THE DEBRIS, SUBSTANCES, TAILINGS OR OTHER EFFLUENT FROM SUCH OPERATIONS DO NOT AND CANNOT PASS INTO THE WATERS OF THAT DISTRICT.

(B) IT IS UNLAWFUL BETWEEN JULY 1ST AND NOVEMBER 30TH TO POLLUTE, MUDDY, CONTAMINATE, OR ROIL THE WATERS OF THE TRINITY AND KLAMATH RIVER FISH AND GAME DISTRICT. IT IS UNLAWFUL BETWEEN THOSE DATES TO DEPOSIT IN OR CAUSE, SUFFER, OR PROCURE TO BE DEPOSITED IN, PERMIT TO PASS INTO, OR PLACE WHERE IT CAN PASS INTO, SUCH WATERS, ANY DEBRIS, SUBSTANCE OR TAILINGS FROM HYDRAULIC, PLACER, MILLING, OR OTHER MINING OPERATION AFFECTING THE CLARITY OF SUCH WATERS. THE CLARITY OF SUCH WATERS SHALL BE DEEMED AFFECTED WHEN SUCH WATERS AT A POINT A DISTANCE OF ONE MILE BELOW THE CONFLUENCE OF THE KLAMATH RIVER AND THE SALMON RIVER OR AT A POINT A DISTANCE OF ONE MILE BELOW THE CONFLUENCE OF THE SOUTH FORK OF THE TRINITY RIVER AND THE TRINITY RIVER, CONTAIN FIFTY (50) PARTS PER MILLION, BY WEIGHT, OF SUSPENDED MATTER, NOT INCLUDING VEGETABLE MATTER IN SUSPENSION AND SUSPENDED MATTER OCCURRING IN THE STREAM OR STREAMS DUE TO AN ACT OF GOD.

(C) IT IS UNLAWFUL, BETWEEN JULY 1ST AND NOVEMBER 30TH TO CARRY ON OR OPERATE ANY HYDRAULIC MINE OF ANY KIND ON, ALONG, OR IN ANY WATERS FLOWING INTO THE TRINITY AND KLAMATH RIVER DISTRICT. HOWEVER, NOTHING HEREIN CONTAINED SHALL PREVENT THE OPERATION OF A HYDRAULIC MINE WHERE THE TAILINGS, SUBSTANCE, OR DEBRIS, OR OTHER EFFLUENT THEREFROM DOES NOT OR WILL NOT PASS INTO THE WATERS OF THE TRINITY AND KLAMATH RIVER FISH AND GAME DISTRICT, BETWEEN SUCH DATES, AND ANY PERSON, FIRM, OR CORPORATION ENGAGED IN HYDRAULIC MINING SHALL HAVE THE RIGHT UNTIL THE FIFTEENTH DAY OF JULY TO USE WATER FOR THE PURPOSE OF CLEANING UP.

(D) ANY STRUCTURE OR CONTRIVANCE WHICH CAUSES OR CONTRIBUTES, IN WHOLE OR IN PART, TO THE CONDITION, THE CAUSING OF WHICH IS IN THIS SECTION PROHIBITED, IS A PUBLIC NUISANCE, AND ANY PERSON, FIRM, OR CORPORATION MAINTAINING OR PERMITTING IT IS GUILTY OF MAINTAINING A PUBLIC NUISANCE, AND IT IS THE DUTY OF THE DISTRICT ATTORNEY OF THE COUNTY WHERE THE CONDITION OCCURS OR THE ACTS CREATING THE PUBLIC NUISANCE OCCUR, TO BRING ACTION TO ABATE SUCH NUISANCE.

SECTION 11037, FISH AND GAME CODE. THE FOLLOWING CONSTITUTES THE TRINITY AND KLAMATH RIVER FISH AND GAME DISTRICT:

THE KLAMATH RIVER AND THE WATERS THEREOF, FOLLOWING ITS MEANDERINGS FROM THE MOUTH OF THE KLAMATH RIVER IN DEL NORTE COUNTY TO ITS CONFLUENCE WITH THE SALMON RIVER, AND ALSO THE TRINITY RIVER AND THE WATERS THEREOF, FOLLOWING ITS MEANDERINGS FROM ITS CONFLUENCE WITH THE KLAMATH RIVER IN THE COUNTY OF HUMBOLDT TO ITS CONFLUENCE WITH THE SOUTH FORK OF THE SAID TRINITY RIVER.

SECTION 1602, FISH AND GAME CODE. ANY PERSON WHO SUBSTANTIALLY DIVERTS OR OBSTRUCTS THE NATURAL FLOW OR SUBSTANTIALLY CHANGES THE BED, CHANNEL OR BANK OF ANY RIVER, STREAM OR LAKE, OR USES ANY MATERIAL FROM THE STREAMBEDS, SHALL NOTIFY THE DEPARTMENT OF SUCH OPERATIONS, EXCEPT WHEN THE DEPARTMENT HAS BEEN NOTIFIED PURSUANT TO SECTION 1601. THE DEPARTMENT WITHIN 30 DAYS OF RECEIPT OF SUCH NOTICE, OR WITHIN THE TIME DETERMINED BY MUTUAL WRITTEN AGREEMENT, SHALL, WHEN AN EXISTING FISH OR GAME RESOURCE MAY BE SUBSTANTIALLY ADVERSELY AFFECTED BY SUCH OPERATIONS, SUBMIT TO THE PERSON ITS PROPOSALS AS TO MEASURES NECESSARY TO PROTECT FISH AND WILDLIFE. THE DEPARTMENT SHALL NOTIFY THE AFFECTED PARTIES THAT IT SHALL MAKE ONSITE INVESTIGATION OF THE OPERATION AND SHALL MAKE SUCH INVESTIGATION BEFORE IT SHALL PROPOSE ANY MEASURE NECESSARY TO PROTECT THE FISH AND WILDLIFE.

WITHIN 14 DAYS OF RECEIPT OF THE DEPARTMENT'S PROPOSALS, THE AFFECTED PERSON SHALL NOTIFY THE DEPARTMENT IN WRITING AS TO THE ACCEPTABILITY OF THE PROPOSALS, EXCEPT THAT THIS TIME MAY BE EXTENDED BY MUTUAL AGREEMENT. IF SUCH PROPOSALS ARE NOT ACCEPTABLE TO THE AFFECTED PERSON, THEN THAT PERSON SHALL SO NOTIFY THE DEPARTMENT. WITHIN SEVEN DAYS A PANEL OF ARBITRATORS SHALL BE ESTABLISHED COMPOSED OF ONE REPRESENTATIVE OF THE DEPARTMENT, ONE REPRESENTATIVE OF THE AFFECTED PERSON, AND A THIRD PERSON MUTUALLY AGREED UPON, OR IF NO AGREEMENT CAN BE REACHED, THE THIRD PERSON SHALL BE APPOINTED IN THE MANNER PROVIDED BY SECTION 1281.6 OF THE CODE OF CIVIL PROCEDURE. THE THIRD PERSON SHALL ACT AS PANEL CHAIRMAN. THE PANEL SHALL HAVE POWER TO SETTLE DISAGREEMENTS AND MAKE BINDING DECISIONS REGARDING FISH AND GAME MODIFICATIONS. SUCH ARBITRATION SHALL BE COMPLETED WITHIN 14 DAYS FROM THE DAY THAT THE COMPOSITION OF THE PANEL IS ESTABLISHED, UNLESS THE TIME IS EXTENDED BY MUTUAL AGREEMENT. EXPENSES OF THE DEPARTMENT REPRESENTATIVE ARE TO BE BORNE BY THE DEPARTMENT, EXPENSES OF THE REPRESENTATIVE OF THE PERSON WHO DIVERTS OR OBSTRUCTS THE NATURAL FLOW OR CHANGES THE BED OF ANY RIVER, STREAM OR LAKE, OR USES ANY MATERIAL FROM THE STREAMBEDS SHALL BE BORNE BY SUCH PERSON; EXPENSES OF THE CHAIRMAN ARE TO BE PAID ONE-HALF BY EACH PARTY.

PERSONS PROPOSING OPERATIONS AFFECTED BY THIS SECTION SHALL NOT COMMENCE SUCH OPERATIONS UNTIL THE DEPARTMENT'S PROPOSALS, OR THE DECISIONS OF A PANEL OF ARBITRATORS, HAVE BEEN INCORPORATED INTO SUCH PROJECTS.

hibitions (a) comply forthwith, (b) comply in accordance with a time schedule set by the board, or (c) in the event of a threatened violation, take appropriate remedial or preventive action. In the event of an existing or threatened violation of waste discharge requirements in the operation of a community sewer system, cease and desist orders may restrict or prohibit the volume, type, or concentration of waste that might be added to such system by dischargers who did not discharge into the system prior to the issuance of the cease and desist order. Cease and desist orders may be issued directly by a board, after notice and hearing, or in accordance with the procedure set forth in Section 13302.

(Amended by Stats. 1971, Ch. 1288.)

13301.1. The regional board shall render to persons against whom a cease and desist order is issued pursuant to Section 13301 all possible assistance in making available current information on successful and economical water quality control programs, as such information is developed by the state board pursuant to Section 13167, and information and assistance in applying for federal and state funds necessary to comply with the cease and desist order.

(Added by Stats. 1970, Ch. 1464.)

13302. (a) Hearings for consideration of issuance of a cease and desist order may be conducted by hearing panels designated by the regional board, each panel to consist of three or more members of the board as it may specify. A member of the board may serve on more than one panel.

(b) Due notice of the hearing shall be given to all affected persons. After the hearing, the panel shall report its proposed decision and order to the regional board and shall supply a copy to all parties who appeared at the hearing and requested a copy. Members of the panel are not disqualified from sitting as members of the board in deciding the matter. The board, after making such independent review of the record and taking such additional evidence as may be necessary, may adopt, with or without revision, the proposed decision and order of the panel.

13303. Cease and desist orders of the board shall become effective and final upon issuance thereof. Copies shall be served forthwith by personal service or by registered mail upon the person being charged with the violation of the requirements and upon other affected persons who appeared at the hearing and requested a copy.

(Amended by Stats. 1972, Ch. 813.)

13304. (a) Any person who discharges waste into the waters of this state in violation of any waste discharge requirement or other order issued by a regional board or the state board, or who intentionally or negligently causes or permits any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up such waste or abate the effects thereof or, in the case of threatened pollution or nuisance, take other necessary remedial action. Upon failure of any person to comply with such cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring such person

to comply therewith. In any such suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.

(b) The regional board may expend available moneys to perform any cleanup, abatement, or remedial work required under the circumstances set forth in subdivision (a) which in its judgment is required by the magnitude of endeavor or urgency of prompt action needed to prevent substantial pollution, nuisance, or injury to any waters of the state. Such action may be taken in default of, or in addition to, remedial work by the waste discharger or other persons, and regardless of whether injunctive relief is being sought. The regional board may perform the work itself, or by or in cooperation with any other governmental agency, and may use rented tools or equipment, either with operators furnished or unoperated. Notwithstanding any other provisions of law, the regional board may enter into oral contracts for such work, and the contracts, whether written or oral, may include provisions for equipment rental and in addition the furnishing of labor and materials necessary to accomplish the work. Such contracts shall be exempt from approval by the Department of General Services pursuant to the provisions of Section 14780 of the Government Code.

(c) If such waste is cleaned up, the effects thereof abated, or, in the case of threatened pollution or nuisance, other necessary remedial action is taken by any governmental agency, the person or persons who discharged the waste, within the meaning of subdivision (a), shall be liable to that governmental agency to the extent of the reasonable costs actually incurred in cleaning up such waste, abating the effects thereof, or taking other remedial action. The amount of such costs shall be recoverable in a civil action by, and paid to, such governmental agency and the state board to the extent of the latter's contribution to the cleanup costs from the State Water Pollution Cleanup and Abatement Account or other available funds.

(Amended by Stats. 1971, Ch. 1288).

(Note the new authority of regional boards in subsection (b) to expend available moneys to perform cleanup work when a cleanup order has been issued under subsection (a), and prompt action is needed to prevent substantial pollution or nuisance. Full authority to take all necessary actions can be delegated to the executive officer (Section 13223). "Available moneys" ordinarily refers to moneys in the State Water Pollution and Abatement Account (Section 13441). Funds made available from an outside source, such as the Federal Government, could also constitute "available moneys". Note that authority to expend moneys for cleanup requires an exercise of judgment. For accounting purposes it is desirable that the exercise of judgment be in writing. A letter to the state board should request needed funds and give the reason in the context of the statute, such as the existence of an "urgency of prompt action is needed to prevent substantial pollution". A previous phone call could ascertain whether necessary funds are available.)

13305. (a) Upon determining that a condition of pollution or nuisance exists which has resulted from a nonoperating industrial or business location within its region, a regional board may cause notice of such condition to be posted upon the property in question. The

waste discharge and are provided an opportunity for public hearing before adoption of such requirements.

13385. Any person who discharges pollutants, except as permitted by waste discharge requirements, or who violates any cease and desist order, prohibition, waste discharge requirement, effluent limitation, water quality related effluent limitation, national standard of performance, pretreatment or toxicity standard or who refuses to comply with the requirements adopted pursuant to Section 13382 shall be subject to a civil penalty not to exceed ten thousand dollars (\$10,000) for each day in which such discharge, violation, or refusal occurs. Funds collected shall be paid to the State Water Pollution Cleanup and Abatement Account.

13386. (a) The Attorney General, upon request of a regional board or the state board, shall petition the superior court to impose, assess and recover the sums provided in Section 13385.

(b) Upon the violation of the terms of any cease and desist order, prohibition, waste discharge requirement, effluent limitation, water quality related effluent limitation, national standard of performance, pretreatment or toxicity standard, the requirements of Section 13383, or upon the failure of any discharger into a public treatment system to comply with any cost or charge adopted by any public agency under Section 204(b) of the Federal Water Pollution Control Act, as amended, the Attorney General, upon the request of the state board or regional board shall petition the appropriate court for the issuance of a preliminary or permanent injunction, or both, as may be appropriate, restraining such person or persons from continuing the violation. The provisions of subdivisions (b) and (c) of Section 13331 shall be applicable to proceedings under this subdivision.

(c) With respect to violation of waste discharge requirements or cease and desist orders, remedies under Section 13385 are in lieu of civil monetary remedies provided for in Section 13350.

13387. (a) Any person who willfully or negligently discharges pollutants except as allowed by waste discharge requirements or who willfully or negligently violates any effluent standard, water quality related effluent standard, national standard of performance, toxicity or pretreatment standard, or who refuses to comply with the requirements adopted pursuant to Section 13382, or who violates any cease and desist order, prohibition, or waste discharge requirement shall be punished by a fine of not more than twenty-five thousand dollars (\$25,000) nor less than two thousand five hundred dollars (\$2,500) for each day in which such violation occurs, or by imprisonment for not more than one year in the county jail, or by both. If the conviction is for a violation committed after a first conviction of such person under this section, punishment shall be by a fine of not more than fifty thousand dollars (\$50,000) for each day in which such violation occurs, or by imprisonment for not more than two years in the county jail, or both. Funds collected shall be paid to the State Water Pollution Cleanup and Abatement Account.

(b) Any person who knowingly makes any false statement, representation, record, report, plan or other document filed with a regional board or the state board, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under

ROGUE RIVER COORDINATION BOARD

517.510 Rogue River Coordination Board. There is created a board to be known as the Rogue River Coordination Board, referred to in ORS 517.520 to 517.550 as the "board."

517.520 Maintenance of fishing conditions; cooperation of placer and fishing interests. It is the intent of ORS 517.510 to 517.550 that, from the standpoint of turbidity, fishing conditions in the Rogue River and its tributaries shall be maintained in Curry County comparable to such fishing conditions in Josephine County, and to provide a medium through which the placer mining interests and fishing interests on the Rogue River and its tributaries may cooperate for the mutual benefit of both. The personnel of the board shall exercise the authority conferred upon the board to that end.

517.530 Members of board; assistants; expenses; quorum. The board shall consist of three members to be appointed by the Governor. One member shall be a fisherman or angler residing in Curry County, one a miner residing in Josephine County and one member at large who shall be neither a fisherman nor a miner and who shall act as chairman of the board. The board shall select one of its members as secretary, who shall have custody of the records. The board is authorized to employ such clerks and assistants as may be necessary and to fix their compensation. Each member of the board shall be allowed and paid his necessary expenses while engaged in the performance of his duties. A majority of the board shall constitute a quorum to transact business and the act or decision of any two members of the board shall be deemed the act or decision of the board.

517.540 Jurisdiction of board; powers and duties. The board shall have complete jurisdiction over the placer mining operations in the waters of and along the Rogue River and each of its tributaries. In respect to the exercise of such jurisdiction it shall:

(1) Make a survey of the placer mining operations in and along the waters of Rogue River and its tributaries for the purpose of ascertaining the effect thereof upon the angling conditions in such waters.

(2) Establish from the facts found by the survey and study a system of rotating,

alternating or coordinating the operations of the various placer mining activities in and along such waters to the end that suitable and favorable conditions for angling and game fishing in such waters, or any part or parts thereof, may be brought about and maintained during certain periods of time by the control or prevention of turbidity caused by placer mining operations in such waters or part or parts thereof.

(3) Cause to be suspended the placer mining operations being carried on by any person or company in or along such waters for any period or periods of time it shall deem necessary to accomplish the purposes of the system.

(4) Make such rules, regulations and orders as it shall deem necessary to carry out the purposes expressed in ORS 517.520. Such rules, regulations and orders shall have the force and effect of law.

517.550 Cooperation of police officers with board. Every state police officer and sheriff whose other duties require him to be in the vicinity of the Rogue River or any of its tributaries shall cooperate with and assist the board in enforcing the provisions of ORS 517.540 and every rule, regulation or order made pursuant thereto.

MINING WITH DREDGING MACHINE

517.610 [Repealed by 1953 c.188 §2]

517.611 Definitions for ORS 517.611 to 517.700. As used in ORS 517.611 to 517.700:

(1) "Division" means the Division of State Lands.

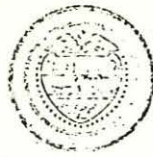
(2) "Consulting committee" means the committee established by ORS 517.700.

(3) "Dredging operation" means any dredge-mining operation, except industrial mineral or sand and gravel production, conducted in this state which substantially disturbs more than 15 acres per year of the topsoil or ground cover of the land on which it is conducted, if the land so disturbed constitutes the floor of a valley.

[1957 c.580 §1]

517.620 [Repealed by 1953 c.188 §2]

517.621 License required; application; fee; applicant's guarantee of faithful performance. (1) No person shall conduct a dredging operation without securing a license from the division as provided in ORS 517.611 to 517.700. Applications for a license shall be verified, shall be in a form



DEPARTMENT OF JUSTICE

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July 9, 1970

No. 6741

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OREGON STATE BOARD OF HEALTH
DISTRICT OFFICE

This opinion is in response to a question presented by the Honorable E. D. Potts, President of the Senate and confirms an earlier oral opinion rendered to the Environmental Quality Commission.

QUESTION PRESENTED

What are the respective powers of the Rogue River Coordination Board and the Department of Environmental Quality with respect to regulation and prevention of turbidity resulting from placer mining operations in the Rogue River Basin?

ANSWER GIVEN

The powers of each agency are complementary, and placer mining operations in the Rogue River Basin resulting in turbidity must be conducted in accordance with regulations of both agencies. If such regulations are in conflict, the stricter of the conflicting requirements is controlling. Placer miners must both obtain water discharge permits and comply with minimum water quality standards as required by the Department of Environmental Quality.

DISCUSSION

The authority of the Rogue River Coordination Board, created in 1939, is defined by ORS 517.510 to 517.550. ORS 517.540 grants it " . . . complete jurisdiction over the placer mining operations in the waters of and along the Rogue River

and each of its tributaries." On the other hand, the Department of Environmental Quality, also created in 1939 as the State Sanitary Authority, has broad powers granted by Chapter 426 [1967] Oregon Laws 946, compiled in ORS Chapter 449, with respect to quality of all of the waters of the state. There thus appears a possible conflict between the specific powers of the Rogue River Coordination Board with respect to the Rogue River and its tributaries, and the general powers of the Department of Environmental Quality. For example, may placer mining activity permitted by the Coordination Board continue, notwithstanding failure to obtain a waste discharge permit from the Department, or may it be prohibited by the Coordination Board, notwithstanding issuance of and compliance with such a waste discharge permit?

Notwithstanding that ORS 517.540 on its face grants to the Coordination Board "complete jurisdiction over placer mining operations in the waters of and along the Rogue River in each of its tributaries," the scope of the Board's activity is nevertheless limited to controlling turbidity caused by placer mining operations, to the extent that such turbidity causes conditions in downstream Curry County to be less favorable for angling and game fishing than those in upstream Josephine County. The Board is simply called upon to balance the needs of two specific interest groups for the mutual benefit of both. ORS 517.520.

This limitation and scope of the Board's function is underscored by the peculiar composition of the Board. Although the 1939 Act provided that the membership of the Board would consist of the state engineer, the chairman of the department

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of geology and mineral industries and the chairman of the state game commission or their duly authorized representatives, a 1941 amendment eliminated the public officials from the composition of the Board. ORS 517.530 now provides:

"The board shall consist of three members to be appointed by the Governor. One member shall be a fisherman or angler residing in Curry County, one a miner residing in Josephine County and one member at large who shall be neither a fisherman nor a miner and who shall act as chairman of the board."

ORS 517.540 sets forth the jurisdiction, powers and duties of the Board:

"The board shall have complete jurisdiction over the placer mining operations in the waters of and along the Rogue River and each of its tributaries. In respect to the exercise of such jurisdiction it shall:

"(1) Make a survey of the placer mining operations in and along the waters of Rogue River and its tributaries for the purpose of ascertaining the effect thereof upon the angling conditions in such waters.

"(2) Establish from the facts found by the survey and study a system of rotating, alternating or coordinating the operations of the various placer mining activities in and along such waters to the end that suitable and favorable conditions for angling and game fishing in such waters, or any part thereof, may be brought about and maintained during certain periods of time by the control or prevention of turbidity caused by placer mining operations in such waters or part or parts thereof."

On the other hand, the statement of legislative purpose pursuant to which the Department of Environmental Quality is granted its authority is markedly broader than the statement

of legislative intent related to the Rogue River Coordination

Board:

ORS 448.077:

"(1) Whereas the pollution of the waters of this state constitutes a menace to public health and welfare, creates public nuisances, is harmful to wildlife, fish and aquatic life and impairs domestic, agricultural, industrial, recreational and other legitimate beneficial uses of water, and whereas the problem of water pollution in this state is closely related to the problem of water pollution in adjoining states, it is hereby declared to be the public policy of the state to conserve the waters of the state and to protect, maintain and improve the quality thereof for public water supplies, for the propagation of wildlife, fish and aquatic life and for domestic, agricultural, industrial, municipal, recreational and other legitimate beneficial uses; to provide that no waste be discharged into any waters of this state without first receiving the necessary treatment or other corrective action to protect the legitimate beneficial uses of such waters; to provide for the prevention, abatement and control of new existing water pollution; and to cooperate with other agencies of the state, agencies of other states and the Federal Government in carrying out these objectives.

"(2) ORS 449.016 to 449.150, 449.205 to 449.250, 449.305 to 449.340, 449.390 to 449.400, 449.410 to 449.440, 449.505 to 449.565, 449.580, 449.760 to 449.830 and 449.850 to 449.920 shall be liberally construed for the accomplishment of these purposes."

From the statements of legislative purpose with respect to each agency, it is apparent that the legislature envisioned vastly different roles for the two agencies. The Board is to assist in promoting cooperation between mining and fishing interests, and to promulgate only those regulations necessary

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to maintain angling conditions on the downstream portion of the Rogue River comparable to those upstream. In contrast, the legislature has charged the Department with the duty to safeguard the interests of the people of Oregon generally with respect to all waters of this state, and the protection of all beneficial uses of the water, including many which the Coordination Board is not charged with protecting.

In order to carry out its charge from the legislature, the Department of Environmental Quality is granted overall jurisdiction of the waters of this state for the prevention and control of pollution. Specific grants of authority are made, and enforcement of general laws prohibiting water pollution is also granted to the Department. ORS 449.079 provides:

"(1) No person shall:

(a) Cause pollution of any waters of the state or place or cause any wastes to be placed in a location where such wastes are likely to escape or be carried into the waters of the state by any means.

(b) Discharge any wastes into the waters of the state if the discharge reduces the quality of such waters below the water quality standards established for such waters by the Sanitary Authority.

(2) No person shall violate the conditions of any waste discharge permit issued under ORS 449.083.

(3) Violation of subsection (1) or (2) of this section is a public nuisance.

The Department is authorized by ORS 449.080 to formulate regulations and to establish standards of water quality and purity in various waters of this state. In establishing

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such standards, the Department is directed to take into account the standards of water quality and purity found in ORS 449.086.

ORS 449.086(3) provides for the issuance of waste discharge permits by the Department, which permits must specify their duration and the conditions for conformance with both statutory and Departmental standards of water quality and purity.

The overall jurisdiction of the Department of Environmental Quality over the waters of the state for the prevention and control of pollution includes control of turbidity, which is a form of pollution within the statutory definition in ORS 449.075(8). Both agencies, therefore, exercise jurisdiction over the same subject matter, unless either 1.) the special legislation creating the Rogue River Coordinating Board and granting power over a particular form of pollution in a particular river basin stands as an exception to the operation of the later general act covering pollution throughout the state, or 2.) the later act granting jurisdiction to the Department of Environmental Quality impliedly repealed the legislation granting power to the Coordination Board. For the following reasons, it is our opinion that both agencies do exercise jurisdiction over the same subject matter, and that neither of the suggested alternatives is valid in this case.

Generally, a special statute dealing with a particular subject is controlling over statutes of general application, standing as an exception to the terms of the general act.

Ricker v. Ricker, 201 Or. 416, 270 P.2d 150 (1954); Anderson

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v. Heltzel, 197 Or. 23, 251 P.2d 482 (1952).

" . . . the general words with which it [the special act] conflicts will be restrained and modified accordingly, so that the two are to be deemed to stand together, one as the general law of the land, the other as the rule of the particular case or an exception to the general rule." Appleton v. Oregon Iron & Steel Co., 229 Or. 81, 86, 358 P.2d 260, 366 P.2d 174 (1961).

However, in this case specific statutory language negates the general rule, and the provisions of ORS Chapter 449 with respect to water pollution are controlling over any inconsistent prior legislation, whether general or special. ORS 449.070 provides:

"In so far as ORS 449.016 to 449.150 and 449.390 to 449.400 are inconsistent with any other law, ORS 449.016 to 449.150 and 449.390 to 449.400 shall be controlling."

Does this legislation thus impliedly repeal the legislation granting powers to the Rogue River Coordination Board? If Chapter 449 is controlling, does it also supersede?

Repeals by implication are not favored in law, and, if possible, both Acts should be harmonized and construed together. State ex rel. Flaxel v. Chandler, 180 Or. 28, 175 P.2d 448 (1946); City of Portland v. Bingham, 209 Or. 575, 307 P.2d 492 (1957). A specific statute will not be considered repealed by a subsequent statute general in its terms. Northern Wasco Co. P.U.D. v. Wasco Co., 210 Or. 1, 305 P.2d 766 (1957).

Thus while the statutory provisions dealing with the

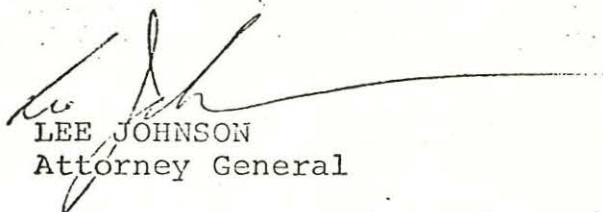
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Rogue River coordinating Board do not stand as an exception to the statutory powers of the Department of Environmental Quality, they remain in effect if they can be harmonized and construed together with the later statutes, and unless they are inconsistent with them.

In our opinion the applicable statutes can be harmonized and construed together, and are not inconsistent. The Rogue River Coordination Board is charged with balancing the interests of two particular groups, i.e. placer miners and fishermen, providing for cooperation between the two groups, and regulating placer mining activity, so that stream conditions for fishing purposes only are the same in Curry County as in Josephine County. Acting within its broader powers and with a wider range of objectives, the Department of Environmental Quality may not achieve the specific objectives of the Rogue River Coordination Board. To the extent necessary to achieve those specific objectives, the Coordination Board may enact appropriate regulations, and is not precluded from imposing standards of turbidity which are more stringent than those imposed by the Department, if necessary for the protection of downstream angling.

Nevertheless, it is apparent from ORS 449.070 that Chapter 517 does not exempt placer mining from the requirement of obtaining a waste discharge permit, and compliance with minimum

water quality standards -- for all purposes, not simply angling purposes -- as set by the Department of Environmental Quality. Should the Department enact stricter water quality standards than those of the Coordination Board, the standards imposed by the Department are controlling.



LEE JOHNSON
Attorney General

LJ:JWO:cm



DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION OFFICE

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TOM McCALL
GOVERNOR

DIARMUID F. O'SCANNLAIN
Director

E. J. WEATHERSBEE
Region Administrator

To: Environmental Quality Commission

From: Director

SUBJECT: Agenda Item No. H, December 20, 1974 EQC Meeting

Public Hearing - Adoption of Permanent Rules Pertaining to "Interim Policy for Approval of New Air Contaminant Sources in the Portland Metropolitan Special Air Quality Maintenance Area"

Background

The urgent need for an "Interim Policy for Approving New Air Contaminant Emission Sources in the Portland Metropolitan Area" was first brought to the attention of the Environmental Quality Commission at its September 20, 1974, meeting (Agenda Item F). At this meeting the EQC directed the staff to draft this policy in Rule form and to include provisions for considerations of tradeoffs in terms of air emissions. At the October 25, 1974, meeting of the EQC the "Interim Policy . . ." in draft rule form was presented (Agenda Item D) with the Director's recommendation to immediately adopt the "Criteria for Approval of New Air Contaminant Sources in the Portland Area Special Air Quality Maintenance Area" as a temporary rule. It was the Director's further recommendation that necessary hearings be authorized 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.

Testimony at the October 25 1974, EQC Meeting regarding adoption of the "Interim Policy" as a rule was generally quite supportive. Representatives of the Port of Portland, Associated Oregon Industries, Portland Chamber of Commerce, Portland Steel Mills, Columbia Independent Refinery, Inc., and North Portland Citizens Committee supported adoption of the policy although the North Portland Citizens Committee was not in favor of inclusion of tradeoffs in the rule.

Significant issues raised in discussion of the Interim Policy included:

1. Desire for expeditious processing of pending permit applications.
2. Need to improve the air quality management data base.



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3. Need for and general support of a clean fuels policy to improve Portland Area air quality and make room for additional growth.
4. Apparent need to focus future control efforts on non-industrial "area source" air emissions including automobiles, backyard and field burning.

After some discussion the EQC adopted the Interim Policy with some minor modifications as a Temporary Rule and authorized conducting necessary hearings to adopt the Interim Policy as a permanent rule.

Public notice of this hearing along with copies of the adopted temporary rule (see attachments A and B) were distributed on November 1, 1974. Since publishing the hearing notice no written comments have been received to date regarding adoption of the permanent rule.

Discussion

Since adoption of the Interim Policy as a temporary rule, three pending air permit applications subject to the rule have been processed. These facilities are listed below and account for approximately 25% of the particulate and 15% of the SO₂ emission allocation allowed by the rule.

<u>Source</u>	<u>Allowed Emission Increase (tons/year)</u>	
	<u>Part.</u>	<u>SO₂</u>
Pacific Carbide-N. Portland (Carbide Mfg. increase)	0	0
Cook Industries-Rivergate (New grain elevator)	30	0
Portland Steel Mills-N. Portland (New Scrap Steel Processing facility)	86	205

Permits for three new small air contaminant sources which emit less than 10 tons/year of air contaminants and thus are exempt from the interim policy have been processed since adoption of the temporary rule. Aggregate air emission increase from these facilities are 5 tons/year of particulate and 0 tons/year of SO₂ thus, confirming the staff position at least at this time that exemption of small sources from the policy would not seriously affect the policy.

Pending permit applications are being processed in the most expeditious manner possible; notably, action on three oil refinery permits and a companion clean fuels policy is proposed at a public hearing before the EQC at the January 24, 1975, meeting. A status report on this matter was presented to the EQC at the November 22, 1974, meeting (Agenda Item E).

Other pending permit applications are being processed and the interim policy rule appears to be providing the needed guidelines to both the Department and permit applicants for expeditious processing.

The development of a 10-year air quality maintenance plan, the heart of which is development of an airshed simulation model, is on schedule.

Improvement in the air quality data base, which is needed to insure accuracy in the formation and administration of a 10-year air quality maintenance plan, will require considerable monetary expenditure if improvements are to be made in a relatively short time. The Department has begun to identify the areas where improvements in this data base are needed and a proposal is being formulated to identify these needed improvements along with costs for presentation to the 1975 Oregon Legislature with a request for special funding.

Conclusions

The temporary rule relating to "Interim Policy for Approval of New Air Contaminant Emission Sources in the Portland Metropolitan Special Air Quality Maintenance Area" has generally been accepted by the local community and has provided needed guidelines to insure against over allocating of the air resources in the critical Portland Metro Airshed.

Continuation of the rule pertaining to "Criteria for Approval of New Air Contaminant Sources in the Portland Metropolitan Special Air Quality Maintenance Area" beyond the 120 day time limit of the present temporary rule is needed to provide reasonable criteria for evaluation of pending and new air permit applications until a comprehensive 10-year air quality maintenance plan is adopted (scheduled by July 1, 1975) and to continue to protect against irreversible environmental damage to the airshed.

Director's Recommendations

It is the Director's recommendation that the Commission adopt as a permanent rule, the temporary rule which was previously adopted by the Commission at its October 25, 1974, meeting and identified as "Criteria for Approval of New Air Contaminant Sources in the Portland Metropolitan Special Air Quality Maintenance Area" (attachment B). It is further recommended that this rule remain effective until adoption of a 10-year air quality maintenance plan.



KESSLER R. CANNON
Director

Attachments:

- A) Notice of Public Hearing
- B) Criteria for Approval of New Air Contaminant Sources in the Portland Metropolitan Special Air Quality Maintenance Area



DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHWEST REGION

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TOM McCALL
GOVERNOR

KESSLER R. CANNON
Director

E. J. WEATHERSBEE
Region Administrator

NOTICE OF PUBLIC HEARING

for

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

The Environmental Quality Commission at its October 25, 1974 meeting adopted as a temporary rule an interim policy for approval of new or expanded air contaminant emission sources in the Portland Metropolitan Special Air Quality Maintenance Area. The interim policy is to control new or expanded air contaminant emission sources until such time as it can be replaced by adoption of a ten-year Air Quality Maintenance Plan.

The interim policy is to provide criteria for the Department of Environmental Quality to follow in reviewing and approving air contaminant discharge permit applications for new or expanded air contaminant sources, including their proposed site locations and general designs, to assure that air quality standards can be achieved and maintained without major disruption to the orderly growth and development of the area.

The purpose of the public hearing is to establish a permanent interim policy rule to supersede the adopted temporary interim policy rule which expires after 120 days. The hearing will be held before the Environmental Quality Commission at the time and place listed below.

At 10:00 a.m. on December 20, 1974
Redwood Room
Swept Wing Restaurant
1212 S. E. Trice Road
Albany, Oregon 97321

Any interested person desiring to submit written testimony concerning the issues of fact, law or policy related to these matters may do so by forwarding them within forty (40) days from the date of this notice to the Department of Environmental Quality, Northwest Region, 1010 N. E. Couch St., Portland, Oregon 97232, or may be heard orally at the public hearing on the date and at the time given above.

Copies of the adopted temporary interim policy rule are available upon request from the Northwest Region office of the Department of Environmental Quality.

Nov 4, 1974
Date

E. J. Weathersbee
Northwest Region Administrator



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News Item Only

DEPARTMENT OF ENVIRONMENTAL QUALITY

AMENDMENT TO CHAPTER 340, OREGON ADMINISTRATIVE RULES

adopted as temporary rule by
Environmental Quality Commission
on October 25, 1974

DIVISION 3

AIR POLLUTION CONTROL STANDARDS FOR AIR PURITY AND QUALITY

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 general 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 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 and adjacent areas between sampling stations for particulates and sulfur dioxide 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.

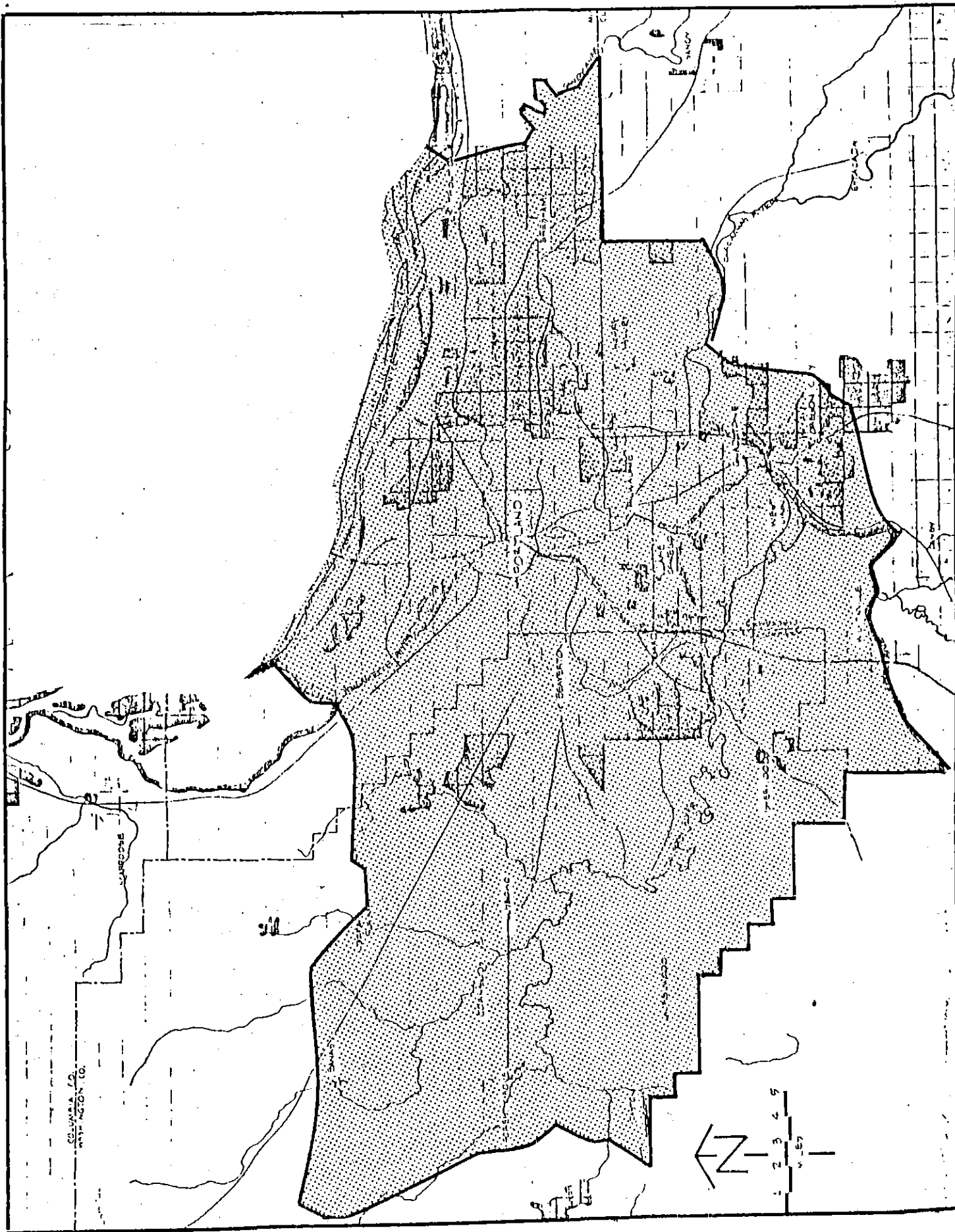
(2) Increases in particulate and sulfur dioxide emissions will not exceed two years of projected average controllable growth (equivalent to 430 tons/year of particulate and 1430 tons/year of sulfur dioxide).

(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 may 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
PORTLAND METROPOLITAN SPECIAL AIR QUALITY AREA





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. I, December 20, 1974, EQC Meeting

JACKLYN L. HALLOCK
Portland

Brown's Island Sanitary Landfill, Marion County - Status Report

MORRIS K. CROTHERS
Salem

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

The Brown's Island Sanitary Landfill is located in the NE 1/4 Section 31 and the NW 1/4 Section 32 of Township 7 South, Range 3 West, W.M. on Brown's Island in Marion County (see attached map fig. 1).

This landfill is the major solid waste disposal site in the Chemeketa 5-county region, serving some 117,000 people who generate approximately 240 tons of solid wastes for disposal each day.

The actual site is owned and operated respectively, by two different private individuals; however, the wastes disposed therein are collected under franchises issued by the City of Salem and Marion and Polk counties and the landfill is operated under a solid waste disposal site permit issued by the DEQ and a conditional land use permit issued by Marion County. The Chemeketa Regional Solid Waste Management Plan has designated the Brown's Island site as a major solid waste regional landfill for a 5 to 10 year period.

The site lies in the floodplain of the Willamette River, between the old Willamette River channel and the present river channel. The old channel is usually dry, but during annual high flood flows it becomes an important flood flow channel.

The original access road, Homestead Road South (Brown's Island Road) has two low sections at approximately elevation 128 (USGS datum) which are inundated at river stages in excess of 19 feet (Salem gage) and thereby rendered non-usable for varying periods almost every year. During these periods of nonaccess to Brown's Island, in past years, the solid wastes have been hauled to Marion County's Macleay site for disposal. The Macleay site is now essentially filled to capacity, has serious leachate and other environmental problems and is not an adequate back-up site.



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In order to make the Brown's Island Sanitary Landfill available for use year-round, Marion County, in 1973, constructed an allweather access road to the island. The new road is an extension of Roberts' Road and crosses the old river channel with a rock and earth fill to an elevation of approximately 140 (USGS datum) so as not to be overtopped by floods that would ordinarily be expected to occur not more than once in 10 years. The Department, by its letter of June 19, 1973, supported Marion County's request to FHA for funding construction of an all-weather access road to Brown's Island; however, the design criteria and construction plans were not submitted to or reviewed or approved by the Department. Detailed plans for County roads are normally not reviewed by the Department.

In January 1973, extreme high flood flows of the Willamette River (attenuated by dams to an effective 24year flood according to the U. S. Corps of Engineers) washed out the new allweather access road and two sections of the landfill dikes. Substantial solid wastes were washed downstream and if the road had not washed out, thereby relieving the pressures on the landfill, undoubtedly a much greater portion of the landfill would have been washed away. In spite of objections by the Department, Marion County has rebuilt the washed out section of the allweather access road thereby again placing the landfill in jeopardy of being eroded or washed out by floods that might be expected to occur with a frequency as often as once in five years and which, in fact, could occur any given year.

The Brown's Island landfill has been operated under a series of short term permits issued by the Department since State jurisdiction of solid waste disposal was transferred from the State Health Division to the Department by the 1971 Oregon Legislature. Short term permits were used as a mechanism to require and obtain needed improvements in the construction and operation of the landfill. Also, since the landfill was located in the Willamette River floodplain, the Department restricted operation to the 30-acre area then under lease unless and until it could be shown by a comprehensive engineering study and flood flow analysis that further expansion into the floodplain could be safely done.

The construction of the all-weather access road and the subsequent wash out and temporary closure of the Brown's Island landfill in January, 1974, increased the urgency for a detailed flood flow study to determine what needed to be done to protect the landfill from further washout and to determine the extent and the conditions under which the landfill might be expanded.

On May 3, 1974, Department staff and a representative of the U. S. Corps of Engineers made a field inspection and evaluation of the landfill, and Marion County, City of Salem, Sanitary Services Co., Inc., and Chemeketa Region were advised by our letter of May 9, 1974, and at a meeting held on May 22, 1974, of actions and conditions necessary to continue use of the Brown's Island Landfill. These included:

1. Cutback the upstream dike of the landfill to ease interference with Willamette River flow.
2. Repair exterior dikes to withstand 100 year flood flows.
3. No further expansion of the landfill toward the main river channel unless it could be shown by a hydraulic study that further expansion could be safely accomplished.
4. Removal or modification of the all-weather access road so as not to further jeopardize the landfill.

It was also suggested that the landfill might be expanded immediately without further study into the high ground area to the east and downstream of the landfill if proper authorizations from BOR and Marion County could be obtained. This area could be used because it is located immediately downstream from the present landfill and would cause no further restriction of flood flows. The area is also at a high enough elevation that it can be worked during high river flow periods of the year. BOR approval is necessary because these 21 acres were purchased for the Willamette Greenway with BOR funds. A conditional use permit from Marion County and a new or modified solid waste disposal permit from the Department would also be necessary before this area could be used.

Subsequently, Chemeketa and Marion County financed preparation of a detailed flood flow analysis by Mr. John McDonald of Clark and Groff, Consulting Engineers. The analysis indicates that the Brown's Island landfill could be safely expanded further into the Willamette River floodplain provided the new all-weather access road is removed or modified so as not to substantially restrict flood flows in the old channel.

The Department is generally inclined to agree, on the basis of the Clark and Groff study and a preliminary evaluation of the study results by the U. S. Soil Conservation Service, that the Brown's Island landfill probably could be expanded further into the floodplain to some yet undetermined limit if (1) the road is removed or substantially modified and (2) the exterior dikes of the landfill are properly designed and constructed to assuredly withstand maximum expected flood flows. Location of landfills in flood plains is not generally recommended; however, the Chemeketa regional solid waste planning group and its consultants were unable to locate a better site in almost 3 years of intense planning activity.

In order not to risk having the landfill washed out again this winter, a request was made to Marion County by letter dated October 2, 1974, "...that this road be removed or modified by no later than December 1, 1974, such that it will not interfere with flood flows in the Willamette River in a manner to jeopardize the integrity of the landfill." So far, Marion County Has not agreed to remove or modify the new road. Mr. McDonald has advised Marion County that in his opinion the new road could be used until such time a 5-year flood is forecasted and then a section of the road "...MUST be weakened so that it is carried away before the landfill is eroded."

The Department is not satisfied that the "flood forecast, road weakening" procedure suggested by Mr. McDonald, could be carried out in a manner to afford adequate assurances against wash-out of the landfill. Also, if the road is left to wash out at the whim of Mother Nature, the area could be suddenly faced with a solid waste disposal crisis. The Department is of the opinion the road should be removed or modified on a planned basis with alternative disposal plans made to assure continuous and adequate solid waste disposal for the area.

A possible solution to the Brown's Island access problem might be to raise the old road 3 to 5 feet to an elevation of 131 or 133 feet (USGS datum). It appears that this could be done without seriously restricting flood flow passage at the higher river stages. A rough analysis of river stage data by the Department indicates that raising the old road from its present elevation of 128 to elevation 131, would have made it usable for all but 13 days during the high flow period of 1973-74 and if raised to elevation 133, this road would have been passable all but 6 days during 1973-1974. Most years the old road would appear to be operable year-round if elevated 3 to 5 feet in its lowest sections. Lowering the new road from its present elevation of approximately 140 to elevations 131 or 133 might produce somewhat similar results; however raising the old road would appear to cause less flood flow pressures on the landfill than would be the case if the new road were to be left in place at a lowered elevation. Both of these possibilities appear worthy of further study; however, neither should be done without a thorough engineering analysis of the potential benefits and hazards. Alternative disposal procedures would have to be developed for the short periods when Brown's Island might not be accessible with such a modified road system. Of course, Brown's Island could be made safely accessible during any river flow conditions by construction of a properly designed bridge; however, this is believed to be prohibitively expensive, at least on a short term basis.

The Department has been notified by the site operator, Sanitary Services Co., Inc., that the present operating area will be filled to capacity by February 1, 1975. The operator also indicated that it would take between 30 and 45 days to prepare the Greenway land for receipt of solid waste. Since the Greenway land has not yet been acquired, possible short term alternatives were explored and a letter outlining possible alternatives was directed to Marion County on December 6, 1974. Interim hauling to the Coffin Butte Landfill in Benton County or to Rossman's Landfill in Clackamas County are possible short-term alternatives, subject to local approval. Construction of another lift at Brown's Island is not considered a practical alternative because:

- a) Cover material would have to be imported.
- b) Mounding of the solid wastes would be unsightly.
- c) Mounding would tend to produce more leachate discharge.

Conclusions

1. The Brown's Island Sanitary Landfill is the major solid waste disposal site in Marion County and serves the entire City of Salem and portions of Marion and Polk Counties.
2. The present landfill area will be filled by February 1, 1975, and the only usable area available for short-term expansion of the landfill is the 21-acre parcel to the east of the present landfill which was purchased with BOR money for the Willamette Greenway.
3. Use of the 21 acres of Willamette Greenway lands requires the acquisition and trade of equivalent lands acceptable to BOR, a conditional use permit from Marion County and a modified solid waste disposal permit from DEQ.
4. In order for the 21-acre parcel to be made ready for use by February 1, 1974, when the present landfill will be full, preparation of the site should start no later than January 1, 1974. Every effort should be made to acquire and make this area available for use by February 1; however, contingency plans should be made now for alternative disposal sites in the event this schedule cannot be met.
5. The new all-weather access road places the landfill in jeopardy of being seriously damaged or washed away by once in 5 years expectancy, or greater, flood flows. The new road should immediately be removed or modified such that flood flows in the old channel will not be substantially restricted.

6. An immediate analysis should be made to determine if the old road, or **perhaps** the new road, could be modified so as to greatly improve reliability of access to Brown's Island during high-water periods and still not restrict flood flows to the point of jeopardizing the landfill.
7. Marion County or the Chemeketa group should act immediately and positively to assure that the area's solid wastes will be disposed of in an acceptable manner on a continuous basis.

Proposed Action

Based on information on hand to date, the Department proposes as follows:

- 1) The Department proceed to issue a renewal permit to Sanitary Service Co., Inc., allowing continued disposal of solid waste within the present confines of the Brown's Island Sanitary Landfill until February 1, 1975. Additional time will be incorporated to allow completion of specified site closure procedures including the provision of adequate exterior dike protection. (The extent of dike protection needed will be dependent upon the final disposition of the new road.)
- 2) The Department proceed to issue, subject to BOR and local land-use approval, a solid waste disposal permit to either Sanitary Services Co., Inc., or to Marion County to allow immediate expansion of the Brown's Island landfill into the 21-acre area to the east.

Such action will require submission of an application to expand the landfill together with detailed site preparation and operational plans.
- 3) Marion County be encouraged to either remove or modify the new road in order to remove the serious threat of washout of the landfill by anticipated high river flows.
- 4) The old access road be raised to provide essentially year-round access to Brown's Island, except during unusually high water periods, provided a more detailed study verifies that this can be accomplished without jeopardizing the landfill.
- 5) Chemeketa make immediate alternative plans for disposal of solid wastes for both the immediate future, in the event the Greenway lands may not be available by the time the present landfill is full, and for the longer-term future periods when Brown's Island may not be accessible due to exceptionally high waters.



