# 7/15/1975

# OREGON ENVIRONMENTAL QUALITY COMMISSION MEETING MATERIALS



State of Oregon Department of Environmental Quality

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#### MINUTES OF SPECIAL MEETING

#### OF THE

#### OREGON ENVIRONMENTAL QUALITY COMMISSION

### July 15, 1975

Pursuant to required notice and publication, the Environmental Quality Commission called to order a special meeting on Tuesday, July 15, 1975. The meeting was convened in the Auditorium of the Armond Larive Junior High School, 199 East Ridgeway Avenue, Hermiston, Oregon.

Commissioners present included Mr. Joe B. Richards, Chairman; Dr. Morris Crothers, Vice Chairman; Dr. Grace S. Phinney; (Mrs.) Jacklyn L. Hallock, and Mr. Ronald M. Somers.

The Department was represented by Mr. Loren (Bud) Kramer, Director, and, several additional staff members.

# PUBLIC HEARING: RE ISSUANCE OF AIR CONTAMINANT AND WATER POLLUTION CONTROL PERMITS FOR PROPOSED ALUMINUM REDUCTION PLANT: ALUMAX UMATILLA DIVISION

<u>Mr. John Kowalczyk</u> of the Department's Air Quality Program presented the staff report with regard to the proposed permits. A Water Pollution Control permit was proposed despite the applicant's intention to employ no discharge.

Conclusions of the Staff were as follows:

- 1. Alumax proposes to employ highest and best practicable treatment and control of air emissions by application of dry alumina scrubbing to cell emissions and wet scrubbing to pot room building ventilation air.
- 2. Based on comprehensive statistical analysis conducted by the Department, maximum projected particulate and fluoride air emissions from Alumax would be within the emission limitation requirements of the Department's regulations for new aluminum reduction plants.
- 3. Based on diffusion modeling by Alumax's consultants which has been verified by the Department, air emissions from Alumax should not cause any applicable air quality standard to be exceeded.
- 4. Air emissions from Alumax should not cause applicable Federal Class II significant deterioration of air quality limits (moderate growth limits) to be exceeded anywhere off the plant boundaries.

- 5. Air emissions from Alumax should not cause deterioration of air quality greater than Federal Class I limits (pristine air limits) in the potential Class I Cold Springs National Wildlife Refuge area.
- 6. Air emissions from Alumax should have no adverse effect on animal life, plant life (including crops) and surface water quality in the vicinity of the plant site.
- 7. Alumax proposes to employ highest and best practicable treatment and control of process wastewater and storm water runoff by recycling all process water and disposing of storm water by evaporation pond. There would be no discharge of wastewaters to any waters of the State.
- 8. Domestic sewage from the Alumax facility and support activities would be adequately handled by the Umatilla sewage treatment plant provided some plant improvements are made.
- 9. The Alumax facility and support activities (trucks, motor vehicle traffic) should be able to comply with Department noise regulation, including degradation limits for quiet areas. If auto and truck traffic is significantly greater than projected, imposition of car pooling or mass transit for shift working may be necessary to maintain compliance with noise requirements.
- 10. Solid waste generated by Alumax is proposed to be recycled to the maximum extent practicable. Inert, non-toxic wastes would be disposed of in the Umatilla Butte Landfill. No potential problems from waste disposal at the landfill is foreseen, except that landfill life would be shortened from a projected 1985 to 1979 date. Potentially toxic wastes (pot liners) are proposed to be handled and disposed of by methods approved by the Department.
- 11. An adequate pre- and post-plant monitoring program would be undertaken by Alumax as required by the Department beginning at least two crop crowing seasons prior to plant operation. Data would be gathered to demonstrate compliance with ambient air standards and determine actual impact on local animal life, plant life, and water quality.
- 12. Regulating the electrical power usage by Alumax is considered beyond the jurisdiction of the Department. It is noteworthy that siting of Alumax at Umatilla locates the plant near major electrical generating facilities in the Northwest, thereby minimizing transmission line (energy) loss.
- 13. The large Alumax facility would have significant local community impact during the construction and operating phases. The demands for over 600,000 gallons per day of water for makeup of evaporation loss would be quite significant. Additional demands on public services such as

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sewage, housing and solid waste disposal facilities in a relatively sparsely populated area would also be significant. The Department has adequate regulations in conjunction with local government to control potential solid waste and sewage problems. However, significant local government efforts, particularly in the area of water supply, traffic improvements, and housing would be necessary to insure that impact of the Alumax facility is not detrimental to local living conditions.

- 14. The proposed Air Contaminant Discharge Permit for Alumax is conditioned to insure that air emissions are kept to the lowest practicable level during plant startup and operation. Extensive pre- and post-monitoring would be required to detect any significant impact to the environment from air emissions. Approval from the Department will be required for disposal methods of all solid wastes.
- 15. The proposed Water Pollution Control Facilities Permit for Alumax does not allow any discharge of wastewaters to public waterways and contains conditions to assure against accidental discharge of contaminated wastewaters.
- 16. The proposed Alumax Aluminum Reduction Facility at Umatilla would be the cleanest facility of its kind in the world from an environmental standpoint and should not cause any detrimental impact to the local environment.

It was the Director's recommendation that the Commission authorize the Department to issue the subject permits.

#### TESTIMONY

Following Mr. Kowalczyk's report, the Chairman opened the meeting to public testimony.

There followed a long line of witnesses as listed on Attachment A who testified in favor of the proposed permits. While the testimony, presented in oral and/or written form, frequently contained conclusions that the proposed facility would not impair the environment, the testimony was essentially extraneous to the issue of whether the permits were wisely drafted.

The testimony favored the applicant's installation on the grounds that it would result in higher employment, a larger tax base, more efficient use of the hospital, appropriate diversification of industry, benefit to the schools, and many other community advantages.

Incorporated also were repetitive assertions that the community could rise to increased needs in the areas of housing, schooling, water supply, sewage and solid waste disposal, and energy supply. It was contended (particularly by <u>Mr. A. F. Rohrman</u>)-that developments of equal or greater magnitude than that proposed by Alumax had been taken in stride previously by the community.

The concept of fostering private investmemt was forwarded by <u>Mr. Charles</u> Norris as an argument in favor of the applicant's project.

In addition to the witnesses listed, testimony was given by the following:

<u>Mr. James C. Howarth</u>, Vice President and Project Manager for Alumax, alluding to the extensive information given the Department by the applicant, introduced six technical experts available to answer any questions the Commission might have. He commended the staff report, characterized the permit conditions as comprehensive and stringent, and assured the Commission that Alumax could comply with all conditions.

State Representative Wallace McCrae (District 57) urged favorable action on the permit application. He cited the compatability of the proposal with the policy on ruralization of industry and diversification of local economy. Further, he cautioned that, absent the permits, the project might be commenced out of state.

<u>Mrs. Anita Frankel</u> of the Environmental Protection Agency's (EPA) Region X Office addressed the Commission. She stated that her agency was charged with the review of new sources to determine whether they will comply with 1974 regulations regarding the Prevention of Significant Deterioration (PSD) in Airsheds where the ambient air standard is better than the required secondary level.

As a new source whose construction would commence after June 1, 1975, in an airshed exceeding secondary levels, she said, the project would have to be reviewed and, subject to public participation, determined acceptable with regard to PSD particulate and SO<sub>2</sub> emissions requirements.

She urged the applicant to contact her office toward submission of the