KESSLER R. CANNON
Director

Attachments

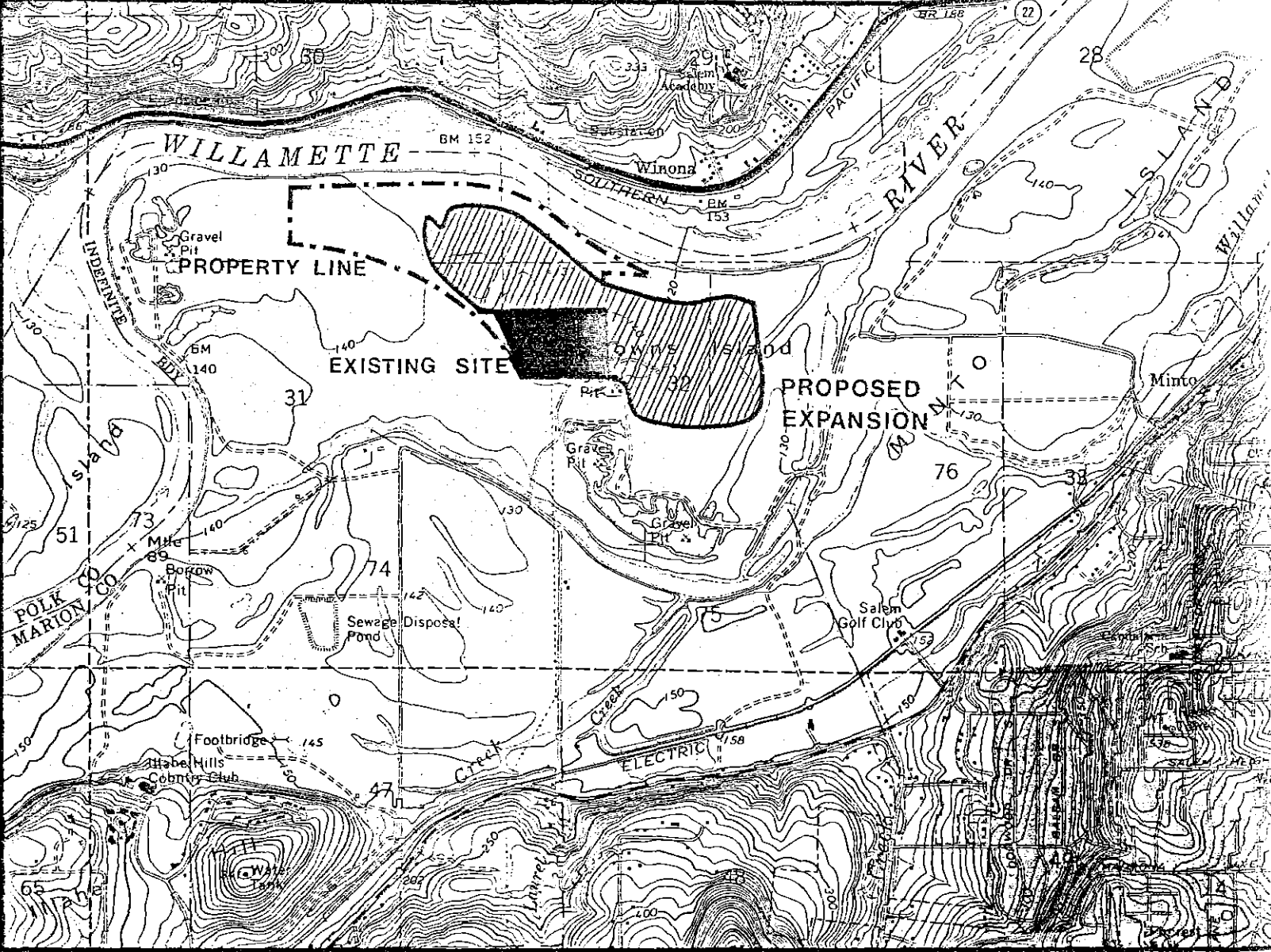
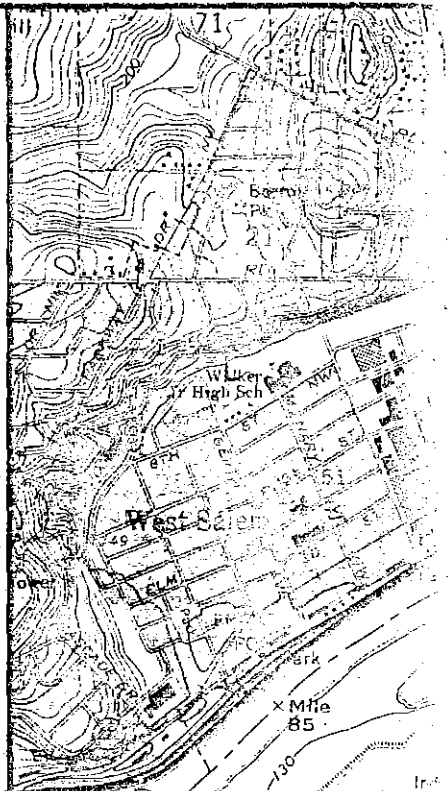
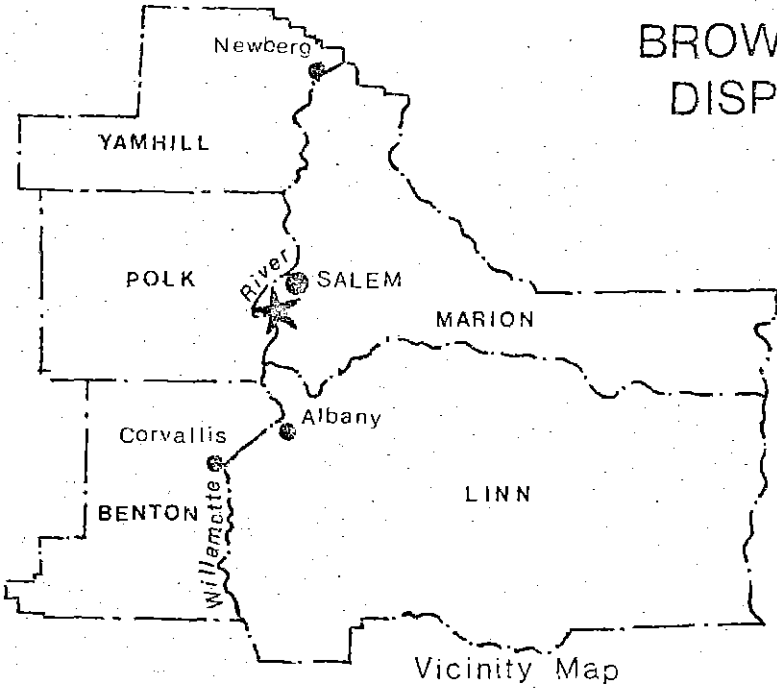
Figure 1

Letters (4)

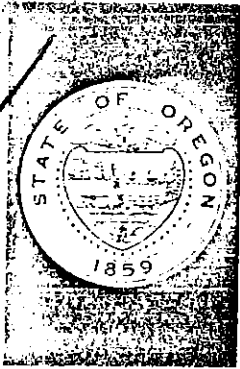
PROPOSED BROWN'S ISLAND DISPOSAL SITE



Exhibit 1



Xerox to RPR ✓
Xerox to Bill Schlitt



DEPARTMENT OF ENVIRONMENTAL QUALITY

Ry/s

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229- 5357

TOM McCALL
GOVERNOR

June 19, 1973

DIARMUID F. O'SCANNLAIN
Director

Mr. Pat McCarthy, Chairman
Marion County Board of Commissioners
Courthouse
Salem, Oregon 97301

Re: S.W. - Marion County
Brown's Island Disposal Site

Dear Commissioner McCarthy:

This is in reply to your letter of May 29, 1973, regarding the Farmer's Home Administration construction grant to Marion County, and requesting assurance that the Brown's Island Landfill is acceptable as a regional disposal site for at least ten years.

The present Brown's Island solid waste disposal permit, issued by the Department of Environmental Quality under which the landfill is being operated, covers only 30 acres of the approximately 90 acres potentially available for filling. Mr. William Schlitt, operator of the Brown's Island Landfill has been advised by the Department that before consideration can be given to expansion of the site beyond the area approved under the present permit, a full engineering evaluation of the disposal site must be completed which includes data and operational plans as necessary to assure that the landfill will not be adversely affected by at least 100 year frequency flood waters.

The present landfill area is estimated to have a remaining life of 3 to 5 years depending upon how well the site is operated and based upon the present rate of fill. At this time, assurance of landfilling at Brown's Island can be given for only up to five (5) years, contingent upon the conditions of a valid permit issued by the DEQ, operation in accordance with the permit and operation at maximum compaction densities and efficiencies. The occurrence of any unforeseen environmental hazards during this time would of course have to be dealt with in an appropriate manner.

Assurance beyond five years cannot be considered until engineering studies have been conducted which demonstrate feasibility of filling additional areas without hazard of potential washout by flood waters.

Mr. Pat McCarthy, Chairman
June 19, 1973
Page 2

The Department considers construction of an all-weather access road to the Brown's Island Site to be an implementation project of high priority. The present rate of filling and anticipated short remaining life of the Macleay Landfill Site make it imperative that year-round access be developed for the Brown's Island Site as soon as possible. Actions of the County Solid Waste Advisory Committee and the Chemeketa Region Board of Directors also indicate support of the Brown's Island access road project. The Department's full support is given to use of the FHA Funds for this purpose.

If you have any questions concerning this matter, or if we can be of further assistance, please let us know.

Sincerely,

DIARMUID F. O'SCANNLAIN
Director



E. J. Weathersbee
Deputy Director

EAS:mmm
cc: Ken Keudell, FHA Portland
cc: J. J. Armstrong
cc: Clifford Jones
cc: Alan Hershey
cc: J. A. Anderson
cc: Salem District Office

KESSLER R. CANNON

May 9, 1974

Mr. John A. Anderson, Chairman
Joint County-City Solid Waste Committee
Marion County Department of Public Works
County Courthouse
Salem, Oregon 97301

Re: SW - Brown's Island Sanitary
Landfill, Marion County

Dear Mr. Anderson:

This is in reply to your letter of April 29, 1974, requesting a Department evaluation of Brown's Island Sanitary Landfill.

The U. S. Army Corps of Engineers, in a letter dated March 25, 1974, has indicated that there are severe problems with the location of the landfill and the newly constructed access road. They indicated that expansion of the landfill further into the floodplain, as proposed, would restrict approximately 90% of the floodway and cause velocities approaching nine (9) feet per second past the landfill. The Corps feels that at these velocities it would not be economically feasible to protect the dikes from erosion. The existing new service road and existing landfill already restrict approximately 70% of the flood plain until the road is either overtopped or washed out. As you know, last January the pressures and velocities resulting from this constriction caused the landfill dikes to be washed out in two places resulting in substantial solid waste loss downstream. The landfill damage and waste loss would have undoubtedly been much greater if the road hadn't washed out, thereby providing relief.

On May 3, 1974, Department staff along with a representative of the Corps of Engineers conducted an inspection of the existing landfill. The following actions and conditions are considered necessary to protect the landfill and to serve as a basis for determining future operation:

Mr. John Anderson

Page 2

May 9, 1974

1. The Westward or upstream point of the present diked area must be cut off and a new dike constructed starting from the southwest corner and extended in a straight line to intersect with the North dike at an angle (inside the diked area) of approximately 150 degrees. This would require pulling back some of the garbage that has already been spread out toward the northwest corner of the present diked area.
2. All exterior dikes must be repaired and constructed such that they can assuredly withstand 100 year flood pressures and velocities. This will require a detailed floodflow analysis to determine actual design velocities, with and without the road, and with present and possible future landfill configurations.
3. It appears that the landfill cannot be safely expanded in a manner that would further restrict the floodplain and unless a detailed and thorough hydraulic study is conducted and unless such study shows that it could be safely done, it would be the intent of this Department not to allow expansion of the landfill beyond the present diked area (after the northwest corner has been cut back as discussed in item 1.).
4. The new all-weather access road should be removed or re-constructed to allow essentially unrestricted flow of floodwaters unless it can be shown by hydraulic study that the landfill can be protected against washout without removing the restricting influence of the road.

The above items will be specifically dealt with in the renewal permit for Brown's Island landfill scheduled to be issued prior to July 1, 1974.

It is possible that some expansion of the landfill to the east or southeast might be allowed in accordance with a specifically agreed plan provided the necessary authorizations could be obtained for such use of these lands. However, such areas would provide only an interim, short-term program at best and a search for alternative disposal areas must be implemented immediately.

If it could be shown by a full engineering evaluation that the landfill and expanded areas could be protected under 100 year flood conditions and not cause damage to adjacent areas, the Department would be receptive to expansion and use of the site as a regional landfill. However, preliminary evaluation by the Corps of Engineers and the Department indicate that this will not prove practicable.

Mr. John Anderson

Page 3

May 9, 1974

We would like to meet with your committee and discuss this matter in further detail at your earliest convenience.

Very truly yours,

KESSLER R. CANNON
Director

RLB:lb

E. J. Weathersbee, Administrator
Northwest Region Office

~~Private~~

cc: Solid Waste Management Division, DEQ
cc: Chemeketa Region
cc: Marion County Board of Commissioners
cc: Marion County Health Department
cc: City of Salem
cc: Sanitary Service Company, Inc.
cc: Salem District Office, DEQ

October 2, 1974

Marion County Board of Commissioners
Marion County Courthouse
Salem, Oregon 97301

Re: SW - Brown's Island Sanitary
Landfill, Access Road
Marion County

Gentlemen:

The DEQ is in receipt of a flood-flow study concerning the Willamette River in the vicinity of Brown's Island prepared for the Chemeketa Region by Clark & Groff Engineers, Inc. The report was prepared at the request of the Department to help determine the acceptability and advisability of the continued use of Brown's Island as a sanitary landfill disposal site.

On September 19, 1974, a meeting was held between Frank Richendorf of the Soil Conservation Service, Jerry Connors of Chemeketa, John McDonald of Clark and Groff Engineering, Inc., and Russ Fetrow, Bob Brown and me representing the Department. At that meeting it was determined, based on the Clark & Groff analysis and report and upon our understanding of Mr. Richendorf's evaluation and interpretation of the data in the Clark & Groff report, that it would be necessary to remove the all-weather access road to Brown's Island in order to protect the present refuse filled area from potential wash-out by normal high river flows. It is therefore, requested that this road be removed or modified by no later than December 1, 1974, such that it will not interfere with flood water flows in the Willamette River in a manner to jeopardize the integrity of the landfill.

It is further requested that you notify this Department at the earliest possible time, but no later than November 1, 1974, of the County's intended action regarding the all-weather access road.

It was also determined that further northward expansion into the flood-plain should not be allowed until such time additional information, as outlined in the Department's letter of September 6, 1974, is provided,

Marion County
Page 2
October 2, 1974

at which time a more complete judgement regarding this aspect of the overall Brown's Island matter could be made. It is our understanding that John McDonald will submit a proposal to Marion County for providing the additional information.

Since it appears that an all-weather road to Brown's Island will not be available, it becomes imperative that an alternate disposal site which will permit adequate disposal of solid wastes during high-water periods each year when Brown's Island would be inaccessible, must be identified and agreed upon within a very short time. We would be glad to meet with representatives of the County to find a solution to this urgent problem.

If you have any questions or wish to discuss any of the above in further detail, please contact me or Mr. Robert Brown of this office at 238-8471, or the Salem District Office at 278-8240.

Very truly yours,

KESSLER R. CANNON
Director

RLB:lb

E. J. Weathersbee
Administrator
Northwest Region

Encl.

cc: Chemeketa
cc: City of Salem
cc: Salem District Office
cc: Solid Waste Management Division
cc: Frank Reckendorf
cc: John McDonald

December 6, 1974

Mr. Harry Carson, Chairman
Marion County Board of Commissioners
Marion County Courthouse
Salem, Oregon 97301

Re: SW - Brown's Island Sanitary Landfill
Marion County

Dear Mr. Carson:

On December 2, 1974, a meeting between Bill Schlitt and this Department was held to discuss the Brown's Island Sanitary Landfill status. During this meeting, Mr. Schlitt informed us that the present landfill would be full by February 1, 1975.

In regard to expansion into the 21 acre parcel to the east, Mr. Schlitt indicated that it would take between 30 and 45 days for its proper construction and preparation for disposing of garbage. Since the Bureau of Outdoor Recreation land to the east has not been acquired, possible short term alternatives were explored. One alternative discussed was the placement of an additional lift. Mr. Schlitt, as well as the Department, feels that this approach is unacceptable due to the following:

1. The cost of hauling cover and berm construction material to the site would be extremely high and perhaps prohibitive.
2. Adding additional height to the present landfill would probably be unacceptable to home owners north of the Willamette River as well as to the landfill property owner.
3. An additional lift would increase the possibility of heavy leachate production and discharge to the river.
4. Finished landfill contours should be maintained at elevations compatible with surrounding lands.

The only other alternatives to the immediate disposal problem would appear to be to transfer the wastes to other established acceptable landfills. Accordingly, it is requested that Marion County

Mr. Harry Carson
Page 2
December 6, 1974

immediately make initial contacts with operators of Rossmans Landfill in Clackamas County and Coffin Butte Landfill in Benton County, and the respective county governments to determine their positions on possible interim transfer of solid waste from the Salem area in the event that the BOR land has not be acquired, locally approved, and the site prepared for use by February 1, 1975.

Recognizing that both alternatives would be costly and only interim in nature, at best, the urgency for obtaining the BOR land, obtaining conditional use approval and preparing the site for use is obvious. In hopes of expediting the solid waste disposal permit for the new land, the enclosed forms and site preparation and operational plans for the BOR land should be returned as soon as possible. The appropriate permit will be issued subject to the acquisition of the land.

In order to keep this Department apprised of on-going work, an immediate status report on the following would be appreciated:

1. Status of acquisition of BOR land to the east.
2. Status of Conditional Use Permit for the use of BOR land for a landfill.
3. The date that the engineering plans and appropriate solid waste disposal permit forms will be submitted to the Department.
4. The status of the engineering flood flow analysis.

In response to Mr. McKinney's letter dated November 15, 1974, we offer the following information:

1. The questions of the use of the gravel pits around the Salem area for solid waste disposal will be presented to the State Engineer's Office for comment in the near future. It should be noted that this proposal has been rejected by that office under the previous State Engineer, Mr. Stanley.
2. In regard to the Department's contact with the Corps of Engineers and comments received regarding the River and Harbor Act of 3 March, 1899, Mr. L. J. Stein, Chief of the Engineering Division, should be contacted.

In summary, the present Brown's Island landfill will be filled by February 1, 1975; site preparations of the adjacent BOR land should be started by not later than January 1 if this site is to be available for use by February; since it is likely that the BOR land may not be acquired and ready for use by February 1, it is imperative that alternative interim plans be made to assure a means of disposing of solid waste from the City of Salem and adjacent areas.

Mr. Harry Carson
Page 3
December 6, 1974

We are most eager to assist you in any way possible to resolve this urgent problem.

If there are any questions regarding the above matters, please feel free to contact this office.

Very truly yours,

KESSLER R. CANNON
Director

RHF:lb

E. J. Weathersbee
Administrator
Northwest Region

Enclosures

cc: Mayor Lindsey, City of Salem
cc: Bill Schlitt, Sanitary Service Co., Inc.
cc: Russell H. Petrow, Salem District Engineer
cc: E. A. Schmidt, Solid Waste Division, DEQ



ENVIRONMENTAL QUALITY COMMISSION

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—
KESSLER R. CANNON
Director

To : Environmental Quality Commission

From : Director

Subject: Agenda Item No. J, December 20, 1974 EQC Meeting
Teledyne Wah Chang, Albany - Status Report

Background

Teledyne Wah Chang operates a refractory and reactive metals plant at Millersburg near Albany. Operations consist of extraction and reduction of ores to produce zirconium, hafnium, tantalum, columbium and other reactive and refractory metals. Their primary product is zirconium which is used as cladding for nuclear fuel elements. This plant is one of two on the North American hemisphere and produces 85% of the nation's production of zirconium.

The principal pollutants in the waste water discharges from Wah Chang are ammonia, MIBK (Methylisobutyl ketone), thiocyanate and total solids.

The waste waters are partially treated and discharged to Truax Creek, thence to Murder Creek, and via a slough to the Willamette River. The wastes are sufficiently strong and toxic that Truax and Murder Creeks and the slough are rendered almost sterile and devoid of aquatic life and unfit for beneficial use except as an outfall ditch for Wah Chang wastes. In addition, a significant oxygen demand is ultimately exerted on the Willamette River as a result of the organic and NH_4^+ components of the liquid waste stream.

This plant was put under a State waste water discharge permit in August 1968 which called for substantial, incremental reduction in ammonia and other toxic and organic components of its waste water even though the methodology for effecting the required waste component reductions had not yet been developed. The incentive which assured that a strong, sustained waste water control effort would be made was the requirement that production should not increase unless and until waste discharge limits were met.



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Over the years, Wah Chang has sustained substantial "in-house" and consulting service effort to reduce its waste component discharges, has spent substantial monies for development and installation of control facilities and has had some successes in reducing ammonia, MIBK and thiocyanate discharges. Up to about two years ago it appeared that slow but steady progress was being made toward making their wastes non-toxic and in reducing the oxygen demand on the river. This was done primarily by converting substantial waste ammonia to salable fertilizer. Currently a large part of the recovered ammonia is being returned to in-plant production processes.

During the past two years Wah Chang's attempts to further reduce its waste discharges through recovery of additional materials for sale or recycle have had serious setbacks. These failures, coupled with unauthorized increases in production, have resulted in waste discharges substantially and consistently in excess of its waste discharge permit limits. It was recently learned that Wah Chang has steadily increased its production of zirconium metal over the past few years in violation of its existing State Waste Discharge Permit. Their records indicate that in 1973 production was about 37% higher than in 1972. The 1974 levels will be about 60% higher than 1972. Projections for 1975 show an increase over 1972 of greater than 90%.

By letter dated May 29, 1973, attached to their State permit renewal application, Wah Chang requested permission to increase production. Their stated justification for such increase was that it would be necessary in order to afford the costs of continued waste water control research and development. Their letter also stated that, "This, of course, is contingent upon our ability to reduce proportionate amounts of ammonia, thiocyanate, and chloride in our effluent." Again, in a letter dated May 14, 1974, Wah Chang repeated that it would be necessary for them to increase plant capacity in order to make the required environmental improvements economically feasible. On April 29, 1974, the Department forwarded a preliminary draft of a permit to Wah Chang for comment. Comments and counter proposals returned by the company on July 29, 1974 also included reference to this need to expand.

The company made no mention in their communications that they were, and had been, expanding production without approval. The details of their already completed production expansions were not fully divulged until a meeting with the Department's staff on October 24, 1974.

Issuance of an NPDES permit (to also serve as renewal of their State permit) has been delayed due to failure of Wah Chang and the DEQ staff to agree on effluent limits that would be both environmentally acceptable and practicably achievable. Under DEQ regulations, their permit which was issued August 3, 1972, with an expiration date of July 1, 1973, remains in full force and effect until it is either revoked or replaced by a new permit.

Departmental regulation OAR Chapter 340, Section 41-022 (1) specifically prohibits any increase in production until waste waters currently produced are adequately treated and approved facilities to adequately treat projected increased wastes have been provided. Thus, Condition 5 of their still effective 1972 Waste Discharge Permit prohibits an expansion of production facilities or increase in production until satisfactory control over total plant wastes has been achieved so that plant effluent is non-toxic.

Wah Chang presently is requesting increases in the Department's proposed NPDES permit limits to accommodate increases in production already made, to allow further increases in production which they claim are necessary to meet requirements of their customers, and to produce profits needed to develop and install additional waste control facilities. The company's proposal for increased limits would put their pollutant discharges back approximately to the point where they were in 1970. At the same time they, and we, have no assurances that the limits and schedules they propose will be met, only that they will do the best they can.

There are two main reasons why the DEQ staff has failed to keep abreast of happenings at Wah Chang over the past two years. First, the NPDES program necessitated a reissuing of every waste discharge permit in the State by December 1974. To accomplish this, key personnel had to be taken from routine field inspection-followup duties and assigned to the time-consuming tasks of generating and moving paper in accordance with NPDES procedures. As a result, followup on problems has suffered. The Department reorganization in 1973 caused the second major setback. The reorganization shifted staff and reassigned responsibility in a manner such that historically knowledgeable staff members were no longer available and new, inexperienced staff had to begin the long task of learning about each and every waste source in their area. Unfortunately, Wah Chang's problem was one to worsen for lack of agency attention. The Department is approximately two years behind schedule on most field related water quality control functions, and further lagging can be expected until first round permit issuance is complete and staff members can be properly trained.

While this may be a partial explanation for the Department's delay in dealing with Wah Chang's problems, it does not explain the company's proceeding to increase production without a permit.

Recent investigations by the staff indicate that the waste is still toxic and the total impact on public waters is greater than it was two and three years ago. In situ bioassays performed in Truax Creek below the plant discharges in November, 1974, showed 100 percent mortality of all test specimens within 18 minutes. Species tested were juvenile bluegills, large-mouth black bass, suckers, and sculpins. Resident populations of bluegills and large-mouth black bass were found plentiful in the Truax Creek pond area immediately upstream from the plant. Aside from existing toxic conditions, the creek and lakes downstream from Wah Chang's effluent discharge point are rank with chemical waste odors and chemical sludges.

Summary and Conclusions

The Department has been working with Teledyne Wah Chang for many years in an attempt to achieve a level of waste control and treatment that would make effluents acceptable for discharge into public waters. Concentrated efforts, numerous in-plant changes, and process improvements by Wah Chang personnel have achieved some beneficial results but have neither satisfactorily reduced waste damages in the neighboring environment nor met limits prescribed in DEQ Waste Discharge Permits. In spite of these shortcomings and contrary to permit restrictions, Wah Chang has proceeded to expand production which resulted in proportionally increased strong waste discharges to the public waters. The wastes continue to be highly toxic in local waterways and exert a substantial dissolved oxygen demand on the mainstem Willamette River. Further production expansions are now being proposed.

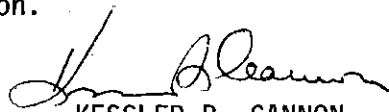
Planned Department Action

The Departmental staff proposes to proceed with issuance of an NPDES permit to Wah Chang which will include the following:

1. A program and time schedule for reducing the ammonium levels and other waste components to non-toxic levels.
2. A requirement to immediately achieve interim effluent limits substantially equivalent to those established in Condition 4 (2000#/day NH_4^+ , etc.) of their Waste Discharge Permit issued On August 3, 1972, even if it necessitates limiting production. Once a production level has been demonstrated at which compliance with those limits can be continuously achieved, no increase in production will be permitted until the Department has approved the permittee's program for achieving, as soon as possible but not later than July 1, 1977, the final environmentally acceptable limits established in the NPDES permit.
3. A program and time schedule for eliminating sludge deposits in the Truax Creek - Murder Creek complex that result from Wah Chang operation.

As soon as the proposed NPDES permit is drafted, the Department will schedule a public hearing. This hearing is expected to be in late January or early February, 1975.

The Department has also initiated a special effort to gather data to document permit compliance or non-compliance by Wah Chang, and would intend to issue Civil Penalties or take other appropriate enforcement action for each permit violation.


KESSLER R. CANNON
Director

HLS:ak

December 4, 1974



ENVIRONMENTAL QUALITY COMMISSION

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KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. K, December 20, 1974 EQC Meeting

Public Hearing to Consider the Adoption of
Proposed Rules Pertaining to Surety Bonds
for Sewerage 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 subsurface sewage disposal system for a 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.



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CONCLUSIONS

To implement the requirements of ORS 454.425 the attached proposed rules have been drafted. They 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. Copies of a proposed surety bond form and of proposed forms for assignment of insured certificate of deposit as other security are also attached but are not part of the proposed rules.

It is proposed that these rules be codified as Sub-division 5, Division 1, Chapter 340, Oregon Administrative Rules, and that following public hearing they be adopted by the Commission.

Section 15-015 defines those sewerage facilities which are exempt from the requirement of filing a surety bond or other approved equivalent security.

Section 15-020 outlines the type of security that can be accepted by the Department.

Section 15-025 specifies the dollar amount of bond or other security required to be filed.

Sections 15-030 and 15-035 pertain to the transfer of facilities and to the maintenance and termination of security, respectively.

Notice of today's public hearing was published in the Secretary of State's bulletin on November 15, 1974 and copies of the notice were mailed to interested persons on October 29, 1974. Copies of the proposed rules were also made available to all persons requesting them.

RECOMMENDATION

It is the Director's recommendation that public testimony be received in this matter at this time, that with full consideration being given to all such testimony thus received the proposed rules be adopted as permanent rules, and that they be filed promptly with the Secretary of State to become effective 10 days after publication by that office.



KESSLER R. CANNON
Director

KHS:vt
12/2/74

Attachments: Proposed Additions to Oregon Administrative Rules
Chapter 340
Proposed Surety Bond Form
Proposed Forms for Assignment of Insured Certificate
of Deposit

Proposed Additions to
Oregon Administrative Rules Chapter 340

DIVISION 1

RULES OF GENERAL APPLICABILITY AND ORGANIZATION

Subdivision 5

SURETY BONDS OR OTHER SECURITY FOR CONSTRUCTION, OPERATION AND MAINTENANCE
OF SEWAGE COLLECTION, TREATMENT OR DISPOSAL FACILITIES

15-005 STATEMENT OF PURPOSE. These rules, adopted pursuant to ORS 454.425, prescribe the requirements and procedures for the filing, maintenance and termination of surety bonds or other approved equivalent security for the construction, operation and maintenance of sewage collection, treatment or disposal facilities.

15-010 DEFINITIONS. As used in these rules, unless the context requires otherwise:

(1) "Commission" means the Environmental Quality Commission.

(2) "Construct" or "Construction" includes installation, repair and major modification or addition.

(3) "Department" means the Department of Environmental Quality.

(4) "NPDES waste discharge permit" means a waste discharge permit issued in accordance with requirements and procedures of the National Pollutant Discharge Elimination System authorized by the Federal Water Pollution Control Act Amendments of 1972 (Public Law 92-500) and of OAR Chapter 340, Sections 45-005 through 45-065.

(5) "Person" means any person as defined in ORS 174.100 but does not include, unless the context specifies otherwise, any public officer acting in his official capacity or any political subdivision, as defined in ORS 237.410.

(6) "Subsurface sewage disposal system" has the same meaning as in ORS 454.605(13).

15-015 SURETY BOND REQUIRED. (1) Every person proposing to construct facilities for the collection, treatment or disposal of sewage shall file with the Department a surety bond, or other approved equivalent security, of a sum determined under Section 15-025 of these rules.

(2) The following shall be exempt from the provision of subsection (1) of this section:

- (a) Subsurface sewage disposal systems designed to serve not more than four families or to have not more than 1200 gallons per day of sewage flow.
- (b) Any sewage collection, treatment or disposal facility owned and operated by a state or federal agency, city, county, county service district, sanitary authority, sanitary district, or other public body, including, but not limited to, a school district or port district.
- (c) Any industrial plant having an NPDES waste discharge permit and its own sewage collection, treatment or disposal facilities, if the latter serve only plant employees and not permanent residences.

15-020 TYPE OF SECURITY. The type of security to be furnished pursuant to ORS 454.425 may be:

(1) Perpetual surety bond executed in favor of the State of Oregon on a form approved by the Attorney General and provided by the Department, such bond to be issued by a Surety Company licensed by the Insurance Commissioner of Oregon,

(2) Insured savings account assigned to the Department with interest earned by such account made payable to the assignor, or

(3) Other security in such form and amount as specifically approved by the Commission.

15-025 AMOUNT OF BOND OR OTHER SECURITY. The amount of the surety bond or other approved equivalent security filed with the Department shall be equal to \$1.00 per gallon per day of installed sewage treatment or disposal capacity with the minimum sum not to be less than \$2,000, or shall be of some other sum specifically approved by the Commission, except that in no case shall the maximum sum exceed \$25,000.

15-030 TRANSFER OF FACILITIES. The ownership of the sewage disposal facilities shall not be transferred without the prior written approval of the Department and the surety bond or other approved equivalent security filed pursuant to ORS 454.425 shall remain in full force and effect notwithstanding any subsequent ownership transfer without such prior written approval.

15-035 MAINTENANCE AND TERMINATION OF SECURITY. The surety bond or other approved equivalent security filed pursuant to ORS 454.425 shall remain in force and effect until such time as a state or federal agency, city, county, county service district, sanitary authority, sanitary district, or other public body acquires ownership or assumes full liability and responsibility for operation and maintenance of the sewage disposal facilities with the prior written approval of the Department pursuant to section 15-030.



ENVIRONMENTAL QUALITY COMMISSION

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KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item L, December 20, 1974 EQC Meeting

Public Hearing Relative to Proposed Amendments to Rules
Relating to Veneer and Plywood Manufacturing Operations

Background:

The rule amendment under consideration is a proposed emission limitation relative to veneer dryer emissions and is attached as Appendix A.

During the manufacture of plywood, the veneer passes through a dryer in which the moisture content is reduced from the range of 30-200% to about 3%. During this process, the steam driven off carries with it small quantities of organic volatiles present in the wood.

An investigation made in 1970 by Washington State University found that emissions from veneer dryers in the Pacific Northwest and in the South consist of small quantities of solid particulate matter (generally under 0.002 grains per standard cubic foot) and hydrocarbons.

Veneer dryer emissions, consisting of the particulates, volatilized and condensed hydrocarbon compounds, are capable of forming a characteristic blue haze upon emission to the atmosphere.

When the initial Board Product Industries Rules were adopted (March 5, 1971), no emission limit was set for veneer dryers pending completion of a series of studies of emissions and control methods for this source by the American Plywood Association. Instead a section requiring a public hearing was adopted as follows: (Also see Appendix B)

"25-315 VENEER AND PLYWOOD MANUFACTURING OPERATION.

(1) Veneer Dryers—Public Hearing for Emission Standard. By no later than July 1, 1971, the Director of the Department shall schedule a public hearing for the purpose of determining the feasibility of adopting an emission standard for particulate and gaseous emissions from veneer dryers, setting forth allowable emission levels and dates for compliance."



Contains
Recycled
Materials

Washington State University published findings of the previously referred to study in a report, "Investigation of Emissions from Plywood Veneer Dryers", dated March 1971 (Contract supported by the Plywood Research Foundation and the EPA). While significant information was received, much served to verify that emissions varied with wood species, type of dryer, and drying cycle including speed, moisture content, temperature, etc. The report provided the following summary: "Eight Pacific Northwest and five southern plywood veneer dryers were tested for emission rates and process variables. Gas- and steam-heated, longitudinal and jet dryers were studied drying ten wood species types. Wood particles in concentrations of less than 0.002 gr/std dry ft³ were the only significant particulate found at stack temperatures. The visible blue-haze plume consists of hydrocarbon materials that condense after the plume cools below stack temperature. The blue-haze plumes averaged about 20% in equivalent opacity. Douglas fir and ponderosa pine produced the most visible plume. Some dryers have visible water plumes. Total hydrocarbon emissions from the stacks averaged 5.7 lbs/10,000 ft² of 3/8" plywood produced, of which 3.6 lbs represented the condensable fraction. The other fraction is termed volatile hydrocarbons." The conclusions of that report are attached as Appendix E.

The report discussed above was not received by control agencies until May 13, 1971. The American Plywood Association (APA) was then engaged in an evaluation of several additional dryers, examining the effect of changing dryer operating conditions upon the emission of contaminants. The Department had also arranged with the APA to conduct independent emission tests along side the WSU group at installations in Eugene and Lebanon. This information was transmitted to the Environmental Quality Commission at the June 4, 1971 meeting with a request for authorization for a public hearing in December of 1971, which was approved.

It is considered sufficiently relative to the matter before the Commission today to report that discrepancies in source sampling of hydrocarbon emissions and the analytical methods and procedures which were under review by WSU and DEQ were technical in nature and were resolved by diligent and cooperative work.

In late 1971 a proposed rule for veneer dryer emissions was incorporated with other amendments and new rules prepared for Oregon's Clean Air Act Implementation Plan. Public hearings were held in Portland, Medford and Eugene. The proposed rule contained a visible emission limitation (opacity) and a particulate grain loading emission limitation of 0.05 grains per standard cubic foot. The maximum allowable concentration of particulate matter (0.05 gr/scf) was deleted, primarily as a result of a large amount of new data submitted by the American Plywood Association on January 10, 1972. The new test results essentially confirmed the industry hearing testimony to the effect that the 0.05 gr/scf limit would have been considerably more stringent than the opacity limitation on visible emissions.

The Environmental Quality Commission and the Director, at the request of members of the plywood industry, granted an additional nine months to complete investigations into control hardware. As a condition, the American Plywood Association was to submit quarterly reports in March, June, and September of 1972 delineating industry efforts and progress in finding and installing various types of control equipment. After submission of the second report, the Department appointed a study committee, composed of individuals from various plywood manufacturing companies and equipment representatives who were involved in research and development programs on veneer dryers.

The continued investigation by the Department made clear the extreme difficulty of effectively controlling veneer dryers with only a visible emission limitation. The multiplicity of emission points in close proximity to one another frequently resulted in interference to a degree that no valid individual readings was possible. Further the staff concluded that the visible haze which hangs over plants and areas was related to the total mass emission of the particulates (hydrocarbons) from the plant and that limitations in terms of mass measurements had to be established. A number of other significant items were developed at that time: 1) there is little uniformity in the operation of veneer dryers; 2) there was still a limited amount of hard data relating to veneer dryer emissions to various operating parameters; 3) there was not agreement within industry that a quantitative emission regulation was warranted.

The Department during this period investigated several means of quantitatively relating veneer dryer emissions including 1) process weight limitation, 2) grain loading, and 3) mass emission versus production. Each of the control systems were considered to have advantages and disadvantages.

The report to the Environmental Quality Commission at its October 4, 1972 meeting requesting authorization for a public hearing for a proposed rule amendment which included a quantitative mass emission limitation had these conclusions:

"It is the conclusion of the Department that a quantitative mass emission limitation should be considered at this time. This conclusion is not shared by the industry.

The presently recommended emission limitation of 0.5#/1000 ft² total veneer (3/8" basis) is the level which, on the basis of limited data, will assure the relief of the current visible emission problem, and is achievable with currently available control equipment.

The limitations imposed by insufficient data makes it desirable that a definite date for further review should be included in this regulation. There are several members of the industry currently embarked on emission control programs. The review date is to coincide with these control programs and further amendments of the regulation will be predicated on the results of these installations. Should these control installations demonstrate an adequate control of visible emissions and indicate a higher or lower mass emission limitation, the presently recommended 0.5 pounds per 1000 square feet (3/8 inch basis) would be adjusted. All adjustments will be made on the basis of operating test data."

A final report from the Plywood Research Foundation dated October 12, 1972 was received and is attached in Appendix F. The report, in addition to stating the cost of testing veneer dryers could be prohibitive depending upon dryer configuration and frequency of testing required, suggested there was inadequate data to set an emission limit. It was estimated that source testing could cost \$1200 to \$1600 per emission point per test which could approach \$2 million for the Oregon segment of the plywood industry. Industry also requested a review date for emission limits if limits were set at that time. A dual standard for new and old equipment did not appear justified. The report also reviewed the status of control equipment trials.

The initially proposed rule presented at the October 4, 1972 meeting for the January 26, 1973 public hearing was revised to reflect results of conferences and further evaluation by the Department. Basically it removed the mass emission limitation and it recognized the difficulty in reading opacity from individual stacks and new language was added addressing visible air contaminants and the area blue haze problem by the following:

"....no person shall operate any veneer drier, or driers, such that visible air contaminants, including condensible hydrocarbons, are emitted in such quantities so as to create any characteristic "blue haze" which is observable at any point beyond the exterior wall of the building housing the veneer drier or driers, or at any point further than 50 feet in any direction from the veneer drier, whichever is greater."

At the public hearing on January 26, 1973 much of the testimony was in contrast to the precepts and conclusions drawn from the industry evaluations and conferences with control agency staffs over the prior year. The Department reviewed the testimony and obtained an Attorney General's Opinion relative to the enforceability of "the characteristic blue

haze" section. The Industry Committee basically agreed with only setting an opacity limitation on veneer dryer emissions, however suggested that the section (1)(a) relative to "characteristic blue haze" should be labelled a policy section. The complete testimony is attached as Appendix G.

The Department report to the Environmental Quality Commission for the April 2, 1973 meeting had these conclusions:

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

The Commission adopted the proposed rule as amended on April 2, 1973 (a copy is contained in Appendix D).

The rule as adopted contained in subsection (a) a restriction on visible emissions such that the "blue haze" was not observable beyond the exterior wall of the building housing the dryer or at any point greater than 50 feet; subsection (b) contained an opacity limitation; subsection (c) required submission of a compliance schedule or notice of participation in an approved study; and in addition to other requirements relative to fugitive emissions, etc. required a public hearing be held not later than January 1, 1975 to review current technology and the adequacy of these regulations and the necessity and practicability of adopting a mass emission limitation.

Discussion:

The public hearing today has been called to fulfill the hearing requirement in the adopted rule. The proposed rule as amended, and being considered here today, would require: 1) applying highest and best practicable treatment as does the current rule in Section 25-310(4); 2) establishing as an objective instead of a regulation the limitation on the distance from the dryer or beyond buildings that the characteristic "blue haze" may persist, proposed in Section 25-315(1)(a); 3) establishing an opacity limitation of 10% from any one stack, proposed Section 25-315(1)(a), which is considered more restrictive than the current rule; 4) those persons operating veneer dryer(s) to be in compliance with the rule or under a compliance schedule approved by the Department by March 1, 1975, proposed section 25-315(1)(c); 5) operation at all times such that emissions of air contaminants are kept at the lowest practicable levels, proposed section 25-315(1)(d); 6) prohibiting any practice of willfully concealing emissions by such means as dilution, proposed section 25-315(1)(e); 7) control of fugitive emissions, proposed section 25-315(1)(f); and 8) more restrictive emission limitations for problem areas upon a finding by the Commission that such was necessary, proposed section 25-315(1)(g).

Since late 1969, the Department has met with industrial committees and through consultation and the regulatory process, industry and others have developed control technology to control the visible emissions from veneer dryers. Unfortunately at this point in time, not all of the developed and evaluated control systems have been installed on operating plants. Thus, performance capabilities over long periods of time have not been established. In fact, a few control systems have been operated only as pilot plant installations. Appendix H contains a staff evaluation of all the control installation technology reviewed or observed by the Department. Of those systems for which emission test data are available, including the Georgia Pacific System, Buchholz Foam System, Baker Filter, Dupont Catalytic Afterburner, Energex Burner, Leckenby and Moore Lo-Em System, opacities of less than 10% are achievable and the reported grain loading are frequently at 0.05 grains per standard cubic foot (gr/scf) and some are reported as less than 0.03 gr/scf. Essentially all are at less than 0.08 gr/scf. It is concluded from data available that a mass emission limitation is not necessary at this time, alleviating a significant cost for source testing to determine compliance. General particulate emission limitations are 0.1 gr/scf for "new" sources, and 0.2 gr/scf for "existing" sources, OAR 340, Section 21-030. However, the proposed 10% opacity is expected to be more restrictive than either 0.1 or 0.2 gr/scf. It should be noted that under OAR 340, Section 20-035, the Department can require source testing to determine type, quality and quantity of emissions.

The currently proposed rule revision is the result of a number of meetings with a representative industrial committee responsible in part for reporting to the Department control progress and test data. The committee position is that available highest and best practicable control technology if installed cannot comply with the essentially zero visibles 50 feet beyond the dryer stacks or buildings contained in the existing rule. They claim there is insufficient evidence to assure that a wisp or plume of "blue haze" might not occasionally be observed beyond the current regulatory limits and place them in technical violation of the current rule.

The Department concludes that the proposed rule changes, which makes an objective out of the distance "blue haze" may persist and adds a 10% maximum allowable opacity, have the following merits. They remove an argument that current control technology is not available on a reasonable basis to meet the rule. Control systems, presently available, can reduce visible emissions from less than 10% to zero opacity. These same systems will be installed under the highest and best practicable rule section providing a high degree of control. Each such proposal is subject to review and approval by the Department.

The industrial committee initially proposed an opacity limitation of 20% as set forth in their letter and attachment of September 16, 1974, attached as Appendix I. In that letter it was stated that cost of control per dryer will range from \$60,000 to as high as \$175,000 per unit, exclusive of costs for control of fugitive emissions.

According to Department records, 93 mills in Oregon will be subject to the rule and those mills have a total of 253 dryers. The Department agrees with the industry statement that the proposed rule will have its greatest impact on older smaller mills. In view of current economic conditions submitted schedules will be approved on a case-by-case basis.

Testimony relative to the proposed rule received by December 9th includes a letter from the Lane Regional Air Pollution Authority supporting the proposed rule change, and a letter from the North Santiam Plywood Company at Mill City objecting to the proposal as too costly, causing curtailment of production and possibly forcing closure of the average mill. Both letters are also attached in Appendix J.

Conclusions:

The Department concludes that:

1. Control technology is available to reduce visible emissions from veneer dryers to the proposed rule requirements.
2. The proposed rule change is not projected to result in any significant change in applied control technology so as to comply with the proposed rule as compared to the current rule.
3. The 10% opacity limitation will result in grain loadings below 0.1 grain per scf, and based upon current information a mass emission limitation is not considered necessary.
4. The adoption of the proposed rule will allow the Department to receive and approve schedules of compliance in an orderly manner.

Director's Recommendation:

It is the recommendation of the Director that public testimony be heard concerning the proposed amendments to Veneer and Plywood Manufacturing Operations and appropriate action be taken on the regulation after giving consideration to the testimony received.



KESSLER R. CANNON
Director

APPENDIX A

PROPOSED RULES RELATING TO
VENEER AND PLYWOOD MANUFACTURING OPERATIONS

OAR 340, Section 25-315, Subsection (1)(a) through (h) are repealed and the following Subsections (1)(a) through (1)(g) are adopted in lieu thereof, and Subsection (2)(c) is repealed.

25-315 VENEER AND PLYWOOD MANUFACTURING OPERATIONS

(1) Veneer Driers

- (a) Consistent with Section 25-310(1) through (4), it is the objective of this section to control air contaminant emissions, including but not limited to condensible hydrocarbons such that visible emissions from each veneer drier are limited to a level which does not cause a characteristic "blue haze" to be observable at any point beyond the exterior wall of the building housing the veneer drier or at any point further than 50 feet in any direction from the veneer drier, whichever is greater.
- (b) No person shall operate any veneer drier such that visible air contaminants emitted therefrom exceed 10% opacity, opacity as defined by Section 21-005(4), from any one stack. Where the presence of uncombined water is the only reason for the failure to meet this requirement, said requirement shall not apply.
- (c) After March 1, 1975 no person shall operate a veneer drier which is not in compliance with the emission limitations of this rule or is not subject to a compliance schedule approved by the Department which is incorporated into an enforceable air contaminant discharge permit.

- (d) Each veneer drier shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emissions of air contaminants are kept at the lowest practicable levels.
- (e) No person shall willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission which would otherwise violate this Rule.
- (f) Where effective measures are not taken to minimize fugitive emissions, as defined by Section 21-050, OAR, Chapter 340, the Department may require that the equipment or structures in which processing, handling and storage are done be tightly closed, modified or operated in such a way that air contaminants are minimized, controlled, or removed before discharge to the open air.
- (g) The Department may require more restrictive emission limits than provided in Section 25-315(1)(b) for an individual plant upon a finding by the Commission that the individual plant is located or is proposed to be located in a special problem area. The more restrictive emission limits for special problem areas may be established on the basis of allowable emissions expressed in opacity, pounds per hour, or total maximum daily emissions to the atmosphere, or a combination thereof.

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

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

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

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

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

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

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

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

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

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

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

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

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

refuse burning equipment.

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

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

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

(a) As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, or driers, such that visible air contaminants, including condensible hydrocarbons, are emitted in such quantities so as to create any characteristic "blue haze" which is observable at any point beyond the exterior wall of the building housing the veneer drier or driers; or at any point further than 50 feet in any direction from the veneer drier, whichever is greater.

(b) As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, such that visible air contaminants emitted therefrom at any time exceeds 20% opacity, opacity as defined by section 21-005 (4), from any one stack or an arithmetic average of 10% opacity from all stacks of that veneer drier. Where the presence of uncombined water is the only reason for failure of an emission to meet these requirements, said requirements shall not apply.

(c) As soon as practicable, but not later than July 1, 1973, every person operating a veneer drier shall submit to the Department of Environmental Quality:

(A) Written information, reports, or analysis which demonstrates compliance with the emission limitations contained in

Repealed

subsections (1) (a) and (1) (b), of this section, or

(B) A specific written compliance schedule for complying with the emission limitations contained in subsections (1) (a) and (1) (b), of this section, or

(C) Written notice that the person is participating in a study approved by the Department as sufficient to identify the emissions from said veneer drier or similar veneer drier, and to design an "air cleaning device", as defined by ORS 449.760 (b), which will achieve compliance by said veneer drier or similar veneer drier with the emission limitations contained in subsections (1) (a) and (1) (b) of this section.

(d) Any veneer drier complying with the emission limitations contained in subsections (1) (a) and (1) (b) of this section shall be exempt from compliance with section 21-030, (pertaining to particulate emission limitations).

(e) Any veneer drier, the construction of which is completed subsequent to the effective date of this rule, shall from time of initial operation comply with the emission limitations contained in subsections (1) (a) and (1) (b) of this section.

(f) No person shall attempt to comply with the emission limitations of subsection (1) (a) or (1) (b) of this section by diluting the emissions from the drying process with outside air or other gases. Emissions which are so diluted shall be deemed to be in violation of subsection (1) (a) and (1) (b) of this section.

(g) Unless otherwise agreed to by the Department in writing, any person operating one or more veneer driers in compliance with subsection (1) (a) and (1) (b) shall test at least one (1) representative veneer drier in such manner as specified by the Department in its published standard test method, as it may be amended from time to time, copies of which are on file and available at the main office of the Department. A written report of the results of the test or tests shall be filed with the Department within 90 days of the earliest to occur of the following:

(A) The date compliance with the emission limitations contained in subsections (1) (a) and (1) (b) of this section is reported to the Department, or

(B) The date the "air cleaning device", as defined by ORS 449.760 (b), designed to achieve compliance with the emission limitations contained in subsections (1) (a) and (1) (b) of this section is put into operation, or

(C) The date agreed to by the Department and established in the compliance schedule.

(h) A public hearing shall be held by the Department no later than January 1, 1975, to review current technology and the adequacy of these regulations and the necessity and practicability of adopting a mass emission limitation.

(2) Other Emission Sources.

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

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

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

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

Repealed

Repealed

Amended

- Hist: Amended 2-15-72 by DEQ 37
- Amended 5- 5-72 by DEQ 43 (T)
- Amended 9-20-72 by DEQ 48
- Amended 4- 9-73 by DEQ 52

NOTICE OF PUBLIC HEARING

RELATIVE TO PROPOSED AMENDMENTS TO RULES RELATING TO VENEER
AND PLYWOOD MANUFACTURING OPERATIONS

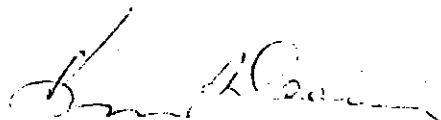
NOTICE IS HEREBY GIVEN that a Public Hearing will be held for the purpose of considering amendments pertaining to rules relating to Veneer and Plywood Manufacturing Operations. Pursuant to OAR Chapter 340, Section 25-315 (1) (h) a public hearing shall be held by the Department no later than January 1, 1975, to review current technology and the adequacy of OAR 340, Sections 25-305 to 25-315. The hearing is scheduled for that purpose and to consider proposed amendments to The Clean Air Act Implementation Plan for Oregon. The public hearing will be held before the Environmental Quality Commission:

At 2:30 p.m. on December 20, 1974
Redwood Room
Sweptwing Motel
Albany, Oregon

Any person desiring to submit testimony related to this matter may do so by forwarding testimony within 30 days from the date of this notice to the Office of Department of Environmental Quality, Air Quality Control Division, 1234 S. W. Morrison, Portland, Oregon 97265, or may be heard orally at the public hearing on the date and at the time and place mentioned above.

Copies of the proposed rule amendment are available upon request from the Department of Environmental Quality, Portland.

Dated this 31st day of October, 1974.



KESSLER R. CANNON
Director

APPENDIX B

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

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

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

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

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

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

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

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

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

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

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

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

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

refuse burning equipment.

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

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

25-315 VENEER AND PLYWOOD MANUFACTURING OPERATIONS. (1) Veneer Dryers-Public Hearing for Emission Standard. By no later than July 1, 1971, the Director of the Department shall schedule a public hearing for the purpose of determining the feasibility of adopting an emission standard for particulate and gaseous emissions from veneer dryers, setting forth allowable emission levels and dates for compliance.

(2) Other Emission Sources.

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

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

(c) Compliance Schedule. No later than September 5, 1971, every person operating a plywood or veneer manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for compliance with this section. The schedule shall provide for compliance with the ap-

plicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

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

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

(a) Every person operating or intending to operate a particleboard manufacturing plant shall cause all truck dump and storage areas holding or intended to hold raw materials to be enclosed to prevent wind-blown particle emissions from these areas from being deposited upon property not under the ownership of said person.

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

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

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

(c) Any person who proposes to control windblown particulate emissions from truck dump storage areas other than by enclosure shall apply to the Department for authorization to utilize alternative controls. The application shall be submitted pursuant to Section 20-020 to 20-030, Ch. 340, OAR, and shall describe in detail the plan proposed to control windblown particulate emissions and indicate on a plot plan

the nearest location of property not under ownership of the applicant.

(2) Other Emission Sources.

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

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

(3) Compliance Schedule. Not later than September 5, 1971, every person operating a particleboard manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for complying with Sections (1) and (2) of this regulation. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

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

25-325 HARDBOARD MANUFACTURING OPERATIONS. (1) Truck Dump and Storage Areas.

(a) Every person operating or intending to operate a hardboard manufacturing plant shall cause all truck dump and storage areas holding or intended to hold raw materials to be enclosed to prevent windblown particle emissions from these areas from being deposited upon property not under the ownership of said person.

(b) The temporary storage of raw materials outside the regularly used areas of

the plant site is prohibited unless the person who desires to temporarily store such raw materials first notifies the Department of Environmental Quality and receives written approval.

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

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

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

(2) Other Emission Sources.

(a) No person shall cause to be emitted particulate matter from hardboard plant sources including, but not limited to hogs, chippers and other material size reduction equipment, process or space ventilation systems, particle dryers, classifiers, presses, sanding machines, and materials handling systems, in excess of a total from all sources within the plant site of one (1.0) pound per 1000 square feet of hardboard produced on a 1/8 inch basis of finished product equivalent.

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

(3) Emissions from Hardboard Tempering Ovens.

(a) No person shall operate any hardboard tempering oven unless all gases and vapors emitted from said oven are treated in a fume incinerator capable of raising the temperature of said gases and vapors to at least 1500° F for 0.3 seconds or longer.

(b) Specific operating temperatures lower than 1500° F may be approved by the Department upon application, provided that information is supplied to show that operation at said temperatures provides sufficient treatment to prevent odors from being perceived on property not under the ownership of the person operating the hardboard plant.

(c) In no case shall fume incinerators installed pursuant to this section be operated at temperatures less than 1000° F.

(d) Any person who proposes to control emissions from hardboard tempering ovens by means other than fume incineration shall apply to the Department for authorization to utilize alternative controls. The application shall be submitted pursuant to Section 20-020 to 20-030, Chapter 340 OAR, and shall describe in detail the plan proposed to control odorous emissions and indicate on a plot plan the location of the nearest property not under ownership of the applicant.

(4) Compliance Schedule. No later than September 5, 1971, every person operating a hardboard manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for complying with Sections (1), (2), and (3) of this regulation. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

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

APPENDIX C

Jim Proff
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Ann Proff Assoc.

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

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

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

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

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

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

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

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

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

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

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

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

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

refuse burning equipment.

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

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

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

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

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

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

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

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

(2) Other Emission Sources.

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

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

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

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

Hist: Amended 2-15-72 by DEQ 37

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

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

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

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

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

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

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

(2) Other Emission Sources.

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

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

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

submit to the Department of Environmental Quality a proposed schedule for complying with Sections(1) and (2) of this regulation. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

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

25-325 HARDBOARD MANUFACTURING OPERATIONS. (1) Truck Dump and Storage Areas.

(a) Every person operating or intending to operate a hardboard manufacturing plant shall cause all truck dump and storage areas holding or intended to hold raw materials to be enclosed to prevent wind-blown particle emissions from these areas from being deposited upon property not under the ownership of said person.

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

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

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

(c) Alternative Means of Control. Any person who desires to control windblown particulate emissions from truck dump and storage areas other than by enclosure shall first apply to the Department for authorization to utilize alternative controls. The application shall be submitted pursuant to Section 20-020 to 20-030, Ch. 340, OAR, and shall describe in detail the

plan proposed to control windblown particulate emissions and indicate on a plot plan the nearest location of property not under ownership of the applicant.

(2) Other Emission Sources.

(a) No person shall cause to be emitted particulate matter from hardboard plant sources including, but not limited to hogs, chippers and other material size reduction equipment, process or space ventilation systems, particle dryers, classifiers, presses, sanding machines, and materials handling systems, in excess of a total from all sources within the plant site of one (1.0) pound per 1000 square feet of hardboard produced on a 1/8 inch basis of finished product equivalent.

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

(3) Emissions from Hardboard Tempering Ovens.

(a) No person shall operate any hardboard tempering oven unless all gases and vapors emitted from said oven are treated in a fume incinerator capable of raising the temperature of said gases and vapors to at least 1500°F for 0.3 seconds or longer.

(b) Specific operating temperatures lower than 1500°F may be approved by the Department upon application, provided that information is supplied to show that operation of said temperatures provides sufficient treatment to prevent odors from being perceived on property not under the ownership of the person operating the hardboard plant.

(c) In no case shall fume incinerators installed pursuant to this section be operated at temperatures less than 1000°F.

(d) Any person who proposes to control emissions from hardboard tempering ovens by means other than fume incineration shall apply to the Department for authorization to utilize alternative controls. The application shall be submitted pursuant to Section 20-020 to 20-030, Chapter 340 OAR, and shall describe in detail the plan proposed to control odorous emissions and indicate on a plot plan the location of the nearest property not under ownership of the applicant.

(4) Compliance Schedule. No later than

September 5, 1971, every person operating a hardboard manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for complying with Sections (1), (2), and (3) of this regulation. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case

shall final compliance be achieved by later than December 31, 1973.

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

APPENDIX D

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

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

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

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

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

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

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

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

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

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

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

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

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

refuse burning equipment.

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

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

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

(a) As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, or driers, such that visible air contaminants, including condensible hydrocarbons, are emitted in such quantities so as to create any characteristic "blue haze" which is observable at any point beyond the exterior wall of the building housing the veneer drier or driers or at any point further than 50 feet in any direction from the veneer drier, whichever is greater.

(b) As soon as practicable, but no later than December 31, 1974, no person shall operate any veneer drier, such that visible air contaminants emitted therefrom at any time exceeds 20% opacity, opacity as defined by section 21-005 (4), from any one stack or an arithmetic average of 10% opacity from all stacks of that veneer drier. Where the presence of uncombined water is the only reason for failure of an emission to meet these requirements, said requirements shall not apply.

(c) As soon as practicable, but not later than July 1, 1973, every person operating a veneer drier shall submit to the Department of Environmental Quality:

(A) Written information, reports, or analysis which demonstrates compliance with the emission limitations contained in

subsections (1) (a) and (1) (b), of this section, or

(B) A specific written compliance schedule for complying with the emission limitations contained in subsections (1) (a) and (1) (b), of this section, or

(C) Written notice that the person is participating in a study approved by the Department as sufficient to identify the emissions from said veneer drier or similar veneer drier, and to design an "air cleaning device", as defined by ORS 449.760(6), which will achieve compliance by said veneer drier or similar veneer drier with the emission limitations contained in subsections (1) (a) and (1) (b) of this section.

(d) Any veneer drier complying with the emission limitations contained in subsections (1) (a) and (1) (b) of this section shall be exempt from compliance with section 21-030, (pertaining to particulate emission limitations).

(e) Any veneer drier, the construction of which is completed subsequent to the effective date of this rule, shall from time of initial operation comply with the emission limitations contained in subsections (1) (a) and (1) (b) of this section.

(f) No person shall attempt to comply with the emission limitations of subsection (1) (a) or (1) (b) of this section by diluting the emissions from the drying process with outside air or other gases. Emissions which are so diluted shall be deemed to be in violation of subsection (1) (a) and (1) (b) of this section.

(g) Unless otherwise agreed to by the Department in writing, any person operating one or more veneer driers in compliance with subsection (1) (a) and (1) (b) shall test at least one (1) representative veneer drier in such manner as specified by the Department in its published standard test method, as it may be amended from time to time, copies of which are on file and available at the main office of the Department. A written report of the results of the test or tests shall be filed with the Department within 90 days of the earliest to occur of the following:

(A) The date compliance with the emission limitations contained in subsections (1) (a) and (1) (b) of this section is reported to the Department, or

(B) The date the "air cleaning device", as defined by ORS 449.760 (6), designed to achieve compliance with the emission limitations contained in subsections (1) (a) and (1) (b) of this section is put into operation, or

(C) The date agreed to by the Department and established in the compliance schedule.

(h) A public hearing shall be held by the Department no later than January 1, 1975, to review current technology and the adequacy of these regulations and the necessity and practicability of adopting a mass emission limitation.

(2) Other Emission Sources.

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

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

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

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

Hist: Amended 2-15-72 by DEQ 37
 Amended 5-5-72 by DEQ 43 (T)
 Amended 9-20-72 by DEQ 48
 Amended 4-9-73 by DEQ 52

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

(a) Every person operating or intending to operate a particleboard manufacturing plant shall cause all truck dump and storage areas holding or intended to hold raw materials to be enclosed to prevent wind-blown particle emissions from these areas from being deposited upon property not under the ownership of said person.

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

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

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

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

(2) Other Emission Sources.

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

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

(3) Compliance Schedule. Not later than September 5, 1971, every person operating a particleboard manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for complying with Sections (1) and (2) of this regulation. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

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

25-325 HARDBOARD MANUFACTURING OPERATIONS. (1) Truck Dump and Storage Areas.

(a) Every person operating or intending to operate a hardboard manufacturing plant shall cause all truck dump and storage areas holding or intended to hold raw materials to be enclosed to prevent wind-blown particle emissions from these areas from being deposited upon property not under the ownership of said person.

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

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

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

(c) Alternative Means of Control. Any

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

(2) Other Emission Sources.

(a) No person shall cause to be emitted particulate matter from hardboard plant sources including, but not limited to hogs, chippers and other material size reduction equipment, process or space ventilation systems, particle dryers, classifiers, presses, sanding machines, and materials handling systems, in excess of a total from all sources within the plant site of one (1.0) pound per 1000 square feet of hardboard produced on a 1/8 inch basis of finished product equivalent.

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

(3) Emissions from Hardboard Tempering Ovens.

(a) No person shall operate any hardboard tempering oven unless all gases and vapors emitted from said oven are treated in a fume incinerator capable of raising the temperature of said gases and vapors to at least 1500 F for 0.3 seconds or longer.

(b) Specific operating temperatures lower than 1500 F may be approved by the De-

partment upon application, provided that information is supplied to show that operation of said temperatures provides sufficient treatment to prevent odors from being perceived on property not under the ownership of the person operating the hardboard plant.

(c) In no case shall fume incinerators installed pursuant to this section be operated at temperatures less than 1000 F.

(d) Any person who proposes to control emissions from hardboard tempering ovens by means other than fume incineration shall apply to the Department for authorization to utilize alternative controls. The application shall be submitted pursuant to Section 20-020 to 20-030, Chapter 340 OAR, and shall describe in detail the plan proposed to control odorous emissions and indicate on a plot plan the location of the nearest property not under ownership of the applicant.

(4) Compliance Schedule. No later than September 5, 1971, every person operating a hardboard manufacturing plant shall submit to the Department of Environmental Quality a proposed schedule for complying with Sections (1), (2), and (3) of this regulation. The schedule shall provide for compliance with the applicable provisions at the earliest practicable date, but in no case shall final compliance be achieved by later than December 31, 1973.

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

APPENDIX E

CONCLUSIONS

Eight dryers in Pacific Northwest mills and five dryers in southern mills were studied. Steam- and gas-heated longitudinal and jet dryers were studied drying ten different species types.

The nature of veneer dryer emissions varied between species types, heat source, and dryer type. A number of basic similarities exist, however. At stack temperatures the only particulate emission consists of wood particles in concentrations less than 0.002 gr/standard dry cubic feet of stack gas. Outside the stack, however, at cooler than stack temperature, hydrocarbons and water typically condense to form blue haze and/or a water plume or both. Plume opacities of the blue-haze emission ranged from 0% to 100% but averaged 20%. Other volatile hydrocarbons do not condense.

The average total hydrocarbon emission from all dryers tested was 5.7 lbs/10000 ft² of 3/8" plywood produced. The average condensable hydrocarbon emission was 3.6, same basis.

There were large differences in the operation of veneer dryers. These differences, coupled with the condition of the dryers, combined to give varying results for opacity readings of the stacks, water vapor emitted from the stack, and the total hydrocarbon emitted from the stack. If, for example, a stack was operated with its dampers open, the volume flow of gases out the stack was very high, plume opacity was very low, and the volatile and condensable concentration figures seemed generally to be at the lower values. If, however, the dryer was operated with the dampers closed, production was generally higher, air volume was lower, plume opacity was higher, volatile and condensable hydrocarbon concentrations were higher, and total hydrocarbons on a 10,000 ft² (of 3/8"

plywood) production basis were also lower. An important factor, therefore, in veneer dryer operation is the damper setting.

Routine GC analyses of the volatile hydrocarbons in the stack gas at the thirteen dryers studied showed that α pinene was the major monoterpene emitted except for ponderosa pine where Δ^3 carene was the major component. Alpha and β pinene are recognized to be potentially reactive hydrocarbons. Studies to determine the relative reactivities of α and β pinene, ethylene, isobutene, and 1-butene are in progress.

During the drying of Douglas fir, α pinene accounted for 75 to 90% of the monoterpene emission; for southern pine, 55 to 65%; and for ponderosa pine, 40 to 50%. The data also showed that the monoterpene composition of the stack gas was characteristic of the wood species being dried. However, the concentrations were not as characteristic as the composition. During the drying of Douglas fir, southern pine, and ponderosa pine, the concentrations were quite variable; whereas the concentrations measured during the drying of western hemlock, larch, and white fir were at the lower limits of sensitivity of the GC used.

The condensed hydrocarbon fraction has been preliminarily studied. A tentative identification of the bulk of the condensate as a mixture of abietic-pimaric acids has been made. The data also indicate the presence of sesquiterpenes, fatty acids, resin esters, and resin alcohols. Analyses to more precisely identify the components in the condensate would require an effort equal to a separate research project and as such is outside the scope of the present project.

APPENDIX F



Plywood Research Foundation

1119 A Street
Tacoma, Washington 98401/206-272-2283

October 12, 1972

FINAL REPORT TO OREGON DEQ ON VENEER DRYER EMISSION CONTROL PROGRESS

BACKGROUND

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

JOINT INDUSTRY-DEQ MEETINGS

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

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

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

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

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

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

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

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

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

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

STATUS OF CONTROL EQUIPMENT TRIALS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX G

INDUSTRY COMMITTEE STATEMENT ON VENEER DRYER STANDARDS
ENVIRONMENTAL QUALITY COMMISSION HEARING

January 26, 1973

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

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

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

SECTION (1)(a)

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

SECTION (1)(b)

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

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

APPENDIX H

VENEER DRYER EMISSIONS CONTROL SYSTEMS

1. Veneer dryer emission control systems fall into two general categories plus additional approaches.
 - A. Adiabatic scrubbers
 - B. Incineration
 - C. Others - condensation, filtration, low temperature veneer drying
2. Adiabatic scrubbing
 - A. Adiabatic scrubbing depends upon:
 1. Condensing the veneer dryer emissions adiabatically, i.e., the heat removed in condensing the organics is absorbed in vaporizing water;
 2. Collecting the condensed vapors by intimate contact with the scrubbing medium; and
 3. Separation or removal of the condensed phase.

B. The intimate contact step is crucial to removing the condensed drops from the air stream, as most of them are small (<1.0 μ) and thus they are insensitive to inertial effects. Intimate contact is based on the parameters of time, turbulence and the influence of a contact agent, such as packing in a packed scrubbing tower. Two novel approaches to the contact problem are: 1) the foam in the Buchholz scrubbing system and the sand bed in the Becker Sand Filter.

C. Adiabatic scrubbing systems

<u>System</u>	<u>Remarks *</u>	<u>Performance</u>
Air Guard	1, 2, 4	Unit at Cloverdale, California had blue tail (no zero blue haze, but could meet 10% opacity)
Becker Sand Filter	3	Pilot plant unit achieved zero blue haze on yellow pine for 1 hr. run
Buchholz	1, 2, 4	Pilot plant observed to be 10% opacity
Emissions Reactor Control Corp.	1, 2, 4	Has not been observed in normal operation
Georgia-Pacific w/o demister	1, 2, 4	Large steam plume, visible emissions evaluation difficult, estimated to be about 10% opacity
w/ demister	3	Pilot Plant Brink Unit was observed at zero blue haze
Leckenby	1, 2, 4	Data from Leckenby indicate their unit can operate consistently 10% opacity

* See footnotes on next page.

1. Size and/or design varies
2. Operating above pilot scale
3. Not operating above pilot scale
4. Readily available for full scale installation

3. Incineration

- A. Complete incineration is a practical approach especially if there is a heat source, i.e., furnace, boiler or WWB, located near the veneer dryer.
- B. Partial incineration - part of the air circulated in the veneer dryer is passed through a high temperature chamber where the organic components are oxidized to CO₂ & H₂O. This heated air is then blended with cooler air being recirculated to the veneer dryer. By combusting a fraction of the organic vapor it is hoped that the discharge from the veneer dryer can meet the veneer dryer regulations.
- C. Incineration systems:

<u>System</u>	<u>Company</u>	<u>Performance</u>
Incineration in H.F. Boiler	Simpson Timber, Albany Weyerhaeuser, Cottage Grove - Startup 1/75	Meets H.F. Boiler Regs. No blue haze
Incineration in WWB	Drain Plywood	Should be completed by 1/75
Incineration in N.G./R.O. Boiler	Willamette Industries	Scheduled for startup 1/75
Partial Incineration (Energex)	Lane Plywood	Installed on Green End - Little blue haze - no opacity
Catalytic Afterburner	U. S. Plywood	Opacity data not avail- able

4. Other approaches

A. Air/Air condensation - Weyerhaeuser Company

At Snoqualmie Falls little or no blue haze was observed on pilot scale. Condenser at Springfield to start up 12/12/74.

B. Low temperature drying - Unique, attempts to prevent the formation and emission of the organics, rather than removing them from gas stream. In operation at Roseburg Lumber, Dillard. Can meet the 10% opacity regulation.

C. Johns-Manville - HEAF Filter - can meet 10% opacity, but there is a solid waste disposal problem.

D. AAF Kinpactor - was demonstrated to operate at 5 to 10% opacity.

TABLE II

Summary of Veneer Dryer Emission Control Methods (1, 2, 3)

Dryer Type	Control Equipment	Flow Rate SCFM	Pressure Drop Across System In. Water Gauge	Particulate Concentration Gr/SCF		Efficiency %	Average Opacity %		Production Model Installed
				In	Out		In	Out	
Steam	American Air Filter Kinpactor	3,800	33.5	.065	.013	37	40	6	
Steam	American Air Filter Kinpactor and glass fiber demistor	3,000	27	.142	.049	65	28	5	
Steam	Baker Filter	335	25-40	.138	.02	85	50	≈ 0	
Steam	Buchholz Foam System	405	2-3	.086	.010*	88	Brown Plume		
Steam	Dupont Catalytic Afterburner	133	2	.086	.014 (361° F)	84			[3/74]
		140		.099	.0067 (499° F)	93			
		136		.134	.0087 (601° F)	93			
NG	Energex Burner	8,130			.084 @ 12% CO ₂			≈ 0	7/73
NG	G-P Scrubber	11,000	[5]	.137	.036	74	55	5-20	7/73
NG	Johns-Manville Heath HEAF	265	17-29	0.144	.018	87	60	≈ 5	Early 74]
		272	17-29	0.0789	.0019	98	20	≈ 5	
		250	17-29	0.0779	.0017	98	20	≈ 5	
Steam	Leckenby	3,000	[5]	.070	.055 ¹	21		≈ 10	
				.080	.055 ¹	31		≈ 10	
				.054	.034 ²	37		≈ 10	
				.137	.069 ²	48		≈ 10	
NG	Moore Lo-Em	3,415		.094 ⁶	.0944 ³		[60]	5-25	7/73
		3,200		.093	.070 ³	25			2/73
	Seversky Electrostatic Precip.	700	1.3		.004			≈ 0	
		1,300	3.6		.007			20	
Steam	Wayco Condenser	Pilot	<5			51	Red Plume		[2/74]
Steam	Wheelabrator	13,000	16	.048	.035	26		22	10/72
			14.6		.016 Run #1			7	
			14.6		.015 Run #2			20	
NG	Wasteco Incinerator	7,760			.108 @ 12% CO ₂				9/71
Steam	Hogfuel Boiler Incineration	73,100			.115 @ 11% CO ₂ *			10	2/73
Steam	Temperature Reduction							20-40	
Steam	Temperature Reduction				.004-.009				[1975]

* Not Standard FWIS-APCA S-8-2 Test Method

1. Corrected for dilution air, green end

2. Dry end

3. Not concurrent tests

4. Estimated value

APPENDIX I

cc
FAS-2
EWH



September 16, 1974

Mr. Harold Patterson
Director, Air Quality Control
Department of Environmental Quality
1234 S.W. Morrison
Portland, Oregon 97205

Dear Mr. Patterson:

Subject: Veneer Dryer Emission Control

The revised veneer dryer regulation is submitted for your review and consideration. The industry advisory committee feels this proposal to be a reasonable compromise, particularly in view of the considerable industry opinion that only the basic Oregon air regulations should apply to veneer dryers.

Industry, at the time the present regulation was formulated, fundamentally disagreed with the concept of "zero" visibility. At the time of the Environmental Quality Commission action on this subject, the Chairman, Mr. McPhillips, recommended Commission passage of the present regulation as a "goal" for industry's control efforts. Plywood manufacturers, in good faith, have tried to find workable control mechanisms that would meet this "goal." We have now reached a conclusion, based on actual operating experience, that the Commission "goal" cannot be met consistently with any control equipment presently available.

No regulation that discriminates against a segment of a particular industry is fair or equitable. Veneer dryer emission has been defined as an aesthetic concern, in that the emission does not constitute any danger to the health and welfare of the public. The industry advisory committee believes the regulation, revised as appended, can be met by equipment the industry has developed under stimulus of the original goal set by the Commission. Furthermore, the committee feels the proposed revision, based on the following criteria, will provide an effective and enforceable regulation:

1. It is consistent with opacity regulations in California and Washington.

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AIR QUALITY CONTROL



2. It is consistent with opacity regulations governing emissions from other sources within the State of Oregon.
3. Compliance can be achieved with a number of available control devices.
4. The existing regulation allows no additional time for study and testing of untried or unproven control techniques.
5. Delay of the final compliance date, to permit the industry to install the needed equipment, will not jeopardize Oregon's attainment of the National Ambient Air Standards as required by the U. S. Environmental Protection Agency.
6. Fugitive emissions are provided for in such manner that each plant can most effectively cope with its own unique situation.
7. More restrictive requirements may be imposed where special, local conditions warrant.

The magnitude of capital and operating costs of veneer dryer control equipment remains of great concern to the industry. Controlled expenditures per dryer will range from a minimum installed cost of \$60,000 to as high as \$175,000 per unit, exclusive of costs for fugitive emission control. A single plant can have as many as seven dryers for which total control costs may exceed a million dollars for the facility. To put these costs into perspective, it should be pointed out that the original cost of a veneer dryer in an average Oregon plant was around \$80,000. Thus, the investment in control equipment will exceed the depreciated value of the dryer in the majority of cases. The impact of the veneer dryer regulations will fall heaviest on the older, smaller plants, and will be particularly oppressive in today's depressed plywood markets.

In view of the approaching December 1974 deadline of the existing regulations, we look forward to working with you toward an expeditious revision of the existing veneer dryer standards.

Respectfully submitted,

TASK FORCE ON
VENEER DRYER EMISSIONS


Matthew Gould, Chairman

MG:dl
Enc.

25-315 VENEER AND PLYWOOD MANUFACTURING OPERATIONS

(1) Veneer Dryers

- (a) As soon as practicable, but no later than December 31, 1975, no person shall cause to be emitted from any veneer dryer stack, visible air contaminants of an opacity equal to or greater than 20%. Where the presence of uncombined water is the only reason for failure of an emission to meet this requirement, said requirement shall not apply.
- (b) Where required, because of valid adverse local geographical or meteorological conditions, and for dryers installed after December 31, 1974, no person shall cause to be emitted from any veneer dryer stack, visible air contaminants of an opacity equal to or greater than 10%. Where the presence of uncombined water is the only reason for failure of an emission to meet this requirement, said requirement shall not apply.
- (c) As soon as practicable, but no later than December 31, 1975, or upon application for approval to operate a new source, each owner or operator of a veneer dryer shall submit to the Department for approval a schedule for repair and maintenance to control of fugitive emissions.
- (d) As soon as practicable, but not later than May 1, 1975, every person operating a veneer dryer shall submit to

the Department of Environmental Quality:

1. Written information, reports, or analysis which demonstrates compliance with the emission limitations contained in subsections (1) (a) or (1) (b) of this section, or
 11. A specific written compliance schedule for complying with the emission limitations contained in subsections (1) (a) or (1) (b) of this section.
- (e) Any veneer dryer complying with the emission limitations contained in subsections (1) (a) or (1) (b) and (1) (c) of this section shall be exempt from compliance with section 21-030, (pertaining to particulate emission limitations).
- (f) Any veneer dryer the construction of which is completed subsequent to the effective date of this rule, shall, from time of initial operation, comply with the emission limitations contained in subsection (1) (a) or (1) (b), and (1) (c) of this section.
- (g) No person shall attempt to comply with the emission limitations of subsections (1) (a) or (1) (b) of this section by diluting the emissions from the drying process with outside air or other gasses. Emissions which are so diluted shall be deemed to be in violation of subsections (1) (a) or (1) (b) of this section.

APPENDIX J

BOARD OF DIRECTORS

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16 OAKWAY MALL
EUGENE, OREGON 97401
AC 503 686-7618

VERNER J. ADKISON
Program Director

November 27, 1974

Department of Environmental Quality
Air Quality Control Division
1234 S.W. Morrison Street
Portland, OR 97205

Re: Comments on revised veneer dryer regulation.

Gentlemen:

We have worked closely with Department of Environmental Quality staff and Industry representatives in the last few months in their attempt to draft a regulation which will reduce the problem of "blue haze" from veneer dryers, while not causing undue hardship on mill owners. We feel that the proposed regulation fulfills this purpose.

This regulation should cause fine particulate emissions in our region to be reduced. This will benefit the health of the community by reducing the amount of suspended particulate in the air. Visibility reduction, caused by this source should be diminished. We also feel that Industry will be able to meet this regulation with existing control equipment.

We fully support the proposed regulation and have appreciated the opportunity to work with the staff on the proposed regulation.

Sincerely,

Verner J. Adkison
Director

DMB/rh

NOV 29 1974
AIR QUALITY CONTROL

NORTH SANTIAM PLYWOOD COMPANY

P. O. Box 377 MILL CITY, OREGON
AREA CODE 503 897-2391

November 19, 1974

Office of Department of Environmental Quality
Air Quality Control Division
1234 S. W. Morrison
Portland, Oregon 97205

Sirs:

SUBJECT: Written comments concerning Public Hearing, 2:30 PM,
December 20 at Albany for Environmental Quality Division

We, as one of the major plywood producers of the area, have concluded that your proposal to limit all visible blue haze emissions to within fifty feet of the building will be so costly to accomplish and would curtail production of dry veneer to such a degree that the average Douglas Fir mill would be forced to shut down. This seems a drastic statement but several years of investigating this problem has convinced us that the economics of accomplishing this are insurmountable at this time.

We would like to state at this time that we do not believe the small amount of blue haze our present dryers produce are in any way harmful to the health and well being of the people of Oregon. This same process is repeated thousands of times over by nature in the process of sun drying of forest matter and is essential to the growth of plants and trees. This is a well recognized and documented fact.

We would also like to point out that in event this was made a law of the land, the additional energy required to dry Douglas Fir veneer would be enormous and at a time when for national survival we are trying to decrease our need for energy and to make every ounce of energy consumed produce a maximum effort.

Due to these and many more reasons, we ask that you do not implement this ruling.

Sincerely,

NORTH SANTIAM PLYWOOD COMPANY, Inc. of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
David Barnhardt
David Barnhardt

NOV 22 1974

AIR QUALITY CONTROL



ENVIRONMENTAL QUALITY COMMISSION

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

TOM McCALL
GOVERNOR

B. A. McPHILLIPS
Chairman, McMinnville

GRACE S. PHINNEY
Corvallis

JACKLYN L. HALLOCK
Portland

MORRIS K. CROTHERS
Salem

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item No. M-1, December 20, 1974, EQC Meeting
Variance Request - Boise Cascade Lumber Mill,
Beaver Marsh, Oregon

Background

Boise Cascade Corporation operates a sawmill and planing mill near Beaver Marsh in northern Klamath County. Bark and waste white wood have been burned in their modified wigwam waste burner, in compliance with the Department of Environmental (DEQ) regulations since September 21, 1972.

The wigwam waste burner was given a Notice of Violation by the Department of Environmental Quality's Regional office in Bend for violation of the 20% opacity regulation on November 12, 1974.

Boise Cascade, by letter dated November 27, 1974, requested a variance and explained the conditions contributing to the violation:

1. The sawmill and planing mill have been shut down by prevailing market conditions and the plant is operating as a chip mill. White wood planer shavings and hogged trim are no longer available at the wigwam waste burner to promote good combustion.
2. Their supply of natural gas is subject to curtailment so that 3 minute startups to reach a low opacity condition may not be possible. A continuous supply of natural gas to enable smokeless combustion may not be available either.



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3. The company has allocated funds to hog and chip the bark next year so that the wigwam waste burner may be shut down.
 - a. Funds have been allocated for 2nd quarter 1975.
 - b. Actual construction may start as soon as weather permits, perhaps in mid-May of 1975.
4. The company proposes and wants to keep the chip operation running at Beaver Marsh so as not to contribute further to the region's unemployment.
5. The company requests a variance until the bark hog and chipping facilities are completed and running.

Discussion

The mill is located behind a screen of pine trees east of Highway 97 in sparsely settled northern Klamath County. The ambient air is degraded by very few sources there. Other lumber mills are curtailed so that significant unemployment exists. The benefit of employment from a chipping operation involving 50 men is considered significant as compared to the adverse effects of air pollution caused by this wigwam waste burner and which are essentially aesthetic.

The company has submitted a practical plan to eliminate use of the wigwam waste burner altogether. While delaying this plan to May of next year may appear unnecessary, a project to install the machinery now would involve winter construction. This is considered reasonably difficult and costly at that location in view of the probabilities of snow and frozen ground and minimum temperatures that prevail in this area, etc.

Other alternatives of dispersing of the bark are considered to run the costs to where the chips might only be made at a net loss which may mean shutting down this remaining part of the operation.

Conclusion

The Commission has the authority to grant a variance for the reason that special circumstances render strict compliance impractical and no other alternative is available until the proposed facility is completed. The DEQ's Air Quality Control Division recommends this variance to permit the wigwam waste burner emissions to exceed the opacity limit of 20%, when necessary, until July 1, 1975.

The Regional office in Bend recommends the granting of this variance until the bark hog and chipping machinery phase out the wigwam waste burner.

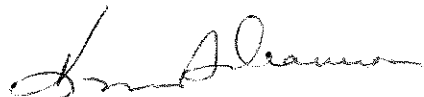
The adverse effect of increased smoke to the workers at the mill and inhabitants of the area is considered small and tolerable. The degradation of the environment as seen from Highway 97 may be considered minimal.

Director's Recommendation

It is recommended that a variance from OAR, Chapter 340, Section 25-020 (1) be granted to Boise Cascade Corporation for their lumber and planing mill at Beaver Marsh in Klamath County under the following conditions:

1. Smoke from the wigwam waste burner operation shall be minimized by use of natural gas as necessary when it is available.
2. The underfire air, overfire air, top damper, and the temperature recording equipment shall all be kept operative at all times.
3. This variance shall terminate on June 30, 1975.

PBB:ahe
December 6, 1974



KESSLER R. CANNON
Director



Boise Cascade

Wood Products Division

Southern Oregon Region
P.O. Box 100
Medford, Oregon 97501
(503) 779-2050

November 27, 1974

Department of Environmental Quality
1234 S. W. Morrison St.
Portland, Oregon 97025

Attention: Mr. Fritz Skirvin

Gentlemen:

This is in reply to the notice of violation of visible emission standards observed by Mr. Borden at our Beaver Marsh stud mill on November 12, 1974.

The sawmill and planing mill at this location have been shut down by prevailing market conditions and the plant is now operating as a chip mill. We feel that loss of the dry waste material from the planing mill is the major factor contributing to this violation since wet bark is the only waste now being burned.

California Pacific Utilities has already given notice to expect significant interruptions of natural gas supply during the coming winter months so it is obvious that we cannot depend on the auxiliary burners for consistent compliance in the immediate future.

We have received an offer to purchase all waste material from this plant and have budgeted the installation of hogging and truck loading equipment for the second quarter of 1975. This budget has been approved in principle by corporate management so we do not anticipate problems in securing allotment of funds. Upon completion of this project the wigwam burner would be placed on a standby status and used only in emergencies. Considering the extremely rigorous climate conditions in the Beaver Marsh area and current lead time on equipment, it is most doubtful that actual construction could start before May 15th 1975.

In view of the facts outlined above and our reluctance to contribute any further toward the unemployment situation in our industry, we would request a variance to operate this burner in violation of visible emission standards until such time as the solution proposed above can be implemented.

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
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We regret our inability to offer a firm date for compliance at this time. If you have further questions please contact Bob Vincent at 779-2050 or Wally Cory at (208) 384-6161.

Yours very truly,

BOISE CASCADE CORPORATION



R. B. Parrish
Manager, Southern Oregon Region

RBP/dh

cc: Wally Cory

John E. Borden - Regional Engineer
Dept. Environmental Quality
Bend, Oregon



ENVIRONMENTAL QUALITY COMMISSION

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TOM McCALL MEMORANDUM
GOVERNOR

To: ENVIRONMENTAL QUALITY COMMISSION

B. A. McPHILLIPS
Chairman, McMinnville

From: Director

GRACE S. PHINNEY
Corvallis

Subject: Agenda Item No. M-2, December 20, 1974, EQC Meeting

JACKLYN L. HALLOCK
Portland

MORRIS K. CROTHERS
Salem

Variance Request: Russell Industries Lumber Mill,
La Pine, Oregon

RONALD M. SOMERS
The Dalles

Background:

KESSLER R. CANNON
Director

Russell Industries operates a small sawmill at La Pine in southwest Deschutes County. The firm operates a salvage type mill by processing snags and dead standing timber into useful lumber, and saleable by-products such as chips and firewood. The mill has no wigwam burner, no boiler, and only one cyclone on a seldom used planer at their furniture shop. The yard is located between Highway 97 and State Highway 31.

Some logs recieved at the mill are found to be rotten; other wood has nails in it and cannot be processed. This waste wood has always been segregated and burned as needed about once a quarter in a pile estimated at 10 feet high and 30 feet across.

Upon applying for an Air Contaminant Discharge Permit, Russell Industries learned of its conflict with Department of Environmental Quality Regulations and has responded with letters dated November 13, 19, and 27 detailing their case for open burning.

The letter of November 27, 1974, requests a variance to open burn the described waste wood three (3) times per year for a duration of approximately sixteen (16) hours each time.

Discussion:

The mill's practice of open burning has aroused no adverse comment. The materials processed by the mill expectedly results in some unusable ends or rotten portions which accumulate at this mill site.

To build a conforming wigwam or employ a conforming trench burner for such a small volume of wood is not considered practical or feasible by the field staff.

The Air Quality Division and Regional Office in Bend recommend a variance to the open burning regulations as no reasonable alternative is considered to now exist.



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Conclusions:

The proposed burning has been accomplished at this location without objections being filed with or adverse observations made by the Department. Degradation to the air environment if significant at all, is concluded at this time to be more acceptable than allowing accumulations of wood wastes resulting in a possible fire hazard or other environmental problem. No feasible alternative is concluded to be available.

Director's Recommendation:

It is recommended that a variance be granted from OAR Chapter 340, Section 23-010 (1) (a), to Russell Industries for their sawmill site at La Pine under the following conditions:

1. That the burning be confined to the present location (as photographed on September 24, 1974).
2. That the burning be conducted no more than three (3) times each year, unless specifically authorized by the Department.
3. That this variance expire on January 1, 1980.
4. That this variance in no way relieves Russell Industries of complying with applicable fire control or fire permit regulations of other governing bodies.
5. That Russell Industries report annually as required by the Air Contaminant Discharge Permit the amount burned.
6. Russell Industries shall notify the Department of Environmental Quality Bend office (phone 382-6886) on the day preceding each of the burning occurrences.

This variance may be revoked upon findings of violation of any of the above conditions. It may also be revoked if any waste other than that produced by Russell Industries (as described in his letters of November 1974) is added to these fires.



KESSLER R. CANNON
Director

FAS:df



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November 19, 1974

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

Re: file O9-0031
Application 0265

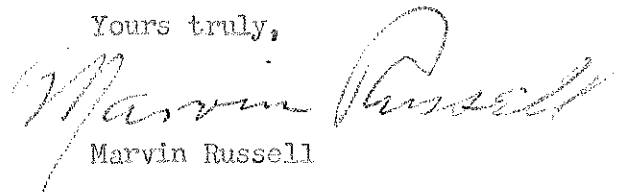
Background

1. We do operate a sawmill at LaPine and have for twenty years.
2. The circle saws we use travel at 650 RPM and in very rare cases where a log is rottensawdust may travel 20 feet into the air.
3. We sell our wood wastes to different people for utilization.
4. We do not convey sawdust by air. The plant does have one cyclone and has had for the last five years. There is possibly 100 lbs of shavings that would pass thru this cyclone ina week; originating from a small furniture planer.
5. The main traveled areas in our mill yard is covered with a red cinder to retard the dust and watering is done when needed.
6. I have taken a personal survey with the people who live near us and in our small town and do not find one complaint with our operation.
7. Production operations at the mill depends on the weather.

D E Q men have gone over my plant site and have seen my operation and if I were to operate under the restrictions you have set forth, I am breaking the law, have always broken the law, as far as your restrictions are concerned; and might just as well call it quits.

If this is the way we are to be restricted, please send me back my \$50 I sent you for this application on Nov. 12, 1973.

Yours truly,


Marvin Russell

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November 13, 1974

Mr. Kessler R. Cannon
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97204

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

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NOV 18 1974

OFFICE OF THE DIRECTOR

Dear Mr. Cannon:

In response to your letter of Nov. 14, we just wanted to tell you that we feel we are being made a fool of by the DEQ.

Shortly after receiving your letter we received a copy of the permit that we are to receive in the near future. It prohibits us from any open burning at our plant site. This is what we applied for in the first place, a permit to do open burning two or three times a year and this is what we thought we were going to receive.

The permit you are issuing enables us to operate our plant, which does not and never has in the twenty years we have operated, caused any air contamination. So we paid \$50 for nothing.

The bureaucratic monster that you are working for has reached it's tentacles way beyond reason. Contamination is something we believe all people are very much concerned with and it should be dealt with for the good of all of us. A large part of the small business that you are confusing to the point that they are ready to quit and fold up are people that are not contaminating anything.

Why can't the DEQ work with the problems that you do have so you can take care of the contamination of the air that is a real threat to people's health.

Mr. Cannon, if this letter sounds bitter it's because we are bitter. In Nov. 1973 we filed the papers, sent the \$50 as requested for the permit and what do we get. One full year later we are notified that we cannot do any open burning at our plant site. Between Nov. 1973 and Nov. 1974 we did not have any correspondence from your office, not even a receipt for the \$50.

What makes this even more irritating is that the Forest Service is burning slash all around us and is creating a smokey haze in the air that stays for days this time of year. Why is our smoke more contaminating than theirs.

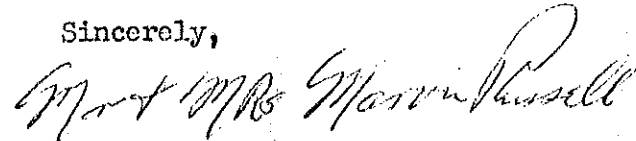
We have spent 20 years working and developing this business into what it is today and have been thru some pretty tough times getting it on it's feet financially. Directly and indirectly this business supports nearly 50 families in the LaPine area. In our peak season we employ 40 to 45 and the hauler who hauls our logs has another 6 or 8 people that earn their livelihood from Russell Industries.

Isn't it going to be a great day for Oregon when the government agencies have made it too rough for the individually owned and family owned business to operate? Won't it be nice when all the small companies are gone and there is only Weyerhaeuser, Georgia Pacific, Boise Cascade and other large corporations working in Oregon forests.

We are not going to argue with you people any longer, when our waste makes it impossible for us to operate we will put Russell Industries up for auction and the 50 families that earn their living from this operation can either move to another area for employment or they can apply for welfare.

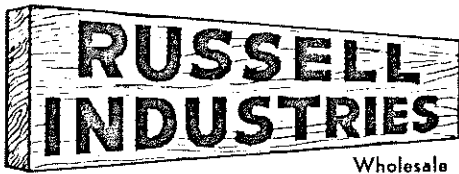
We have another comment that we would like to make. The loggers have taken good care of the forest for a good many years before the environmentalists came along. We have kept fire watches all fire season each year, provided fire fighting crews when needed, and watched out for the birds and animals. You people are harrassing the wrong group. You should be after yourselves because you people are from the big cities and do not know how to respect the woods. People from the cities who do not know how to care for the forest cause more fires, create more garbage in the forest and unnecessarily kill more animals and birds than all the loggers put together, but of course we do not have the Game Commission nor the Tourist Bureau for a lobby in the legislature to protect our interests.

Sincerely,



Mr. & Mrs. Marvin Russell

cc: Sam Johnson
DEQ, Bend office
Governors' office
Radio Station KBND
The Bulletin



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OFFICE OF DEPUTY DIRECTORS

RECEIVED

DEC 8 - 1974

November 27, 1974

Refer: File #09-0031

Application: 0265

DEPT. OF ENVIRONMENTAL QUALITY

Environmental Control Commission
1234 S.W. Morrison Street
Portland, Oregon 97205

Gentlemen:

On November 25, 1974, Cone Hunter, representative for Russell Industries, met with Kessler Cannon, Director, Department of Environmental Quality, in Mr. Cannon's office in Portland, Oregon. At this meeting it was determined that there had been some misunderstandings, with Russell Industries not having been adequately informed as to action to be taken in order to obtain a required variance for open burning, which by law cannot be incorporated within the permit proper.

In Certified, return receipt requested, letter to the D.E.Q., dated November 19, 1974, background information was given on the operations of Russell Industries. I reiterate this information as follows:

1. We do operate a sawmill at LaPine and have for twenty years.
2. The circle saws we use travel at 650 RPM. In very rare cases, where a log is rotten, sawdust may travel 20 feet into the air.
3. We sell our wood wastes to different people for utilization.
4. We do not convey sawdust by air. The plant does have one cyclone and has for the past five years. There is possibly 100 pounds of shavings that pass through this cyclone per week. These shavings originate from a small planer, used in making our Forest Furniture Products.
5. Main traveled areas in our mill yard are covered with a red cinder aggregate to retard dust. This is sprinkled with water in order to abate dust as conditions warrant.
6. I have taken a personal survey of people who live near us in our small town and have yet to find one complaint with our operations.
7. Production and operations at the mill are dependant upon the weather.



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The following information is herewith set forth:

All slab and waste wood trimmings from the mill operations is piled and held until such time as a chipper can be moved in to chip this waste wood for use by another producer. Arrangements have been made to dispose of presently stored slab and waste via the chipper method.

It is estimated that there is now from 200 to 300 truck loads of sawdust piled in storage. Arrangements have been made to haul this sawdust from the area for delivery to a manufacturer who can utilize this waste product.

Local residents purchase a large amount of waste wood for home heating. Older people on Welfare and Social Security are often allowed to pick over the least desirable waste wood and are assessed no charge whatsoever for what they wish to remove from the premises. This is kept confidential, however, and is not advertised. But those truly in need gradually learn of this practice.

As sole owner of Russell Industries, I am fully aware that no industry should be allowed to pollute our air, water or land. Russell Industries has not nor does not pollute in any manner, in my opinion.

In any mill operation, there accumulates a certain amount of rotten, punky, slivered and split wood which must be disposed of in some manner. There also accumulates some old boards and timbers with nails. This material cannot be run through a chipper due to the nails and quite often the quality of the wood is such that it cannot even be given away. It is simply a case of one not being able to utilize it or caring to remove it. The accumulation of worthless wood has to be disposed of in some manner and open burning is the only way at this time. No other manner is available to or feasible for a small operator.

I therefore request that a variance be granted to allow open burning of the waste wood mentioned. Burning will occur about three (3) times per year and lasts approximately sixteen (16) hours each time. Said burning must take place at such time as the weather and local fire conditions will permit. The U. S. Forest Service and State Forestry has control over issuance of fire permits, when required.

After my representative met with Mr. Cannon on November 25, 1974, as mentioned above, I feel we have been appeased only. It does appear that D.E.Q. personnel could have better informed me of what was expected and/or required.

As stated in my letter of November 19, 1974, D.E.Q. representatives have inspected my plant site and observed my operations. Apparently, without a variance being granted, as requested above, I am operating under restrictions, am breaking the law and have always broken the law, considering the permit only.



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In my twenty years of operation no government subsidies have ever been given or received, no requests for an SBA loan has ever been made. I have operated solely from personal initiative, using capital borrowed on a business basis, as required. My business is totally a self made one, with no grants or governmental type loans involved. I pay and have always paid all applicable taxes. Present payroll covers approximately 31 individuals. During the summer months this number increases to perhaps fifty. This comprises the largest single payroll in the LaPine area.

I cannot continue to operate if it must be under a constant threat of citations for so-called unlawful activity. Were my operations ever to have been creating contamination, then I agree that something would need to be done. This has not been the case, however.

I would hope the variance for open burning, as stated, may be granted. I also would hope that full and complete information be given to us in the future so that we have a thorough understanding of what constitutes the permit proper and where a variance must be requested.

Yours truly,

A handwritten signature in cursive script that reads "Marvin Russell".

Marvin Russell

MR/lj

cc: D.E.Q., Bend office
Mr. Kessler Cannon



ENVIRONMENTAL QUALITY COMMISSION

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

TOM McCALL
GOVERNOR

MEMORANDUM

B. A. McPHILLIPS
Chairman, McMinnville

To: Environmental Quality Commission

GRACE S. PHINNEY
Corvallis

From: Director

JACKLYN L. HALLOCK
Portland

Subject: Agenda Item No. N, December 20, 1974, EQC Meeting

MORRIS K. CROTHERS
Salem

Indirect Source Rule Change
Authorization for Public Hearing

RONALD M. SOMERS
The Dalles

KESSLER R. CANNON
Director

Background:

On November 22, 1974, the Commission adopted rules for Indirect Sources. Since that adoption the Director has expressed a concern for the staff time required to implement these rules and has directed the staff to re-evaluate the rule with the following objective; a maximum reduction in manpower requirements with a minimum effect on the Indirect Source review program.

Discussion:

The staff has reviewed the Indirect Source rule and finds that the maximum savings in manpower with the minimum impact on the effectiveness of the program can be achieved by increasing the minimum lot size reviewed from 50 to 100 parking spaces.

Based on the data submitted to the Commission at the November 22, 1974 meeting, this change would have resulted in: 1) approximately a 36.5% reduction in the number of applications received through September 1974 by the Department under the existing rule; and 2) a loss of review authority over approximately 7.5% of the total parking spaces reviewed in the Portland area through September 1974 under the existing rule.

The staff feels that review of all parking facilities is necessary to achieve a balanced indirect source review program. However, review of those individual facilities containing fewer than 100 parking spaces does not at this time appear to be critical based strictly on air quality considerations.



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Additional minor changes and corrections proposed for the clarification of this rule include: 1) section 20-110(10)(b), capitalize "Facilities"; 2) section 20-114(14), addition of the words "in designated parking areas"; 3) section 20-115(5) renumbered to 20-115(3); 4) section 20-115(6) renumbered to 20-115(4); 5) section 20-125(1)(a)(iv), the deletion of "of" and the insertion of "and quantity of Parking Spaces at the Indirect Source and"; 6) section 20-125(1)(a)(vii) line 2, the deletion of the word "spaces"; 7) section 20-129(1)(a)(vi) line 2, the insertion of "concurrent with or" and the insertion of a comma after "the result of".

Recommendation:

It is the recommendation of the Director that a public hearing be authorized for the next Environmental Quality Commission meeting to be held January 24, 1975 for the purpose of taking public testimony prior to considering the adoption of the proposed rule changes.



KESSLER R. CANNON
Director

RLV:h 12/11/74

ADDENDUM TO AGENDA ITEM N, December 20, 1974 EQC Meeting

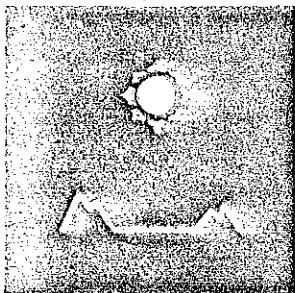
Discussion:

The staff has received from LRAPA and MWVAPA letters requesting delegation of authority to carry out the provisions of the Indirect Source Rule within their respective areas of jurisdiction. As stated in each letter the two Regional Authorities have, under the existing Parking and Highway rule, been conducting Indirect Source reviews and have demonstrated their ability to adequately maintain this program. The staff feels that the delegation of authority is appropriate.

Recommendation:

It is the recommendation of the Director that the authority to carry out the provisions of the Indirect Source Rule within their respective areas of jurisdiction be granted to LRAPA and MWVAPA with the following exception:

"The Department of Environmental Quality shall retain jurisdiction over "Highway Sections" which cross Regional Authority boundaries."



MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

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

To: Environmental Quality Commission
From: Michael D. Roach, Director
Date: December 20, 1974

Subj: Indirect Source Regulations - Delegation of Jurisdiction
to Mid-Willamette Valley Air Pollution Authority

As provided for in Section 20-105 of the recently adopted Indirect Source Regulations, the Mid-Willamette Valley Air Pollution Authority requests delegation of jurisdiction over those indirect sources located in the five-county region served by the Authority.

As indicated in our letter to Mr. Cannon requesting this hearing, our Board of Directors, on February 19, 1974, passed a resolution to request jurisdiction of indirect sources from the Environmental Quality Commission at the appropriate time. Following this resolution, the Authority's federal grant application was filed with the Department committing Authority money and staff hours to these sources and to developing a plan to implement the Department's regulations by May, 1975. The Department reviewed and accepted the application and its objectives. These were included in the official State-wide consolidated plan. At the November 26, 1974 Board Meeting the Board reaffirmed its commitment to regional review and instructed the staff to proceed with obtaining jurisdiction.

Mid-Willamette has been working with indirect sources in the form of parking lots and highways since 1972 with the support of the Department.

In the past two years, the agency has reviewed numerous parking facilities, along with the I-5 expansion, and has requested from the Highway Department an environmental impact statement for the proposed I-305. In the spring of 1974, the Authority participated in a series of workshops with the Mid-Willamette Valley Council of Governments, the Oregon State Highway Department, and the Federal Highway Administration regarding evaluation of the Salem Area Transportation System's impact on air quality. At the present time the agency staff is involved in working with both the cities of Salem and Corvallis in evaluating the air quality impact of urban renewal projects, transit systems and industrial parks. Rapid mid-valley growth rates necessitate continued comprehensive review of these and associated developments. By virtue of its organization Mid-Willamette is most atune with area priorities and problems. Cooperative working relationships have been established with other government agencies, citizens groups, private industry and special interest groups in the area. The nature of the indirect source regulations makes it evident such relationships are a must.

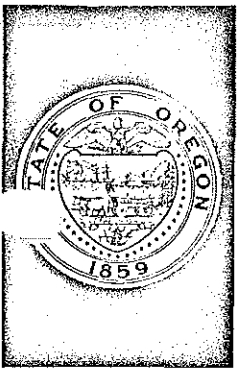
MEMBER COUNTIES: BENTON / LINN / MARION / POLK / YAMHILL

To improve the agency's data base for reviewing indirect sources, a mobile air monitoring laboratory is currently being assembled with the aid of the Department of Environmental Quality. The unit will have the ability to sample for CO, ozone, SO₂, NO_x, and other critical pollutants. It is anticipated the unit will be sited initially in either the Salem metropolitan area or the Albany-Lebanon - Corvallis area. Data collected will provide the mid-valley pollution profile required for review of all sources, not only indirect.

In light of meeting these prerequisites, the Mid-Willamette Valley Air Pollution Authority requests delegation of jurisdiction over indirect sources in its region.

Thank you.

HMP



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5359

TOM McCALL
GOVERNOR

November 27, 1974

KESSLER R. CANNON
Director

Administrative Rules Division
Secretary of State's Office
Salem, Oregon 97310

Attn: Mrs. Ione Hanson

Re: Adoption of Rules Change,
Rules for Indirect Sources

Gentlemen:

Attached are two copies of the Rules for Indirect Sources adopted by the Environmental Quality Commission at the November 22, 1974 meeting, submitted for filing with the Secretary of State.

Included with this transmittal are two copies each of the rule summary, the certification of adoption, and the adopted rule.

It is requested that this rule be published in the Secretary of State's Bulletin on December 15, 1974.

Cordially,

KESSLER R. CANNON
Director

HMP:h

Enclosures

cc RU



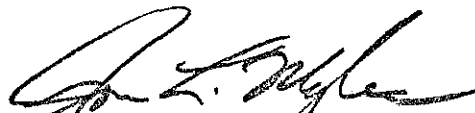
CERTIFICATE OF RULE CHANGE

ENVIRONMENTAL QUALITY COMMISSION

I, RON L. MYLES, Deputy Director, Oregon Department of Environmental Quality, certify that Sections 20-050 through 20-070, Oregon Administrative Rules, Chapter 340, relating to Highways and Parking Structures in Urban Areas were repealed, and Sections 20-100 through 20-135, Oregon Administrative Rules, Chapter 340, relating to rules for Indirect Sources were adopted by the Environmental Quality Commission on November 22, 1974, as shown on Exhibit A, attached hereto and made a part hereof.

I further certify that said Exhibit A is a true and correct copy of the original thereof.

Dated this 5th day of December, 1974.



RON L. MYLES, Deputy Director
Oregon Department of Environmental Quality

ENVIRONMENTAL QUALITY COMMISSION

Rule: General Subject Matter

The adopted rules, Oregon Administrative Rules Chapter 340, Sections 20-100 through 20-135, Rules for Indirect Sources, define indirect sources as air contamination sources and provide for state-wide control of these sources based on parking size or average traffic use. More restrictive limitations are placed on sources located within or near major urban centers. Sources affected by these rules include, but are not limited to airports, highways and parking facilities. Oregon Administrative Rules, Chapter 340, Sections 20-050 through 20-070 are repealed.

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY CONTROL DIVISION

Adopted November 22, 1974

RULES FOR INDIRECT SOURCES

OAR, Chapter 340, Sections 20-050 through 20-070 are repealed and Sections 20-100 through 20-135 are adopted in lieu thereof.

20-100 POLICY

The Commission finds and declares Indirect Sources to be air contamination sources as defined in ORS 468.275. The Commission further finds and declares that the regulation of Indirect Sources is necessary to control the concentration of air contaminants which result from Motor Vehicle Trips and/or Aircraft Operations associated with the use of Indirect Sources.

20-105 JURISDICTION AND DELEGATION

The Commission finds that the complexity or magnitude of Indirect Sources requires state-wide regulation and assumes or retains jurisdiction thereof. The Commission may, however, when any Regional Authority requests and provides evidence demonstrating its capability to carry out the provisions of these rules relating to Indirect Sources, authorize and confer jurisdiction upon such Regional Authority to perform all or any of such provisions within its boundary until such authority and jurisdiction shall be withdrawn for cause by the Commission.

20-110 DEFINITIONS

- (1) "Aircraft Operations" means any aircraft landing or takeoff.
- (2) "Airport" means any area of land or water which is used or intended for use for the landing and takeoff of aircraft, or any appurtenant areas, facilities, or rights-of-way such as terminal facilities, parking lots, roadways, and aircraft maintenance and repair facilities.
- (3) "Associated Parking" means a parking facility or facilities owned, operated and/or used in conjunction with an Indirect Source.
- (4) "Average Daily Traffic" means the total traffic volume during a given time period in whole days greater than one day and less than one year divided by the number of days in that time period, commonly abbreviated as ADT.

- (5) "Commence Construction" means to begin to engage in a continuous program of on-site construction or on-site modifications, including site clearance, grading, dredging, or landfilling in preparation for the fabrication, erection, installation or modification of an indirect source. Interruptions and delays resulting from acts of God, strikes, litigation or other matters beyond the control of the owner shall be disregarded in determining whether a construction or modification program is continuous.
- (6) "Commission" means the Environmental Quality Commission.
- (7) "Department" means the Department of Environmental Quality.
- (8) "Director" means director of the Department or Regional Authority and authorized deputies or officers.
- (9) "Highway Section" means a highway of substantial length between logical termini (major crossroads, population centers, major traffic generators, or similar major highway control elements) as normally included in a single location study or multi-year highway improvement program.
- (10) "Indirect Source" means a facility, building, structure, or installation, or any portion or combination thereof, which indirectly causes or may cause mobile source activity that results in emissions of an air contaminant for which there is a state standard. Such Indirect Sources shall include, but not be limited to:
 - (a) Highways and roads.
 - (b) Parking facilities.
 - (c) Retail, commercial and industrial facilities.
 - (d) Recreation, amusement, sports and entertainment facilities.
 - (e) Airports.
 - (f) Office and Government buildings.
 - (g) Apartment, condominium developments and mobile home parks.
 - (h) Educational facilities.
- (11) "Indirect Source Construction Permit" means a written permit in letter form issued by the Department or the Regional Authority having jurisdiction, bearing the signature of the Director, which authorizes the permittee to Commence Construction of an Indirect Source under construction and operation conditions and schedules as specified in the permit.
- (12) "Mobile Source" means self-propelled vehicles, powered by internal combustion engines, including but not limited to automobiles, trucks, motorcycles and aircraft.

- (13) "Off-street Area or Space" means any area or space not located on a public road dedicated for public use.
- (14) "Parking Facility" means any building, structure, lot or portion thereof, designed and used primarily for the temporary storage of motor vehicles.
- (15) "Parking Space" means any Off-street Area or Space below, above or at ground level, open or enclosed, that is used for parking one motor vehicle at a time.
- (16) "Person" means individuals, corporations, associations, firms, partnerships, joint stock companies, public and municipal corporations, political subdivisions, the state and any agencies thereof, and the federal government and any agencies thereof.
- (17) "Population" means that population estimate most recently published by the Center for Population Research and Census, Portland State University, or any other population estimate approved by the Department.
- (18) "Regional Authority" means a regional air quality control authority established under the provisions of ORS 468.505.
- (19) "Regional Parking and Circulation Plan" means a plan developed by a city, county or regional planning agency, the implementation of which assures the maintenance of the state's ambient air quality standards.
- (20) "Regional Planning Agency" means any planning agency which has been recognized as a substate-clearinghouse for the purposes of conducting project review under the United States Office of Management and Budget Circular Number A-95, or other governmental agency having planning authority.
- (21) "Reasonable Receptor and Exposure Sites" means locations where people might reasonably be expected to be exposed to air contaminants generated in whole or in part by the Indirect Source in question. Location of ambient air sampling sites and methods of sample collection shall conform to criteria on file with the Department of Environmental Quality.
- (22) "Vehicle Trip" means a single movement by a motor vehicle which originates or terminates at or uses an Indirect Source.

20-115 INDIRECT SOURCES REQUIRED TO HAVE INDIRECT SOURCE CONSTRUCTION PERMITS

- (1) The owner, operator or developer of an Indirect Source identified in subsection 20-115(2) of this section shall not Commence Construction of such a source after December 31, 1974 without an approved Indirect Source Construction Permit issued by the Department or Regional Authority having jurisdiction.
- (2) All Indirect Sources meeting the criteria of this subsection relative to type, location, size and operation are required to apply for an Indirect Source Construction Permit:
 - (a) The following sources in or within five (5) miles of the municipal boundaries of a municipality with a Population of 50,000 or more, including but not limited to Portland, Salem and Eugene:
 - (i) Any Parking Facility or other Indirect Source with Associated Parking being constructed or modified to create new or additional parking (or Associated Parking) capacity of 50 or more Parking Spaces.
 - (ii) Any Highway Section being proposed for construction with an anticipated annual Average Daily Traffic volume of 20,000 or more motor vehicles per day within ten years after completion, or being modified so that the annual Average Daily Traffic on that Highway Section will be increased to 20,000 or more motor vehicles per day or will be increased by 10,000 or more motor vehicles per day within ten years after completion.
 - (b) Except as otherwise provided in this section, the following sources within Clackamas, Lane, Marion, Multnomah or Washington counties:
 - (i) Any Parking Facility or other Indirect Source with Associated Parking being constructed or modified to create new or additional parking (or Associated Parking) capacity of 500 or more Parking Spaces.
 - (ii) Any Highway Section being proposed for construction with an anticipated annual Average Daily Traffic volume of 20,000 or more motor vehicles per day within ten years after completion, or being modified so that the annual Average Daily Traffic on that Highway Section will be 20,000 or more motor vehicles per day, or will be increased by 10,000 or more motor vehicles per day, within ten years after completion.

- (c) Except as otherwise provided in this section, the following sources in all areas of the state:
 - (i) Any Parking Facility or other Indirect Source with Associated Parking being constructed or modified to create new or additional parking (or Associated Parking) capacity of 1,000 or more Parking Spaces.
 - (ii) Any Highway Section being proposed for construction with an anticipated annual Average Daily Traffic volume of 50,000 or more motor vehicles per day within ten years after completion, or being modified so that the annual Average Daily Traffic on that Highway Section will be 50,000 or more motor vehicles per day, or will be increased by 25,000 or more motor vehicles per day, within ten years after completion.
- (d) Any Airport being proposed for construction with projected annual Aircraft Operations of 50,000 or more within ten years after completion, or being modified in any way so as to increase the projected number of annual Aircraft Operations by 25,000 or more within 10 years after completion.
- (5) Where an Indirect Source is constructed or modified in increments which individually are not subject to review under this section, and which are not part of a program of construction or modification in planned incremental phases approved by the Director, all such increments commenced after January 1, 1975 shall be added together for determining the applicability of this rule.
- (6) An Indirect Source Construction Permit may authorize more than one phase of construction, where commencement of construction or modification of successive phases will begin over acceptable periods of time referred to in the permit; and thereafter construction or modification of each phase may be begun without the necessity of obtaining another permit.

20-120 ESTABLISHMENT OF AN APPROVED REGIONAL PARKING AND CIRCULATION PLAN(S) BY A CITY, COUNTY OR REGIONAL PLANNING AGENCY

- (1) Any city, county or Regional Planning Agency may submit a Regional Parking and Circulation Plan to the Department or to the Regional Authority having jurisdiction for approval. Such a plan shall include, but not be limited to:
 - (a) Legally identifiable plan boundaries.

- (b) Reasonably uniform identifiable grids where applicable.
 - (c) Total parking space capacity allocated to the plan area.
 - (d) An emission density profile for each grid or plan.
 - (e) Other applicable information which would allow evaluation of the plan such as, but not limited to, scheduling of construction, emission factors, and criteria, guidelines or ordinances applicable to the plan area.
- (2) The Department or Regional Authority having jurisdiction shall hold a public hearing on each Regional Parking and Circulation Plan submitted, and on each proposed revocation or substantial modification thereof, allowing at least thirty (30) days for written comments from the public and from interested agencies.
 - (3) Upon approval of a submitted Regional Parking and Circulation Plan, the plan shall be identified as the approved Regional Parking and Circulation Plan, the appropriate agency shall be notified and the plan used for the purposes and implementation of this rule.
 - (4) The appropriate city, county or Regional Planning Agency shall annually review an approved Regional Parking and Circulation Plan to determine if the plan continues to be adequate for the maintenance of air quality in the plan area and shall report its conclusions to the Department or Regional Authority having jurisdiction.
 - (5) The Department or Regional Authority having jurisdiction shall initiate a review of an approved Regional Parking and Circulation Plan if it is determined that the Regional Parking and Circulation Plan is not adequately maintaining the air quality in the plan area.

20-125 INFORMATION AND REQUIREMENTS APPLICABLE TO INDIRECT SOURCE(S) CONSTRUCTION PERMIT APPLICATIONS WHERE AN APPROVED REGIONAL PARKING AND CIRCULATION PLAN IS ON FILE

(1) Application Information Requirements:

(a) Parking Facilities and Indirect Sources Other Than Highway Sections:

- (i) A completed application form;
- (ii) A map showing the location of the site;
- (iii) A description of the proposed and prior use of the site;
- (iv) A site plan showing the location of Associated Parking areas, points of motor vehicle ingress and egress to and from the site and Associated Parking;

- (v) A ventilation plan for subsurface and enclosed parking;
- (vi) A written statement from the appropriate planning agency that the Indirect Source in question is consistent with an approved Regional Parking and Circulation Plan or any adopted transportation plan for the region.
- (vii) A reasonable estimate of the effect the project has on total parking spaces approved for any specific grid area and Regional Parking and Circulation Plan area.

(b) Highway Section(s):

- (i) Items (i) through (iii) of subsection 20-125(1)(a).
- (ii) A written statement from the appropriate planning agency that the Indirect Source in question is consistent with an approved Regional Parking and Circulation Plan and any adopted transportation plan for the region.
- (iii) A reasonable estimate of the effect the project has on total vehicle miles travelled within the Regional Parking and Circulation Plan Area.

- (2) Within 15 days after the receipt of an application for a permit or additions thereto, the Department or Regional Authority having jurisdiction shall advise the owner or operator of the Indirect Source of any additional information required as a condition precedent to issuance of a permit. An application shall not be considered complete until the required information is received by the Department or Regional Authority having jurisdiction.

20-129 INFORMATION AND REQUIREMENTS APPLICABLE TO INDIRECT SOURCE(S) CONSTRUCTION PERMIT APPLICATION WHERE NO APPROVED REGIONAL PARKING AND CIRCULATION PLAN IS ON FILE

(1) Application information requirements:

- (a) For Parking Facilities and other Indirect Sources with Associated Parking, other than Highway Sections and Airports, with planned construction resulting in total parking capacity for 1000 or more vehicles, the following information shall be submitted:
 - (i) Items (i) through (v) of subsection 20-125(1)(a).
 - (ii) Subsection 20-125(2) shall be applicable.
 - (iii) Measured or estimated carbon monoxide and lead concentrations at Reasonable Receptor and Exposure Sites. Measurements shall be made prior to construction and estimates shall be made for the first, tenth and twentieth years after the Indirect Source and Associated Parking are completed or fully operational. Such estimates shall be made for average and peak operating conditions.

- (iv) Evidence of the compatibility of the Indirect Source with any adopted transportation plan for the area.
 - (v) An estimate of the effect of the operation of the Indirect Source on total vehicle miles traveled.
 - (vi) An estimate of the additional residential, commercial and industrial developments which may occur as the result of the construction and use of the Indirect Source. This shall also include an air quality impact assessment of such development.
 - (vii) Estimates of the effect of the operation and use of the Indirect Source on traffic patterns, volumes, and flow in, on or within one-fourth mile of the Indirect Source.
 - (viii) An estimate of the average daily Vehicle Trips, detailed in terms of the average daily peaking characteristics of such trips, and an estimate of the maximum Vehicle Trips, detailed in one hour and eight hour periods, generated by the movement of people to and from the Indirect Source in the first, tenth and twentieth years after completion.
 - (ix) A description of the availability and type of mass transit presently serving or projected to serve the proposed Indirect Source. This description shall only include mass transit operating within 1/4 mile of the boundary of the Indirect Source.
 - (x) A description of any emission control techniques which shall be used to minimize any adverse environmental effects resulting from the use of the Indirect Source.
- (b) For Parking Facilities and other Indirect Sources with Associated Parking, other than Highway Sections and Airports, with planned construction of parking capacity for 50 to 1000 vehicles; the following information shall be submitted:
- (i) Items (i) through (v) of subsection 20-125(1)(a).
 - (ii) Subsection 20-125(2) shall be applicable. Such additional information may include such items as (iii) through (x) of subsection 20-129(1)(a).
- (c) For Airports, the following information shall be submitted:
- (i) Items (i) through (v) of subsection 20-125(1)(a).
 - (ii) Subsection 20-125(2) shall be applicable.
 - (iii) A map showing the topography of the area surrounding and including the site.
 - (iv) Evidence of the compatibility of the Airport with any adopted transportation plan for the area.
 - (v) An estimate of the effect of the operation of the Airport on total vehicle miles traveled.

- (vi) Estimates of the effect of the operation and use of the Airport on traffic patterns, volumes, and flow in, on or within one-fourth mile of the Airport.
 - (vii) An estimate of the average and maximum number of Aircraft Operations per day by type of aircraft in the first, tenth and twentieth years after completion of the Airport.
 - (viii) Expected passenger loadings in the first, tenth and twentieth years after completion.
 - (ix) Measured or estimated carbon monoxide and lead concentrations at Reasonable Receptor and Exposure Sites. Measurements shall be made prior to construction and estimates shall be made for the first, tenth and twentieth years after the Airport and Associated Parking are completed or fully operational. Such estimates shall be made for average and peak operating conditions.
 - (x) Alternative designs of the Airport, ie. size, location, parking capacity, etc., which would minimize the adverse environmental impact of the Airport.
 - (xi) An estimate of the additional residential, commercial and industrial development which may occur within 3 miles of the boundary of the new or modified Airport as the result of the construction and use of the Airport.
 - (xii) An estimate of the area-wide air quality impact analysis for carbon monoxide, photochemical oxidants, nitrogen oxides and lead particulate. This analysis would be based on the emissions projected to be emitted from mobile and stationary sources within the Airport and from mobile and stationary source growth within 3 miles of the boundary of the Airport. Projections should be made for the first, tenth and twentieth years after completion.
 - (xiii) A description of the availability and type of mass transit presently serving or projected to serve the proposed Airport. This description shall only include mass transit operating within 1/4 mile of the boundary of the Airport.
- (d) For Highway Sections, the following information shall be submitted:
- (i) Items (i) through (iii) of Subsection 20-125(1)(a).
 - (ii) Subsection 20-125(2) shall be applicable.
 - (iii) A map showing the topography of the Highway Section and points of ingress and egress.
 - (iv) The existing average and maximum daily traffic on the Highway Section proposed to be modified.
 - (v) An estimate of the maximum traffic levels for one and eight hour periods in the first, tenth and twentieth years after completion.

- (vi) An estimate of vehicle speeds for average and maximum traffic volumes in the first, tenth and twentieth years after completion.
- (vii) A description of the general features of the Highway Section and associated right-of-way.
- (viii) An analysis of the impact of the Highway Section on the development of mass transit and other modes of transportation such as bicycling.
- (ix) Alternative designs of the Highway Section, ie. size, location, etc., which would minimize adverse environmental effects of the Highway Section.
- (x) The compatibility of the Highway Section with an adopted comprehensive transportation plan for the area.
- (xi) An estimate of the additional residential, commercial and industrial development which may occur as the result of the construction and use of the Highway Section, including an air quality assessment of such development.
- (xii) Estimates of the effect of the operation and use of the Indirect Source on major shifts in traffic patterns, volumes, and flow in, on or within one-fourth mile of the Highway Section.
- (xiii) An analysis of the area-wide air quality impact for carbon monoxide, photochemical oxidants, nitrogen oxides and lead particulates in the first, tenth and twentieth years after completion. This analysis would be based on the change in total vehicle miles traveled in the area selected for analysis.
- (xiv) The total air quality impact (carbon monoxide and lead) of maximum and average traffic volumes. This analysis would be based on the estimates of an appropriate diffusion model at Reasonable Receptor and Exposure Sites. Measurements shall be made prior to construction and estimates shall be made for the first, tenth and twentieth years after the Highway Section is completed or fully operational.
- (xv) Where applicable and requested by the Department, a Department approved surveillance plan for motor vehicle related air contaminants.

20-130 ISSUANCE OR DENIAL OF INDIRECT SOURCE CONSTRUCTION PERMITS

- (1) Issuance of an Indirect Source Construction Permit shall not relieve the permittee from compliance with other applicable provisions of the Clean Air Act Implementation Plan for Oregon.
- (2) Within 20 days after receipt of a complete permit application, the Department or Regional Authority having jurisdiction shall:
 - (a) Issue 20 day notice and notify the Administrator of the Environmental Protection Agency, appropriate newspapers and any interested person(s) who has requested to receive such notices in each region

in which the proposed Indirect Source is to be constructed of the opportunity for written public comment on the information submitted by the applicant, the Department's evaluation of the proposed project, the Department's proposed decision, and the Department's proposed construction permit where applicable.

- (b) Make publicly available in at least one location in each region in which the proposed Indirect Source would be constructed, the information submitted by the applicant, the Department's evaluation of the proposed project, the Department's proposed decision, and the Department's proposed construction permit where applicable.
- (3) Within 60 days of the receipt of a complete permit application, the Department or Regional Authority having jurisdiction shall act to either disapprove a permit application or approve it with possible conditions.
- (4) Conditions of an Indirect Source Construction Permit may include, but are not limited to:
- (a) Posting transit route and scheduling information.
 - (b) Construction and maintenance of bus shelters and turn-out lanes.
 - (c) Maintaining mass transit fare reimbursement programs.
 - (d) Making a car pool matching system available to employes, shoppers, students, residents, etc.
 - (e) Reserving parking spaces for car pools.
 - (f) Making parking spaces available for park-and-ride stations.
 - (g) Minimizing vehicle running time within parking lots through the use of sound parking lot design.
 - (h) Ensuring adequate gate capacity by providing for the proper number and location of entrances and exits and optimum signalization for such.
 - (i) Limiting traffic volume so as not to exceed the carrying capacity of roadways.
 - (j) Altering the level of service at controlled intersections.
 - (k) Obtaining a written statement of intent from the appropriate public agency(s) on the disposition of roadway improvements, modifications and/or additional transit facilities to serve the individual source.
 - (l) Construction and maintenance of exclusive transit ways.

- (m) Providing for the collection of air quality monitoring data at Reasonable Receptor and Exposure Sites.
 - (n) Limiting facility modifications which can take place without re-submission of a permit application.
 - (o) Completion and submission of a Notice of Completion form prior to operation of the facility.
- (5) An Indirect Source Construction Permit may be withheld if:
- (a) The Indirect Source will cause a violation of the Clean Air Act Implementation Plan for Oregon.
 - (b) The Indirect Source will delay the attainment of or cause a violation of any state ambient air quality standard.
 - (c) The Indirect Source causes any other Indirect Source or system of Indirect Sources to violate any state ambient air quality standard.
 - (d) The applicable requirements for an Indirect Source Construction Permit application are not met.
- (6) Any owner or operator of an Indirect Source operating without a permit required by this rule, or operating in violation of any of the conditions of an issued permit shall be subject to civil penalties and/or injunctions.
- (7) Nothing in this section shall preclude a Regional Authority authorized under Section 20-105 from setting the permit conditions for areas within its jurisdiction at levels more stringent than those detailed in Sections 20-100 through 20-135.
- (8) If the Department shall deny, revoke or modify any Indirect Source Construction Permit, it shall issue an order setting forth its reasons in essential detail.

20-135 PERMIT DURATION

- (1) An Indirect Source Construction Permit issued by the Department or a Regional Authority having jurisdiction shall remain in effect until modified or revoked by the Department or such Regional Authority.
- (2) The Department or Regional Authority having jurisdiction may revoke the permit of any Indirect Source operating in violation of the construction, modification or operation conditions set forth in its permit.

- (3) An approved permit may be revoked without a hearing if construction or modification is not commenced within 18 months after receipt of the approved permit; and, in the case of a permit granted covering construction or modification in approved, planned incremental phases, a permit may be revoked as to any such phase as to which construction or modification is not commenced within 18 months of the time period stated in the initial permit for the commencing of construction of that phase. The Director may extend such time period upon a satisfactory showing by the permittee that an extension is justified.



State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: **Hearings Officer**

Date: **December 23, 1974**

From: **R. L. Vogt**

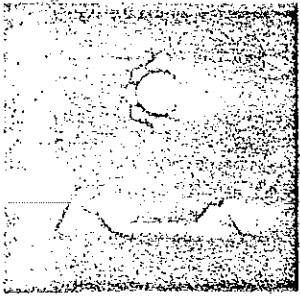
Subject: **Material Submitted at the December 20, 1974 EQC meeting:**

Attached please find:

1. A final staff report as presented to the Commission requesting authorization to hold a public hearing on the proposed modifications to the Indirect Source Rule.
2. A final staff report as presented to the Commission authorizing delegation of authority to the Regional Authorities to implement the adopted Indirect Source rule.
3. A copy of the testimony prepared by MWVAPA for presentation at the EQC meeting. The MWVAPA representative arrived after the Commission took action on the two staff reports listed above.

Attachments

cc: HMP



MID WILLAMETTE VALLEY AIR POLLUTION AUTHORITY

2535 STATE STREET / SALEM, OREGON 97301 / TELEPHONE AC 503 / 581-1715

To: Environmental Quality Commission
From: Michael D. Roach, Director
Date: December 20, 1974

Subj: Indirect Source Regulations - Delegation of Jurisdiction
to Mid-Willamette Valley Air Pollution Authority

As provided for in Section 20-105 of the recently adopted Indirect Source Regulations, the Mid-Willamette Valley Air Pollution Authority requests delegation of jurisdiction over those indirect sources located in the five-county region served by the Authority.

As indicated in our letter to Mr. Cannon requesting this hearing, our Board of Directors, on February 19, 1974, passed a resolution to request jurisdiction of indirect sources from the Environmental Quality Commission at the appropriate time. Following this resolution, the Authority's federal grant application was filed with the Department committing Authority money and staff hours to these sources and to developing a plan to implement the Department's regulations by May, 1975. The Department reviewed and accepted the application and its objectives. These were included in the official State-wide consolidated plan. At the November 26, 1974 Board Meeting the Board reaffirmed its commitment to regional review and instructed the staff to proceed with obtaining jurisdiction.

Mid-Willamette has been working with indirect sources in the form of parking lots and highways since 1972 with the support of the Department.

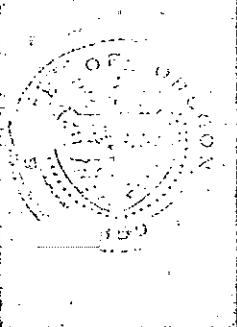
In the past two years, the agency has reviewed numerous parking facilities, along with the I-5 expansion, and has requested from the Highway Department an environmental impact statement for the proposed I-305. In the spring of 1974, the Authority participated in a series of workshops with the Mid-Willamette Valley Council of Governments, the Oregon State Highway Department, and the Federal Highway Administration regarding evaluation of the Salem Area Transportation System's impact on air quality. At the present time the agency staff is involved in working with both the cities of Salem and Corvallis in evaluating the air quality impact of urban renewal projects, transit systems and industrial parks. Rapid mid-valley growth rates necessitate continued comprehensive review of these and associated developments. By virtue of its organization Mid-Willamette is most atune with area priorities and problems. Cooperative working relationships have been established with other government agencies, citizens groups, private industry and special interest groups in the area. The nature of the indirect source regulations makes it evident such relationships are a must.

Environmental Quality Commission

To improve the agency's data base for reviewing indirect sources, a mobile air monitoring laboratory is currently being assembled with the aid of the Department of Environmental Quality. The unit will have the ability to sample for CO, ozone, SO₂, NO_x, and other critical pollutants. It is anticipated the unit will be sited initially in either the Salem metropolitan area or the Albany-Lebanon - Corvallis area. Data collected will provide the mid-valley pollution profile required for review of all sources, not only indirect.

In light of meeting these prerequisites, the Mid-Willamette Valley Air Pollution Authority requests delegation of jurisdiction over indirect sources in its region.

Thank you.



ENVIRONMENTAL QUALITY COMMISSION

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

TOM McCALL
GOVERNOR

MEMORANDUM

B. A. McPHILLIPS
Chairman, Medford

To: Environmental Quality Commission

GRACE S. PHINNEY
Corvallis

From: Director

JACKLYN L. HALLOCK
Portland

Subject: Agenda Item No. N, December 20, 1974, EQC Meeting

MORRIS K. CROFTERS
Salem

Indirect Source Rule Change

RONALD M. SOMERS
The Dalles

Authorization for Public Hearing

KESSLER R. CANNON
Director

Background:

On November 22, 1974, the Commission adopted rules for Indirect Sources. Since that adoption the Director has expressed a concern for the staff time required to implement these rules and has directed the staff to re-evaluate the rule with the following objective; a maximum reduction in manpower requirements with a minimum effect on the Indirect Source review program.

Discussion:

The staff has reviewed the Indirect Source rule and finds that the maximum savings in manpower with the minimum impact on the effectiveness of the program can be achieved by increasing the minimum lot size reviewed from 50 to 100 parking spaces.

Based on the data submitted to the Commission at the November 22, 1974 meeting, this change would have resulted in: 1) approximately a 36.5% reduction in the number of applications received through September 1974 by the Department under the existing rule; and 2) a loss of review authority over approximately 7.5% of the total parking spaces reviewed in the Portland area through September 1974 under the existing rule.

The staff feels that review of all parking facilities is necessary to achieve a balanced indirect source review program. However, review of those individual facilities containing fewer than 100 parking spaces does not at this time appear to be critical based strictly on air quality considerations.

12/21/74
KRC

Additional minor changes and corrections proposed for the clarification of this rule include: 1) section 20-110(10)(b), capitalize "Facilities"; 2) section 20-114(14), addition of the words "in designated parking areas"; 3) section 20-115(5) renumbered to 20-115(3); 4) section 20-115(6) renumbered to 20-115(4); 5) section 20-125(1)(a)(iv), the deletion of "of" and the insertion of "and quantity of Parking Spaces at the Indirect Source and"; 6) section 20-125(1)(a)(vii) line 2, the deletion of the word "spaces"; 7) section 20-129(1)(a)(vi) line 2, the insertion of "concurrent with or" and the insertion of a comma after "the result of".

One additional proposed modification to the rule is the insertion of section 20-130(9) to formally adopt as part of the Indirect Source rule a policy to not approve or deny any Indirect Source application until after the Indirect Source in question has obtained land use approval from the appropriate local planning agency. This procedure has been and is currently being followed and is the policy of the Department under the existing Parking and Highways rule, however, the insertion of this policy within the rule will assist to clarify the intent of the Department.

Recommendation:

It is the recommendation of the Director that a public hearing be authorized for the next Environmental Quality Commission meeting to be held January 24, 1975 for the purpose of taking public testimony prior to considering the adoption of the proposed rule changes.

KESSLER R. CANNON
Director

RLV:h

(as presented at the EQC meeting)

ADDENDUM TO AGENDA ITEM N, December 20, 1974 EQC Meeting

Discussion:

The staff has received from LRAPA and MWVAPA letters requesting delegation of authority to carry out the provisions of the Indirect Source Rule within their respective areas of jurisdiction. As stated in each letter the two Regional Authorities have, under the existing Parking and Highway rule, been conducting Indirect Source reviews and have demonstrated their ability to adequately maintain this program. The staff feels that the delegation of authority is appropriate.

Recommendation:

It is the recommendation of the Director that the authority to carry out the provisions of the Indirect Source Rule within their respective areas of jurisdiction be granted to LRAPA and MWVAPA with the following exception:

"The Department of Environmental Quality shall retain jurisdiction over "Highway Sections" which cross Regional Authority boundaries."

Mr. Chairman:

The Department and this Commission have been working for a considerable period on the problems associated with the AMAX proposal. I'm sure you're all aware of the long history of this project, actually going back to 1967 when the proposition was before the Legislative Assembly. Subsequent then, the Department and this Commission started work on problems associated with air emission standards for aluminum plants. The federal government had failed to develop standards, and this Commission knew such standards were essential. Work by the Department was completed, and more than a year ago this Commission took final action and adopted emission standards, known at that time to be the toughest in the world. ^{AMany} Industry and people generally felt plants could not meet the standards set, and those who opposed the development at Warrenton felt the issue was therefore dead, and the plant would not be constructed.

In the months which followed, new techniques emerged which now indicate that AMAX may well be able to meet Oregon's strict standards. This being the case, both this Commission and the Department have had literally thousands of citizen comments offered into our decision-making process. Surely it is timely and proper that this issue now be resolved.

I think most people know that members of this Commission

have serious and growing concerns with the many unknowns associated with the proposal. Later this spring, for example, studies will be completed to give needed baseline data on the makeup and complexity of the estuary and Youngs Bay. However, we will not have, nor do we see any way in which we can have reliable comments on impacts of the plant and its emissions through future years on the biota of the estuary. Years from now it may well be that evaluations will show little if any impact if the plant were to operate. It is equally possible that years from now we may well find serious and damaging effects on the estuarine life, with irreversible impacts. Then it would be too late.

Members of this Commission have commented on the possibility of designation of Oregon's estuaries as special areas. Such an action could provide needed special restrictions on development which would forego irreversible impacts.

To me a very real cloud exists over this plant and others because of the newly published EPA rules on significant deterioration. There is no question but what this must be resolved, and that resolution in itself may require some substantial time. Included in that resolution may well be a decision by this Commission that coastal areas such as the area to be impacted by AMAX would go into a Class I classification, precluding major industrial development.

Members of this Commission are also aware of a new process for aluminum reduction being developed by Alcoa,

which promises zero discharges, with a significant and substantial reduction also in energy use.

The subject of energy also is one of the great social questions involved in this problem. I think responsibilities of this Commission go beyond the technical side of actual standards for environmental protection. We cannot avoid an awareness of the enormous amount of a dwindling energy supply which would be required by this operation. Regardless of the complexities of the northwest power pool, it remains true that kilowatts required for this plant cannot be available elsewhere, and may in fact have to be replaced by environmentally damaging generation facilities.

Therefore, I move:

- (1) that all of the area within and between Youngs Bay estuary, Fort Stevens State Park and Fort Clatsop National Monument, within which the proposed AMAX Company primary aluminum plant is planned to be located be designated by the Environmental Quality Commission by rule to be a special problem area pursuant to Section 25-270, chapter 340, Oregon Administrative Rules; and
- (2) that the following designated more restrictive limits be established by rule for such special problem area:
 - (a) an emission limit of fluoride essentially equal to zero; and

(b) the same sulfur dioxide and particulate limits as are provided for a Class I area designation, pursuant to the United States Environmental Protection Agency rules published in the Federal Register on December 5, 1974, for prevention of significant air quality deterioration (Federal Register Document 74-28353; filed 12/4/74).

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McCall chides EQC for stand

SALEM (AP) — Gov. Tom McCall has gently chided the Environmental Quality Commission for designating the site of the proposed AMAX aluminum plant as a "special area" subject to the strictest pollution control

standards.

The EQC said last Friday air emissions from the proposed plant in Warrenton should be limited to "essentially zero" pollution.

"I'm no fan of the AMAX proposal, but I'm sympathetic to the company in this case," McCall said. "AMAX was told (earlier) to limit fluoride emissions to a pound per ton, and it came in under that. Now it's being told the limit might be zero."

McCall said it damages Oregon's image to change the rules after telling a company what it must do to build in the state, even though the decision may have been correct in the case of AMAX.

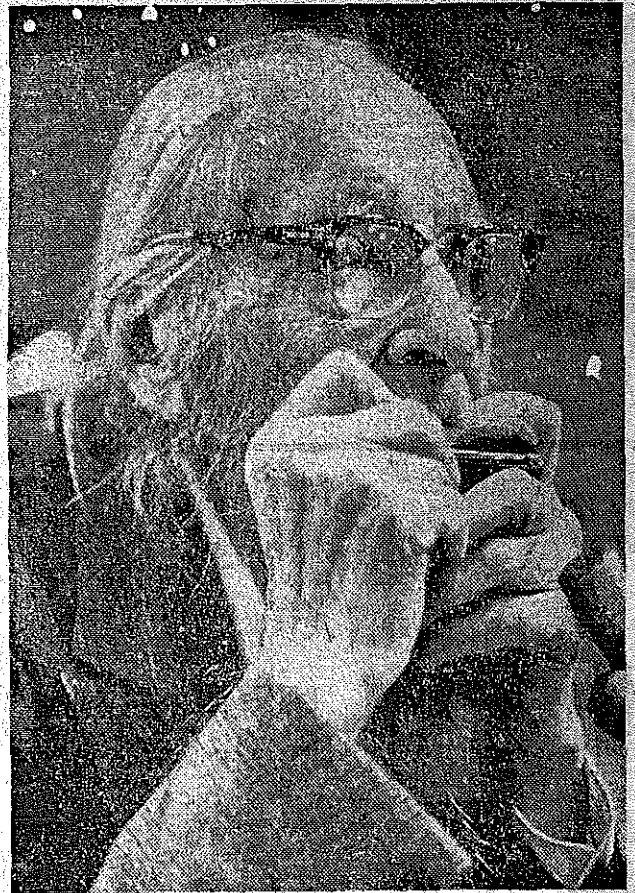
"Neither a state nor a business can kick a field goal while somebody is moving the goal posts," McCall said. "This points up again the need to do all the research before the decision-making stage is reached. It would save both business and the state a lot of grief."

Jobs official to quit post

SALEM (AP) — Eldon Cone, deputy administrator of the state employment division, will retire Friday after 34 years with the agency.

He started in the Klamath Falls office in 1940. Cone has been a director of the employment service, manager of offices at The Dalles, Ontario and McMinnville, and supervisor of field services.

In another move, George W. Benedict was named manager of the downtown Portland office of the em-



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O.J. 12-25-79

Straub, McCall Divided On Aluminum Plant Policy

By DEAN SMITH
Journal Staff Writer

Gov.-elect Robert Straub said Tuesday that he doesn't share Gov. Tom McCall's concern that AMAX Aluminum Co. is being unfairly dealt with by the state Environmental Quality Commission.

Straub met with AMAX President David Mayers and Kessler Cannon, director of the Department of Environmental Quality Commission, to discuss the arrangement for the plant in Astoria.

McCall is "moving the goal posts" in Astoria, says Straub. He hopes to solve the problem by designating the area as a special problem area requiring "essentially zero" fluoride emissions. "The way our environment is constantly changing," Straub said after the meeting. "So I don't look on it quite the same

way (as does McCall).

"We have a changing environment and we're going to have to change the goal posts from time to time. But I am concerned about the delay factor and the extra costs on industry."

Straub said he thinks "extra caution is justified" in the case of the Astoria area.

Ronald Somers, The Dalles, instigated the move to remove any chance that AMAX might harm the Youngs Bay estuary.

Cannon said the EQC has scheduled a Feb. 7 hearing in Portland, beginning at 9 a.m. at the Public Service Building, to consider the special designation.

He declined to speculate on the commission's decision, but said he believes the

standards, which require new plants to meet a standard of one pound fluoride per ton of aluminum produced, already have forced AMAX to "do things we didn't think we could do," Mayers said.

AMAX will produce about one-half pound of fluoride emissions per ton of aluminum as an annual average, he said.

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Straub met with AMAX President David Mayers and Kessler Cannon, director of the Department of Environmental Quality, in a hastily arranged meeting in Portland.

McCall accused the EQC of "moving the goal posts" by considering designating the Astoria area, where AMAX hopes to locate, a special problem area requiring "essentially zero" fluoride emissions.

"The process of protecting our environment is constantly changing," Straub said after the meeting. "So I don't look on it quite the same

way (as does McCall).

"We have a changing environment and we're going to have to change the goal posts from time to time. But I am concerned about the delay factor and the extra costs on industry."

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Citing conflicting experts' testimony, EQC member

FORCE FOR CHILDREN SALEM (UPI) — Gov. Tom McCall has appointed a Task Force on Early Child Development to determine the need and composition of a structure for statewide planning in the interest of children. McCall named Secretary of State Clay Myers to be chairman of the task force.

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He declined to speculate on the commission's decision, but said he believes the EQC is acting cautiously.

Mayers, of San Mateo, Calif., said Straub was "non-committal" on the issue, although other AMAX officials said the governor-elect "wants industry and wants jobs."

Oregon's tough fluoride

standards, which require new plants to meet a standard of one pound fluoride per ton of aluminum produced, already have forced AMAX to "do things we didn't think we could do," Mayers said.

AMAX will produce about one-half pound of fluoride emissions per ton of aluminum as an annual average, he said.

Mayers said the nation and world need aluminum, and acknowledged that AMAX "can't sit on" its power contract with the Bonneville Power Administration.

"I think this kind of treatment (by the EQC) would give Oregon a very bad record," he said.

EAR TO THE WALL
Amax Chief Cries 'Foul'

By KEN BRADLEY
 Journal Business Editor

"We've been had," the president of Amax Aluminum Co. said as he came away from a Tuesday afternoon meeting with Gov.-elect Bob Straub.

David Mayers and a party of Amax executives flew here from San Mateo for a face-to-face conversation after the Environmental Quality Commission moved last Friday to change the ground rules on emissions in the Warrenton area. Amax is proposing to build a \$300 million aluminum reduction plant there.

Mayers said Amax cannot back off on the project and is prepared to fight.

"We've spent \$9 million in studies and engineering," he said.

Conceding that Amax has kept a rather low profile, Mayers said that Oregon people need only to look at the facts and he is sure the company will get a go-ahead.

"The state needs the jobs, the nation needs the aluminum and it won't be a drain on the region's power facilities," he said.

Mayers seemed amazed that the state would set a standard of 1 pound of fluoride per ton of aluminum and then move to renege on the ruling.

"We are 50 per cent under the standard," he emphasized. "This plant is at least five times as good as the best aluminum plant in the state." Amax has earmarked \$40 million for pollution controls.

Responding to the argument that the plant would use energy that would have to be replaced later by a more-polluting source, Mayer said it would use less than 1 per cent of the peak load in 1977.

The aluminum executive had done his homework. He pointed to an argument heard previously: "If the power isn't used, it will escape to the State of Washington."

But his best argument was yet to come. Mayer said the state would get a black eye and other industries would be afraid to consider Oregon if the ground rules are to be changed.

"We had to come up here and see if we could shed any light on the matter. We can't understand what the problem has been."

He said the company has followed all the rules and there is a negligible impact on the environment.

Amax is a joint venture with Mitsui & Co. of Japan.

Mayer said the nation is importing 600,000 tons of aluminum annually and the figure is expected to double in the next few years.

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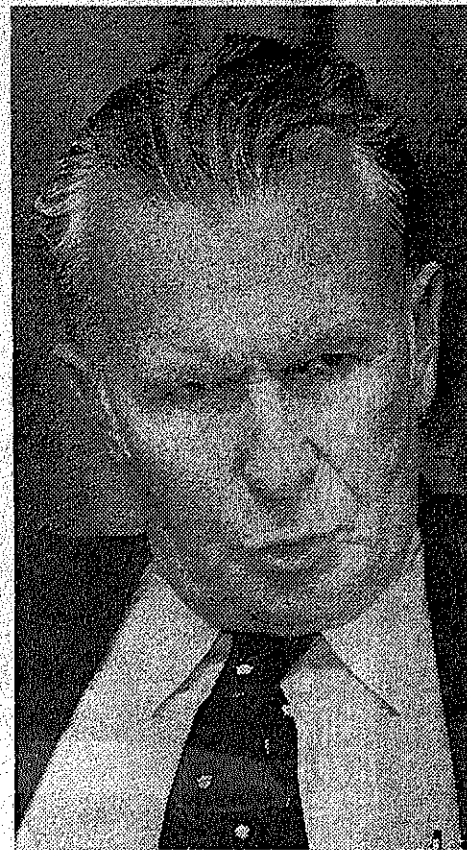
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DAVID MAYERS

"... I don't understand"

opment. The Alcoa people tell us it will be three years before they know whether the process is feasible on a large scale."

Mayer said Amax has discussed licensing with Alcoa, but even Alcoa is using the old method in its new plants.

He said the Warrenton plant must be in operation by late 1975. "We can't just sit on our power contract with Bonneville Power Administration."

Mayer said BFA has been cooperative and that there has been no pressure from it for Amax to give up its power contract.

The Amax executive said he expects the matter to be resolved in the next six weeks.

"To impose a zero emission standard on the Astoria area would be the worst kind of discrimination.

"I'm surprised they would even consider it, because that is the equivalent of a wilderness area."

Mayer said he doesn't know what the company's next step will be if it isn't permitted to build at Warrenton.

He figures the people in Warrenton who favor the plant will become more vocal when they hear the whole story.

Mayer wouldn't say whether the matter will be taken to the courts. "We won't give up without a struggle."

(Related story on B14)

Note: Mr. Hogue could not attend due to plane trouble in Medford. His statement will be read by Ted Hurd (see next paper)

Opening statement for the plywood industry veneer dryer hearing, Albany, Oregon, December 20, 1974, before the Environmental Quality Commission of the State of Oregon.

My name is Russell J. Hogue, President and Chief Executive Officer of the Medford Corporation, Medford, Ore. What I have to say represents the consensus of the entire plywood industry in Oregon, as expressed in a unanimous position recently adopted by the American Plywood Association Board of Trustees.

Plywood is the backbone of adequate housing for America. In 1973, approximately half of the 18.3 billion square feet of plywood produced by 190 mills in 18 states went into residential construction.

The role of plywood as an indispensable material for all types of construction is well recognized by the nation's builders. In the words of the National Association of Home Builders, there is no effective substitute for it.

For more than three decades, Oregon has been the most important plywood manufacturing state in the nation. Eighty-four Oregon plants produced 8.5 billion square feet of plywood in 1973, or 46.5 percent of total industry production.

In contrast to 1972-1973, when all manufacturers of wood products enjoyed a brief boom, the plywood industry has been experiencing a market crisis that has grown progressively more severe through the summer and fall of 1974. Prospects for the months immediately ahead are even more bleak.

The No. 1 cause of the weak market, which has resulted in mill closures and curtailments affecting one-third of the entire industry, has been the collapse of plywood's primary market, new home building.

By year end, housing starts nationally are expected to be at least 40 percent below the 1973 level. Many efforts are being directed toward at least a modest home building recovery, but no significant marketplace relief is possible before April or May of 1975 at the earliest.

As a result, plywood manufacturers are facing the most difficult winter in their history.

While President Ford has finally acknowledged that the nation is in a recession, it is obvious that for some months many communities in Oregon and Washington have been in a depression, suffering unemployment levels well in excess of the national average.

Some Oregon communities are now reporting unemployment levels exceeding 12 percent. This is about double the national level.

These figures reflect the impact of the market collapse on plywood, one of Oregon's basic industries.

As an indication of the fast-accelerating decline, the American Plywood Association reported that 18 plants nationwide were closed and 55 others curtailed, in the week ending December 14, 1974. Eight of the closures were in Oregon and three in Washington. No less than 17 of those curtailed were in Oregon and 13 in Washington.

Nationally, about 8,000 out of 42,000 plywood production workers are unemployed. At least 3,000 of the jobless are in Oregon alone. The Plywood Association estimates weekly payroll losses in the state at not less than \$750,000 a week.

These earnings losses are for plywood production personnel only, and do not include losses in logging, sawmills and the many service industries dependent on wood products. Including logging, lumber and the community-wide effect, the state's weekly earnings drop can be conservatively estimated at about \$3,000,000.

The great concern of the plywood industry as it enters the winter of 1974 is survival. For many of the companies, large as well as small, the combination of low market prices and soaring manufacturing costs is critical.

The production capacity of all plywood companies will be desperately needed when housing demand eventually returns. A number of these companies, however, have announced permanent or long-term shutdowns.

If more of these closures are not to become permanent, with irreparable loss to the communities involved as well as to the nation, the plywood companies will need the help and understanding of the financial community and all who deal with them, including the environmental agencies.

It is against this background of severe market depression that this hearing on veneer dryer emissions takes place today.

The plywood industry has been engaged for many years, on a voluntary basis, in cooperative efforts with regulatory agencies to find out more about dryer emissions.

Our industry believes in clean air and clean water, and we are pledged to do our share toward the realization of a better environment. But at this time of market collapse and future economic uncertainty, we simply cannot afford the luxury of doing more than is needed.

As a nontechnical man, I have never understood why veneer dryers needed to be flagged out for special regulations. There is no evidence that the emission is harmful to health and, as far as I know, there are no other state regulations on dryers, or on industrial emissions as a whole, that are more restrictive than a 20 percent opacity.

Why discriminate in Oregon and why discriminate against veneer dryers? All existing dryers in Texas, for instance, must meet only a 30 percent requirement with new dryers to meet 20 percent. Our industry in Oregon is being required to spend far more money on dryers than the plywood industry in other states.

This would put Oregon mills at a competitive disadvantage.

Perhaps you will recall that in the beginning, control equipment for veneer dryers was not available. Under those circumstances, our industry did not wait but undertook to adopt, design and develop suitable control devices and this work is continuing.

Everything that appeared to have any promise whatsoever has been or is being tried and evaluated. None of these control systems has proven to be totally effective regardless of cost. To our knowledge, this is the first time a single industry has been involved in such a major research effort to develop its own pollution control equipment.

Let me close with an appeal for moderation. In your commendable zeal to do the best possible for Oregon's air, please give consideration to all of the factors affected and to the total impact of the regulation on the people of Oregon.

We ask you not to impose this unjust burden on the plywood industry, especially in the fragile economic conditions we face today. For some firms, the added uncertainty and anticipated cost could well be the straw to break the camel's back, further adding to Oregon's unemployment and economic problems.

The regulations as drafted are very comprehensive. However, as an industry, we are unitedly opposed to a 10 percent opacity requirement. We do not believe that any adequate justification has been made for departing from the state-wide 20 percent opacity standard.

We, therefore, respectfully request that the Environmental Quality Commission revise the proposed regulation to require veneer dryers to meet only the standard set for all industry in Oregon.

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REMARKS OF TED HURD, MANAGER AND SUPERINTENDENT, GIUSTINA BROS. LUMBER & PLYWOOD CO., EUGENE, OREGON.

RESPONSE OF THE TASK FORCE ON VENEER DRIER EMISSIONS TO THE PROPOSED RULES RELATING TO VENEER AND PLYWOOD MANUFACTURING OPERATIONS AS THEY RELATE TO VENEER DRIERS:

The Industry Task Force on Veneer Drier Emissions disagrees with the 10% opacity limit as defined in paragraph 1-B of the proposed rules as being discriminatory and too restrictive, and that this limit should be changed to 20% opacity, or Ringleman 1.

This change would make the rule consistent with the opacity regulations of our neighboring states of California and Washington, the plywood plants with which we must compete in the marketplace.

It would also be consistent with the regulations governing emissions from other sources within the state of Oregon. Any regulation that discriminates against a segment of a particular industry is neither fair nor equitable and may be illegal, particularly when it is known that veneer drier emissions do not constitute a danger to the health and welfare of the public -- and remain only of an aesthetic concern.

Despite the claims of some manufacturers and developers of control equipment it cannot be shown beyond a reasonable doubt that existing know-how or equipment will control veneer drier emissions to 10% opacity consistently under all conditions of weather, geographical location, veneer species, type of energy used as heat source, or seasonal and other general operational upset conditions.

Quoted prices for as yet unproven control devices on the market today could cost the average plywood plant from \$60,000 to \$175,000 per drier, depending on size and age of the facility. These costs are beyond reason for the marginal

effectiveness that would result, in many cases more, even, than the original costs of the drier installation.

We ask only for a realistic achievable rule, one that industry could live with and believe in. One that could be met at a reasonable cost.

Closing statement

I am Lyle K. McDonald, General Manager of Linnton Plywood Association, Portland, Ore., and a member of the Board of Trustees of the American Plywood Association. On behalf of the Board of Trustees, I would like to offer some brief closing thoughts in summation of the industry position.

We are unitedly opposed to the 10 percent opacity requirement, believing it to be discriminatory and not founded on any known detriment to health.

We ask that veneer dryers be required to meet the opacity standard for all industry in Oregon, and no more than that.

Having stated our conviction that the proposed regulation on opacity is unjust and unnecessary, let me add that its implementation would be an economic disaster for our state-wide plywood industry.

In the depressed market conditions existing today and likely to continue for months to come, mills just can't afford to gamble hundreds of thousands of dollars on equipment which has not yet proven the ability to render 10 percent opacity under all conditions.

Some devices currently available have demonstrated an ability to meet a 10 percent standard in one set of circumstances over a limited period of time. But there is no assurance whatever that these results can be obtained in other circumstances and over a longer period of time.

A mill could spend \$150,000 or \$200,000 on control equipment in good faith, and still get opacity readings in excess of 10 percent.

We submit that to require an economic burden of this order, without any guarantee of satisfactory results, and which is more severe than that required of others, would be both unreasonable and unjustified.

The magnitude of capital and operating costs of veneer dryer control equipment, even without a 10 percent opacity requirement, is literally staggering.

Control expenditures per dryer range from a minimum installed cost of \$60,000 to as high as \$175,000 per unit, exclusive of costs for fugitive emission control. A single plant can have as many as seven dryers for which total control costs may exceed a million dollars for the facility.

To put these costs into perspective, it should be pointed out that the original cost of a veneer dryer in an older Oregon plant was around \$80,000. Thus, the investment in control equipment will exceed the depreciated value of the dryer in the majority of cases.

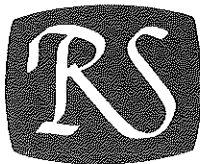
The impact of the regulations will fall heaviest on the many small, independent plants in the industry -- plants which in many cases are the economic mainstays of their communities.

The small, independent and worker-owned plywood mills account for about 20 percent of national production. They represent an investment in human and material resources that is incapable of replacement.

These plants, and the industry as a whole, sincerely wish to play their part in realizing a better quality of life. In this regard, they have made a notable contribution already.

But, if they are forced into permanent closures by a burden greater than their fair share, the state and citizens of Oregon will be the heaviest losers. The question of environmental controls would then become a matter of purely academic and historic interest.

REID · STRUTT



INC.

929 N. E. 23rd Avenue • P. O. Box 14247 • Portland, Oregon 97214

Phone 234-5011

Area Code 503

December 27, 1974

Environmental Quality Commission
1234 S. W. Morrison St.
Portland, Oregon 97205

Attention: Mr. Wayne Hanson
Assistant Director, Air Quality

Dear Mr. Hanson:

Friday, December 20, it was our privilege to attend the EQC hearing concerning the proposed amendments to veneer and plywood manufacturing operations.

Our company designs and supplies pollution control systems for veneer and other types of dryers. We have reviewed with interest the various comments made at the meeting, such as:

"10% opacity is unreasonable and possibly illegal."

"There is no equipment presently available to run continually at 10% opacity or below."

"10% opacity is too low, 20% is reasonable."

"No equipment supplier would guarantee compliance with 10% opacity."

"10% opacity is not achievable, we are unitedly opposed to 10% opacity requirements."

In light of these and other comments, we felt our response would be in order.

We understand the apprehension exhibited by a number of Oregon plywood manufacturers concerning sizeable capital expenditures for pollution abatement equipment, especially considering the present economic trends. We do not, however, agree that the proposed 10% opacity regulations are "not attainable" with present technology. In fact, we believe that the regulations requiring zero opacity with mass emissions rates of 0.1 grains per dry standard cubic foot are fully achievable with present technology and at reasonable cost.

Reid-Strutt, Inc. is presently under contract with Multnomah Plywood Corp., St. Helens, Oregon, to supply two 100% recycle-incineration systems using the closed loop, incineration principle as heat source replacement and pol-

lution abatement modifications to two existing gas-fired Prentice veneer dryers. We specifically guarantee compliance with applicable pollution regulations, including zero opacity and 0.1 grains per dry standard cubic foot mass emissions. Completion and acceptance of the contract is contingent upon meeting these requirements. We are prepared to extend this guarantee on any such contract.

Multnomah Plywood Corp. issued the contract to satisfy action demanded by the Department of Environmental Quality, Northwest Region, State of Oregon. A construction permit was applied for and obtained from this Agency. Construction is under way with start-up and full operation expected before March 1, 1975. This system achieves more than just pollution abatement. It also provides the heat source for the drying operation and utilizes in plant generated waste wood as the main fuel source. The elimination of natural gas and propane as fuel mean monthly savings of approximately \$15,000.00 at today's natural gas prices. At this anticipated fuel cost savings, the total installed price of the system will be covered in less than three years.

Multnomah Plywood is our first application of the 100% recycle system to veneer dryers. However, we have five such systems operating on particleboard and hardboard dryers. Two of these systems are installed at Timber Products in Medford, Oregon, and have been in operation for more than one year. The source test reports for both are included herein. The first report, conducted on Dryer #3, shows compliance with the regulations for new sources in both opacity and mass emissions rate. This unit, as shown by test report data sheet, is capable of running at zero opacity and under 0.1 grains per dry standard cubic foot. The source test report for Dryer #4 was made, at the request of the D.E.Q., using the newly proposed veneer dryer testing procedures. As its data sheets show, #4 Dryer is also in compliance with the regulations for new sources; namely, zero opacity and less than 0.1 grains per dry standard cubic foot.

The particleboard dryer produces the same blue haze as the veneer dryer with the added problem of combustible particulate carry-over from the cyclone separator used to collect the dry furnish following the drying process. (The blue haze is often a bigger problem with the particleboard dryer than the veneer dryer due to higher temperature differences across the average particleboard dryer.)

Our other three systems are installed and operating at Pope & Talbot Hardboard Plant at Oakridge, Oregon. Source tests for these units will be made in the near future. A fourth unit at Oakridge will be installed in mid-1975. The units at Timber Products in Medford and Oakridge use sanderdust waste as fuel.

Drawing #B-0099 shows the 100% recycle loop applied to a "dual zone" veneer dryer. Actually, the dryer could be virtually of any type, since the thermodynamics would be essentially the same.

It will be noticed that all gasses leaving the dryer must pass through the "air heater" before being exhausted to atmosphere. It is while in the air heater that the gasses are raised to a temperature high enough to burn up or incinerate any combustibles including the "blue haze," usually 1000-1200°. The vent gasses therefore are free of combustibles and mass emission rates are low enough to provide colorless vent stack gasses at zero opacity.

We appreciate the opportunity you have given industry to submit data that could be helpful to you in setting veneer dryer pollution standards. We thus thought it important that we acquaint you with our company and the type of systems and guarantees that we offer to the Plywood Industry. Any opportunity to meet with you personally on these matters would be welcomed.

Sincerely,

REID-STRUTT, INC.



Ken Parks

KP:su

Enclosure

SOURCE TEST REPORT

PARTICLE DRYER #3
TIMBER PRODUCTS - MEDFORD, OREGON

November 6, 1974

BWA
ASSOCIATES
VWR
ENVIRONMENTAL
CONSULTANTS

Route 3 Box 1405
Klamath Falls, Oregon 97601

Eubelman

TIMBER PRODUCTS
Medford, Oregon

1.0 SOURCE TEST REPORT

1.1 Introduction:

On November 6, 1974, emission tests were performed on a rotary dryer fired with a Coen Burner, in operation at the particle board plant of Timber Products in Medford, Oregon. The purpose of the tests was to demonstrate compliance with Oregon Department of Environmental Quality air contaminant discharge regulations. The tests were performed in accordance with the Oregon Veneer Dryer test procedure of January 1973 as agreed in telephone conversations with Mr. Skirvin of DEQ. Two samples were obtained each of two hour test time duration. Sampling was accomplished with an EPA Method 5 sampling train operated under isokinetic conditions.

Particulate concentrations measured including "back-half" catch averaged 0.08 grains per dry standard cubic foot. Mass emission rate averaged 6.1 pounds per hour. Equivalent Opacity during the four hours of testing was zero.

1.2 Description of Source:

The source is a Coen Inner Air Wall Air Heater rated at 7×10^6 BTU per hour. Effluent gas from the burner is utilized to dry particle board process material in a rotary dryer. An I.D. fan system is utilized as a recycle transport system to carry the cyclone exhaust back into the burner for incineration of the hydrocarbon material from the wood drying. Natural gas is used for a sustaining flame in the burner and contributes about 3.5% of the heat input to the dryer. (See Photographs)

1.3 Sampling and Analytical Methods:

1.3.1 Field Equipment

Sampling Train: LSI Model 100 stack sampler
Calibrated 9-74

1.3.2 Field Procedures: As specified in DEQ Method

1.3.3 Laboratory Procedures: As specified.

1.3.4 Special Problems: None

1.4 Sampling Point Description:

Two 3" diameter ports were located at 90° to one another 24 feet above the inlet and 15 feet below the top of a 36" diameter stack.

1.5 Detailed Results:

See 1.5.1 Summary Report and body of attached.

1.5.1 SUMMARY REPORT

Plant: Timber Products
Medford, Oregon

Source: Particle Dryer #3.

Stack: #3 - 36" diameter

Control Equipment: Recycle incineration system for hydrocarbons,

Date of Test: November 6, 1974

	RUN #1	RUN #2	AVERAGE
Time - Start	1100	1440	-
Duration - Minutes	120	120	120
Process Rate lbs/hr (bone dry basis)			8000
Rated heat input 10^6 BTU/hr			7
Aux. Fuel - % Natural Gas			3.5
Ave. Stack Temperature	530	522	526
Ave. Stack Velocity fps	43.97	41.75	42.86
Ave. Stack Flow Std.cfm	8855	8450	8653
Ave. Moisture Content %	8.7	9.0	8.85
Grain Loading gr/dscf	0.08	0.08	0.08
Mass Emission Rate lbs/hr	6.33	5.9	6.1
Percent Isokinetics	97.6	96.2	96.9
Ave. Equivalent Opacity %	0	0	0
Ave. Particle Size microns	-	-	4.5

by:

E. Wellman

BWR ASSOCIATES

BASIC SOURCE TEST DATA

SOURCE IDENTIFICATION

Name of Company (Owner): TIMBER PRODUCTS

Location of Boiler (Stack): MEDFORD OREGON
City State

Name of Company Contact: KEN PARKS - REED-STRUTT

Names of Persons Conducting Test:
BWR ASSOCIATES
E. A. WELLMAN

Name of Regulatory Agent(s) Present to Observe Test:
NONE

Stack Identification (i.e., 1, 2, ... N., S., ...): 3

How many boilers are ducted to the exhaust stack? 1

Identification of each boiler ducted to the stack:

- | | | | | | |
|-------------------------|----|----|----|----|----|
| 1. <u>PACT Deyer #3</u> | 2. | 3. | 4. | 5. | 6. |
| 2. | 3. | 4. | 5. | 6. | |

Note: A separate boiler identification form must be filled out for each boiler connected to the stack.

Sample Point Description:

Is the sample point in a circular X or rectangular duct?

If circular, what is the diameter? 36 (inches)

If rectangular, what is the height? _____ (inches)

what is the width? _____ (inches)

How far downstream from the sample point is the nearest bend or other flow obstruction? 24 (ft).

How far upstream from the sample point is the nearest bend or other flow obstruction? 15 (ft).

IDENTIFICATION AND DESCRIPTION

Identification No. (i.e., I, W, ... H, S, ...): PARTICLE DRYER #3

Manufacturer: COEN

Installation Date: 1973 Major Revision Date: _____

Nameplate Capacity (_____ (lbs/hr) @ _____ (psig))

OF _____ (H.P.) Water Tube: _____ Fire Tube: _____

Other Nameplate Data: COEN INNER AIR WALL AIR HEATER

7 x 10⁶ BTU/HR.

Spreader/Stoker: _____ Dutch Oven: _____ Other: COEN BURNER

Indicate which of the following are installed on the boiler:

F.D. Fan _____ Wet Scrubber _____

Automatic F.D. Fan Damper Control _____ Bag House _____

F.D. Fan - RECYCLE TRANSPORT _____ Cinder ReInjection System _____

Automatic F.D. Fan Damper Control _____ Sanderdust Burner System _____

Automatic Fuel Feed Controller _____ Other Control Equipment: _____

Continuous Recording Steam Flow Meter _____ TEMP. RECORDER IN & OUT _____

Continuous Recording Opacity Monitor _____ _____

Continuous Recording Oxygen Recorder _____ _____

Multiclone Cinder Collectors _____ _____

V.1 STEAM GENERATION RATE DATA

The following data should be recorded for each test run:

Date: 11/6/74 Run No.: 162 Steam Pressure (psig): 772

Average Boiler Steam Generation Rate During Test: _____ (lbs/hr)

Peak Boiler Steam Generation Rate During Test: _____ (lbs/hr)

Minimum Boiler Steam Generation Rate During Test: _____ (lbs/hr)

How was steam flow rate determined:

DRYER OPERATED @ MAXIMUM LOAD - OUTPUT 8000 lbs/hr
CHIPS - BONE DRY BASIS.

ANALYSIS OF WOOD FUEL USED DURING CERTIFICATION TEST

Describe the approximate percentage make-up of the wood (hogged) fuel used during the compliance certification test:

<u>Fuel Description</u>	<u>Approximate Percent by Weight (DRY)</u>
X Planer Shavings	0
Sawdust	0
X Sawdust	0
Bark	0
✓ Hogged White Wood	0
X Other Wood Residues <i>PLYWOOD TRIM</i>	0
Total.....	100%

} 1300 lb/hr
PASSES
TYLER #12
SCREEN

What is the moisture content of the mixed wood fuel on a "wet" basis? < 10

BTU VALUE \approx 8900 BTU/lb.
HEAT INPUT 11.57×10^6 BTU/hr

IF the boiler is equipped with a cinder reinjection system, were the cinders being injected during the test? N.A.

AUXILIARY FUEL CONSTITUENTS

What is the normally used percentage of heat input to the burner from?

<u>Aux. Fuel Description</u>	<u>Approximate Percent of Total BTU Input</u>
Natural Gas	<u>3.5</u> SUSTAINING FLAME
Propane	0
Coal	0
Oil	0
Crude	0
Light	0
Other	0
Clarifier Sludge	0
Other	0
Wood (Hogged) Fuel	<u>96.5</u>
Total...	100%

PLANT: TIMBER PRODUCTS

LOCATION: MEDFORD, OREGON

DATE: 11/6/74 TIME START: 1100 TIME END: 1320 SAMPLING TIME/POINT: 10min

BAROMETRIC PRESSURE 29.05 "Hg. STACK PRESSURE: 0.15 "H₂O ΔH₂O = 1.67 "C": 0.90

Ambient Temperature: 64 °F Dry Bulb: - °F Wet Bulb: - °F %H₂O: 8.7

Stack Diameter: 36 inches Stack Area: 7.07 ft². Nozzle Diameter: 1/2 "375"

Stack Identification: DRYER #3 Run # 1 CO₂ 4.6 O₂ 15.2 COV -

LEAK TEST: 0.004 CFM N₂% 80.2

START -
NE PORT

START
SE PORT

END of
RUN -

POINT #	TIME MIN	DP		METER VOL	IMP. T	METER T °F		STACK T °F	"VAC	OPACITY
		"H ₂ O	"H ₂ O			IN	OUT			
				3.9 CF						
1	10	0.30	2.80	12.9	64	66	66	500	8	0
2	20	0.30	2.80	22.6	64	102	76	500	8	0
3	30	0.33	3.10	32.5	64	112	76	560	9	0
4	40	0.30	2.80	42.9	62	112	78	500	9	0
5	50	0.30	2.80	52.6	62	114	79	500	10	0
6	60	0.34	3.30	63.1	62	116	79	520	13	0
7	70	0.36	3.40	73.9	62	90	86	560	12	0
8	80	0.33	3.10	84.2	62	108	84	520	17	0
9	90	0.32	3.00	95.0	63	106	84	520	17	0
10	100	0.30	2.80	104.2	64	102	82	560	17	0
11	110	0.30	2.80	113.9	66	100	80	520	17	0
12	120	0.28	2.60	123.3	68	100	78	540	18	0
13										
14										
15										
16										
17										
18										
19										
20										
total	120	/	35.30	119.6 CF	763	1228	948	6360	155	0
AVERAGE	/	/	2.94	0.99 CFM	63.6	102.3	79	530	13	0

PLANT: TIMBER PRODUCTS

LOCATION: MEDFORD, OREGON

DATE: 11/6/74 TIME START: 1440 TIME END: 1645 SAMPLING TIME/POINT: 10min

BAROMETRIC PRESSURE: 29.05 "HG. STACK PRESSURE: 0.20 "H₂O ΔH₂O = 1.87 "C": 0.90

Ambient Temperature: 70 °F Dry Bulb: - °F Wet Bulb: - °F H₂O: 9.0

Stack Diameter: 36 inches Stack Area: 7.07 ft². Nozzle Diameter: 1/2 " 37510

Stack Identification: DRYER #3 Run # 2 CO₂ 4.8 O₂ 15.3 CO₁ 0

LEAK TEST: 0.002 CFM

N₂% 79.9

START
SE PORT

START
NE PORT

END of
TEST

POINT #	TIME MIN.	DP "H ₂ O	OH "H ₂ O	METER VOL 123.6 CF	TEMP. °F	METER T °F IN	METER T °F OUT	STACK T °F	VAC	OPACITY
1	10	0.34	3.30	33.5	64	87	87	480	14	0
2	20	0.32	3.00	42.7	64	95	82	540	16	0
3	30	0.32	3.00	51.9	64	100	80	540	16	0
4	40	0.30	2.90	61.0	64	112	80	480	11	0
5	50	0.25	2.40	71.1	64	118	82	460	13	0
6	60	0.30	2.90	81.2	64	112	82	480	14	0
7	70	0.34	3.30	91.6	64	92	86	520	16	0
8	80	0.34	3.30	201.4	64	108	86	560	17	0
9	90	0.28	2.60	109	64	106	85	560	17	0
10	100	0.20	1.95	19.6	64	108	85	600	13	0
11	110	0.25	2.40	28.3	64	118	86	560	13	0
12	120	0.20	1.95	236.9	64	109	86	480	13	0
13										
14										
15										
16										
17										
18										
19										
20										
total	120	\	31.00	113.3 CF	768	1265	1007	6260	173	0
AVERAGE	\	\	2.58	0.944 CFM	64	105.4	84	522	14.4	0

94.7

PRELIMINARY VELOCITY TRAVERSE

PLANT TIMBER PRODUCTS - MEDFORD

DATE 11/6/74

RUN NO. 1 & 2

STACK DIAMETER, in. 36

BAROMETRIC PRESSURE, in. Hg. 29.05

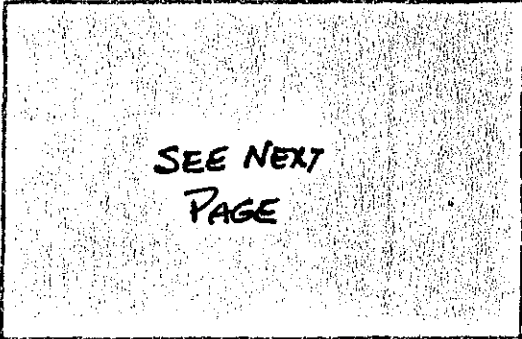
STATIC PRESSURE IN STACK (P_g), in. Hg. 0.011 - 0.015

OPERATORS _____

STACK NUMBER 3

SOURCE TYPE PARTICLE DRYER

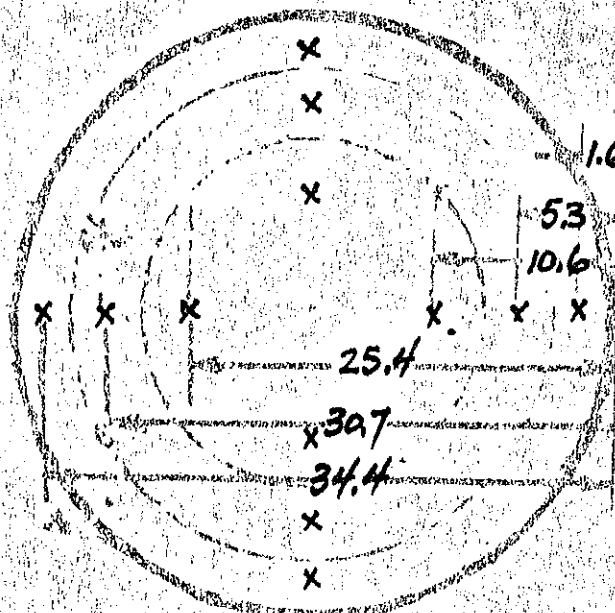
TYPE OF PITOT TUBE USED ("S" or "P") - S



SCHEMATIC OF STACK CROSS CONNECTION

Traverse point number	Velocity head, in. H ₂ O		$\sqrt{\Delta P}$		Stack temperature (°F)	
	RUN 1	RUN 2	RUN 1	RUN 2	RUN 1	RUN 2
1	.30	.34	.547	.583	530	522
2	.30	.34	.547	.583		
3	.33	.28	.574	.529		
4	.30	.20	.547	.497		
5	.30	.25	.547	.500		
6	.34	.20	.583	.447		
7	.36	.34	.600	.583		
8	.33	.32	.574	.566		
9	.32	.32	.566	.566		
10	.30	.30	.547	.547		
11	.30	.25	.547	.500		
12	.28	.30	.529	.547	↓	↓
AVERAGE:			.559	.533	530	522

TRAVERSE POINT LOCATION



SAME DIMEN.
BOTH DIAMETERS

Cross section of a circular stack divided into three concentric equal areas showing the location of the traverse points.

PERCENT OF STACK DIAMETER FROM INSIDE WALL OF STACK

TRAVERSE POINT NUMBER	NUMBER OF TRAVERSE POINTS ON A DIAMETER									
	6	8	10	12	14	16	18	20	22	24
1	4.4	3.3	2.5	2.1	1.8	1.6	1.4	1.3	1.1	1.1
2	14.7	10.5	8.2	6.7	5.7	4.9	4.4	3.9	3.5	3.2
3	29.5	19.4	14.6	11.8	9.9	8.5	7.5	6.7	6.0	5.5
4	44.2	29.1	22.6	17.7	14.6	12.5	10.9	9.7	8.7	7.9
5	58.9	39.5	34.2	25.0	20.1	16.9	14.6	12.9	11.6	10.5
6	73.6	49.2	45.8	33.5	26.9	22.0	18.8	16.5	14.6	13.2
7	88.3	58.9	57.4	44.5	36.6	28.3	23.6	20.4	18.0	16.1
8	103.0	68.6	68.4	55.0	43.4	37.5	29.6	25.0	21.8	19.4
9	117.7	78.3	79.8	62.3	49.1	42.5	38.2	30.6	26.1	23.0
10	132.4	88.0	91.5	68.2	54.9	47.7	41.5	38.8	31.5	27.3
11	147.1	97.7	103.2	73.3	60.8	52.4	44.4	41.2	33.3	29.5
12	161.8	107.4	114.9	77.9	66.7	57.1	47.4	43.8	35.1	31.7
13	176.5	117.1	126.6	82.3	72.6	61.8	50.6	46.4	36.9	33.9
14	191.2	126.8	138.3	86.7	78.5	66.5	53.8	49.0	38.7	36.1
15	205.9	136.5	150.0	91.1	84.4	71.2	57.0	51.6	40.5	38.3
16	220.6	146.2	161.7	95.5	90.3	76.5	60.2	54.2	42.3	40.5
17	235.3	155.9	173.4	100.0	96.2	81.8	63.4	56.8	44.1	42.7
18	250.0	165.6	185.1	104.4	102.1	87.1	66.6	59.4	45.9	44.9
19	264.7	175.3	196.8	108.9	108.0	92.4	69.4	62.0	47.7	47.1
20	279.4	185.0	208.5	113.3	113.9	97.7	72.2	64.6	49.5	49.3
21	294.1	194.7	220.2	117.8	119.8	103.0	75.0	67.2	51.3	51.5
22	308.8	204.4	231.9	122.2	125.7	108.3	77.8	69.8	53.1	53.7
23	323.5	214.1	243.6	126.7	131.6	113.6	80.6	72.4	54.9	55.9
24	338.2	223.8	255.3	131.1	137.5	118.9	83.4	75.0	56.7	58.1
25	352.9	233.5	267.0	135.6	143.4	124.2	86.2	77.6	58.5	60.3
26	367.6	243.2	278.7	140.0	149.3	129.5	89.0	80.2	60.3	62.5

BWR ASSOCIATES
LABORATORY REPORT

PLANT: TIMBER PRODUCTS. BY: ERW
 ADDRESS: McANDREWS ROAD - MEDFORD
 DATE: 11/6/74 NO. RUNS: 2
 SOURCE IDENTIFICATION: PARTICLE DRYER #3.

RUN #	IMPINGER	#1	#2	#3	#4	TOTAL
1	NET COND.	140	49	12	26	226 ml.
2	NET COND.	133	52	10	27	222 ml.

RUN #	FRONT FILTERS / BACKUP	PART 1 PROBE	PART 2 ORGAN.	PART 3 WATER	PART 4 IMP.	TOTAL
1	484.2 86.7	12.7	18.8	3.9	2.6	608.9 mg
2	451.7 75.9	10.8	12.7	2.2	4.2	557.5 mg

REMARKS: _____

B W R A S S O C I A T E S
 ISOKINETIC SAMPLING CALCULATIONS

PLANT: TIMBER PRODUCTS

DATE: 11/6/74

STACK IDENT: DRYER #3

RUN NO: 1 BY: ECW

1. Dry Gas Volume

$$V_{mstd} = (17.71)(V_m) \left(\frac{P_{bar} + \Delta H}{13.6} \right)$$

$$V_{mstd} = (17.71)(19.6) \left(\frac{(29.05) + (2.94)}{13.6} \right) = \underline{112.5} \text{ SCF}$$

(551)

2. Volume of Water Vapor

$$V_{wstd} = (0.0234)(V_{lc})$$

$$V_{wstd} = (0.0474)(226) = \underline{10.71} \text{ SCF}$$

3. Moisture Content

$$Bw_0 = \frac{V_{wstd}}{V_{mstd} + V_{wstd}}$$

$$Bw_0 = \frac{(10.71)}{(112.5) + (10.71)} = \underline{.087}$$

4. Dry Molecular Weight

$$M_d = (CO_2)(.44) + (O_2)(.32) + (CO + N_2)(.28)$$

$$M_d = (4.6)(.44) + (15.2)(.32) + (50.2)(.28) = \underline{29.34}$$

2.024 4.864 22.456

5. Wet Molecular Weight

$$M_s = M_d(1 - Bw_0) + 18(Bw_0)$$

$$M_s = (29.34)(1 - .087) + 18(.087) = \underline{28.35}$$

1.566

6. Stack Gas Velocity

$$V_{s,ave} = K_p C_p \sqrt{A_p \frac{T_s}{P_s M_s}}$$

$$V_{s,ave} = (85.48)(0.84)(.559)$$

$$\sqrt{\frac{1.0955}{\frac{(990)}{(29.061)(28.35)}}} = 43.97 \text{ FPS}$$

1.202

7. Stack Gas Volumetric Flowrate

$$Q_s = 60(1 - Bw_0) V_s A_s \left(\frac{530}{T_s} \right) \left(\frac{P_s}{29.92} \right)$$

$$Q_s = 60(1 - .087)(43.97)(7.07) \left(\frac{530}{990} \right) \left(\frac{29.061}{29.92} \right) = 8855 \text{ SCFM}$$

8. Grain Loading grains/SCF

$$C_g = \frac{(.0154)(W)}{V_{in, std}}$$

$$C_g = \frac{(.0154)(608.9)}{(112.5)} = .08 \text{ gr/SCF}$$

9. Corrected Grain Loading gr/SCF @ 12% CO₂

$$C_g' = \frac{(C_g)(12)}{(\% \text{ CO}_2)}$$

$$C_g' = \left(\frac{\quad}{\quad} \right) (12) = \text{gr/SCF @ 12\% CO}_2$$

10. Total Particulate Emission Pounds/hour

$$C_t = (.00857)(C_g)(Q_s)$$

$$C_t = (.00857)(.08)(8855) = 6.33 \text{ #/hr}$$

11. Percent Excess Air

~~$$EA = \frac{(\%O_2) - .5(\%CO)}{.264(\%N_2) - (\%O_2) + .5(\%CO)} \times 100$$~~

~~$$EA = \frac{(\quad) - .5(\quad)}{.264(\quad) - (\quad) + .5(\quad)} \times 100 = \quad \%$$~~

12. Isokinicity

$$\%I = \frac{Ts(1.667) \left[(.00267)(V_{Ic}) + \frac{V_m}{T_m} \left(P_{bar} + \frac{H}{13.6} \right) \right]}{\theta V_s P_s A_n}$$

$$\%I = \frac{(990)(1.667) \left[(.00267)(226) + \frac{(119.6)}{(557)} \left(29.05 + \frac{6.3525}{13.6} \right) \right]}{(120)(43.97)(29.061)(200767)}$$

$$I = \frac{11479.56}{117.6} = 97.6 \%$$

BWR ASSOCIATES
ISOKINETIC SAMPLING CALCULATIONS

PLANT: TIMBER PRODUCTS

DATE: 11/6/74

STACK IDENT: DRYER #3

RUN #: 2 BY: EAJ

1. Dry Gas Volume

$$V_{mstd} = (17.71) (V_m) \left(\frac{P_{bar} + \Delta H}{T_m} \right)$$

$$V_{mstd} = (17.71) (113.3) \left(\frac{(29.05) + \frac{(2.58)}{13.6}}{(554.7)} \right) = \underline{105.7} \text{ SCF}$$

2. Volume of Water Vapor

$$V_{wstd} = (0.0474) (V_{lc})$$

$$V_{wstd} = (0.0474) (222) = \underline{10.52} \text{ SCF}$$

3. Moisture Content

$$B_{w0} = \frac{V_{wstd}}{V_{mstd} + V_{wstd}}$$

$$B_{w0} = \frac{(10.52)}{(105.7) + (10.52)} = \underline{0.09}$$

4. Dry Molecular Weight

$$M_d = (CO_2\%) (.44) + (O_2\%) (.32) + (CO+N_2\%) (.28)$$

$$M_d = \frac{(4.8) (.44) + (153) (.32) + (79.9) (.28)}{2.112 \quad 4.896 \quad 22.372} = \underline{29.38}$$

5. Wet Molecular Weight

$$M_s = M_d (1 - B_{w0}) + 18 (B_{w0})$$

$$M_s = (29.38) (1 - .09) + 18 (.09) = \underline{28.37}$$

1.63

6. Stack Gas Velocity

$$V_{s,ave} = K_p C_p \sqrt{\frac{A_p T_s}{P_s H_s}}$$

$$V_{s,ave} = (85.48)(0.84)(.533)$$

$$\frac{1.0908}{\frac{(982)}{(29.065)(28.37)}} = 41.75 \text{ FPS}$$

1.191

7. Stack Gas Volumetric Flowrate

$$Q_s = 60(1 - Bw_0) V_s A_s \left(\frac{530}{T_s} \right) \left(\frac{P_s}{29.92} \right)$$

$$Q_s = 60(1 - .09)(41.75)(7.07) \left(\frac{530}{982} \right) \left(\frac{29.065}{29.92} \right) = 8450 \text{ SCFM}$$

8. Grain Loading grains/SCF

$$C_g = \frac{(.0154)(W)}{V_{instl}}$$

$$C_g = \frac{(.0154)(557.5)}{(105.7)} = .08 \text{ gr/SCF}$$

9. Corrected Grain Loading gr/SCF @ 12% CO₂

$$C_g' = \frac{(C_g)(12)}{(\% \text{ CO}_2)}$$

$$C_g' = \frac{(.08)(12)}{(\quad)} = \text{gr/SCF @ 12\% CO}_2$$

10. Total Particulate Emission Pounds/hour

$$C_t = (.00857)(C_g)(Q_s)$$

$$C_t = (.00857)(.08)(8450) = 5.9 \text{ #/hr}$$

11. Percent Excess Air

~~$$EA = \frac{(\%O_2) - .5(\%CO)}{.264(\%N_2) - (\%O_2) + .5(\%CO)} \times 100$$~~

~~$$EA = \frac{(\quad) - .5(\quad)}{.264(\quad) - (\quad) + .5(\quad)} \times 100 = \quad \%$$~~

12. Isokinicity

$$\%I = \frac{Ts(1.667) \left[(.00267)(V_{Ic}) + \frac{V_m}{T_m} \left(P_{bar} + \frac{H}{13.6} \right) \right]}{\theta \cdot V_s \cdot P_s \cdot A_n}$$

$$\%I = \frac{(982)(1.667) \left[(.00267)(222) + \frac{(113.3)}{(59.7)} \left(29.05 + \frac{(2.58)}{13.6} \right) \right]}{5.972}$$

$$(120)(41.75)(29.065)(.000767) \quad 10746.4$$

I = 96.2 %

Environmental Consultants

SOURCE TESTING
AND ANALYSIS



Route 3 Box 1405
Klamath Falls, Oregon 97601
503/884-7538

LABORATORY ANALYSIS REPORT

CLIENT: Reid-Strutt Company, Inc.

SAMPLE SOURCE: Emissions from Timber Products, Medford Coen Burner

DATE OF SAMPLE: 6 November, 1974 DATE OF ANALYSIS: 21 November 1974

NATURE OF SAMPLE: Combustion Particulate - Filter catch.

SAMPLE WEIGHT: 200 mg

RESULTS:	Insoluble Material:	84mg-----	42.0 %
	Solubles	116mg-----	58.0 %
	Sodium	33.4mg	28.79 %
	Potassium	9.0mg	7.76 %
	Calcium	2.8mg	2.41 %
	Chloride	30.0mg	25.86 %
	Carbonate	20.0mg	17.24 %
	Undetermined Solubles		17.94 %

by: E. A. *Edwellman*
Analyst

on '3 Test on Nov 6
.08 Grs/SCFM
0% opacity

SOURCE TEST REPORT

ROTARY CHIP DRYER — # 4
TIMBER PRODUCTS, MEDFORD, OREGON

MAY 15, 1974

BWA
ASSOCIATES
VWR
ENVIRONMENTAL
CONSULTANTS

Route 3 Box 1405
Klamath Falls, Oregon 97601

Edwellman

1.0 SOURCE TEST REPORT: TIMBER PRODUCTS, MEDFORD, OREGON

1.1 INTRODUCTION

On May 15, 1974, emission tests were performed on a rotary chip dryer installed by Reid-Strutt Company, Inc at the Timber Products plant in Medford, Oregon. The purpose of the tests were to demonstrate compliance with Oregon Department of Environmental Quality emission regulations. All tests were performed as prescribed in the tentative method developed by the Oregon-Washington Hog Fuel Boiler Study Committee using an E.P.A. sampling train operated under isokinetic conditions.

Particulate concentrations measured averaged 0.085 grains per dry standard cubic foot of stack gas. Corrected grain loading was 0.1 grains per dry standard cubic foot at 12% Carbon dioxide. The mass emission rate averaged 2.55 pounds per hour. Approximately 35% of the total particulate weight collected on the filters was composed of soluble sodium salts probably derived from the glue residues present in the plywood trim component of the fuel.

Visible emissions from the stack did not exceed 5% Equivalent Opacity at any time during the testing period. The source is in compliance with Oregon D.E.Q. regulations of Opacity, mass emission rate and grain loading for new sources.

1.2 DESCRIPTION OF SOURCE

The source is a Coen Inner air wall air heater rated at 7×10^6 BTU per hour. Effluent gas from the combustion of wood fuel is utilized to dry chips in a rotary dryer. An I.D. fan system is used as a recycle transport of effluent from the dryer back into the furnace. Natural gas is employed for a sustaining flame and contributes about 3.5% of the heat input to the dryer.

1.3 SAMPLING AND ANALYTICAL METHODS

1.3.1

1.3.1 Field Equipment:

Test Train: Luce Model 31 EPA Train- Calibrated 10-73

Orsat Analyzer: Hayes - recharged 5-14-74

1.3.2 Field Procedures: As specified

1.3.3 Laboratory Procedures: As specified

1.3.4 Special Problems or Considerations: None

1.4 SAMPLING POINT DESCRIPTION (See Basic Source Test Data Sheet)

1.5 DETAILED RESULTS (See Summary Report)

1.5 SUMMARY REPORT

Plant: Timber Products, Medford, Oregon.

Source: Chip Dryer - Coen Inner Air Wall Air Heater

Stack: Dryer Stack 37 1/2" in diameter

Control Equipment: I.D. Recycle system from dryer to air heater.

Date of Test: May 15, 1974

R E S U L T S

	Run 1	Run 2	Average
Time - Start	1200	1330	-
Duration - Minutes	60	60	60
Load	max.	max.	max.
Rated Heat Input BTUx10 ⁶	7	7	7
Auxiliary Fuel Natural Gas %	3.5	3.5	3.5
Ave. Stack Temperature °F	933	909	921
Ave. Gas Velocity FPS	27.15	26.84	26.995
Ave. CO ₂ Content %	9.96	9.87	9.92
Ave. Moisture Content %	26	27	26.5
Grain Loading gr/dscf	0.09	0.08	0.085
Adjusted gr/dscf @ 12% CO ₂	0.108	0.097	0.10
Emission Rate lbs/hr	2.7	2.4	2.55
Isokinetics %	96.3	98.6	97.45
Ave. Particle Size microns	-	-	2.36
Ave. Equivalent Opacity	< 5%	0	< 5%

by: Ed Wellman
BWR ASSOCIATES.

IDENTIFICATION AND DESCRIPTION

Identification No. (i.e., 1, w, ... N, S., ...): CHIP DRYER

Manufacturer: COEN INER AIR WALL AIR HEATER

Installation Date: 1973 Major Revision Date: —

Nameplate Capacity of Boiler: NA (lbs/hr) @ NA (psig)

or _____ (H.P.) Water Tube: _____ Fire Tube: _____

Other Nameplate Data: CHIP DRYER - 7x10⁶ BTU/HR

Spreader Stoker: _____ Dutch Oven: _____ Other: COEN BURNER

Indicate which of the following are installed

- | | |
|---|------------------------------------|
| <input checked="" type="checkbox"/> F.D. Fan | _____ Wet Scrubber |
| <input checked="" type="checkbox"/> Automatic F.D. Fan Damper Control | _____ Bag House |
| <input checked="" type="checkbox"/> I.D. Fan <u>RECYCLE TRANSPORT</u> | _____ Cinder Reinjection System |
| _____ Automatic I.D. Fan Damper Control | _____ Sanderdust Burner System |
| <input checked="" type="checkbox"/> Automatic Fuel Feed Controller | Other Control Equipment: |
| _____ Continuous Recording Steam Flow Meter | <u>TEMP RECORDER IN & OUT.</u> |
| _____ Continuous Recording Opacity Monitor | _____ |
| _____ Continuous Recording Oxygen Recorder | _____ |
| _____ Multiclone Cinder Collectors | _____ |

STEAM GENERATION RATE DATA NOT APPLICABLE

The following data should be recorded for each test run:

Date: _____ Run. No.: _____ Steam Pressure (psig); _____

Average Boiler Steam Generation Rate During Test: _____ (lbs/hr)

Peak Boiler Steam Generation Rate During Test: _____ (lbs/hr)

Minimum Boiler Steam Generation Rate During Test: _____ (lbs/hr)

How was steam flow rate determined: _____

DRYER OPERATED AT MAXIMUM LOAD DURING TEST RUNS.

BASIC SOURCE TEST DATA

SOURCE IDENTIFICATION

Name of Company (Owner): TIMBER PRODUCTS

Location of ~~Boiler~~ (Stack): MEDFORD OREGON
City State
CHIP DEYER

Name of Company Contact: KEN PARKS - REID-STRUTT INC.

Names of Persons Conducting Test:
WELLMAN (BWR ASSOCIATES)

Name of Regulatory Agent(s) Present to Observe Test:
NONE

Stack Identification (i.e., 1, 2, ... N., S., ...): 1

How many boilers are ducted to the exhaust stack? NONE

Identification of each boiler ducted to the stack:

1. 1 3. _____ 5. _____
2. _____ 4. _____ 6. _____

Note: A separate boiler identification form must be filled out for each boiler connected to the stack.

Sample Point Description:

Is the sample point in a circular X or rectangular _____ duct?

If circular, what is the diameter? 37 1/2 (inches)

If rectangular, what is the height? _____ (inches)

what is the width? _____ (inches)

How far downstream from the sample point is the nearest bend or other flow obstruction? 24 (ft).

How far upstream from the sample point is the nearest bend or other flow obstruction? 15 (ft).

ANALYSIS OF WOOD FUEL USED DURING BOILER CERTIFICATION TEST

Describe the approximate percentage make-up of the wood (hogged) fuel used during the compliance certification test:

<u>Fuel Description</u>	<u>Approximate Percent by Weight (DRY)</u>
X Planer Shavings	_____ %
Sanderdust	_____ %
X Sawdust	_____ %
Bark	_____ %
X Hogged White Wood	_____ %
X Other Wood Residues <u>PLYWOOD TRIM</u>	_____ %
Total.....	100% <u>1300 #/HR</u>

What is the moisture content of the mixed wood fuel on a "wet" basis? < 10 %

BTU VALUE APPROX 8900 BTU/lb.
HEAT INPUT 11.57 x 10⁶ BTU/HR

If the boiler is equipped with a cinder reinjection system, were the cinders being injected during the test? No

AUXILIARY FUEL CONSTITUENTS

What is the normally used percentage of heat input to the boiler from?

<u>Aux. Fuel Description</u>	<u>Approximate Percent of Total BTU Input</u>
Natural Gas	<u>3.5</u> %
Propane	_____ %
Coal	_____ %
Oil	_____ %
Crude	_____ %
Light	_____ %
Other	_____ %
Clarifier Sludge	_____ %
Other	_____ %
Wood (Hogged) Fuel	<u>96.5</u> %
Total...	100%

PRELIMINARY VELOCITY TRAVERSE

PLANT TIMBER PRODUCTS - MEDFORD

DATE MAY 15, 1974

RUN NO. 1

STACK DIAMETER, in. 37 1/2"

BAROMETRIC PRESSURE, in. Hg. 29.85

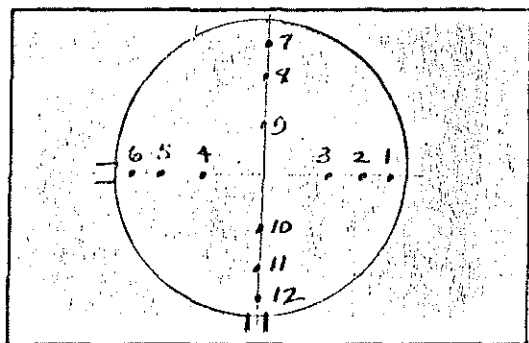
STATIC PRESSURE IN STACK (P_g), in. Hg. .008

OPERATORS BWR ASSOCIATES - WELLMAN

STACK NUMBER 1

SOURCE TYPE CHIP DRYER

TYPE OF PITOT TUBE USED ("S" or "P") - S



SCHEMATIC OF STACK CROSS CONNECTION

Traverse point number	Velocity head, in. H ₂ O	$\sqrt{\Delta P}$	Stack temperature (T _s), °F
1	.10	.316	920
2	.10	.316	
3	.09	.300	
4	.09	.300	
5	.05	.224	
6	.05	.224	
7	.08	.283	
8	.10	.316	
9	.10	.316	
10	.10	.316	
11	.08	.283	
12	.055	.234	V
AVERAGE:		.286	920°F

BWR ASSOCIATES
SOURCE SAMPLING FIELD DATA SHEET

PLANT: TIMBER PRODUCTS

LOCATION: MEDFORD, OREGON

DATE: 5-15-74 RUN NO. 2

TIME START: 1330 TIME END: 1440

SAMPLING TIME/POINT: 5 MINUTES.

BAROMETRIC PRESSURE: 29.85 "Hg.

AMBIENT TEMPERATURE: 68 °F.

STACK PRESSURE: 0.11 "H₂O .008 "Hg.

STACK IDENTIFICATION: CHIP DRYER #1

STACK DIAMETER: 37 1/2 INCHES.
STACK AREA: 7.67 SQ. FT.
NOZZLE DIAMETER: 1/2 IN. (0.4" I.D.)

VOLUME CONDENSATE: 176 ML.

PERCENT CO₂: 9.87
O₂: 9.27
CO: 0.63
N₂: 80.23

BY: Ed Wellman

POINT #	TIME	ΔP	ΔH	METER VOL 798.3	IMPINGER T ° F	METER T ° F		STACK T ° F	OPACITY	VACUUM	REMARKS
						IN	OUT				
1	5	.05	.35	799.6	62	120	98	920	0	1	BEGIN SW PORT
2	10	.10	.78	801.6	62	125	98	900	0	3	
3	15	.10	.78	804.0	62	127	95	920	0	3	
4	20	.10	.78	807.5	62	127	95	940	0	3	
5	25	.10	.78	811.0	62	125	90	900	0	3	
6	30	.05	.35	812.2	62	125	90	900	0	3	END SW PORT
7	35	.10	.78	814.6	62	125	95	900	0	5	BEGIN NW PORT
8	40	.10	.78	816.9	62	125	95	900	0	6	
9	45	.10	.78	819.2	62	128	98	950	0	6	
10	50	.10	.78	821.4	62	128	98	920	0	6	
11	55	.05	.35	822.7	62	125	96	880	0	3	
12	60	.05	.35	823.8	62	122	92	880	0	3	END of TEST
TOTAL	60	1.0	7.64	25.5	744	1502	1140	10910	0	45	
AVERAGE	—	.083	0.64	0.425 CFM	62	125	95	909	0	3.75	

BWR ASSOCIATES
SOURCE SAMPLING FIELD DATA SHEET

PLANT: TIMBER PRODUCTS

LOCATION: MEDFORD OREGON

DATE: 5-15-74 RUN NO. 1

TIME START: 1200 TIME END: 1307

SAMPLING TIME/POINT: 5 MINUTES.

BAROMETRIC PRESSURE: 29.85 "Hg.

AMBIENT TEMPERATURE: 72 °F.

STACK PRESSURE: 0.11 "H₂O .008 "Hg.

STACK IDENTIFICATION: CHIP DRYER #1

STACK DIAMETER: 37 1/2 INCHES.

STACK AREA: 7.67 SQ. FT.

NOZZLE DIAMETER: 1/2 IN. (0.4" ID)

VOLUME CONDENSATE: 178 ML.

PERCENT CO₂: 9.96

O₂: 8.83

CO: 0.50

N₂: 80.71

BY: E. Willman

POINT #	TIME	ΔP	ΔH	METER VOL 773.4	IMPINGER T ° F	METER T ° F		STACK T ° F	OPACITY	VACUUM	REMARKS
						IN	OUT				
1	5	.10	.78	775.8	60	110	85	920	0	2	BEGIN NW PORT
2	10	.10	.78	777.8	60	118	90	950	0	2	
3	15	.08	.62	779.8	60	118	92	920	<5%	1	
4	20	.08	.62	782.6	60	118	92	930	0	1	
5	25	.05	.40	784.7	60	118	90	910	<5%	1	
6	30	.05	.40	786.0	60	118	90	880	0	1	END NW PORT
7	35	.10	.78	788.0	60	120	92	920	0	2	BEGIN SW PORT
8	40	.10	.78	790.0	60	120	92	940	0	2	
9	45	.10	.78	792.0	60	122	92	940	0	2	
10	50	.10	.78	794.0	70	120	92	950	0	2	
11	55	.06	.45	796.4	75	120	92	980	0	1	
12	60	.06	.45	797.6	75	120	92	950	0	1	END of RUN
TOTAL	60	.98	7.62	24.2	760	1422	1091	11190	<5	18	
AVERAGE	—	.082	0.64	0.403 CFM	63	119	91	933	≈ 0	1.5	

ORSAT DATA AND CALCULATION SHEET

CLIENT TIMBER PRODUCTS - MEDFORD

Sampling point location 26' ABOVE BREECING - CHIP DRYER

Date MAY 15, 1974 Time 1200 - 1300 Run No. 1

		Analysis 1	Analysis 2	Analysis 3	Avg	x = mole.wt	wt/mole (dry)
CO ₂	% vol (dry)	10.4	10.0	9.5	9.96	44/100	4.385
O ₂	% vol (dry)	8.8	9.5	8.5	8.83	32/100	+2.826
CO	% vol (dry)	0.5	0.2	0.8	0.50	28/100	+0.140
N ₂	% vol (dry)				80.71	28/100	22.600
M = Avg molecular wt of dry stack gas =							<u>29.951</u>

Date MAY 15, 1974 Time 1330 - 1430 Run No. 2

Sampling point location SAME

		Analysis 4	Analysis 5	Analysis 6	Avg	x = mole wt	wt/mole (dry)
CO ₂	% vol (dry)	9.8	9.8	10.0	9.87	44/100	4.341
O ₂	% vol (dry)	9.2	9.5	9.1	9.27	32/100	+2.965
CO	% vol (dry)	0.9	0.2	0.8	0.63	28/100	+ .177
N ₂	% vol (dry)				80.23	28/100	22.464
M = Avg molecular wt of dry stack gas =							<u>29.947</u>

BWR ASSOCIATES
LABORATORY REPORT

PLANT: TIMBER PRODUCTS

BY: E. Wellman

ADDRESS: MEDFORD, OREGON

DATE: MAY 15, 1974 NO. RUNS: 2

SOURCE IDENTIFICATION: CHIP DRYER

RUN #	IMPINGER	#1	#2	#3	#4	TOTAL
1	NET COND.	105	62	3	8	178
2	NET COND.	112	49	4	11	176

RUN #	FILTER + CYCLONE	PART 1 PROBE	PART 2 ORGAN.	PART 3 WATER	PART 4 IMP.	TOTAL
1	81.1	49.1	1.7	3.6	1.5	137mg
2	87.1	34.5	2.9	2.8	0.9	128.2mg

REMARKS: SOLUBLE SODIUM COMPOUNDS -

ACCOUNT FOR APPROXIMATELY 35% OF TOTAL

WEIGHT OF PARTICULATE

BWR ASSOCIATES
ISOKINETIC SAMPLING CALCULATIONS

PLANT: TIMBER PRODUCTS - MEDFORD DATE: 5/15/74
STACK IDENT: CHIP DRYER RUN #: 1 BY: ELW

1. Dry Gas Volume

$$V_{m_{std}} = (17.71)(V_m) \frac{(P_{bar} + \Delta H)}{13.6} \frac{1}{T_m}$$
$$V_{m_{std}} = (17.71)(24.2) \left(\frac{(29.85) + (.64)}{13.6} \right) \frac{1}{(565)} = \underline{22.68} \text{ SCF}$$

2. Volume of Water Vapor

$$V_{w_{std}} = (0.0474)(V_{1c})$$
$$V_{w_{std}} = (0.0474)(178) = \underline{8.44} \text{ SCF}$$

3. Moisture Content

$$B_{wO} = \frac{V_{w_{std}}}{V_{m_{std}} + V_{w_{std}}}$$
$$B_{wO} = \frac{(8.44)}{(22.68) + (8.44)} = \underline{.27}$$

4. Dry Molecular Weight

$$M_d = (CO_2\%)(.44) + (O_2\%)(.32) + (CO+N_2\%)(.28)$$
$$M_d = ()(.44) + ()(.32) + ()(.28) = \underline{29.951}$$

5. Wet Molecular Weight

$$M_s = M_d(1 - B_{wO}) + 18(B_{wO})$$
$$M_s = (29.951)(1 - .27) + 18(.27) = \underline{26.71}$$

T.P
RUN #1

6. Stack Gas Velocity

$$V_{s_{ave}} = K_p C_p \sqrt{\Delta p \frac{T_s}{P_s M_s}}$$

$$V_{s_{ave}} = (85.48)(0.84)(.286) \sqrt{\frac{(1393)}{(29.858)(26.71)}} = 27.15 \text{ FPS}$$

7. Stack Gas Volumetric Flowrate

$$Q_s = 60(1 - Bw_0) V_s A_s \left(\frac{530}{T_s}\right) \left(\frac{P_s}{29.92}\right)$$

$$Q_s = 60(1 - .27)(27.15)(7.67) \left(\frac{530}{1393}\right) \left(\frac{29.858}{29.92}\right) = 3458 \text{ SCFM}$$

8. Grain Loading grains/SCF

$$C_g = \frac{(.0154)(W)}{V_{m_{std}}}$$

$$C_g = \frac{(.0154)(137)}{(22.68)} = 0.09 \text{ gr/SCF}$$

9. Corrected Grain Loading gr/SCF @ 12% CO₂

$$C_g' = \frac{(C_g)(12)}{(\% \text{ CO}_2)}$$

$$C_g' = \frac{(0.09)(12)}{(9.96)} = .108 \text{ gr/SCF @ 12\% CO}_2$$

10. Total Particulate Emission Pounds/hour

$$C_t = (.00857)(C_g)(Q_s)$$

$$C_t = (.00857)(.09)(3458) = 2.7 \text{ \#/hr}$$

T.P.
Run #1

11. Percent Excess Air

$$EA = \frac{(\%O_2) - .5(\%CO)}{.264(\%N_2) - (\%O_2) + .5(\%CO)} \times 100$$

$$EA = \frac{(8.83) - .5(.50)}{.264(80.71) - (8.83) + .5(.50)} \times 100 = \underline{67.4} \%$$

12. Isokinicity

$$\%I = \frac{T_s(1.667) \left[(.00267)(V_{1c}) + \frac{V_m}{T_m} \left(P_{bar} + \frac{H}{13.6} \right) \right]}{\theta V_s P_s A_n}$$

$$\%I = \frac{(1393)(1.667) \left[(.00267)(178) + \frac{(21.2)}{(565)} \left(29.85 + \frac{(.64)}{13.6} \right) \right]}{(60)(27.15)(29.858)(.00087)}$$

$$I = \underline{96.3} \%$$

BWR ASSOCIATES
ISOKINETIC SAMPLING CALCULATIONS

PLANT: TIMBER PRODUCTS - MEDFORD DATE: 5/15/74
STACK IDENT: CHIP DRYER RUN #: 2 BY: EMW

1. Dry Gas Volume

$$V_{m_{std}} = (17.71) (V_m) \frac{(P_{bar} + \frac{\Delta H}{13.6})}{T_m}$$
$$V_{m_{std}} = (17.71) (25.5) \left(\frac{(29.85) + \frac{(.64)}{13.6}}{(570)} \right) = \underline{23.687} \text{ SCF}$$

2. Volume of Water Vapor

$$V_{w_{std}} = (0.0474) (V_{1c})$$
$$V_{w_{std}} = (0.0474) (176) = \underline{8.34} \text{ SCF}$$

3. Moisture Content

$$B_{w_0} = \frac{V_{w_{std}}}{V_{m_{std}} + V_{w_{std}}}$$
$$B_{w_0} = \frac{(8.34)}{(23.69) + (8.34)} = \underline{.26}$$

4. Dry Molecular Weight

$$M_d = (CO_2\%) (.44) + (O_2\%) (.32) + (CO+N_2\%) (.28)$$
$$M_d = () (.44) + () (.32) + () (.28) = \underline{29.947}$$

5. Wet Molecular Weight

$$M_s = M_d (1 - B_{w_0}) + 18 (B_{w_0})$$
$$M_s = (29.947) (1 - .26) + 18 (.26) = \underline{26.84}$$

T.P.
Run #2

6. Stack Gas Velocity

$$V_{s_{ave}} = K_p C_p \sqrt{A_p \frac{T_s}{P_s M_s}}$$

$$V_{s_{ave}} = (85.48)(0.84)(.286) \sqrt{\frac{(1369)}{(29.858)(26.84)}} = 26.84 \text{ FPS}$$

7. Stack Gas Volumetric Flowrate

$$Q_s = 60(1 - B_{w_0}) V_s A_s \left(\frac{530}{T_s} \right) \left(\frac{P_s}{29.92} \right)$$

$$Q_s = 60(1 - .26)(26.84)(7.67) \left(\frac{530}{(1369)} \right) \left(\frac{(29.858)}{29.92} \right) = 3531 \text{ SCFM}$$

8. Grain Loading grains/SCF

$$C_g = \frac{(.0154)(W)}{V_{m_{std}}}$$

$$C_g = \frac{(.0154)(128.2)}{(23.69)} = 0.08 \text{ gr/SCF}$$

9. Corrected Grain Loading gr/SCF @ 12% CO₂

$$C_g' = \frac{(C_g)(12)}{(\% \text{ CO}_2)}$$

$$C_g' = \frac{(.08)(12)}{(9.87)} = .097 \text{ gr/SCF @ 12\% CO}_2$$

10. Total Particulate Emission Pounds/hour

$$C_t = (.00857)(C_g)(Q_s)$$

$$C_t = (.00857)(.08)(3531) = 2.4 \text{ \#/hr}$$

T.P.
Run #2.

11. Percent Excess Air

$$EA = \frac{(\%O_2) - .5(\%CO)}{.264(\%N_2) - (\%O_2) + .5(\%CO)} \times 100$$

$$EA = \frac{(3.27) - .5(.63)}{.264(30.23) - (3.27) + .5(.63)} \times 100 = 73.2\%$$

12. Isokinicity

$$\%I = \frac{Ts(1.667) \left[(.00267)(V1_c) + \frac{Vm}{Tm} \left(P_{bar} + \frac{H}{13.6} \right) \right]}{\theta Vs Ps An}$$

$$\%I = \frac{(1369)(1.667) \left[(.00267)(176) + \frac{(25.5)}{(570)} \left((29.85) + \frac{(.64)}{13.6} \right) \right]}{(60)(26.84)(29.858)(.00087)}$$

$$I = 98.6\%$$

PARTICLE SIZE ANALYSIS

SOURCE: TIMBER PRODUCTS DATE: 5-15-74 BY: EDW

MAGNIFICATION: 450 "C" FACTOR: 1.25 microns/emd.

TALLY DATA

d (emd)	Tally	n	nd	nd ³	nd ⁴
.5		92	46	11.5	5.75
1		98	98	98	98
2		66	132	528	1056
3		29	87	783	2349
4		23	92	1472	5888
5		17	85	2125	10625
6		7	42	1512	10584
7		5	35	1715	12005
8		2	16	1024	8192
9					
10		1	10	1000	10000
11					
12					
13					
14					
15					

Σn 340 Σnd 643 Σnd^3 10269 Σnd^4 60803

Average Particle Size by Number:

$D_{n1} = (\Sigma nd / \Sigma n)(c) = (643 / 340)(1.25) = 2.36 \mu$

Average Particle Size by Weight:

$D_{w1} = (\Sigma nd^4 / \Sigma nd^3)(c) = (60803 / 10269)(1.25) = 7.4 \mu$

R. HUGH LOVE
Director of Communications



December 26, 1974

Mr. Kessler R. Cannon
Director
Environmental Quality Commission
1234 S. W. Morrison Street
Portland, Oregon 97205

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
DEC 27 1974

OFFICE OF THE DIRECTOR

Dear Mr. Cannon:

As the record has been left open for 10 days, I would like to submit the enclosed additional statement to the Commission on behalf of the American Plywood Association relative to the hearing in Albany on December 20 (Proposed Amendments to Rules Relating to Veneer and Plywood Manufacturing Operations).

Sincerely,

A handwritten signature in cursive script that reads "Carl Erb".

CARL M. ERB, JR.
Manager, Gluing Studies
Division For Product Approval

CME/cb



Statement of Carl Erb, a member of the research staff of the American Plywood Association, Tacoma, Wash.

I am a chemistry graduate of the University of Puget Sound, Tacoma, Wash. I was project leader for the four year study conducted by the Plywood Research Foundation into veneer dryer technology and the nature of veneer dryer emissions.

I would like to take this opportunity to submit additional testimony relative to the proposed establishment of a 10 percent opacity limit for veneer dryers in the State of Oregon.

Before proceeding with a qualification concerning testimony on dryer energy requirements, I wish to comment briefly on the impromptu statement made to the Environmental Quality Commission on December 20 by Mr. H. M. Demeray, of the Mid-Willamette Valley Air Pollution Authority. Mr. Demeray's remarks on dryer emissions and cigarettes were undoubtedly well intended. However, we suggest that they can be characterized as essentially emotional and not supportable by fact. There is no evidence that veneer dryer emissions are harmful to health.

With regard to energy requirements, the matter of the energy needed for the operation of the veneer dryer at Boise Cascade's Albany, Ore., plant was brought to the attention of the Commission on December 20.

In retrospect, it seems to me that there is some confusion which was not satisfactorily clarified with regard to the use of natural gas in conjunction with the sander dust burner.

The dryer in question was initially a direct-fired dryer using natural gas as fuel. This is still the case. The sander dust burner was installed to dispose of the sander dust while at the same time eliminating the "blue haze" from the dryer exhaust. It was hoped that some use could be made of the heat generated by burning the sander dust, thereby reducing total natural gas usage.

Using this method, the company has made a lengthy and determined effort to reduce natural gas consumption. They have reported, however, that under everyday production conditions gas savings are negligible. The predominant heat source is the same gas burner which was original equipment in the dryer.

Further, the total volume of sander dust produced by the mill is not quite adequate to supply fuel for the control of the emissions from one of the two dryers required for full mill operation.

#

To: EOC -

Re: Veneer Dryer Emissions

December 20, 1974

The Oregon Environmental Council supports the 10% opacity limitation and stack distance ^{measurements} ~~limitations~~. We join with the American Lung Association in ~~the~~ encouragement of reduction of the smaller or fine particulates which are a part of the characteristic "blue haze". These finer particulates are health hazards since they by-pass the normal or natural body defense mechanisms and are, therefore, far more than merely an aesthetic problem.

From: Marilyn Donnell
855 N.W. Conifer
Corvallis, Or 97330



An Industrial America Company

North Portland

OFFICE OF DEPUTY DIRECTORS

RECEIVED

JAN - 2 1975

DEPT. OF ENVIRONMENTAL QUALITY

December 31, 1974

Mr. Kessler R. Cannon
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Mr. Cannon:

O.A.R. 340 Section 25-315 (Standards for
Veneer Dryer Emissions)

On December 20, a public hearing was held in Albany, Oregon, to discuss proposed amendments to existing air quality standards relating to veneer dryers. Our company had representatives at that meeting to observe and to speak on behalf of our organization. By way of submitting this letter, we wish to reiterate our position for the benefit of the Environmental Quality Commission.

Moore Oregon was incorporated in the State of Oregon in 1927. Our company has been engaged in the manufacture of machinery for the sawmill and the plywood industry for many, many years. We began manufacturing equipment for drying veneer in 1939. Since that time we have produced a great many veneer dryers that are located in plywood mills throughout the Pacific Coast as well as in Western Canada and in the Southeastern United States.

As one of the leading manufacturers of veneer drying equipment, we recognized several years ago the importance of controlling emissions from veneer dryers. We were substantial contributors to the Plywood Research Foundation (a division of the American Plywood Association) whose purpose it was to define the magnitude of the veneer dryer emission control problem and to address itself to possible solutions to that problem.

Through the expenditure of our own development funds, we sought to achieve methods which would control veneer dryer emissions at acceptable levels but which would not result in significant increased operating costs for our customers, the manufacturers of plywood. We have been relatively successful with our development work for those manufacturers who utilize direct-heated, (gas, oil or wood-fired) veneer dryers. This is through a device that we refer to as our "Lo-Em System". This system introduces heat into the veneer dryer in such a manner that the atmosphere within the dryer is continually cleaned up. This results in fewer emissions from the dryer. The system makes a most significant improvement over what the users' current dryer emissions are; however, there is a limit to how well the Lo-Em system operates on an absolute basis.

If a user has a very severe emission problem, the Lo-Em system will reduce the emission substantially, but they still may not be in the range of a 10% opacity.

continued.....

member



Mr. Kessler R. Cannon

12/31/74

We do believe, however, that any dryer can have emissions reduced to a 20% opacity level through the use of this system.

The Lo-Em system is a one-time capital cost to the plywood mill operators. There is no operating cost after the initial change is made to the equipment. As you can well appreciate, this is the type of improvement that a mill operator prefers over one that has a continuing energy cost; i.e., high energy scrubber.

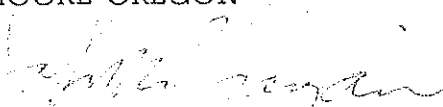
Moore Oregon has been an observer to tests that have been conducted with low temperature veneer drying in steam veneer dryers. By employing this technique, veneer dryer emissions can be substantially reduced, but it is doubtful that they can be reduced to the 10% opacity level on a continuing basis. We have observed that the low-temperature technique is successful in meeting a 20% opacity level.

We urge you to change the air quality standards to allow a maximum opacity of 20% from any one stack. Our reasons for urging you to consider this are that there are (1) techniques for achieving 20% opacity reliably; (2) the techniques do not result in increased operating costs for the plywood manufacturer; (3) the equipment and/or technology is readily available and can be put into use almost immediately; (4) there are no successful proven techniques for achieving the 10% opacity level which do not either (a) result in substantial increases in the consumption of energy, or (b) result in solid waste disposal problems which are at least equal to the air quality control problems that we seek to eliminate.

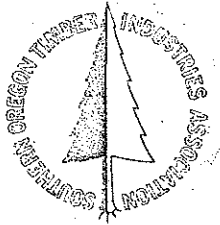
Your kind attention to this recommendation is appreciated.

Very truly yours,

MOORE OREGON


John M. Vranizan
Vice President & General Manager

/cn



SOUTHERN OREGON TIMBER INDUSTRIES ASSOCIATION

2680 N. PACIFIC HWY.

MEDFORD, OREGON 97501

TELEPHONE 773-5329

December 20, 1974

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

Gentlemen:

Please accept this letter for placement in the hearing record on "Proposed Rules Relating to Veneer and Plywood Manufacturing Operations"; OAR 340, Section 25-315, Veneer Driers.

Consistent with testimony from other industry representatives, this organization strongly urges modification of the proposed rules to a 20% opacity standard rather than 10% so that the industry, as well as the Department, may have a goal which is attainable. We also support the suggestion that the extension of the deadline to March 1, 1975.

Southern Oregon communities are significantly dependent on the forest products industry as the economic mainstay, as is being so forcibly illustrated in the current economic slump. We strongly feel that without demonstration that public health is endangered in any manner, southern Oregon citizens would much prefer to tolerate a level of "blue haze" from operating plywood plants than to further jeopardize the ability of those plants to employ workers who so desperately seek gainful employment.

There is serious doubt in our minds that the alleged benefits of the regulation as proposed merit the costs required to comply and the risk of the cost burden on an industry already economically crippled. There seems to be some justification for delay to permit time for technological development which may be able to provide better answers with improved economic feasibility.

Sincerely yours,

Martin Craine
Secretary-Manager

MEC:cw

Testimony Delivered at Public Hearing
Relative to Proposed Amendments to
Rules Relating to Veneer and Plywood Manufacturing Operations
December 20, 1974
Albany, Oregon

My name is Wallace Cory. I am the Environmental Manager for Boise Cascade Corporation's Timber and Wood Products Group and have been privileged to serve on ~~an ad hoc~~^{the} industry ~~committee~~^{technical} working with the D.E.Q. staff in an attempt to develop an effective but fair regulation. I appreciate the opportunity to testify relative to the proposed amendments to rules relating to veneer and plywood manufacturing operations. Boise Cascade Corporation is vitally interested in promoting clean air in the State of Oregon and is especially interested in rules and regulations as they pertain to veneer dryers. Our corporation has some 19 dryers in the State of Oregon at seven different locations. We have cooperated with the Oregon D.E.Q. and the appropriate regional Air Pollution Control authorities in attempting to control emissions from these sources to the best of our ability.

Of the seven different locations, one location appears to be in compliance and has been so certified by the Oregon D.E.Q. Two more locations in the Willamette Valley have received considerable emission control attention. The installation here at Albany has been certified in compliance by the Mid-Willamette Air Pollution Control Authority after a considerable investment in time and money by Boise Cascade Corporation. A second location within the jurisdiction of the Mid-Willamette Valley Authority has received a considerable amount of attention by Boise Cascade but has yet to be certified. Additionally, Boise Cascade has installed control devices at two of its locations in the State of Washington. While working on these projects we feel that we have accumulated a considerable amount of knowledge relating to the control of veneer dryer emissions.

Based upon our experience, we have come firmly to the conclusion that consistent compliance with the Oregon regulation due to become effective on January 1, 1975, which requires that there be zero visible emission from veneer dryers, is virtually impossible. As the Forest Products Industry testified when this regulation was adopted, the zero visible emission portion of the regulation may be considered to be an objective but not a requirement. It is unattainable, however, with existing technology. A review of control devices and methodology as applied by various members of the industrial community verifies that the attainment of this goal is presently impossible. It is with this background and this experience that Boise Cascade is pleased to support a change in the regulations governing veneer dryer emissions in the State of Oregon.

While we are definitely in favor of a change, one point in the proposed amendments is most disconcerting. Paragraph 1-B of the proposed amendment would require veneer dryer stack opacity to be less than 10%. The general emission standards as defined by paragraph 21-015 of the Oregon regulation currently allow 40% opacity on emission from sources outside special control areas and restrict this to 20% opacity on sources within special control areas. The State of Washington restricts opacity to 40% and will reduce this allowance to 20% after July 1, 1975. The adjoining State of Idaho restricts opacity to 40% from all sources. Recognizing that Oregon is highly concerned with pollution, the other Pacific Northwest states are equally concerned and appear to be satisfied with a less rigorous standard. Frankly, we in the industry find it hard to justify the additional restriction on opacity from veneer dryer stacks in Oregon. Not only is Oregon proposing a standard more restrictive than its neighbors,

but it is proposing a standard for veneer dryers that is more restrictive than the requirement for other sources within the state. I submit that this is discriminatory and that there is no reason for veneer dryers to meet a standard more restrictive than that established for other sources within the state. There has been no information to date that would indicate veneer dryers to be a more serious health hazard than other sources. In fact, the reverse is true. Veneer dryer emissions create primarily an aesthetic problem. If aesthetics can be satisfied with a 20% or 40% restriction on other sources, I see no reason that a 20% restriction would not be satisfactory for regulating veneer dryers. Limitation of opacity to 10% may be a nice thing to do, but hardly necessary.

A 10% opacity means that only a wisp of smoke or emission is allowed. While many devices may be capable of reducing opacity to 10%, the majority of these devices cannot consistently meet a 10% opacity restriction. A reasonable effort at control, however, involving the purchase of many devices presently on the market will allow a reduction of opacity to 20% to be consistently met.

In short, I see no difference in the control prescription to be applied whether the restriction is 10% or 20%. The 10%, however, will require more regulatory attention, will mean no end of headache for the operator and, in the longrun, will not result in cleaner air for the citizens of Oregon.

Our control approach for one of our locations in the Willamette Valley has been the installation of an incineration device in the dryer. The device has effectively reduced the opacity in one stack to about 10% and from the other stack to consistently below 20%. The total cost of this installation was some \$165,000. If the State of Oregon adopts the 10% opacity restriction, it would appear that Boise Cascade will have spent \$165,000 needlessly and at that plant we will be right back where we started originally. I submit that this is not the way to cleaner air.

A requirement on industry to expend these kinds of dollars fruitlessly results in only more and more resistance within the industrial community to proceed on an experimental basis or to proceed at all without being coerced. I do not think that this is the sort of situation in which you want to place Oregon industry.

Again, I would reiterate the necessity of amending the present Oregon regulation. I would also reiterate my objection to the 10% opacity restriction in the proposed amendment and strongly urge that the Environmental Quality Commission recommend adoption of a regulation which would include an opacity restriction no more stringent than 20%.

Boise Cascade Corporation appreciates this opportunity to present its views regarding these amendments.

ASSIGNMENT TO
DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON
SECURITY REQUIRED BY ORS 454.425

_____ hereinafter called "Assignor," whose principal place of business is _____,

_____ does hereby assign and set over to the Department of Environmental Quality of the State of Oregon, all right, title, and interest of whatever nature of Assignor, in and to the insured account of Assignor in _____,

_____ evidenced by a certificate in the amount of _____ numbered _____ which is delivered to the Department of Environmental Quality of the State of Oregon herewith. Assignor agrees that this assignment carries with it the right in the insurance of the account by the Federal Savings & Loan Insurance Corporation or Federal Deposit Insurance Corporation, and includes and gives the right to the Department of Environmental Quality of the State of Oregon to redeem, collect, and withdraw the full amount of such account at any time WITHOUT NOTICE TO ASSIGNOR.

This assignment is given as security for Assignor's following the plans and specifications approved by the Oregon Environmental Quality Commission in the construction by Assignor of facilities for the collection, treatment or disposal of sewage located at _____,

_____ and to have the facilities maintained and operated in accordance with the rules, regulations and orders of the Commission.

Assignor hereby notifies the above-named savings institution of this assignment.

Dated this _____ day of _____, 197__.

Assignor

By: _____
President

(Corporate Seal)

By: _____
Secretary

RECEIPT FOR NOTICE OF ASSIGNMENT

Receipt is hereby acknowledged to the Department of Environmental Quality of the State of Oregon of written notice of the assignment to said Department of the account and certificate identified above. We have noted in our records the Department's interest in said account as shown by the above assignment and have retained a copy of this sheet. We certify that we have received no notice of any lien, encumbrance, hold, claim or obligation affecting the above-identified account prior to the assignment to the Department of Environmental Quality of the State of Oregon. We certify that the account is fully insured by the Federal Savings and Loan Insurance Corporation or Federal Deposit Insurance Corporation. We agree to make payment to the Department of Environmental Quality of the State of Oregon upon its request in accordance with the laws applicable to this savings institution.

Dated this _____ day of _____, 197__.

Name of Savings Institution

By: _____
Name of Authorized Officer

Title of Authorized Officer

Street City

RECEIPT FOR CERTIFICATE

AND

DIRECTION TO PAY EARNINGS

Receipt is acknowledged of the above assignment and the certificate identified in the above assignment. The savings institution named in the above assignment is hereby authorized and directed to pay any earnings on the above-identified account to the above-mentioned assignor until otherwise notified in writing by the Department of Environmental Quality of the State of Oregon.

assumes full liability and responsibility for operation and maintenance, of the facilities or until the facilities are connected to an area wide sewerage system.

3. The principal shall connect the sewage collection, treatment or disposal facilities to an area wide sewerage system as soon as such area wide sewerage system becomes physically available.
4. The principal shall not transfer ownership of the domestic sewerage system without first obtaining the written approval of the Department of Environmental Quality.

If the principal shall promptly and faithfully perform the foregoing conditions, then this obligation shall be void, otherwise it shall remain in full force and effect.

IN WITNESS WHEREOF, the principal and the surety have executed this performance bond on this _____ day of _____, 19__.

Principal

Surety

Attorney in Fact

Countersigned:

Registered Agent

Dated this _____ day of _____, 197__.

DEPARTMENT OF ENVIRONMENTAL QUALITY
OF THE STATE OF OREGON

By: _____
Credit Representative

SURETY BOND FOR CONSTRUCTION
OPERATION AND MAINTENANCE OF
SEWAGE COLLECTION, TREATMENT OR DISPOSAL FACILITIES

KNOW ALL MEN BY THESE PRESENTS: That _____
(Name)

_____, _____
(Address)

as principal, and _____

_____, a corporation organized and existing
(Surety Company)

under the laws of the State of _____, and duly licensed
by the Insurance Commissioner of Oregon for the purpose of making, guaranteeing
or becoming surety upon bonds or undertakings required or authorized by the
laws of the State of Oregon, as surety, are jointly held and firmly bound
unto the State of Oregon in the amount of _____

_____ Dollars, lawful money of the United
States of America, or any part thereof as provided in ORS 454.425, the
payment of which we jointly and severally bind ourselves, our heirs, executors,
administrators, successors and assigns, firmly by these presents.

NOW, THEREFORE, the conditions of this obligation are as follows:

1. The principal shall follow the plans and specifications in the construction of the facilities for the collection, treatment or disposal of sewage, located at _____
_____ in Sec. ____, T. ____, R. ____, W.M. in
_____ County, Oregon, as approved by the Department of Environmental Quality.
2. The principal shall operate and maintain the facilities in accordance with the rules, regulations, permits, and orders of the Department of Environmental Quality and the bond shall remain in force and effect until such time as a responsible city, county, sanitary district or other public body acquires ownership, and

TELEDYNE WAH CHANG ALBANY

AGENDA ITEM NO. J - December 20, 1974

ALTERNATIVES OF ACTION BY COMMISSION

1. Show cause hearing followed by Commission order to reduce production to those levels which existed prior to the expansion and to reduce effluent to present permitted levels.

Comments: This process is slow and cumbersome.

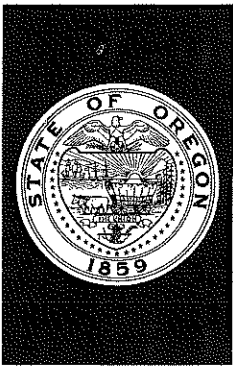
2. Based on unauthorized plant expansion, issue civil penalties warning letter to reduce production to those levels which existed prior to plant expansion.

Comments: They may contend that since the Department neither denied or approved their application for expansion that they automatically had a temporary permit to proceed [OAR 340-14-020 (5)]. Note: Since the modification of rules adopted September 21, 1973, the above rule does not apply to discharges requiring NPDES permits. A requirement to reduce production to levels which existed prior to expansion may require employment layoffs. Our legal authority to limit production is questionable. It may be difficult to make a determination of what production level is applicable.

- Permit
- *3. Based on self-monitoring data and limited Department grab samples, issue a civil penalties warning letter giving them 5 days to reduce the effluent to the limits required after July 1, 1973 of their present permit.

Comments: This would undoubtedly require a large reduction in production but to what level is unknown. It may cause employment layoffs. Since the effluent limits are really our major concern rather than production, this alternative is better than 2.

4. Do nothing until new NPDES permit is issued. Proceed to issue it as rapidly as possible and then follow a strict enforcement program to guarantee that they stay within the limits or be fined civil penalties.
Comments: The very earliest the permit could be issued is mid-February.



DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5372

TOM McCALL
GOVERNOR

December 20, 1974

KESSLER R. CANNON
Director

HAND DELIVERED

Teledyne Industries, Inc.
DBA Teledyne Wah Chang Albany
Post Office Box 460
Albany, Oregon 97321

Re: Notice of Violation and
Intent to Assess Civil Penalty
WQC-MWR-74-153
IW-Teledyne Wah Chang Albany
Linn County

Gentlemen:

In reviewing the monitoring reports submitted for August through December, 1973 and January through October, 1974 by the Albany plant of Teledyne Industries, Inc. doing business as Teledyne Wah Chang Albany hereinafter referred to as "Company," I find violations of condition 4 of Company's Waste Discharge Permit number 1213.

The limits set in condition 4 are as follows:

	<u>Lbs/Day (Maximum)</u>	<u>Lbs/Day (Maximum Monthly Average)</u>
Ammonium ion (NH ₄ ⁺)	2000	
Thiocyanate ion (SCN ⁻)		150
Methylisobutyl ketone (MIBK)		300
pH	6.5 - 7.5	

The violations are specifically:

	<u>*Monthly Average NH₄⁺</u>	<u>Monthly Average SCN⁻</u>	<u>Monthly Average MIBK</u>	<u>pH</u>
<u>1973</u>				
August	8,451	917	792	Not Reported
September	8,419	1,117	894	Not Reported
October	7,149	1,247	624	Not Reported
November	6,703	1,687	1,064	Not Reported
December	7,067	1,586	664	Not Reported



Contains
Recycled
Materials

Teledyne Industries, Inc.
December 20, 1974
Page Two

1974

January	8,700	960	960	Not Reported
February	7,560	1,575	1,865	Not Reported
March	5,950	1,465	1,199	Not Reported
April	6,960	1,845	3,810	Not Reported
May	9,472	1,539	1,006	Not Reported
June	8,505	1,935	1,380	
14				2.91
25				8.40
July	11,304	1,278	708	
1				3.44
26				8.52
August	10,175	1,178	918	
12				2.83
26				8.84
September	7,646	2,265	1,854	
4				8.69
16				9.26
October	8,284	2,012	1,416	
1				2.84
14				2.53

*Monthly average in excess of daily maximum indicates that daily maximum was exceeded one or more times during the month.

These violations of the limits contained in condition 4 of Company's Waste Discharge Permit constitutes violations of Oregon Revised Statutes (ORS) 468.720(2).

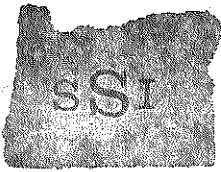
If, five days after you receive this notice the above-described violations continue or similar violations occur, the Department will impose a civil penalty against you in the amount of from \$50 to \$10,000 per day for each and every violation. Each and every day of such violation shall constitute a separate and distinct violation.

Cordially,

KESSLER R. CANNON
Director

DDF:gc

cc: Richard P. Blunk, Vice President - Teledyne Wah Chang Albany
Midwest Region - DEQ
Water Quality Control - DEQ
Raymond P. Underwood, Legal Counsel - Dept. of Justice
John Vlastelicia, Oregon Operations - EPA



Research
Standards
Service

Oregon Sanitary Service Institute

4645 18th Pl. S., Salem, Oregon 97302 Phone 362-1526

December 20, 1974

Environmental Quality Commission Hearing

Browns Island Disposal Site

Recommendations

- (1) Marion County reduce road height on new road. We offer assistance in equipment and manpower.
- (2) DEQ immediately permit with condition of operational plan added land toward river and furnish technical assistance to operator in developing that plan.
- (3) All legal and negotiation steps be pursued on 21 acres expansion for longer term use, with DEQ assurance that this land can be used.
- (4) Consideration be given to a joint DEQ-Marion County bridge to the site based upon following:
 - (a) Obtaining all legal approvals required on 21 acres.
 - (b) Obtaining a longer term (five year minimum) DEQ operational permit.
 - (c) Full excavation of a sufficient segment of road with replacement by a piling type bridge commonly used in log trucking roads at roughly estimated cost of \$50,000.
 - (d) Financing to be through DEQ pollution control bonds with 30% grant to Marion County as authorized by law, if approved by Legislature.
 - (e) Repayment over five years. At current rate of 270,000 yards approximate annual use, the repayment cost would be in the neighborhood of 3¢ per yard. Since the average charge per yard is currently just above 40¢, the 8% Marion County franchise fee on disposal at the site would be adequate to repay principal and interest. If the resource recovery unit in Salem is placed into operation at an earlier time, the wastes could be reduced as much as 75%, thereby reducing the repayment unless an increase in fee is provided. However, the privately operated Browns Island Site is the lowest cost sanitary landfill in western Oregon, so there is adequate room to adjust the fee.
- (5) There are no alternatives. MacLeay is virtually out of room and must be preserved for emergency use. Woodburn does not have sufficient capacity and your staff does not recommend use. Albany is being phased out and Lebanon is a restricted use site. Coffin Butte at Corvallis has specific conditions in the permit prohibiting use by Salem. Oregon City has operational hours problems that prevent the double shifting of trucks required for the 90 plus mile round trip to disposal to say nothing of the cost over old 99E. Eugene is desperately using an intermediate site. Portland is in danger over its proposed expansion. Newberg and Whiteson do not have the capacity and Yamhill County has already indicated to Chemeketa Region that use of Newberg by outside areas will be sharply curtailed.

We do not attempt here to assess the excessive cost to the consumer in any of the alternatives that are partially available. Better to entirely stop collection until the governmental agencies involved resolve their differences and agree upon a reasonable plan for disposal.

Respectfully submitted,


Roger Emmons, Ex. Director & Counsel

COMMISSIONERS

HARRY CARSON, JR., CHAIRMAN
HENRY C. MATTSON
PAT MCCARTHY

EXECUTIVE SECRETARY
BRUCE PROSSER

LEGAL COUNSEL
FRANK C. MCKINNEY

TELEPHONE 588-5212
AREA CODE 503



COURTHOUSE
SALEM, OREGON 97301

December 19, 1974

To: The Environmental Quality Commission
From: Marion County Board of Commissioners
Subject: Brown's Island Sanitary Landfill

In response to the status report and proposed action submitted by DEQ Director Kessler R. Cannon, Marion County offers the following statement and alternative proposals.

First, some general comments on Mr. Cannon's report. Mr. Cannon has indicated that the old access road has only two low spots at an elevation of 128 feet. Our profile maps indicate virtually the entire road is 128 feet or under with only the extreme northerly end being substantially above 128 feet.

It is also indicated that, "In spite of objections by the Department, Marion County has rebuilt the washed-out section of the all-weather access road . . ." Our files indicate that the first objection received by Marion County from the Department was the letter of May 9, 1974, which was long after the road had been completely rebuilt. The County therefore did not rebuild the road over the Department's objection.

We would disagree with the Department's statement that Macleay site is not an adequate back up site. We would agree that it is not an adequate back up site if one is speaking in terms of disposing of the entire volume which would normally be taken to Brown's Island landfill for even a very short period of time. However, the County does not at any time use the Macleay site for disposal of the entire Brown's Island landfill volume. Historically, access to the Brown's Island landfill has been inaccessible for various periods each year. During these periods it has been the practice of Marion County to suspend residential collections for a week (which amount to one pick up in most cases) and only service those daily accounts for which it is imperative to have disposal service each day; e.g., hospitals and restaurants. These wastes have then been disposed of at the Macleay site which, in our opinion, is still adequate for such use and will be for some time to come if our estimate of an average of four to six days of no access to Brown's Island per year is accurate. This estimate is based on use of the new road after lowering to an elevation of 136 feet.

The Environmental Quality Commission

Page 2

December 19, 1974

We would also like to note in passing that of the four recommendations made by the Department in its letter of May 9, 1974, all but the removal or modification of the new access road have been completed.

As an alternative proposal to Mr. Cannon's proposed action, Marion County proposes as follows:

That the new all-weather road be modified by lowering it to an elevation of 136 (USGS Datum) and maintaining that elevation for a distance of 500 feet.

Based on the 1974 flood levels, this road would have been closed for only four days at this elevation. Our cost estimates for this modification is \$15,500.

Mr. Cannon also indicates that further diking may be necessary. Members of the Marion County staff have been led to believe by the DEQ staff that the problems presented by the 1974 flood have been cured by the fact that the upstream dike has been completely removed and the west end of the fill area has been covered, rounded, and sloped (at least 3:1) and seeded pursuant to DEQ recommendations, and that no further diking would be necessary if the the road is sufficiently modified.

The County would be opposed to any further costly studies without some financial support of other parties who have an interest in this matter. Several studies have already been made, and it has proven difficult to get any two people to draw the same conclusions from or agree to what they mean. It is our recommendation that the parties agree on a course of action and proceed.

Marion County would also be opposed to raising the elevation of the old road because of the additional expenses involved. Our estimate is that the cost would be \$115,000 or seven to eight times the estimated cost to lower the new road; and, as indicated previously, with the new road at 136 feet, there will be no access due to high water for an average of four to six days per year.

The second part of our proposal is that the Department issue a solid waste disposal permit to allow immediate expansion of the present landfill a distance of approximately 400 feet further north into the Willamette flood plain towards the River.

The Environmental Quality Commission

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December 19, 1974

The DEQ agrees that further expansion is safe provided that the new road is modified to not substantially restrict the flood flows. We have been assured by our personnel that the road modifications and the proposed 400-foot-extension landfill area could be prepared for use by February 1, 1975, if a disposal permit is granted forthwith.

Before proceeding with any modification of the new access road, however, we feel that it is imperative that we have a firm commitment from the Environmental Quality Commission and the Department of Environmental Quality that use of the proposed 400-foot northward extension will be permitted to its full capacity when the road has been lowered to an elevation of 136 feet for a distance of 500 feet.

According to our estimates, the use of the 400-foot extension (a total of approximately 12 acres) can be usable as a disposal site for approximately 14 months, thereby alleviating the present pressing need for a disposal site and allowing us to continue unpressured negotiations with respect to the BOR property and the private property owners. An atmosphere of meaningful negotiation will certainly be to the County's advantage.

With respect to the BOR property negotiations, there is no possibility for the acquisition of this property by the January 1, 1975, date which Mr. Cannon's report indicates site preparation must be started if this site is to be ready for use by February 1, 1975. Our most optimistic estimate of the date of completion for this complicated transaction is April 30, 1975; but depending on BOR and the private property owners, could be July 1, 1975, or later. Negotiations are presently being carried on with the attorney for the property owner by Bill Juza, City Attorney, and Frank McKinney, County Counsel. Both the Board of Commissioners and City Council have been fully advised of the appraisal amounts and are being kept current on negotiations.

It is our feeling, with regard to this 21-acre parcel, that we need a firm commitment from the Environmental Quality Commission and the Department of Environmental Quality that a permit will be granted for the full use of this property when it is finally acquired. A conditional use permit application which would allow this property to be used as a landfill site has been filed with the Marion County Planning Commission on December 16, 1974.

It is our belief that this proposal if accepted will not only provide for the short-term disposal needs but will lead to the acceptance and establishment of Brown's Island sanitary landfill as a regional disposal site.

The Environmental Quality Commission

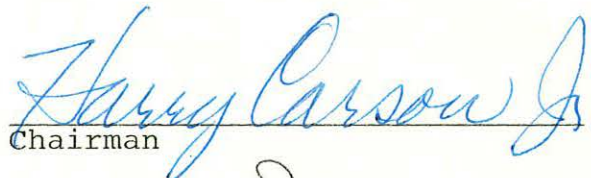
Page 4

December 19, 1974

One of our chief concerns, naturally, is the cost of implementation of this proposal. Marion County cannot and does not feel that it is appropriate that it be asked to shoulder the entire financial burden and, unless some cooperative financial arrangement can be worked out, we see no hope of this proposal reaching fruition.

Sincerely yours,

BOARD OF COUNTY COMMISSIONERS


Chairman


Commissioner


Commissioner



WESTERN MINING COUNCIL OF LINN COUNTY

SWEET HOME, OREGON 97386

Dec. 20, 1974

Dear Sirs:

It is definitely important that you give the people more chance to speak. Especially when the D & Q makes rules against the Miners. Whether they are week end Miners or Commercial Miners. All Citizens should have the right to mine without fearing any type of harassment.

Gold will be on free market after Jan. 1st 1975. It will be very necessary for the Gold Miner to know in plain English what he is to do.

Please send new information you have as to the next meeting to discuss the gold industry.

Mrs. Mabel Moore

Secy & Treasurer of Linn County
Mining Council

Box 433
Sweet Home, Ore. 97386



GOLD PROSPECTORS

ASSOCIATION OF AMERICA

1849 Willamette Eugene, Oregon 97401

The American sportsman has spent more money, time and effort to protect the natural environment against commercial operations than any other group in our society. Yet the sportsman is the very individual who has received the major amount of criticism from these so called environmentalists.

Recreational mining is the fastest growing family hobby in America today.

Recreational mining does not pollute the rivers and streams. on the contrary it helps. As any sports fisherman can tell you most all fish in the Northwest spawn in shallow and gold (spec. gravity 19) is found in the deeper holes. The small underwater dredge does not have the capacity to even scratch the surface, let alone muddy much water.

These so called environmentalists (most of whom have never seen a small dredge of less than six inches in size) would have recreational mining stopped forever by way of imposing bonds, and hiring inspectors to do nothing more than write citations and in general harass the sportsman in to giving up one more of his rights.

Prospecting is one of the most enjoyable recreational activities still available to the American people.

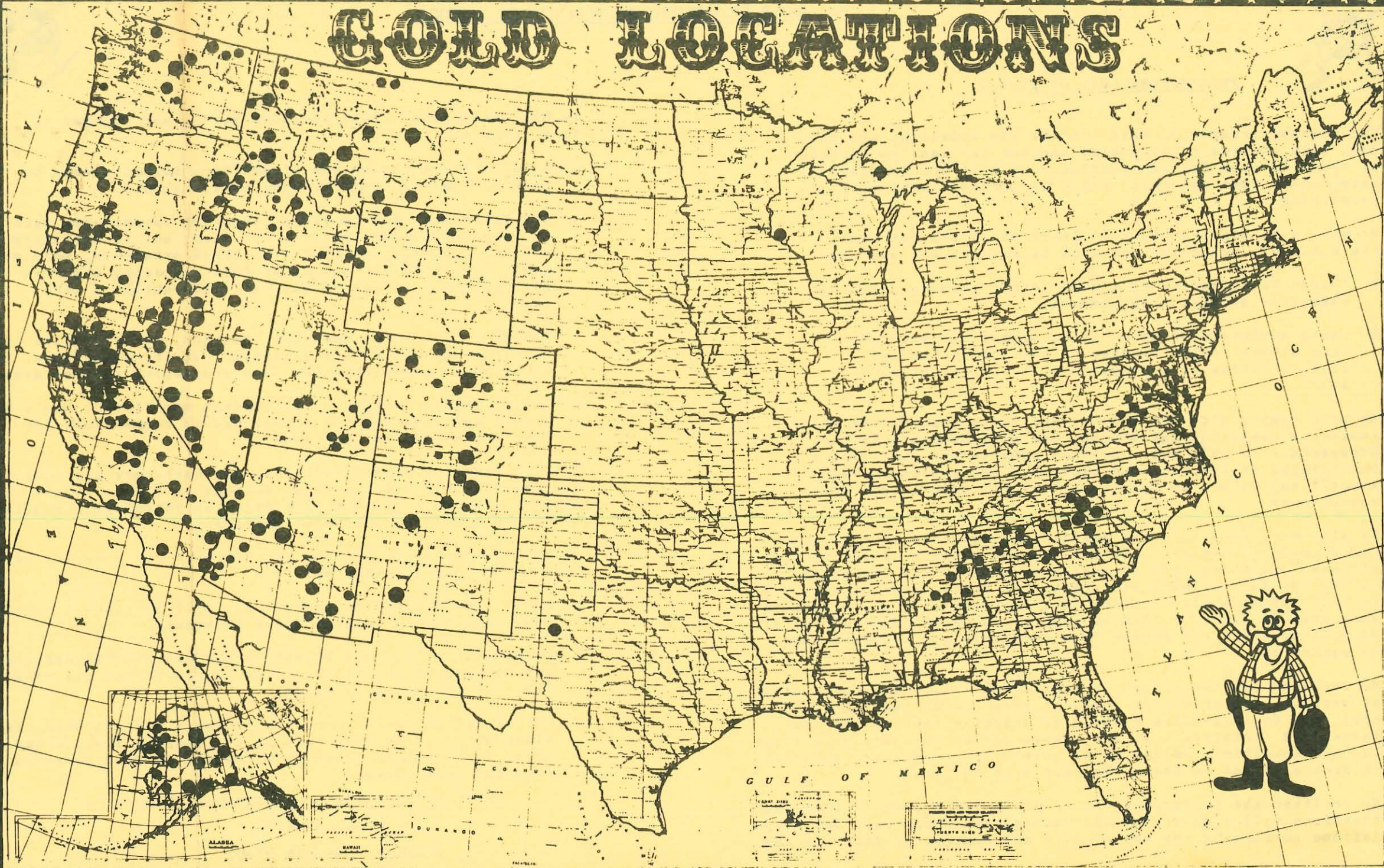
We only ask that those people employed by the government realize that the government is the people and that they do not rob themselves or their countrymen of the right to go upon public lands. to prospect for precious metals by way of imposing bonds and unfair restrictions that will certainly not inhibit large commercial operations but steal the right of the common man and woman to enter their own public domain.

The American people will probably accept inflation, higher taxes and possibly another depression, but by passing strict requirements on the small miner it fringes on the right of all the people who use the outdoors. By taking away one more of our rights as free people you bring closer the final showdown between buracracy and the people.

GPAA

(503) 484-1849

GOLD LOCATIONS





PROSPECTORS CODE OF ETHICS

1. The weekend prospector will utilize his knowledge and all available records to determine whether the land he intends to enter is open for prospecting. He will not knowingly enter lands that are under claim by another party without permission.
2. He will make himself aware of lands which are not under claim but are otherwise not open to prospecting such as:
 - a. Deeded homestead entry ground (stock raising homestead separates surface from mineral).
 - b. Lands administered by a public agency but withdrawn from mineral entry because of its public use and classification as a campground, botanical or scenic area.
3. He will comply with all Federal and State regulations which concern prospecting and mining, and will help his fellow prospectors to this end. He will promote and participate in training of the required knowledge and skills to help himself and others in complying with all Federal and State regulations.
4. He will cooperate with the public land agencies administering campgrounds by limiting his stay to the maximum number of days allowed, realizing that extension of time at any one place beyond the days allowed will result in degradation of the site. He will maintain his campsite in a neat and sanitary condition than when he found it, and as good as he would like to find it. He will pack out the refuse from materials and supplies that he packed in.
5. He realizes the importance of streambank vegetation for control of erosion, for providing shade to keep the stream temperature cool, and for providing a means of dropping insects for fish foods, and therefore will not remove any of the bank vegetation for his operations unless it is absolutely necessary, and then in such a way as to leave the root mass in place.
6. He realizes the tremendous threat of resource loss by fire, and therefore will comply with all Federal and State laws and regulations concerning the use of fire and control of fire hazards on his operations. This includes but is not limited to such items as:
 - a. No open fires during the Closed Fire Season except by permit from the administering public agency.
 - b. All equipment used in the prospecting operations, such as vehicles, dredge engines and earth moving machinery, will be properly equipped with spark arresters, mufflers, tools to reduce the chance of fire spreading and fire extinguishers to use on his equipment should a fire start.
 - c. Should a fire occur near his location, he will offer his services and use of his equipment, at the going rate, to the agency responsible for fire protection in that area.
 - d. Taking initial action to extinguish any fire he may discover, and alerting the proper agency responsible for fire protection in that area.
7. He will insure that effluent from his machinery and pump engines will not reach a water surface or a live stream which would cause oil and film from the petroleum products to become a part of the water surface.
8. He will cooperate in helping to keep open the lines of access to the public lands by:
 - a. At no time during his operations, will he block a public road with his vehicle or other machinery.
 - b. At no time during any of his operations will he destroy any portion of a public road prism, including the road bed, and cut and fill slopes.
 - c. Not using the roads of public lands in periods when traveling would leave deep ruts in the running surface and cause soil movement through splashing of fine material from the road surface.

No. 1 - Manual

ALUMINUM COMPANY OF AMERICA
ALCOA BUILDING · PITTSBURGH, PENNSYLVANIA 15219
TECHNOLOGY MARKETING DIVISION



December 13, 1974

Mr. E. J. Weathersbee
Administrator
Regional Office
Department of Environmental Quality
Northwest Region
1010 N.E. Couch Street
Portland, Oregon 97232

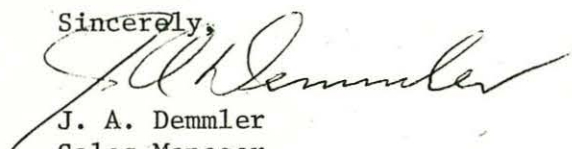
Dear Mr. Weathersbee:

I have reviewed your letter of December 3 inquiring about the status of the new Alcoa Smelting Process with our smelting management and with our Public Relations Department. We are at a loss to explain the wording used in the next to the last paragraph of the Wall Street Journal article dated September 26, 1974, since we have not changed our position on the question of the completion of the Palestine, Texas smelter. We do not plan to expand the plant to its contemplated capacity until the 15,000 ton/year unit has demonstrated its capabilities. Thus, it follows that additional capacity that might be required prior to the decision to complete the Palestine smelter would be installed using the Hall Process.

We expect the initial unit at the Palestine smelter to start up in the fourth quarter of 1975. Until we develop operating experience, we would prefer not to answer questions relating to emissions and energy consumption. I have sent Mr. F. A. Skirvin copies of 10 of the most pertinent patents relating to the new Alcoa smelting process. I believe that a study of these patents will provide you with a better understanding of the process.

The new process is not now available to other companies although in all probability we will be prepared to license it for appropriate fees. We have not yet established a date for this licensing, but I would estimate that it would be five years from now or possibly longer. I hope this information will assist you in your deliberation on the Amax permit application.

Sincerely,



J. A. Demmler
Sales Manager

JAD/an

Mr. Chairman:

The Department and this Commission have been working for a considerable period on the problems associated with the AMAX proposal. I'm sure you're all aware of the long history of this project, actually going back to 1967 when the proposition was before the Legislative Assembly. Subsequent then, the Department and this Commission started work on problems associated with air emission standards for aluminum plants. The federal government had failed to develop standards, and this Commission knew such standards were essential. Work by the Department was completed, and more than a year ago this Commission took final action and adopted emission standards, known at that time to be the toughest in the world. Industry and people generally felt plants could not meet the standards set, and those who opposed the development at Warrenton felt the issue was therefore dead, and the plant would not be constructed.

In the months which followed, new techniques emerged which now indicate that AMAX may well be able to meet Oregon's strict standards. This being the case, both this Commission and the Department have had literally thousands of citizen comments offered into our decision-making process. Surely it is timely and proper that this issue now be resolved.

I think most people know that members of this Commission

have serious and growing concerns with the many unknowns associated with the proposal. Later this spring, for example, studies will be completed to give needed baseline data on the makeup and complexity of the estuary and Youngs Bay. However, we will not have, nor do we see any way in which we can have reliable comments on impacts of the plant and its emissions through future years on the biota of the estuary. Years from now it may well be that evaluations will show little if any impact if the plant were to operate. It is equally possible that years from now we may well find serious and damaging effects on the estuarine life, with irreversible impacts. Then it would be too late.

Members of this Commission have commented on the possibility of designation of Oregon's estuaries as special areas. Such an action could provide needed special restrictions on development which would forego irreversible impacts.

To me a very real cloud exists over this plant and others because of the newly published EPA rules on significant deterioration. There is no question but what this must be resolved, and that resolution in itself may require some substantial time. Included in that resolution may well be a decision by this Commission that coastal areas such as the area to be impacted by AMAX would go into a Class I classification, precluding major industrial development.

Members of this Commission are also aware of a new process for aluminum reduction being developed by Alcoa,

which promises zero discharges, with a significant and substantial reduction also in energy use.

The subject of energy also is one of the great social questions involved in this problem. I think responsibilities of this Commission go beyond the technical side of actual standards for environmental protection. We cannot avoid an awareness of the enormous amount of a dwindling energy supply which would be required by this operation. Regardless of the complexities of the northwest power pool, it remains true that kilowatts required for this plant cannot be available elsewhere, and may in fact have to be replaced by environmentally damaging generation facilities.

Therefore, I move:

- (1) that all of the area within and between Youngs Bay estuary, Fort Stevens State Park and Fort Clatsop National Monument, within which the proposed AMAX Company primary aluminum plant is planned to be located be designated by the Environmental Quality Commission by rule to be a special problem area pursuant to Section 25-270, chapter 340, Oregon Administrative Rules; and
- (2) that the following designated more restrictive limits be established by rule for such special problem area:
 - (a) an emission limit of fluoride essentially equal to zero; and

(b) the same sulfur dioxide and particulate limits as are provided for a Class I area designation, pursuant to the United States Environmental Protection Agency rules published in the Federal Register on December 5, 1974, for prevention of significant air quality deterioration (Federal Register Document 74-28353; filed 12/4/74).

#

STATEMENT TO E.Q.C.

Friday, December 20, 1974

Despite our efforts to maintain communication between the staffs of DEQ and TWCA, the limits on our discharge as proposed in the December 4, 1974 staff report to E.Q.C. are not compatible with operation of the Wah Chang zirconium plant. We cannot accept the interim limits because even with production rates well below the production rates that were established in our 1968 permit, we cannot meet an ammonia discharge level of 2,000 #/day.

We are adamant in our position that the Teledyne Wah Chang plant cannot operate until June 1975, under the 2,000 #/day ammonia limit because present regulations allow no alternative to the civil or criminal penalties for any discharge in excess of the NPDES permit limits.

As a result of our experience with an ammonia concentration unit which was installed in February 1974, repaired and tried again in May 1974, we feel confident that a 2,000 #/day limit cannot be met before June 1975. The reason the equipment that was originally installed is not operable is because of catastrophic failure of the materials of construction. We have redesigned the unit and are presently building it out of materials which should give us no problems with corrosive failure and construction of that unit is being expedited as rapidly as possible. The original unit cost in excess of \$100,000. The zirconium replacement for the failed portion will cost over \$120,000.

Two points should be made concerning the interim 5,000 #/day limit for the Teledyne Wah Chang plant.

1. According to the best figures we have for the ammonia loading in the Willamette River, the 5,000 #/day discharge for TWCA is 2-1/2% of the total ammonia loading in the Willamette River at Albany, using the same analytical technique that Teledyne Wah Chang is using for reporting of ammonia loading of the effluent. The total Teledyne Wah Chang discharge as compared to the Willamette River north of Salem is 0.6%. We have been working for many years to continually reduce the ammonia discharge for our plant because it is the most significant element affecting the toxicity of our effluent.
2. Our present treatment of waste streams at the Teledyne Wah Chang facility is effecting approximately 85% removal of ammonium ion from the discharge stream. Secondary treatment or its equivalent, according to the O.A.R. 41-020, is defined as treatment which will remove 85% of the oxygen demand in waste discharge.

Our efforts, although extensive, have not resulted in establishing treatment in excess of 85%. They have, however, been very significant in reducing discharges from our plant.

There is no producer of zirconium in the Free World that has made any attempt to reduce ammonia discharge from its plant other than Teledyne Wah Chang Albany. Furthermore, we can find no evidence of any other ammonia user in Oregon who devotes over one-half of his steam generation capacity to ammonia removal.

Basic to any discussion is the definition of "Plant Capacity". The inference that Teledyne Wah Chang has increased the capacity of its plant steadily since 1972 is not in accordance with our understanding of the 1968 waste discharge permit. The production capacity of our Separations plant had not increased until March of 1974, 11 months after our notification of a necessity to expand. Prior to that time, reported production capacity increases were achieved by greater on-line utilization of the columns which existed in 1968.

Further comment on the staff report seems to be in order. We would address the following specific points.

P.1, #3 Truax, Murder Creek, Conser Slough, receives discharges of nine other industries in addition to TWCA.

We have not seen evidence of a significant impact of oxygen demand on the Wilamette River.

P.1, #4 Last sentence should read "...effluent rendered non-toxic", not "...discharge limits were met." Traditionally, numbers at end of period have been goals, not necessarily practical limits.

P.2, #2 See Para. 1 above.

P.2, #3 Quotation taken out of context. Next sentence reads, "During the transition stage, we expect that there will be temporary increases in one or more of the pollutants, but as the major transitions occur, we are confident of very significant improvements."

P.2, #3 Last sentence should include our letters of May 7, May 14, and May 17, just to indicate our continuing attempts at communication.

P.2, #4 We have not hidden anything, but have: (1) supplied all information requested, and (2) repeatedly asked for meetings to discuss our activities. As an example, our October 3, 1973

telephone call to Bill Leshner, at which time we were assured that DEQ would "assign a high priority" to the TWCA permit.

P.3, #2 Early 1973 limits can be met.

In summary, Teledyne Wah Chang has made every technical effort to reduce the quantity of discharge from its plant. We cannot accept a discharge limit set by a staff which has rejected our continuous efforts to discuss problems and potential solutions, particularly when these limits are not technically feasible prior to June 1975.



S. A. Worcester
Vice President, Technology

SAW:jks

I. REVIEW OF PREVIOUS PERMITS AND EXPERIENCE

A historical review of the permits held by Teledyne Wah Chang Albany over the years since 1967 and the progress made by us will illuminate that portion of the problem which remains. In addition, it may well show the way toward a new and realistic permit.

On the following page you will find a tabular presentation of our permit provisions and the modifications required by those permits with time. (Table 1)

Table 1 and Appendix B clearly demonstrate a continued attempt at improvement in waste discharge quality since 1967. The improvement has been possible even in the face of an absolute increase in the quantities of process chemicals which are used in the plant. Equally apparent is the fact that the fond hopes of the permit writers were not realized very often. We feel that this was due, in part, to an unrealistic view of what could be achieved with modifications to only portions of our very complex system.

None of the previous final discharge levels required by DEQ permits were based on economic or technological feasibility. Previous permits were based on final goals to be reached by the end of the permit period, without any certainty that they could be achieved. Many of the techniques proposed to meet the final requirements were beyond the state of the art.

In addition, several disappointments were occasioned by the failure of major pieces of equipment which did not perform at design level. All too often the performance of our consultants has been measured and found wanting. A notable example of this is the situation which arose from the design of the original ammonia distillation column by three consulting engineering firms. The original design criterion was for a flow of 150 gpm. However, operating experience proved that a flow of 80 gpm was the maximum which could be achieved. Subsequently, we used our in-house engineers to design a column to operate within the design criteria set earlier.

Only in very specialized areas or in systems which are broadly applied throughout the chemical processing industry have we found dependable and useful consultants. Because of this experience we are loath to seek advice outside our own staff. This is not to say that we do not intend to seek their advice in the future. But we have learned that verification of their recommendations is necessary if we are to avoid in the future the costly oversights which we have experienced. The continued improvement of our waste discharge is dependent, in our view, upon an orderly progression of reductions resultant from process changes, reagent conservation, recycle, and recovery systems.

TABLE 1

PAST WASTE DISCHARGE PERMITS:

FROM	TO	PERMIT No.
11/30/67	12/31/69	257
9/26/69 (modified)	2/28/70	540
2/28/70	2/28/71	701
2/28/71	12/31/71	983
1/3/72	7/1/73	1213
12/20/74	7/1/78	Proposed NPDES

	257						540		701		983	1213		PROPOSED NPDES		TWCA Propos. 7/29/77
	7/69-2/69	2/69-6/69	6/69-7/69	7/69-10/69	10/69-5/70	5/70-	AFTER 9/69	AFTER 12/69	By 6/70	By 2/71	2/71-12/71	BEFORE 7/73	AFTER 7/73	BEFORE 6/77	6/77-7/73	
NH ₄ ⁺	22,500	22,500	16,650	5,300	85	85	15,000	7,500	5,000	2,000	5,000	5,000	2,000	4,000	20	8,000
SO ₄ ⁻	21,400	21,400	21,400	21,400	5,500	5,500	8,000	8,000	12,000	10,000	10,000	10,000	4,000	---	---	---
SCl ⁻	2,250	1,740	1,740	1,740	1,740	55	800	800	800	800	800	600	250	250	35	1,500
NA ⁺	6,370	6,370	6,370	6,370	6,370	6,370	6,000	41,000	---	---	---	4,000	3,000	---	---	---
CA ⁺⁺	3,560	3,560	3,560	36,000	36,000	36,000	3,500	3,500	---	---	---	15,000	15,000	---	---	---
CL ⁻	37,500	37,500	37,500	37,500	37,500	37,500	40,000	40,000	40,000	40,000	---	17,000	15,000	---	---	---
F ⁻	---	---	---	---	---	---	---	---	---	---	---	300	200	140	28	140
MIXK	1,350	1,000	1,000	100	100	100	300	300	200	200	1,000	500	500	500	30	1,500
TSS	---	---	---	---	---	---	---	---	---	---	---	1,400	700	700	220	1,200
Oil	---	---	---	---	---	---	---	---	---	---	---	140	140	1,050	420	1,500
COD	---	---	---	---	---	---	---	---	---	---	---	3,000	1,000	140	140	3,500
FLOW	1.5	1.5	1.5	5.3	5.3	5.3	---	---	---	---	---	---	---	1.7	1.7	3.0
TDS	---	---	---	---	---	---	---	---	---	---	---	---	---	2.0	2.0	3.5
														48,000	14,000	150,000
														72,000	21,000	175,000

Because of the complexity of the zirconium-hafnium separations system and the additional inputs from other parts of the plant, we can expect beneficial results only from programs which have been properly conceived, lab tested, pilot-plant tested, full-scale designed, installed, and debugged. Unseemly haste in order to meet unrealistic deadlines has not been productive of long-range benefits. Further, orderly planning has been shown to be an economic necessity. Because of the costs of further reductions on top of previous programs, it is prudent to conserve major funding only for proposals of demonstrated worth.

Programs aimed at making substantial improvements were proposed in our application for permit renewal dated May 29, 1973. Your response dated April 29, 1974 contained unattainable levels as we indicated in our letters of May 7, 14, 17, 1974. Your response to these, dated July 12, 1974, still left many questions unanswered; as outlined in our letter to you of July 29, 1974. In an attempt to answer some of the remaining questions, our staff met with you on October 24, 1974. This poor communication has pushed back some planned programs and caused unproductive expenditure of money and engineering time.

II. INSTALLATIONS COMING ON LINE

The primary effort toward maximum toxicity reduction involves recycle and recovery of ammonia. Historical record of achievement in this area is included in Appendix D.

Major capital and engineering efforts in the past have been expended on the ammonium sulfate fertilizer plant, the ammonium hydroxide recovery plant, and the V-3, V-4 recovery unit, as outlined above in the historical review. Failure of the rubber-lined pressure vessels in the boildown unit necessitated a lengthy and very costly redesign using zirconium as a structural material. As the design required vessels capable of handling elevated pressures, ASME coding was necessary. Efforts to obtain this coding approval were successful, resulting in the issuance of the code for zirconium pressure vessels in September, 1974. Design of components necessary for an all-zirconium unit were begun immediately, the unit has been ordered, and the target date for operational status is May, 1975.

Between now and May, 1975 additional steps to be taken and anticipated reductions in ammonia discharge are as follows:

Date	Process Change	NH ₄ OH Reduction #/day	Maximum NH ₄ OH Discharge #/day
11/1/74	Steady state operation of TWCA designed recovery column	2,000	9,000

11/15/74	Recycle of NH_4OH scrubber solution	200	9,000
12/1/74	Partial recycle of V-3 V-4 stream	3,000	6,000
5/1/75	Steady state operation of V-3, V-4 boildown with recycle or sale of concentrate	2,000	4,000

Additional refinement of sumpage and recovery, as well as modification of some operating procedures is being emphasized, with the expectation of further reduction of approximately 1,000 pounds per day.

The next major project will be the reduction of total dissolved solids. In addition to the approximately 30,000 pounds per day ammonium and sulfate ions to be deleted from our aqueous discharge by May, 1975, the results of two years efforts in laboratory, engineering, and pilot plant phases indicate that by concentrating the CaCl_2 generated in the ammonia recovery column, at least 66,000 lbs. per day CaCl_2 should be removed. Marketability of the product is being evaluated at this time, with enough favorable indications that a multistage evaporator large enough to handle twice this amount is being designed to handle fluctuations in oxide production rates. Following completion of design, the best delivery we have been promised is 12 to 14 months, which should give us an on-stream plant by April, 1976. Additional benefits are the complete removal of residual ammonia in this particular stream, and the majority of the thiocyanate currently being discharged. This unit would decrease the total dissolved solids (TDS) by approximately 66,000 pounds per day, leaving approximately 64,000 pounds in the discharge at a ZrO_2 production rate of 30,000 lbs. per day. The quantity of CaCl_2 recovered should vary directly with oxide production at the ratio of 2.2 lbs. CaCl_2 per lb. ZrO_2 . Evaluation of the product by a potential customer is still in progress. Should that evaluation indicate that the CaCl_2 product is not applicable to the customer's need, we will be faced with the problem of finding a market or developing a disposal method.

Strippers for the three aqueous streams containing dispersed and dissolved MIBK are all functional as of 11/6/74. These, combined with the sumpage scheduled for fiscal 1975 will drop the ketone level below 500 pounds per day.

Research aimed toward quantum improvements in chemical efficiency and recycle through drastic modifications in many of the unit operations of zirconium-hafnium chlorination and separation is being pushed as rapidly as possible. Some of the priorities applied to long-term projects have been changed because of the energy and raw material crises experienced in the past two years. We would appreciate the opportunity to discuss some of these programs with you, so that mutually desirable goals can be

established, and subsequent priorities assigned as early as possible. This is one area in which we feel a consultant would be of benefit. We propose the employment of an individual who could work with both Teledyne Wah Chang Albany and the DEQ in establishing mutually agreeable future standards based upon the availability of economical technology.

III. TOXICITY BIOASSAYS AND BIOMONITORING

The O.S.U. Department of Fisheries and Wildlife has been providing bioassay service to Teledyne Wah Chang Albany for approximately 3 years. Our agreement with O.S.U. will conclude during 1975. The final portion of the agreement calls for them to equip a test facility for us and to train a technician to work under the direction of our Environmental Biologist. Not only routine, weekly, acute toxicity bioassays; but also long-term growth studies will be conducted by us. O.S.U. will continue to supply us with appropriate salmonid fishes for use as bioassay subjects.

The laboratory is about 80% complete and is already stocked with fish. Bioassays will be routinely performed in the new facility very soon. Training of the technician will begin no later than January, 1975.

As soon as the routine bioassay system goes into operation a series of research acute toxicity bioassays and long-term growth studies will be conducted on synthetic waste. The synthetic waste will be formulated to approximate our waste at various stages during the new compliance period. The purpose of the research is to document the decreasing toxicity of our waste as expressed by a sensitive bioassay subject. The ultimate purpose is to determine the concentrations at which our wastes become non-toxic. By bioassaying the various synthetic waste concentrations we contemplate the ability to determine the impact of system changes on the aggregate toxicity of our waste.

Final discharge limits for the period after June, 1977 have obviously been based on some estimate of the toxicity of the waste. The research described above seems to be a more rational way to determine the remission of toxicity. Experience has indicated that direct application of EPA emission factors or published research data does not take into account complex interactions which can take place in such a way that toxicity is ameliorated. We present this as further support for the contention that specific limits for the post-June, 1977 period be left out of the pending permit until the factual base can be determined for their promulgation.

IV. DISCHARGE LIMIT PROPOSAL

	Beginning on Effective Date of Permit	Until 6/30/77
NH ₄ ⁺	5,000/6,000 until 6/1/75	3,000/4,000
SCN ⁻	1,200/1,600 until 8/1/75	500/700
F ⁻	140/210	140/210
MIBK	800 until 6/1/75	500
TSS	700/1050	700/1050
Oil & Grease	140	140
COD	3,000 until 8/1/75	1,500
TDS	160,000/175,000 until 4/30/76	90,000/100,000

Note: monthly average/daily maximum

The basis for this table can be found in the text which follows. The suggested limits are based upon our estimation of the best practicable control technology available to us now.

As mentioned previously, the history of our permits indicates that the process of determining second round limits has been fraught with imprecision even over short periods. Since the proposed permit is being written to cover the period before June, 1977 and then, as a second round, the period from July, 1977 to July, 1978; we feel that this even longer period dooms the second round limit setting process to certain failure. Those factors which will play a role in limit setting will be more precisely defined as consulting agreements conclude, research is finalized, engineering is finished, and bioassay studies conducted. Therefore, we suggest that no limits be set for the post-June, 1977 period until some time certain in the future which be included in the compliance schedule.

Because of the near certainty of an energy curtailment during this coming winter and subsequent winters any permit written for us should very clearly define priorities for the operation of pollution control devices which are energy consumptive. Since we have several different natural gas and electricity priorities, consideration should be given to the sequence of equipment shutdown as the several levels of curtailment are instituted. In addition to energy curtailment we can expect that air pollution alert conditions may cause the shutdown of fuel burning equipment which will indirectly increase aqueous wastes by requiring the shutdown of resource recovery, recycle and pollution control devices.

The proposed draft permit makes no mention of either of the above issues. In order to avoid any misunderstanding or confusion

our permit should clearly define what must be done. As a simplistic approach one might assume that both problems could be handled under the general provisions for upsets. Unfortunately, this course seems to make both Teledyne Wah Chang Albany and DEQ liable to criticism and legal action from several sources.

The Teledyne Wah Chang Albany staff has been keeping informed about advanced techniques for waste treatment. Among those processes which we have evaluated are only a few which now seem to hold any promise at all.

Reverse osmosis membrane technology is now progressing to the extent that this technique may be compatible with our solvent containing effluent. Earlier evaluation of the system was discouraged by the membrane manufacturer because of the almost certain degradation of the membrane by MIBK. However, recent research has developed new materials for membranes which may perform acceptably in the presence of solvent. Therefore, two major problems still remain to be considered in evaluating reverse osmosis for use on part of our discharge. Those two remaining problems are: power consumption and brine disposal.

An evaluation of some of our waste streams by the Avco freeze-crystallization research group demonstrated that the materials tested were not amenable to treatment by this method. Both the CaCl_2 and HCl containing waste streams depressed the freezing point to such a degree that the energy requirements are inordinately high and the refrigerants used are unable to effect satisfactory crystallization.

APPENDIX A

Average daily production by month of ZrO_2 +
 HfO_2 and Zr sponge.

June, 1973 - Present
Projections to June 1975

	<u>#/Day ZrO₂+HfO₂</u>	<u>Zr Sponge</u>
May, 1973	31,146	13,320
June	31,722	12,316
July	29,699	15,094
August	33,192	12,974
September	30,755	14,312
October	28,067	15,027
November	26,566	15,921
December	30,314	16,043
January, 1974	29,465	16,690
February	31,749	17,549
March	29,088	18,062
April	32,705	17,179
May	36,235	18,068
June	38,735	17,997
July	38,995	17,894
August	34,116	19,191
September	30,629	16,893
October	33,646	
<u>PROPOSAL</u>		
November	39,000	19,000
December	38,000	19,000
January, 1975	38,000	19,000
February	41,000	19,000
March	42,000	19,000
April	48,000	19,000
May	46,000	19,000
June	50,000	19,000

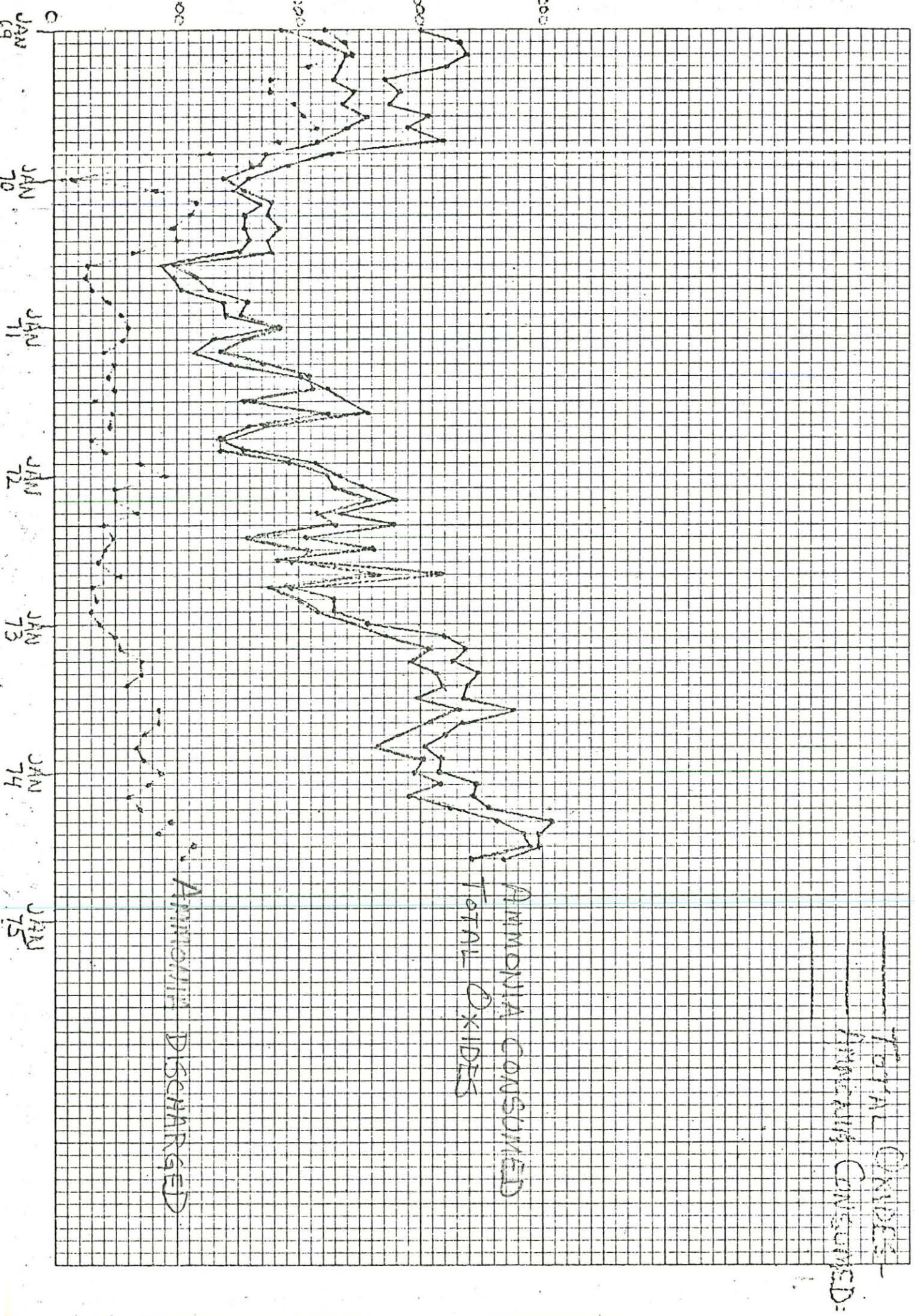
APPENDIX B

Graphs and Tables of Discharge

DATE	NH ₄ ⁺	SO ₄ ⁼	SCN ⁻	F ⁻	Cl ⁻	Na ⁺	Ca ⁺⁺	MIBK	TSS	COD	MGD	Oil
1968 Sept.	19,421	18,586	2,759	145	38,805	6,389	3,279	1,246	980	---	1.45	
Oct.	22,278	16,951	2,786	103	41,306	6,089	3,444	1,961	2,374	---	1.55	
Nov.	21,218	18,266	1,956	86	46,715	5,597	4,219	996	1,722	---	1.47	
Dec.	27,760	20,510	1,730	---	44,702	5,415	5,883	425	2,338	---	1.50	
1969 Jan.	22,240	18,532	1,030	---	40,930	5,707	3,865	1,216	2,002	---	1.55	
Feb.	23,857	18,715	1,008	37	45,795	6,605	6,215	1,215	2644	---	1.46	
Mar.	24,350	19,690	750	110	53,100	7,390	7,450	250	2,050	---	1.49	
Apr.	20,780	16,460	820	70	47,040	6,770	1,750	1,750	1,170	---	1.40	
May	17,720	13,290	1,280	100	38,650	6,230	1,500	155	900	---	1.54	
June	17,820	16,020	690	100	38,270	3,590	3,040	80	1,930	---	1.66	
July	19,700	22,970	820	140	45,520	2,990	3,260	70	1,160	---	1.63	
Aug.	20,228	16,725	992	93	41,385	2,387	2,713	155	1,519	---	1.86	
Sept.	21,379	11,165	1,291	130	40,628	2,911	670	430	---	---	1.20	
Oct.	18,132	10,263	671	140	24,960	2,937	693	390	---	---	1.30	
Nov.	12,780	8,683	520	65	23,404	1,593	1,377	531	228	---	1.30	
Dec.	16,510	11,573	1,148	157	31,008	3,758	881	692	550	645	1.89	
1970 Jan.	1,644	3,132	467	156	7,977	1,878	1,897	632	311	321	1.17	
Feb.	8,367	9,249	346	149	16,951	5,323	2,914	932	664	1,289	1.19	
Mar.	11,578	11,254	515	95	22,707	4,183	4,069	658	400	1,286	1.14	
Apr.	11,083	10,783	430	118	24,478	4,031	4,053	516	269	1,344	1.29	
May	9,717	7,522	380	107	23,657	3,441	5,232	498	546	1,447	1.42	
June	10,531	7,501	300	115	20,394	3,330	5,784	334	426	737	1.38	
July	6,473	6,268	377	75	19,591	2,359	6,990	355	366	1,271	1.29	
Aug.	2,833	3,416	339	71	9,720	568	4,458	142	387	813	.95	
Sept.	2,712	5,057	259	108	11,648	2,604	4,927	486	940	864	1.30	
Oct.	3,062	5,788	638	75	18,638	2,213	7,588	525	713	2,063	1.50	
Nov.	4,523	6,840	935	98	15,914	2,122	6,212	810	530	4,160	1.68	
Dec.	5,505	6,717	823	135	18,520	2,199	8,452	1,361	523	7,031	1.79	
1971 Jan.	6,049	8,003	671	130	17,469	2,236	8,506	820	640	4,009	1.85	
Feb.	5,647	6,888	518	123	18,291	1,664	8,880	682	655	1,296	1.64	
Mar.	4,089	6,870	500	118	21,256	1,706	14,195	574	1,353	2,545	1.77	
Apr.	4,994	8,324	322	154	19,992	1,539	12,073	462	392	3,105	1.68	
May	4,460	7,813	385	169	24,962	3,030	15,457	538	385	3,199	1.85	
June	4,997	7,415	583	136	23,535	1,761	10,652	409	310	2,133	1.49	
July	3,319	569	137	108	7,783	605	2,016	86	374	634	.86	
Aug.	4,891	7,839	375	80	20,837	2,693	13,320	214	241	2,975	1.61	
Sept.	4,728	6,851	419	155	18,089	2,449	2,139	314	310	2,093	1.86	
Oct.	2,964	4,667	221	286	11,843	2,769	5,226	403	200	1,391	1.56	
Nov.	4,128	7,242	306	111	21,211	2,989	11,315	695	264	2,613	1.67	
Dec.	7,140	8,025	465	255	19,530	3,405	6,810	870	420	3,495	1.80	
1972 Jan.	9,230	9,571	156	284	14,029	2,769	4,601	980	724	2,692	1.70	
Feb.	4,959	8,891	808	219	8,535	3,357	2,617	726	192	3,603	1.64	
Mar.	5,063	7,898	594	176	16,619	2,120	8,208	932	203	2,633	1.62	

DATE	NH ₄ ⁺	SO ₄ ⁼	SCN ⁻	F ⁻	Cl ⁻	Na ⁺	Ca ⁺⁺	MIBK	TSS	COD	MGD	Oil
Apr.	6,924	9,144	984	108	18,960	2,292	8,028	912	240	4,440	1.45	
May	4,144	7,115	735	143	22,157	2,670	11,503	819	241	2,622	1.49	
June	4,966	8,560	787	102	24,333	2,311	10,363	254	584	2,997	1.52	
July	4,158	7,952	826	112	26,222	2,992	12,740	602	252	2,058	1.68	
Aug.	3,575	7,708	915	114	26,283	3,246	10,982	601	243	2,688	1.72	86
Sept.	5,393	9,605	1,279	83	32,609	3,781	13,344	653	236	2,544	1.67	83
Oct.	3,060	6,542	649	99	30,682	4,681	12,591	846	296	2,228	1.69	113
Nov.	3,393	6,509	736	69	26,485	4,335	12,052	794	230	2,070	1.38	81
Dec.	3,032	5,062	1,187	57	22,594	5,489	9,910	729	501	3,575	1.72	100
1973 Jan.	3,759	7,000	1,006	104	28,534	3,419	12,373	1,287	488	5,300	1.77	74
Feb.	4,988	10,251	765	107	34,165	3,932	14,703	1,820	1,423	3,412	1.83	214
Mar.	5,251	9,979	662	123	32,910	3,742	14,692	1,232	1,386	2,310	1.85	108
Apr.	7,081	10,425	518	126	34,383	4,789	12,796	675	440	2,669	1.88	94
May	7,053	12,738	714	106	37,012	6,308	14,850	745	275	3,101	1.82	76
June	6,045	10,261	806	93	32,271	5,208	13,919	527	992	2,511	1.86	93
July	- - -	- - -	- - -	- - -	- - -	- - -	- - -	- - -	- - -	- - -	- - -	- - -
Aug.	8,451	10,203	917	56	30,844	4,976	9,230	792	222	2,224	1.67	83
Sept.	8,419	11,935	1,177	119	35,194	5,483	10,475	894	536	2,354	1.79	60
Oct.	7,149	12,412	1,247	87	43,631	6,047	16,762	624	348	2,146	1.74	102
Nov.	6,703	14,121	1,687	137	41,222	6,217	17,176	1,064	684	2,766	1.82	106
Dec.	7,067	8,018	1,586	151	42,174	6,085	17,169	664	906	2,597	1.81	136
1974 Jan.	8,700	14,100	960	165	32,100	8,430	19,050	960	1,260	2,250	1.80	---
Feb.	7,560	11,925	1,575	135	44,100	7,500	17,925	1,845	3,030	3,000	1.80	180
Mar.	5,950	11,870	1,465	118	44,370	8,155	18,352	1,199	503	4,218	1.78	148
Apr.	6,960	13,350	1,845	135	50,895	8,580	18,315	3,810	360	2,295	1.80	75
May	9,472	12,728	1,539	89	53,972	10,872	17,464	1,006	148	1,036	1.78	144
June	8,505	17,475	1,935	105	66,435	9,990	28,380	1,380	210	2,820	1.80	75
July	11,304	17,060	1,278	123	61,893	12,305	26,627	708	231	2,156	1.85	62
Aug.	10,175	14,520	1,178	122	65,561	9,394	23,837	918	459	2,402	1.84	107
Sept.	7,646	13,634	2,265	147	64,904	11,263	28,211	1,854	243	4,499	1.82	61
Oct.	8,284	12,069	2,012	89	68,585	7,376	30,843	1,416	209	3,367	1.79	60

D R E D G I N G



APPENDIX C

Ammonia Recovery and Recycle

Ammonia Recovery and Recycle

Date	NH ₃	(NH ₄) ₂ SO ₄
Aug. 1969		40,000 approx.
May 1970	80,000	110,000
June	76,009	155,964
July	172,140	238,915
Aug.	107,661	132,091
Sept.	95,673	120,318
Oct.	169,317	140,587
Nov.	157,442	149,303
Dec.	170,434	192,880
Jan. 1971	179,430	213,101
Feb.	168,565	167,175
Mar.	329,206	159,912
Apr.	260,644	145,112
May	328,790	240,440
June	314,793	197,315
July	Down	Down
Aug.	414,480	278,366
Sept.	386,773	120,872
Oct.	151,442	135,166
Nov.	353,214	165,346
Dec.	241,706	198,051
Jan. 1972	173,288	191,829
Feb.	21,024	214,627
Mar.	409,409	184,171
Apr.	364,622	167,147
May	353,668	167,221
June	341,363	98,072
July	602,868	186,371
Aug.	421,140	161,151
Sept.	510,662	169,018
Oct.	447,145	172,573
Nov.	386,253	183,205
Dec.	319,960	165,645
Jan. 1973	549,728	55,440
Feb.	523,221	111,101
Mar.	538,001	183,161
Apr.	520,576	199,711
May	457,916	147,303
June	493,235	127,015
July	664,484	156,157
Aug.	464,949	132,096
Sept.	550,444	136,596
Oct.	703,596	180,326
Nov.	509,749	145,611
Dec.	476,328	142,286
Jan. 1974	627,761	215,683
Feb.	523,377	288,745
Mar.	586,567	264,384
Apr.	632,560	347,258
May	567,642	335,130
June	611,968	326,381
July	480,715	400,369
Aug.	574,021	286,584
Sept.	659,847	194,930

Ammonia Recovery and Recycle, Yearly Totals

Year	NH ₃	(NH ₄) ₂ SO ₄
1970	1,028,676	1,240,058
1971	3,129,043	2,020,856
1972	4,351,402	2,061,030
1973	6,452,137	1,716,803
1974 YTD	5,264,458	2,659,464

APPENDIX D

Proposed Permit Provisions

SPECIAL CONDITIONS

- S1. The permittee shall provide waste treatment and control facilities or necessary process modifications to meet the effluent limitations specified in Condition S7 in accordance with the following time schedule:

Preliminary engineering report	June 30, 1975
Report of progress	Sept. 1, 1975
Final program and plans	Jan. 31, 1976
Set levels for Condition S7	Mar. 1, 1976
Report of progress	July 1, 1976
Report of progress	Jan. 1, 1977
Complete construction of facilities and planned modifications	Apr. 30, 1977
Attain optimum operational levels for Condition S7, report progress	June 30, 1977
Progress report	June 1, 1977
Final report	Dec. 1, 1977

- S2. Delete.

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

- S4. The permittee shall collect V1, V2, V3 and V4 streams from zirconium/hafnium separation for recovery and reuse of the ammonium ion component.

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

- S6. Beginning on the effective issuance date of this permit and ending June 30, 1977, the quantity and quality of effluent discharged directly or indirectly to Truax Creek shall be limited as follows:

Parameter	Beginning Effective Date of Permit	Until 6/30/77
NH ₄ ⁺	5,000/6,000 until 6/1/75	3,000/4,000
SCN ⁻	1,200/1,600 until 8/1/75	400/600
F ⁻	140/210	140/210
MIBK	800 until 6/1/75	500

TSS	1,000/1,200	1,000/1,200
Oil & Grease	140	140
COD	3,000 until 8/1/75	1,500
TDS	160,000/175,000 until 4/30/76	90,000/100,000

Note: Monthly average/daily maximum

- S7. After June 30, 1977 the quality and quantity of effluent discharged directly or indirectly to Truax Creek shall be limited to those levels determined on Mar. 1, 1976 for Condition S7. See Provision S1 above.
- S8. The total discharge shall be controlled to maintain a reasonable constant flow rate throughout each 24-hour operating period.
- S9. Notwithstanding the effluent limitations established by this permit, no wastes shall be discharged and no activities shall be conducted after the effective issuance date of this permit which will violate Water Quality Standards as adopted in OAR 340-41-025 and OAR 340-41-045 except in the following defined mixing zones:
- Until June 30, 1977:
- The allowable mixing zone shall consist of Truax Creek and those bodies of water downstream starting at the point of discharge and extending beyond the confluence with the Willamette River by a radius of 100 feet.
- After June 30, 1977:
- The allowable mixing zone shall consist of Truax Creek starting at the point of discharge and extending to the confluence with Murder Creek.
- S10. No petroleum-base products in excess of the limits in Conditions S6 and S7 or other substances which might cause the Water Quality Standards of the State of Oregon to be violated shall be discharged or otherwise allowed to reach any of the waters of the state.
- S11. Sanitary wastes shall be disposed of to a septic tank and subsurface disposal system (or by other approved means) which is installed, operated and maintained in accordance with the requirements of the Department of Environmental Quality and the local health department and in a manner which will prevent inadequately treated waste water from entering any waters of the state or from becoming a nuisance or health hazard.

- S12. Filter backwash, solids, sludges, dirt, sand, silt or other pollutants separated from or resulting from the treatment of intake or supply water shall not be discharged to state waters without first receiving adequate treatment (which has been approved by the Department) for removal of the pollutants.
- S13. Unless approved otherwise in writing by the Department, the permittee shall observe and inspect all waste handling, treatment and disposal facilities and the receiving stream above and below each point of discharge at least daily to insure compliance with the conditions of this permit. A written record of all such observations shall be maintained at the plant and shall be made available to the Department of Environmental Quality staff for inspection and review upon request.
- S14. The permittee shall monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the wastes discharged. A record of all such data shall be maintained and submitted to the Department of Environmental Quality at the end of each calendar month. Unless otherwise agreed to in writing by the Department of Environmental Quality, data collected and submitted shall include but not necessarily be limited to the following parameters and minimum frequencies:

Parameter	Minimum Frequency
COD	1 24-hr composite sample/week
Oil & Grease	1 24-hr composite sample/week
Ammonium ion	1 7-day composite & 1 24-hr composite/week
Thiocyanate ion	1 7-day composite/week & 1 24-hr composite sample/week
Sulfate ion	1 7-day composite/week & 1 24-hr composite sample/week
Chloride ion	1 7-day composite/week & 1 24-hr composite sample/week
Calcium ion	1 7-day composite/week & 1 24-hr composite sample/week
Sodium ion	1 7-day composite/week & 1 24-hr composite sample/week
Fluoride ion	1 7-day composite/week & 1 24-hr composite sample/week
Methylisobutyl ketone	1 7-day composite/week & 1 24-hr composite sample/week
Total Suspended Solids	1 7-day composite/week & 1 24-hr composite sample/week
Flow	Daily
pH	Daily
Conductivity	Continuous recording
Total Heavy Metals	1 7-day composite/week
Cadmium	1 7-day composite/week
Cyanide	1 7-day composite/week
Arsenic	1 7-day composite/week

- S15. Within 30 days of the issuance of this permit the permittee shall submit a detailed description of the sampling procedures used, sample analysis techniques and exact location of sampling stations.
- S16. Bioassays of the waste discharge stream shall be conducted in sufficient number to represent on a continually current basis the dilution with river water required to render the wastes nontoxic as evidenced by using a sensitive organism appropriate to the toxicity level. These organisms are to include *Gambusia* spp., a salmonid, or an appropriate sensitive organism, or organisms to be selected as a result of research. Progress reports shall be submitted at intervals not to exceed 9 months.
- S17. The permittee shall cooperate and participate in continuation of the study "The Effects of Wah Chang Effluent on Juvenile Salmon" with the Department of Fisheries and Wildlife, Oregon State University. Progress reports shall be submitted at intervals not to exceed 6 months until completion.
- S18. Within 90 days of issuance of permit, permittee shall provide an alternative power source sufficient to operate all facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit. In lieu of this requirement the permittee may certify in writing to the Department within 30 days of the issuance of the permit that in the event of a reduction, loss, or failure of a power source the permittee shall halt, reduce or otherwise control production and/or all discharges in order to maintain compliance with the terms and conditions of this permit.
- S19. The permittee shall prepare, submit to the Department and implement a suggested spill prevention and contingency plan for the facility covered by this permit within 90 days of the date of its issuance. Such plan shall include at least the following information and procedures relative to the prevention and handling of spills and unplanned discharges of oil, chemicals and other hazardous substances:
- a. A description of the reporting system which will be used to alert responsible facility management and appropriate legal authorities;
 - b. A description of the facilities which prevent, contain or treat spills and unplanned discharges;
 - c. A list of all oil and hazardous materials used, processed or stored at the facility which may be spilled and could conceivably be discharged to state waters;
 - d. A brief description of recent spills and changes made to prevent their occurrence; and

e. An implementation schedule for additional facilities which may be required to prevent the spillage of oil, chemicals and other hazardous materials and subsequent discharge to state waters.

- S20. An adequate contingency plan for prevention and handling of spills and unplanned discharges shall be in force at all times. A continuing program of employee orientation and education shall be maintained to ensure awareness of the necessity of good in-plant control and quick and proper action in the event of a spill or accident.
- S21. A continuing program shall be initiated to reduce the total fresh water consumption by increased utilization of soiled waters.
- S22. An environmental supervisor shall be provided to coordinate and carry out all necessary functions related to maintenance and operation of waste collection, treatment and disposal facilities. This person must have access to all information pertaining to the generation of wastes in the various process areas.
- S23. The permittee shall, during all times of disposal, provide personnel whose primary responsibilities are to assure the continuous performance of the disposal system within the limitations of this permit.

1234 S. W. Morrison Street
Portland, Oregon 97205

Attention: Permit Program

APPLICATION TO THE DEPARTMENT OF ENVIRONMENTAL QUALITY
FOR RENEWAL OF PERMIT

1899
No. 93466
Received MAY 31 1973

A. REFERENCE INFORMATION:

Official Name and Address of Applicant (Owner) Teledyne Wah Chang Albany P.O. Box 460 Albany, Oregon 97321		State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY Waste Discharge Permit and Tax Credits Present Permit No. 1213 Date Expires 7-1-73
Responsible Official (Name, Title, Address, Phone) Richard P. Blunk, Vice President P.O. Box 460 Albany, Oregon 97321 (926-4211)	Alternate Responsible Official or Chief Operator E. F. Baroch, Technical Director P.O. Box 460 Albany, Oregon 97321 (026-4211)	
Description of activities requiring a permit from the DEPARTMENT: (Check all that apply) <input type="checkbox"/> Construct, install, or modify waste collection, treatment, or disposal facilities. <input checked="" type="checkbox"/> Operate waste collection, treatment, or disposal facilities. <input checked="" type="checkbox"/> Discharge treated waste waters into the waters of <u>Truax Cr.</u> <input checked="" type="checkbox"/> (Other) <u>Expand productive capacity and construct a new waste outlet.</u>		

B. GENERAL QUESTIONS:

1. Have the treatment or disposal methods employed, as indicated in previous applications, been altered in any way since the last application was submitted? YES NO If yes, explain.

2. Has the quantity or quality of wastes discharged, as indicated in previous applications, been significantly changed in any way since the last application was submitted? YES NO If yes, explain.

C. SPECIAL QUESTIONS AND REQUESTED INFORMATION:

1. If any changes in operations or waste quantity or quality are anticipated in the near future, please attach an explanation or proposal.

2. Please attach a brief report which indicates your progress in meeting the requirements and limitations of your present permit.

See attached letter report for Items 1 and 2.

I hereby certify that the information contained in this application is true and correct to the best of my knowledge and belief.

Signature of owner (or legally authorized representative) J. R. Blunk
Title Vice President
Date 5/27/73

May 29, 1973

Mr. E. J. Weathersbee
Deputy Director
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205

RE: Permit Number 1213

Dear Mr. Weathersbee:

1 In your review of the enclosed application for renewal of our waste discharge permit, it will be apparent that we have not been able consistently to meet limits in our present discharge permit on ammonia, ketone, thiocyanate, and particularly chloride, ions.

2 As steady-state operation of our zirconium production facilities is dependent upon a stable supply of zirconium tetrachloride, an independent source is being developed here at Teledyne Wah Chang Albany. The urgency of this requirement is such that a crash program to develop and pilot plant a crude chlorination process has been undertaken. This process is capable of much more efficient conversion of zircon and chlorine to zirconium tetrachloride than has been achieved to date.

3 Further design refinements to the ketone strippers are expected to enable some improvement, but the definite assurance of meeting the proposed July 1973 limits will require a degree of consistency in operation that may not be possible to achieve.

4 The nature and, to a lesser extent, the quantity of our suspended solids has been altered by the addition of the crude chlorination pilot plant. These suspended solids have proven amenable to control by the use of a chemical flocculant, by reduction of hydraulic load on clarifier and settling ponds, and by closer pH control during the precipitation and settling phases. We have ordered polymer for flocculation and are in process of designing a permanent installation to replace the present temporary unit. A water use task force has been formed under my direction for the express purpose of reducing water consumption. Piping modifications are being made to allow precipitation and settling to occur under more stable pH conditions.

5 Ammonia is the other constituent that will be extremely difficult to control within your desired levels. Delivery schedule slippage on auxiliary equipment necessary for the operation of the zirconium boiler for concentrating the V3-V4 stream will push the initial operation of the unit into mid-August 1973. In addition, the customer for the concentrated liquor is facing handling and storage problems which may curtail his usage. We are therefore actively pursuing alternate acceptable disposal means.

6 Now is the time we should make drastic modifications to our basic separations process that will yield a quantum improvement in reduction of chemical input, improve recycle and recovery, and a subsequent improvement in the quality of our effluent. Sufficient research has been accomplished to enable us to make firm commitments on decision, design, and completion of some major modifications, while others require further investigation. In addition to the need to improve our chemical input and output, and the state of our R&D efforts, the third essential ingredient to catalyze such drastic and expensive changes is the currently promising market situation in which our customers are beginning to demand more material.

7 We would request your approval for the immediate initiation of a project to provide a pond or lagoon to store at least 20,000,000 gallons of V3-V4 liquor. This cushion would give us a chance to develop alternate means of disposal. As a last resort, we would like to explore the possibility of impoundment during low-flow seasons. We would propose to use our lower 5-acre sludge storage pond. If we can remove the solids stored there now, the pond would provide approximately six months' storage at our present rate of V3-V4 liquor production. The pond capacity at present would allow only about one month's storage. The solids stored in this pond are reasonably well dewatered, and could be trucked either to a city park site, for which we have been asked to contribute fill material, or to an agricultural site for an amendment to heavy clay soil. If we are to meet the July limits, it is important that we should begin moving solids early in June.

8 The first major process change we intend to initiate is a system of feed preparation by recrystallization. This will improve efficiency of the separations process by providing a higher purity feed than does the present system, and would reduce ammonia consumption by an appreciable degree. Most importantly, however, the process will allow an initial reduction of chloride ion in our discharge by about 30%. September 1, 1973 is the date our Chemical R&D Department has promised a final decision on which way to proceed on recrystallization, i.e., evaporation, pH, etc. One year after the decision date should allow sufficient time for engineering, fabrication, and installation, giving us an operating system by September 1, 1974.

9
Zirconium raffinate precipitation is the next possibility for drastic change, with promise of a significant reduction in effluent impurities. Two systems have been under development for several years, and we are locked into an April 1974 decision date on which way to proceed, with a pilot plant by February 1975. Either system would reduce ammonia use by at least 5,000 pounds per day, and one of the systems shows promise of complete thiocyanate destruction in this stream which is the major source of this pollutant in our discharge. Again, we are facing up to a one-year period to perform engineering, equipment design, fabrication and installation, following the April 1974 decision day.

10
In addition to these two major modifications which would provide, among other benefits, ammonia-free feed makeup and precipitation, we are vigorously pursuing investigation into the feasibility of completely ammonia-free separation processes. The success of these processes is dependent to a very great extent upon the success of project #1, the feed recrystallization. Mixer-settler and pilot column work will continue during this crystallization development period, and a firm decision will be made by September 1, 1974. If the decision is to proceed, we expect the required plant renovation to require not more than 18 months, giving February 1976 as the latest acceptable target date for achievement. One other encouraging possibility of the ammonia-free separations system, combined with either of the two systems to be used for zirconium precipitation, is that probably sulfuric acid could be eliminated completely from the system--all acidity requirements being taken care of by HCl which we would expect to reclaim and recycle to a large degree.

11
Other, less drastic changes already underway are additional chlorine recovery systems, and improved chlorination equipment which has raised efficiencies from a previous 70% in the old carbide and early model sand chlorinators, to over 90% in the new pilot model fluidized bed units. With production models based on these pilot units and the proven reliability of the Teledyne Wah Chang Albany continuous monitoring instruments, we confidently expect to operate consistently at or better than 95% efficiency, thereby further diminishing chloride and sodium ions by a noticeable amount.

Although it is too early to estimate accurately the costs involved in the above proposed changes, the neighborhood of \$10,000,000 does not seem unrealistic. In order to justify expenditures of this magnitude, these changes would of necessity have to promise increased plant productivity. We therefore request permission to raise the plant capacity from the present 900,000 lbs. zirconium oxide per month to 1,500,000 lbs. in the next year, followed by an increase to 1,800,000 lbs. ZrO₂ during 1975. This, of course, is contingent upon our ability to reduce proportionate amounts of ammonia, thiocyanate, and chloride in our effluent. During the transition stage we expect that there will be temporary increases in one or more of the pollutants, but as the major process transitions occur, we are confident of very significant improvements.

W. B. J. Weathersbee
May 29, 1973
Page 4

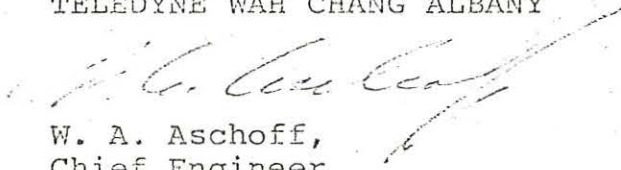
TELEDYNE
WAH CHANG ALBANY

To monitor more closely the effects of these changes, both increases and decreases, we are in the process of extending our research program with OSU on toxicity and fish growth to the stage of building a continuous bioassay laboratory to Dr. Warren's design. The structure will be on the Wah Chang plant grounds, and will use a continuously flowing mixture of river water and plant effluent. Oak Creek Laboratory personnel will set up and operate the unit for the first year, during which time Wah Chang personnel will be trained and will take over at the end of that period.

14 We would appreciate your keeping confidential our proposed process changes and plant capacities. We would be very happy, however, to discuss any or all of these points with you at your convenience.

Yours very truly,

TELEDYNE WAH CHANG ALBANY


W. A. Aschoff,
Chief Engineer

WAA:dkm
Enc.

MONTHLY EFFLUENT FIGURES / POUNDS PER DAY 1974

	JAN	FEB	MAR	APRIL	MAY	JUN	JUL	AUG	SEP
NH ₄ ⁺ (ammonia)	8700	7560	5950	6960	9472	8505	11,304	10,175	7646
SO ₄ ⁻ (sulfate)	14,200	11,925	11,870	13,350	12,728	17,475	17,060	14,520	13,634
SCN ⁻ (thiocyanate)	960	1,375	1,465	1,815	1,539	1,935	1,278	1,178	2,265
F ⁻ (fluoride)	165	135	118	135	89	105	123	122	147
Cl ⁻ (chloride)	32,400	44,100	44,370	50,895	53,872	66,435	62,893	65,561	64,904
Na ⁺ (sodium)	8,430	7,500	8,155	8,580	10,508	9,990	12,305	9,394	11,263
Ca ⁺⁺ (calcium)	19,050	17,925	18,352	18,315	17,464	28,380	26,267	23,837	28,211
MIBK (methyliso-butyl ketone)	960	1,845	1,199	3,810	1,006	1,380	?	?	1,854
TSS						230			
Oil/ Grease	?	180	1,480	144	75	75	?	?	61
COD	2,250	3,000	4,218	2,295	1,036	2,820	?	?	4,499
TDS (NH ₄ , SO ₄ , Cl ⁻ , Na ⁺ , Ca ⁺⁺)	82,400	89,000	88,900	98,200	104,100	130,800	133,900	113,600	125,658

	Present State Permit (maximum)	Requested by Wah Chang	Initial Proposed NPDES Limits (monthly average)	Final Proposed NPDES Limits 7/1/77 (monthly average)
NH ₄ ⁺	2,000	8,000	3,000	20
SO ₄ ⁻	5,000			
SCN ⁻	250	1,500	250	35
F ⁻	200	140	140	28
Cl ⁻	15,000			
Na ⁺	3,000			
Ca ⁺⁺	15,000			
MIBK	500	1,500	500	30
TSS	700	1,200	700	280
Oil/Grease	140		140	140
COD	1,000	3,500	1,000	140
TDS		160,000	48,000	14,000

WASTE DISCHARGE PERMIT

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued in accordance with the provisions of
ORS 449.083

Permit Number: 1213
Expiration Date: 7-1-73
Page 1 of 5

ISSUED TO:

Teledyne Wah Chang Albany
Post Office Box 460
Albany, Oregon 97321

REFERENCE INFORMATION

File Number: 93466
Appl. No.: 1525 Received: 1-3-72
Major Bin: Willamette Minor Bin: Murder Creek
Receiving Stream: Tillamook Creek
River Miles: 2.0
County: Linn

Until such time as this permit expires or is modified or revoked, Teledyne Wah Chang Albany is herewith permitted to:

- Complete and place in effective operation planned process changes and waste recovery systems for better control and greater reduction of wastes.
- Operate and maintain existing waste control facilities.
- Discharge treated wastes and uncontaminated cooling waters in a controlled manner.
- Conduct further studies and develop specific proposals for further reducing and controlling waste discharges.

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

All other waste discharges are prohibited.

- All plant processes and all waste collection, treatment and disposal facilities shall be operated and maintained at all times at maximum efficiency and in a manner which will minimize waste discharges.
- The permittee shall eliminate, treat for 95% removal of chemical ions and other toxic components or recover chemicals from streams V₃ and V₄ (Zirconium/hafnium operations) by not later than July 1, 1973 to comply with limits set forth in Condition No. 4 of this permit.
- The permittee shall maintain waste discharge limits within the following constituent limits until elimination of V₃ and V₄ streams or until July 1, 1973, whichever occurs first:

Parameter	Max. Concentration (mg/l) (based on 1.7 MGD effluent flow)	lbs/day (maximum)	lbs/day (maximum monthly average)
COD	213	3,000	
Oil	10	140	
Ammonium ion	355	5,000	
Thiocyanate ion	42	600	400
Sulfate ion	710	10,000	8,000
Chloride ion	1,200	17,000	
Methylisobutyl ketone	35	500 (June-Sept incl.)	
	57	800 (Oct-May incl.)	
Calcium ion	1,060	15,000	
Sodium ion	285	4,000	
Fluoride ion	21	300	
Total suspended solids	100	1,400	
pH range	6.5 - 7.5		

WASTE DISCHARGE PERMIT

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

Permit Number: 1213
Expiration Date: 7-1-73
Page 2 of 5

- After July 1, 1973 the permittee shall maintain waste discharge limits within the following constituent limits:

Parameter	Max. Concentration (mg/l) (based on 1.7 MGD effluent flow)	lbs/day (maximum)	lbs/day (maximum monthly average)
COD	70	1,000	
Oil	10	140	
Ammonium ion	140	2,000	
Thiocyanate ion	17	250	150
Sulfate ion	350	5,000	4,000
Chloride ion	1,060	15,000	
Methylisobutyl ketone	35	500	300
Calcium ion	1,060	15,000	
Sodium ion	215	3,000	
Fluoride ion	14	200	
Total suspended solids	50	700	
pH range	6.5 - 7.5		

These limits shall be attained by process improvement, new treatment facilities or curtailment of production.

- The permittee shall submit by not later than July 1, 1973 a detailed program and time schedule for rendering its total plant effluent nontoxic. No expansion of production facilities or increase in production shall be permitted until satisfactory control over total plant wastes has been achieved so that plant effluent is nontoxic.
- Bioassays of the waste discharge stream shall be conducted in sufficient number to represent on a continually current basis the dilution with river water required to render the wastes nontoxic as evidenced by using a sensitive organism appropriate to the toxicity level. These organisms are to include *Gambusia* spp., a salmonid, or an appropriate sensitive organism, or organisms to be selected as a result of research. A progress report shall be submitted prior to July 1, 1973.
- The permittee shall conduct or cooperate and participate in the following studies to be completed and reported on the date as noted:
 - Continuation of the study "The Effects of Wah Chang Effluent on Juvenile Salmon" with the Department of Fisheries and Wildlife, Oregon State University. Progress reports May 1, 1973 and May 1, 1974.
 - Cooperate with DEQ study "Ecological Fate and Effect of Ammonia (NH₄⁺ and NH₄OH) in Industrial Waste Discharges in the Willamette and South Santiam Rivers."



State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Kess Cannon Date: 12-19-74
From: Kent Ashbaker
Subject: Chain of Events Since Permit No. 1213 Was Issued to Teledyne Wah Chang,
Albany, August 3, 1972

Between the date of permit issuance (August, 1972) and April, 1973 Wah Chang was essentially meeting permit limits on the important parameters. Some of the minor parameters were being exceeded, but we elected to take no action since they seemed to be making progress toward the new limitations which would go into effect July 1, 1973.

January 11, 1973

We received a progress report from Wah Chang which indicated several alternatives which they would be considering in order to achieve the lower effluent limits which would go into effect July 1, 1972.

April 6, 1973

Bill Lesher, Rich Reiter and Craig Starr of the staff met with Wah Chang to review progress toward meeting July 1, 1973 limits.

April 12, 1973

Bill Lesher wrote memo regarding Wah Chang's progress toward meeting July 1, 1973 limits. There was an indication that Wah Chang may have difficulty in meeting chloride limits.

May 31, 1973

An application for renewal of the State Waste Discharge Permit was received from Wah Chang. The application indicated that "definite assurance of meeting the proposed July 1973 limits will require a degree of consistency in operation that may not be possible to achieve". The application also indicated that there would be a six-week delay in removing the U₃ and U₄ streams from the treatment system. They requested a production increase of 67% during 1974 and 100% by the end of 1975. They requested permission to dispose of the sludge in the sludge lagoon and use the sludge lagoon to store the U₃ and U₄ streams until they could be eliminated. The proposal for sludge disposal was not acceptable to the Solid Waste Division.

June 11, 1973

Bill Lesher wrote a memo recommending that the present permit be extended until we have authority to issue an NPDES Permit. Therefore, no renewal permit was drafted.

August 30, 1973

Wah Chang sent a letter stating that production over the past six months had remained essentially constant, and that the effluent was as good as it had been in previous reporting periods for the year.

September 20, 1973

Bill Lesher visited the plant to get updated information on progress toward waste treatment improvements in order to draft NPDES Permit. Some information was not available, and he was told that it would be sent to him.

September 26, 1973

Oregon (DEQ) received authority from EPA to write NPDES Permits.

March, 1974

Although Bill Lesher had still not received all of the information he had requested from Wah Chang, he drafted an NPDES Permit.

April 29, 1974

Draft NPDES Permit was mailed to Wah Chang for comments.

May 7, 1974

Wah Chang requested an extension of time for submission of comments.

May 10, 1974

Wah Chang phoned and requested a meeting with the staff. They were told that as soon as written comments had been submitted and the staff had reviewed them, a meeting would be scheduled.

May 14, 1974

Wah Chang again requested additional time to submit written comments. They also asked for our rationale in establishing the permit limits.

May 17, 1974

Wah Chang submitted a progress report.

July 12, 1974

A letter was sent to Wah Chang explaining the rationale behind the permit limits.

July 29, 1974

Wah Chang finally submitted written comments on the draft permit.

August 26, 1974

Bill Lesher circulated his comments regarding Wah Chang's letter of comments.

October 24, 1974

Staff held a meeting with Wah Chang. At this meeting, Wah Chang admitted that they had increased production and production capacity.

October 28, 1974

E J Weathersbee wrote memo to the Director, in which he summarized the Wah Chang problem.

MINUTES OF THE SIXTY-FOURTH MEETING
OF THE
OREGON ENVIRONMENTAL QUALITY COMMISSION

December 20, 1974

Pursuant to the required notice and publication, the sixty-fourth meeting of the Oregon Environmental Quality Commission was called to order at 9:00 a.m. on Friday, December 20, 1974. The meeting was convened in the Redwood Room of the Swept Wing Restaurant at 1212 S.E. Price Road in Albany, Oregon.

All commissioners were present including: Mr. B.A. McPhillips, Chairman; Dr. Morris Crothers; Dr. Grace S. Phinney; (Mrs.) Jacklyn L. Hallock; and Mr. Ronald M. Somers. Staff members present included Kessler R. Cannon, Director; Ronald L. Myles, Deputy Director; Assistant Directors Frederick M. Bolton (Enforcement), Wayne Hanson (Air Quality), and Kenneth Spies (Land Quality). Chief Counsel Raymond P. Underwood and several additional staff members were present.

MINUTES OF THE NOVEMBER 22, 1974 COMMISSION MEETING

It was MOVED by Mr. Somers, seconded by Mrs. Hallock, and carried to adopt the minutes of the November 22, 1974 meeting as distributed.

PROGRAM ACTIVITY REPORT FOR NOVEMBER, 1974

The reading of the activity report was informally waived. Mr. Cannon noted that the AMAX permit application was incomplete. Mr. Somers commended the volume and currency of activity but noted delay on the AMAX proposal. He suggested that consideration of the proposal be begun anew in terms of: a) spring arrival of needed baseline data on environmental effects; b) possible zero fluoride emission feasibility with new Alcoa process; c) irreversible nature of potential hazards; and d) effects of proposed industry on the Northwest power pool. It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried unanimously to conduct a rule-making hearing on a proposed rule which would designate as a Special Problem Area that area bounded by Youngs Bay Estuary, Fort Stevens State Park, and Fort Clatsop National Monument.

It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried that the activity report be approved as submitted. (summary attached as Appendix A)

It was MOVED by Mr. Somers, seconded by Dr. Phinney and Mrs. Hallock, and unanimously agreed that Director Cannon have the Commission's vote of confidence based on his past performance.

TAX CREDIT APPLICATIONS

Tax Credit Application T-590 was dropped from the agenda as incomplete. It was MOVED by Mr. Somers, seconded by Mrs. Hallock, and carried that the remaining fifteen Tax Credit recommendations of the Director be adopted as submitted.

They are as follows:

<u>APP. NO.</u>	<u>APPLICANT</u>	<u>CLAIMED COST</u>
T-579	Modoc Orchard Company	\$103,965
T-573	Modoc Orchard Co.	50,381
T-585	Terminal Flour Mills Co.	33,322
T-591	Publishers Paper Co.	575,174
T-592	Publishers Paper Co.	81,009
T-593	Publishers Paper Co.	17,817
T-595	Publishers Paper Co.	257,620
T-603	Crown Zellerbach Corp.	215,674
T-606	Brooks Scanlon	363,386
T-608	Publishers Paper Co.	2,413,714
T-609	Publishers Paper Co.	116,977
T-610	Georgia Pacific Corp.	67,903
T-611	Georgia Pacific Corp.	70,655
T-612	Georgia Pacific Corp.	85,366
T-552	Stauffer Chemical Co.	37,998

PRESENTATION OF CUP AWARDS

It was MOVED by Mrs. Hallock, seconded by Dr. Phinney, and unanimously carried to grant an Oregon CUP Award to Cascade Construction Company for its Abernathy site.

Mr. Cannon and Mr. McPhillips commended nominee Mr. Kenneth H. Spies for the quality and longevity of his service to the Department and its predecessor-agency. It was MOVED by Mr. Somers and seconded by Dr. Phinney and carried that Kenneth H. Spies be granted the Oregon CUP Award for his career efforts.

AUTHORIZATION TO CONDUCT HEARINGS ON PROPOSED MOTOR VEHICLE INSPECTION PROGRAM (PURSUANT TO ORS 468.370)

It was MOVED by Mr. Somers, seconded by Dr. Phinney and Dr. Crothers, and carried unanimously that the Department be authorized to conduct public hearings to receive testimony on proposed standards of automobile noise control and emissions.

VEHICLE INSPECTION PROGRAM - STATUS REPORT

Mr. Wayne Hanson and Mr. Somers called public attention to the mobile inspection unit situated in view of the meeting, noting it was available for examination and free testing. It was stated that after July 1, 1975, the program would entail a fee and would be mandatory for vehicle owners in Multnomah, Clackamas, and Washington Counties. Mr. Hanson and Dr. Phinney discussed the difficulties involved in evaluating the results of the inspection program on ambient air quality. It was noted that the cost to bring vehicles into compliance with the Department's interim standards was not prohibitive in most cases.

GOLD MINING IN OREGON-STATUS REPORT

Mr. Terry Westfall, biologist for the Southwest Region presented a series of slides depicting the various types and sizes of placer mining operations now in Oregon.

Mr. Somers expressed interest in the State Police and/or other state agencies as possible sources of assistance in maintaining compliance with NPDES permits.

It was strenuously objected by Mr. George Massie on behalf of the Gold Panners Association of America that manifold local, state, and federal agencies, in their enforcement of complex and nebulous standards, were unduly harassing the recreational miner. Mr. Massie noted that the country is in need of the gold and that voluminous recreational mining constituted the cleanest method of obtaining it. Mr. Cannon, Mr. Somers, and Mr. Westfall emphasized repeatedly that the Department's only concern was with turbidity caused by the operations; and that peripheral concerns with land removal, wildlife, and nuisance problems were not under discussion. Mr. Henry Speaker testified that he had been mining a great number of years and had seen no deleterious effect on fishlife or irrigation facilities. He opined that his operation enhanced surrounding plant and fish life. It was his contention that he was protected by the 1872 Mining Law and attempts to regulate or halt his operation were in derogation of his civil liberties. Mr. Cliff Everett testified that the Commission's adoption of standards on December 3, 1971, which discriminated against the commercial miner was a violation of Section 20, of Article 1 of the Oregon Constitution. He contended that the Department of Geology and Mineral Industries should have exclusive jurisdiction in mining affairs. In the face of repeated irrelevant comment, a point of order was made to close discussion with the assurance that Department personnel would meet with the miners in the future.

RULE-MAKING HEARING RE: PERMANENT RULE ON ALLOCATION OF AIR EMISSIONS IN THE PORTLAND METROPOLITAN AREA

After due publication and notice to all required parties the hearing was convened. Mr. John Kowalczyk of the Northwest Regional Office read the Director's recommendation.

Mr. Tom Donaca of the Association of Oregon Industries testified against the adoption of the rule. He stated concern that future improvements in the area's air quality resulting from improvement in Washington point sources would not be recognizable from current baseline data and could not, therefore, be credited to Oregon Industry. Dr. Crothers pointed out that the budget request for funds to improve data, a request supported by Mr. Donaca's group, would, if approved, equip the Department with data necessary to credit Oregon installations with any improvement attributable to Washington reduction in emissions.

Mr. Donaca also expressed concern that the temporary rule, if made permanent, would possibly be in conflict with the coming Significant Deterioration rules required by the EPA. He said Class II requirements are not yet fully understood and it is uncertain which state agency will be empowered to enforce the Significant Deterioration requirements.

Mr. Kowalczyk stated the Portland area to be in noncompliance with the Significant Deterioration requirements and, therefore, exempt from the provisions of that federal prevention program. With regard to other federal standards, Mr. Kowalczyk noted that the proposed rule's requirements exceeded these.

Written matter offered by Portland's mayor and Port Authority was noted for the record by Mr. McPhillips.

Mrs. Marianne Donnel of the Oregon Environmental Council questioned the exemption of sources emitting less than ten tons annually. Mr. Kowalczyk pointed out that such sources are still subject to the other standards for general air quality and that a deluge of exempt installations would result in reconsideration of the rule. Mr. Cannon noted that the proposed rule came about not to regulate small industry but due to the possibility of a small number of major installations resulting from the Port of Portland's current Rivergate policy.

It was MOVED by Dr. Phinney, seconded by Mrs. Hallock, and unanimously carried that the rule be adopted (OAR 340, 32.005 to 32.025).

BROWN'S ISLAND: MARION COUNTY SOLID WASTE-STATUS REPORT

The staff report indicates that the Brown's Island Fill will be unfit for further use on February 1, 1975. The selection of alternate solid waste disposal for the area now served by the Brown's Island Fill by the deadline is the problem immediately ahead. Mr. Russell Fetrow, Salem District Engineer presented the staff report and showed slides of the Brown's Island Fill and the surrounding area. Mr. Roger Emmons of Sanitary Services Co. Inc. reported that of the 240 tons deposited daily, less than 25% comes from the Santiam Canyon area.

Dr. Crothers stated that Bureau of Recreation approval for the use of a twenty-one acre site to the east of the present fill could not be obtained in time to prepare the site for use on February 1, 1975.

Mr. Harry Carson Jr., Chairman of the Marion County Board of Commissioners noted that the staff report was not in agreement with the County's information with regard to low spots on the old access road to the landfill. The County's information is that the old road is, in fact, below 128 feet in elevation in all but a short portion of it. Mr. Carson's position was that the first objection from the Department to the rebuilding of the new access road was May 9, 1974, after completion of the task.

Mr. Carson went on to state Macleay site was, in the view of the County, an adequate back-up site for periods when the Brown's Island Fill was isolated by floods, (projected to average four to six days per annum). The county proposed to lower the new road to an elevation of 136 feet and use the Macleay site for a backup. The cost estimate for this was \$15,500. It was proposed to extend the fill 400 feet north.

With regard to other suggested improvements at the Brown's Island Site, Mr. Carson noted that the Department had lead the county staff to believe that the flood danger represented by the 1973 flood had been cured by the removal of an upstream dike and the covering, rounding, and sloping of the west end fill area of the facility.

Mr. Carson stated that the County would be in opposition to any further costly studies without financial assistance from other agencies. Marion County objects to the raising of the old access road, reasoning that the estimated \$115,000 for this would be prohibitive. The county is opposed to shouldering the entire financial burden for the implementation and operation of the BOR site.

The County proposed the Department issue a new permit to allow extension of the present site four hundred feet north (toward the main channel of the river) this, in the county's view, could be accomplished by February 1, 1975. The use of the proposed 400 foot extension for fourteen months is a condition to the county's offer to expend moneys to lower the new access road. This would allow more time to negotiate with the BOR to obtain the twenty-one acres to the west. April 30, 1975 was the County's most optimistic estimate for the attainment of the BOR site.

In answer to a question from Mr. Somers, it was noted that half the \$72,000 cost of restoration after the 1973 flood was born by the federal government and that the present site is owned by private interests and leased to the fill operator.

In answer to a question from Dr. Crothers, Mr. Carson stated the County's estimate that the BOR site would last the county five years, affording time to study alternate methods of solid waste disposal. The County is exploring Resource Recovery as a long term goal.

Mr. McPhillips noted that, like the present one, many Oregon Landfills were in a crisis situation.

Mr. Vernon Bradley testified that the use of a river's flood plain for a landfill site is poor policy which should never have been initiated and should not now be perpetuated. He criticized the Clark and Ross Engineering Report as in error with regard to the feasibility of further diking and recommended that the access road be by trestle. Mr. McPhillips noted that the landfill on the flood plain in Yamhill County just above his home had proven satisfactory for two years. Mr. Bradley criticized the management of the Brown's Island Fill.

Mr. Somers questioned the proposition that the river stayed at nineteen feet or over for only a week of the year.

Mr. Glenn Hogg testified that he, his brother, and sister own the farm directly north of the present landfill in Polk County and have resided there for seventy years. During this time, Mr. Hogg reported, he has been a student of the river. He objects to the use of highly arable land for a landfill and objects to the failure to consider the evolution of the river in relation to Brown's Island. Recalling when the river was straight and deep from Halsey to Salem, Mr. Hogg noted that the gradual deposition of materials born from upstream has made the river shallow, forcing it to erode against its banks. Brown's Island, Mr. Hogg contends, is the site of present heavy erosion. He opined that future heavy flooding will result in the taking of part of Brown's Island as the river channel. A dike sufficient to prevent the same would have to run from Illahe Hills to below Salem and would endanger the properties on the other side of the river in case of floods.

Mr. Oliver Fursman who lives near Mr. Hogg objected to the fill on the grounds that it is unsightly, noisome, and malodorous. These conditions, he testified, impaired the operation of his residential apartment complex.

Mrs. W.D. Gwenn of the Dallas Highway spoke on behalf of her neighbors and others from the Eola Hills area of Polk County and objected to the failure of the present proposals to adequately deal with the river's flood cycle which, on a ten year basis, entails flooding more extreme than that encountered in 1974. She further objected to the debris that is continually left on the river banks from the fill. She contended that the fill was not covered with six inches of overlay except on occasion of inspection by officials. The result is a malodorous condition that affects her neighborhood.

Mr. William Schlitt operator of the landfill testified that he was as concerned with solid waste problems as anyone in the community and the community members should recognize that solid waste is everyone's problem. It was noted that the present overlay is material from Boise Cascade.

Mr. Fetrow noted that, on some days, inclemencies of weather render coverage impractical.

Mr. Roger Emmons, representing Mr. Schlitt for the Oregon Sanitary Service Institute, stated that he completely supported the County's proposal. Further, he suggested that a short trestle on the new road is not necessary. He strenuously asserted that no alternatives to the county plan are available, enumerating the impediments to the several alternatives that have been under discussion. Mr. Emmons noted that under current conditions, it takes more than one year to get additional trucks and these were needed for any distance hauling to alternate sites. He stated that the proposed four hundred foot extension was two hundred feet less than the original plan for the use of Brown's Island. He added that the operator would be willing to help Marion County with the proposed road alterations. It was noted that, except for Whiteson and Coffin Butte, every site in Western Oregon is on a flood plain.

Dr. Crothers pointed out that Mr. Schlitt is reputed to be one of the best landfill operators in Oregon.

In response to Dr. Crothers' questions, Mr. Emmons said three to ten years would be the projected time for the implementation of a satisfactory long-term, solid waste disposal system involving resource recovery. This would eliminate 75% by weight of the solid waste. He asked the Department to institute studies on the feasibility of dumping the 25% residue in the gravel pits. In response to a question by Dr. Phinney, Mr. Emmons stated that experiments with source separation had shown it to be too costly, without sufficient public participation, and no help in the disposal of putrescibles. The Environmental Protection Agency holds forth, according to Mr. Emmons, for the source separation of only cardboard and newspapers.

Dr. Phinney, noting that no action is required of the Commission, urged the Department to proceed along the lines set forth and also urged that, as soon as the BOR site is ready, disposal to the North of the present site cease.

Mr. McPhillips noted that the landfill adjacent to his home is covered and well cared for and opined that no sufficient reason is apparent for a failure in this respect on Brown's Island. He requested surveillance of the fill.

TELEDYNE WAH CHANG, ALBANY - STATUS REPORT

Mr. Kent Ashbaker read the summary and conclusions of the staff report, indicating that the permittee, Teledyne Wah Chang, had expanded its operations, causing increased emission in violation of its permit. It was contended this was done despite the failure of programs to reduce the effluent discharge into the public waters.

Mr. S.A. Worcester, representing the permittee, testified that the permittee had not expanded production until eleven months after its notification to the Department that it so intended. He argued that expanded production consisted of increasing the number of columns, not the increased use of on-line separation columns. Mr. Worcester stated that the permittee could not meet the 2000 pounds per day interim ammonia emission limit until June 1975. He cited unforeseen failure in the ammonia concentration unit designed to meet the limits. He strenuously insisted that the permittee had not acted in bad faith with relation to its permit.

Mr. McPhillips stated that, in his view, the gravamen of the matter was increased discharge, not increased production.

In response to Mr. Worcester's statement that the permittee was in competition with another plant located in West Virginia which had no controls whatsoever, Mr. Somers noted that West Virginia did not have a tax credit available for such efforts. Mr. Worcester rejoined that it was unwise for the permittee to attempt to "put the problem to bed with money."

In response to questions from Mr. Somers, Mr. Worcester conceded that part of the malodorous condition of the air in Albany was owing to the permittee's operation.

In response to a question from Mrs. Hallock, Mr. Ashbaker stated that the primary violation initiated in April 1973 and had gradually increased beyond the permit limit since then.

Mr. McPhillips noted that he could agree to 5000 pounds per day until June after Mr. Worcester reiterated his commitment to meet 2000 per day as of June 1, 1975.

Mr. Worcester noted that there was no cost benefit but a high incentive to recover ammonia in response to questioning by Mr. Somers. Mr. Worcester stated that the column subject to a tax credit application in 1969 has been extensively modified since and that a shut down to modify such equipment precipitated the permittee's unusually high discharge in August and July.

In response to Dr. Crothers' inquiry, Mr. Worcester estimated the use of a recycling process tested in early December would permit operation at current volume with less than 5000 pounds per day. There was question as to the recycling processes' success due to some problems with an ammonia distillation process apertaining to the recycle. He did not know how often shut down for maintenance (involving pond storage and retrieval of ammonia) would occur.

Mr. Somers, noting that he was reluctant to shut the permittee's operation down and cost jobs, stressed his dissatisfaction with Wah Chang's increase of production and discharge and its implicit public disregard for the authority of the agency. Mr. Somers noted that the public nature of the problem rendered Department inaction, in the face of blatant non-compliance, a poor precedent for the guidance of other permittees.

In answer to Mr. McPhillips' question, Mr. Ashbaker opined that the 5000 pounds per day during high water until June would not have an adverse effect greater than the 2000 per day after June 1. He added that considerably less than 2000 pounds would be required to return the receiving creek to a nontoxic state.

Mr. Worcester commented that the permittee was concerned with a failure of the Department to commit itself as to what would be the ultimate limit of ammonia loading in the creek.

In response to Dr. Phinney's question, Mr. Worcester stated that the two solvents included in the permit were running at 600 pounds per day for the one and 400 for the other, amounts which are under negotiation with the Department.

Mr. Worcester expressed dissatisfaction with the rigidity of enforcement by the Department which, in his opinion, used to exercise flexibility.

Mr. Cannon stressed that the permit was the result of negotiations with the permittee which resulted in a prohibition of expansion until the limits were met. It was noted that, in light of this condition, there was an obvious and deliberate violation. This, Mr. Cannon felt, justified added incentive in the future for compliance; such incentive to come in the form of a civil penalty. Mr. Cannon alluded to strong pressure from the EPA to enforce limits as limits, not as goals.

Mr. Somers concurred in the proposed use of civil penalties as did Dr. Crothers. In voicing her concurrence, Dr. Phinney noted that the effluent involved was significantly dangerous. Mr. McPhillips concurred in the use of the civil penalty to curb future violation. The Commission approved permit limits of ammonia effluent as follows: until June 1, 1975, 5000 lbs per day; after June 1, 1975, 2000 lbs per day with negotiations aimed at further reduction.

Mr. Ashbaker stated that 5000 lbs per day would be enforced along with all other permit parameters until June 1, at which time the limit for ammonia would be reduced to 2000 lbs per day.

Mr. Harold Hiemstra spoke in criticism of the permittee, pointing out that the Department's figures indicate that the permittee has submitted reports showing noncompliance with eight of the permit's twelve parameters during the entire first nine months of 1974.

In response to a question by Mr. Somers, Mr. Ashbaker pointed out that thiocyanate, one of the effluents reported, was not lethal as is cyanide; though it caused a minor oxygen demand on the receiving creek.

RULE-MAKING HEARING RE: PROPOSED RULES PERTAINING TO SURETY BONDS AND OTHER SECURITIES UNDER ORS 454.425

Mr. Patrick D. Curran of the Department's Water Quality Division read the staff's conclusions and recommendation with regard to the proposed rules.

Mr. Craig Starr of Lane County spoke in favor of adoption of the rules as proposed but suggested that OAR Chapter 340, Section 15-015 (2) (a) read: "Subsurface sewage disposal systems designed to serve not more than four single family dwelling units or any other establishment or establishments with a projected sewage flow of not more than 1200 gallons per day." Mr. Starr's suggestion was based on apprehension of a conflict between "four family dwellings" and "1200 gallons per day."

Mr. Somers suggested that the rule be worded in the conjunctive using "and" instead of "or."

Mr. Starr reported his suggested wording to have been almost identical to that used in the subsurface sewage standards and suggested that OAR Chapter 340, Section 15-015 (2)(c) be worded so as not to distinguish between industrial plants having an NPDES permit and those not having the same.

Mr. Somers expressed the viewpoint that the proposed subparagraph (c) was intended to prevent inconvenience to residents where the construction is performed by a plant owner and affects dwellings served by the facility. He noted that the NPDES requirement made no difference in his view.

Mr. Cannon stated that his understanding of the NPDES claims was that such a permit assured the Department of adequate construction, alleviating the necessity of the additional assurance a bond would provide.

Mr. Ray Underwood requested that staff be given time to study Mr. Starr's proposals further.

Dr. Crothers noted that latter day practices of co-habitation out of wedlock brought into question the definition of the word "family."

Mr. I.M. Timm of Albany expressed concern that a small restaurateur might be required to post bond and suffer a significant deprivation of capital until there was formed a service district.

Mr. Somers reiterated that type of protection the rule was intended to give to homeowners as against the misconduct of developers or other homeowners. He noted that there is little cost involved in the organization of a service district with the power to assess all property owners equitably.

Mr. McPhillips closed the hearing with instructions to the Director to hold the record open for ten days for written material. It was planned that the Commission would make its decision at the next meeting with regard to the adoption of the rule.

VARIANCE REQUEST - BOISE CASCADE LUMBER MILL, BEAVER MARSH, OREGON

Mr. John Borden of the Central Region read the Director's conclusion and recommendation with respect to the Boise Cascade Wigwam Burner at Beaver Marsh. It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried that the variance from OAR Chapter 340, Section 25-020(1) be granted to Boise Cascade Corporation until June 30, 1975, as recommended.

Mr. Borden read the Director's Conclusions and Recommendation with regard to the variance request of Russell Industries for open burning at Lapine. In response to a question by Mr. Somers, Mr. Fritz Skirvin commented that the contribution by Russell Industries to the occasional haze in the Sun River Area was not substantial. It was MOVED by Mr. Somers, seconded by Mrs. Hallock and carried that Russell Industries be granted a variance from OAR, Chapter 340, Section 23-010(1)(a) as recommended by the Director.

AUTHORIZATION TO CONDUCT RULE MAKING HEARING ON PROPOSED CHANGES TO
INDIRECT SOURCE RULES

Mr. Richard Vogt of the Department's Air Quality Division, alluding to the Director's recommendation, added the proposal that the rule be worded so as to adopt, as policy, inaction on applications until local land use planning authority has approved the proposed land use. It was MOVED by Dr. Crothers, seconded by Dr. Phinney and carried that the public hearing be held on January 24, 1975 as recommended.

Mr. Vogt read the Director's recommendation that authority to enforce the Indirect Source Rule within their respective areas of jurisdiction (border highway areas excepted) be delegated to LRAPA and MWVAPA. It was MOVED by Mrs. Hallock and seconded by Dr. Phinney and carried that the proposed authority be granted to the LRAPA and MWVAPA.

RULE-MAKING HEARING RE: VENEER AND PLYWOOD MANUFACTURING

After due publication and notice to all required parties the hearing was convened. Mr. Fritz Skirvin of the Department's Air Quality Division began with the reading of the Director's Discussion, Conclusions, and Recommendations. Included in the discussion was the Department's view that "control systems presently available can reduce visible emissions from less than 10% to zero opacity."

The Lane Regional Air Pollution Authority, by correspondence to the Department, supported the proposed rule. Correspondence offered by the North Santiam Plywood Company prior to the hearing was in opposition to the rule.

In response to suggestion by Dr. Crothers and Dr. Phinney, it was agreed by Mr. Skirvin and Mr. Cannon that the Department would include metric figures in parentheses along with the standard measurements in future proposals.

It was noted by Mr. Somers and Mr. Skirvin that the compliance schedule available under the proposed rule would allow a case by case review of the problems facing each operator: he who can immediately comply and he who might find delay necessary.

Mr. Ted Hurd, speaking on behalf of the Task Force on Veneer Dryer Emissions, lead the spokesmen who opposed the adoption of the proposed rule in its current form. He noted that the Task Force was composed of members of the American Plywood Association and the private sector of industry. Mr. Hurd stated that the Task Force was opposed to the 10% opacity limit on several grounds: it was said to exceed the standard required of other industries; exceed the standard required by neighboring states; pose a goal unattainable in the light of present technology; and pose an economic burden of undue proportion on the operators. On this basis the Task Force supported a 20% opacity limit. In response to questioning by Mr. McPhillips, Mr. Hurd opined that the 10% opacity limit would require much more sophisticated equipment, such as mist eliminators, than would the 20% opacity limit. He alluded to estimates of from \$3.50 to \$5.00 per CFM. He also expressed the view that no "off the shelf" equipment was available that was certain to meet 10% opacity for twenty-four hours per day, 365 days per year. In response to questioning by Mrs. Hallock, Mr. Hurd stated 10% or zero opacity might some day be possible. He contended the realm of the reasonable, not the possible, should guide the Commission. In response to questioning by Mr. Somers, Mr. Hurd noted that control devices which incorporate the condensation of materials from the process simply substitute a solid waste problem for an air quality problem. He further opined that the term "characteristic blue haze" might have evolved from a failure of science to comprehend the precise make-up of the emission from veneer dryers.

Mr. Skirvin noted that, while the Weyerhaeuser dryers in Coos Bay were thought to be uncontrolled at present, a mist system on their dryers at Springfield was in the start-up process and would soon be monitored by members of the Department.

Mr. Hurd delivered a prepared statement from Mr. Russell J. Hogue which was said to represent the consensus for the Oregon plywood industry and the American Plywood Association Board of Trustees. Mr. Hogue's statement took issue with the proposed 10% opacity requirement: citing the value of the plywood industry to the community; its present state of economic depression; the value of the industry to Oregon; the competitive disadvantage of 10% opacity requirement for Oregon industry while other states require less stringent control; the industry's history of voluntary effort; and the lack of indication that the emission is harmful to health. He requested that 20% opacity be adopted.

In answer to Mr. McPhillips' inquiry, Mr. Hurd pointed out that he did not contend that the emission was not harmful to health but that there was no evidence sufficient to support such a proposition. He also conceded to Mr. McPhillips that the pulp industry had undertaken efforts to reduce emissions which were on a scale with those undertaken by the plywood industry. Dr. Crothers noted that, in his opinion, the emissions from veneer dryers might well pose a health hazard as yet unproven.

Dr. Phinney noted that particulates and hydrocarbons were health problems per se in her experience. Mr. Wallace Corey, representing Boise Cascade Corporation, delivered a prepared statement objecting to the 10% opacity requirement of the proposed rule on many of the same grounds advanced by Mr. Hurd and Mr. Hogue. He added the information that, should the 10% opacity rate be adopted, one of Boise Cascade's Willamette Valley installations which just spent \$165,000 to reach 20% opacity in one stack and 10% in another will have done so needlessly. It was contended that such happenings would have the effect of reducing the enthusiasm of the industry toward voluntary efforts.

Mr. Corey assured Dr. Crothers that the proposed amendment, if it read 20% opacity, would be supported by Boise Cascade. Mr. Corey expressed to Mr. Somers the opinion that the availability of a tax credit to be directed against property tax during the period of market depression would not pose a particular advantage to industry for attempts to meet 10% during the present inactivity of many facilities. Upon response to Dr. Crothers, Mr. Corey noted that a variety of types of energy might be employed, depending on the systems used, to reach the lesser opacity figure. Dr. Crothers asked if descending opacity corresponded with descending energy use and was given an affirmative answer. Mr. Corey stated Boise Cascade used hog fuel boilers in most places, preferred them, but used gas boilers in one or two locations too small to warrant the use of hog fuel. Mr. Somers was told that the use of hog fuel boilers was impractical in the smaller installations.

In response to a question by Mrs. Hallock, Mr. Patterson commented that the concept of zero opacity evolved from discussions with the industry wherein parameters of emission control other than opacity were dismissed as too expensive, initiating the discussion of opacity.

Mr. Dave Barnhardt of North Santiam Plywood stated that his plant employed 450 people and was required to operate at full capacity to do this. He objected that 20% opacity would be the most stringent regulation that small companies could meet without being forced to shut down. He told Mr. Somers that his installation of a third dryer would allow slowing of the entire dryer process (using three dryers to do the work of two) thus meeting reduced air emission requirements without increased energy use. Commenting on the plywood industry in general, Mr. Barnhardt alluded to his company's traditional willingness to absorb short term losses in order to keep long time employees on the job.

Mr. James Pratt of Roseburg Lumber Company supported the statements of previous speakers in opposition to the 10% opacity requirement. He added that the changing of goals through continual proposal and adoption of more stringent standards created an atmosphere of uncertainty in setting of policy by top management. Finally, noting that 10% opacity was the equivalent of slightly dirty glasses, he urged the Commission to consider the amount of excess energy that might be expended in trying to gain the dubious advantage of 10% opacity over 20% opacity.

Mr. Ehrman Guistina of Guistina Brothers Plywood and Lumber Company in Eugene testified to long cooperation with the regional authority and objected to the 10% opacity on several of the grounds set forth by the preceding speakers. He strenuously asserted insufficiency of proof as to the success of current devices in their ability to meet 10% opacity.

Mr. Guistina added that application of the "highest and best practical treatment" rule might force the removal of expensive devices if they fail to meet the proposed standard. Also, he noted that the emissions of the dryers were much less offensive than auto exhaust emissions.

Mr. Harry Demarry of the Mid-Willamette Valley Air Pollution Authority testified in favor of the proposal. He drew an analogy between the absence of proof of a causal relationship between cigarettes and health five years ago and the lack of proof of a like relationship with regard to veneer dryer emissions today. Further, he noted that the effect of the emissions on the community was more than aesthetic, alluding to the failure of Mr. Hogue to reach the meeting by the use of aircraft. Next, he cited the Department of Revenue as authority for the proposition that the entire cost of emission controls could be written off against taxes. He emphasized that equipment was available, along with full guarantee by its sellers, to meet the 10% opacity requirement. Since March of 1974, 10% has been the standard within the jurisdiction of MWVAPA and, according to Mr. Demarry, several installations are meeting the requirement. Mr. Demarry opined that those installations with hog fuel burners could meet 10% opacity. He contended that the industry's position in negotiation prior to the proposal of rules was that the reduction of "zero blue haze" to a policy would be traded for industry acceptance of 10% opacity at the point source. Mr. Demarry urged that the Department extend, in generous fashion, tax credits to indirect pollution abatement devices, such as green end moisture beaters and fire prevention equipment. Finally, Mr. Demarry noted that the plywood industry could be subjected to fair discrimination such as that proposed. In response to a question from Mr. Somers, Mr. Demarry noted that he now allows the older plants higher emission rates but could not do so were the proposed standards adopted. Mr. Somers expressed concern that some of the older installations might be forced out of business by the rule.

Mr. Lyle K. McDonald, speaking for the industry, argued on the same ground cited by previous advocates of the 20% limit and stressed the threat to small independent plants. He argued that where these are forced to shut down, the state and the communities are the ultimate losers. He estimated for Mr. Somers that the average plant in Oregon is twenty years old. It was noted that paragraph (g) of the proposed amendment provided a protection to the environment which might be considered in lieu of the 10% limit on opacity. Mrs. Hallock asked if meeting a goal of 10% with a limit of 20% would result in a tax credit incentive to exceed the limit and attain the goal. Mr. Skirvin replied that the incentive would be there for either 20% or 10% but such a program would present administrative problems which staff would prefer to avoid. He argued that elimination of the characteristic blue haze, a condition which is susceptible of precise definition in more scientific terms, would require 10% opacity and would not be accomplished with a 20% limit. Mr. Skirvin's opinion was that consideration of the monetary impact of standards was beyond the

pale of staff's concern. It was noted by Mr. Somers that not every installation had sander dust which would enable the use of the Wasteco Burner without the need to process fuel for this purpose.

Mr. Jerry Ambrose of Moore-Oregon stated that his Moore Lo-EM system could reach 10% but could not consistently remain there. He cited 20% as within the capabilities of the system. He recommended that a 20% standard be incorporated into the rule.

Mr. William Capranos of Baker Industries stated the Baker Filter could meet 10% consistently and the maker would guarantee this to the buyer in terms of total refund and removal of equipment. He noted that the hydrocarbon recovered from control systems could be recycled into some of the installations using fuel of a "Bunker C" type. He stated that blue haze has characteristics of longevity and low altitude that render it more detrimental than other emissions. In response to Mr. Somers, Mr. Capranos stated that his filtration system depended on sand which had to be periodically cleaned and required an eighty to one hundred horse power motor.

Mr. Al Buchholz of Buchholz Industries argued that the degree of visibility of the haze is dependent only on the size configuration of the emission. He contended that the materials offensive to health were present regardless of visibility, rendering opacity an insufficient parameter for a standard. Mr. Buchholz further argued that the angle of view and background were factors in opacity which left some plants in a higher category of opacity simply due to their surroundings.

Mr. Burt Vaughn of Boise Cascade noted that the Albany plant with its Wasteco burner was not providing gas savings to his dryer operation. Resultingly, the Sweet Home plant was equipped with a Moore Lo-EM system which does result in gas savings. It appears that the Sweet Home plant can meet 20%. Mr. Vaughn states he cannot meet the 10% limit with the Lo-Em. He objected to the use of the tax credit to give incentive to the installation of these devices.

Mr. McPhillips closed the hearing.

It was MOVED by Dr. Crothers, seconded by Dr. Phinney, and carried that the hearing record be kept open for ten days for the inclusion of written offerings.

Mr. McPhillips adjourned the meeting.

MINUTES OF THE SIXTY-FOURTH MEETING

of EQC

December 20, 1974

APPENDIX A

Water Quality Control - Water Quality Division (35)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11- 1-74	Green S.D.	Happy Valley Rd. - No. 26 sewer crossing	Prov. app.
11- 1-74	Ashland	C. O. #2 TP	Approved
11- 1-74	Unity	Sewage collection system & 7.74 acre non-overflow sewage lagoon system	Prov. app.
11- 4-74	Springfield	Minor Subdivision sewers	Prov. app.
11- 4-74	Bend	Addendum No. 5 - grit chamber and septic tank dumping station	Approved
11- 4-74	Lincoln City	Careage Corp. nursing home sewer	Prov. app.
11- 4-74	Gold Beach	Septic tank dumping station	Prov. app.
11- 8-74	Mosier	Sewage collection system & 0.085 MGD extended aeration STP	Prov. app.
11-12-74	USA (Beaverton)	Allen Avenue sewer diversion	Prov. app.
11-12-74	NTCSA	C.O. A-1, Sch. IV	Approved
11-13-74	Josephine County	Harbeck-Fruitdale-South Allen Cr. int. sewer	Prov. app.
11-13-74	Junction City	Norman Park Subdivision Third Addition sewers	Prov. app.
11-15-74	BCVSA	Valley Estates Subdivision sewers	Prov. app.
11-15-74	BCVSA	Oak Grove Road sewer project	Prov. app.
11-15-74	Gleneden S.D.	Sewerage system to Depoe Bay S.D.	Prov. app.
11-18-74	Boardman	C.O. to contract for interim sewage facilities	Approved
11-19-74	BCVSA	Lozier Lane sewer project and Wilson Rd. sewer Lat. #1 south	Prov. app.
11-21-74	Pendleton	Indian Agency sewer extension	Prov. app.
11-25-74	North Bend	Newmark Street sewer	Prov. app.
11-25-74	Springfield	Gateway Street sewer	Prov. app.
11-25-74	Springfield	SWF Plywood pressure sewer line	Prov. app.
11-25-74	Coquille	East 13th Street sewer	Prov. app.
11-25-74	USA (Forest Grove)	C. O. No. 3 - STP modifications	Approved
11-26-74	Bay City	C. O. B-8, STP contract	Approved
11-26-74	Ashland	Mt. Ranch Subdivision Phase 1 sewers	Prov. app.
11-26-74	Josephine County	Harbeck-Fruitdale S.D. - Alexander Drive sewer	Prov. app.
11-26-74	Salem	Sludge truck purchasing documents	Prov. app.
11-27-74	Corvallis	26th Street sewer replacement	Prov. app.
11-27-74	Gold Beach	C. O. No. 1 - STP contract	Approved
11-29-74	Bly S.D.	C.O. Nos. 3 & 4 - Sch. B, STP contract	Approved
11-29-74	Warrenton	C. O. No. 1 - interceptor project	Approved

Water Quality Control - Northwest Region (35)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11- 1-74	Salem (Willow)	Central Services Center near I-5 and State Street sanitary sewers	Prov. app.
11- 5-74	Tualatin	Revised Shawnee Plains sanitary sewers	Prov. app.
11- 6-74	Milwaukie	The Grove, Phase 1, sanitary sewers	Prov. app.
11- 7-74	USA (Aloha)	Ray Sullivan sanitary sewer extension	Prov. app.
11- 7-74	Troutdale	Autumn Park Subdivision sanitary sewers	Prov. app.
11- 8-74	USA (Aloha)	CO-JO No. 2 sanitary sewers	Prov. app.
11- 8-74	USA (Aloha)	Hyland Hills Center, Phase 1, construction sanitary sewers	Prov. app.
11-12-74	USA (Beaverton)	Revised Allen Avenue sewerage diversion	Prov. app.
11-14-74	USA (Aloha)	Torreyview On Site, Phase 1, sanitary sewers	Prov. app.
11-18-74	Portland (Columbia)	Southeast Harney Street sanitary sewers	Prov. app.
11-18-74	USA (Beaverton)	Carolwood 1 sanitary sewers	Prov. app.
11-18-74	Lake Oswego (Tryon)	L.I.D. 163, Lake Shore Road sanitary sewers	Prov. app.
11-19-74	CCSD #1	Rainier Court sanitary sewers	Prov. app.
11-21-74	Amity	Lateral A-2, sanitary sewer on Roth Street	Prov. app.
11-22-74	Monmouth	Southwest Heights Addition No. 5 sanitary sewers	Prov. app.
11-22-74	Hillsboro	Sewell Station sanitary sewers	Prov. app.
11-22-74	Tualatin	Revised 105th Street sanitary sewers	Prov. app.
11-25-74	Salem (Willow)	Railroad Trunk, Phase 11, Main Road-1, sanitary sewers	submitted to Mar-Polk Bound.
11-26-74	Canby	North Cedar Street from 5th to Dahlia Place sanitary sewer	Pending
11-29-74	Gresham	Between SE Stark Street and SE 221st Avenue sanitary sewer	Pending

Water Quality Control Industrial Projects - Northwest Region (3)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11- -74	St. Helens	<u>Kaiser Gypsum</u> bay study	Pending
11-19-74	Marion County	<u>Robert Belozer Fryer Farm</u> chicken rearing facilities	Approved
11-29-74	Milwaukie	<u>Proto Tool</u> chrome plated rinse water treatment system	Approved

Water Quality Control Industrial Projects - Midwest Region (1)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
12-3-74	Linn County	<u>Donald Gabrielli</u> animal waste facilities	Prov. app.

Air Quality Control - Air Quality Division (13)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11- 1-74	Clackamas County	<u>Dammasch State Hospital</u> 100-space parking addition	Outside jurisdic- tion--no action
11- 5-74	Washington County	<u>Farmers Insurance Group</u> relocation of existing facility. 4 spaces added	Cond. app.
11- 5-74	Washington County	<u>Tualatin Plaza</u> 56-space parking facility	Cond. app.
11- 6-74	Marion County	<u>Pringle Creek Parking Facility</u> Hilton Hotel, 520-space parking facility	Cond. app.
11- 7-74	Douglas County	<u>Permaneer</u> door jam plant installation	Approved
11- 7-74	Coos County	<u>Georgia-Pacific, Coos Bay</u> veneer dryer emission scrubber system	Approved
11- 7-74	Coos County	<u>Georgia-Pacific, Coquille</u> veneer dryer emission scrubber system	Approved
11- 7-74	Lincoln County	<u>Georgia-Pacific, Toledo</u> veneer dryer emission scrubber system	Approved
11-13-74	Lane County	<u>State Motor Pool</u> relocation of 175-space parking facility	Cond. app.
11-14-74	Jefferson County	<u>Warm Springs Forest Products</u> new wigwam burner installation	Approved
11-15-74	Josephine County	<u>Fibreboard (Bate Plywood)</u> Air-Guard scrubber for veneer dryer emissions	Approved
11-15-74	Jackson County	<u>Kogap</u> new veneer dryer (no. 3) installation	Approved
11-25-74	Clackamas County	<u>Lincoln International</u> Phased warehouse parking facility	Cond. app.

Air Quality Control - Northwest Region (28)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11- 1-74	Washington County	<u>Western Foundry</u> scrubber to control cupola emissions	Approved
11- 1-74	Yamhill County	<u>Publishers Paper, Newberg</u> new digester	Approved
11- 1-74	Multnomah County	<u>Resource Recovery Byproducts</u> paper classifier	Reviewing info on controls
11-2-74	Washington County	<u>Pacific Building Materials</u> concrete readymix plant	Notice of Construction cancelled
11- 4-74	Columbia County	<u>Cascade Energy, Inc.</u> oil refinery	Reviewing emission info and EIA
11- 4-74	Multnomah County	<u>Ross Island Sand and Gravel</u> concrete batch plant	Permit issued
11- 4-74	Multnomah County	<u>Pennwalt Corp.</u> expansion of chlorine-caustic soda manufacturing	Reviewing info on emissions
11- 4-74	Clackamas County	<u>Milwaukie Plywood</u> veneer dryer control	Notice of Construction cancelled
11- 2-74	Washington County	<u>Pacific Building Materials</u> concrete readymix plant	Notice of Construction cancelled

Air Quality Control - Northwest Region (cont)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11- 5-74	Multnomah County	<u>Oregon Steel Mills, Front Street</u> ladle fume exhaust	Approved
11- 5-74	Clackamas County	<u>Oregon Portland Cement</u> paving of vehicular traffic areas	Approved
11- 5-74	Multnomah County	<u>Western Farmers</u> control of truck receiving	Evaluating info
11- 5-74	Clackamas County	<u>Oregon Portland Cement Company</u> new aggregate lime storage bin	In process
11- 7-74	Columbia County	<u>Charter Energy Company</u> oil refinery	Evaluating trade-offs and effect on ambient air
11- 7-74	Multnomah County	<u>Pacific Carbide</u> new furnace	Permit Issued
11- 7-74	Multnomah County	<u>Columbia Steel Casting</u> new furnace and controls	Permit issued
11- 8-74	Multnomah County	<u>Teeples & Thatcher, Inc.</u> sawdust cyclones	Approved
11- 8-74	Multnomah County	<u>Schnitzer Steel Products</u> wire incinerator	Permit Issued
11-14-74	Tillamook County	<u>Tillamook Creamery</u> control whey dryer exhaust	Approved
11-14-74	Multnomah County	<u>Chamberlain's Pet Crematorium</u> cremation incinerator	Proposed permit issued
11-15-74	Multnomah County	<u>Triangle Milling</u> dust control	Drafting approval letter
11-15-74	Multnomah County	<u>Zidell Explorations, Inc.</u> new secondary aluminum smelter	Accepted for filing
11-15-74	Multnomah County	<u>Owens Corning</u> fiberglass plant	Awaiting info on controls and tradeoffs
11-18-74	Multnomah County	<u>ESCO - Plant #3</u> new 4-ton induction furnace	Approved
11-19-74	Multnomah County	<u>Portland Steel Mills</u> new steel mill	Proposed permit issued
11-22-74	Multnomah County	<u>Kaiser Permanente Medical Center</u> controlled atmosphere incinerator	Reviewing submitted application
11-25-74	Multnomah County	<u>Rhodia--Chipman Division</u> dichlorophenol distillation expansion	Drafting approval letter
11-26-74	Clatsop County	<u>AMAX Aluminum</u> new aluminum reduction plant	Evaluating info on issues raised at public hearing
11-27-74	Multnomah County	<u>Norwest Publishing</u> control of heatset ink dryer	Reviewing manufacturer's data

Land Quality - Solid Waste Management Division (3)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11-14-74	Crook County	<u>Les Schwab</u> new site; tire disposal site	Prov. app.
11-19-74	Union County	<u>Ladd Canyon Disposal Site</u> new site; operational plan	Prov. app.
11-27-74	Lane County	<u>Franklin Landfill</u> existing site; operational and closure plans	Approved

Solid Waste Management - Northwest Region (1)

<u>Date</u>	<u>Location</u>	<u>Project</u>	<u>Action</u>
11-1-74	Yamhill County	<u>Willamina Lumber Company</u> new wood waste landfill	Approved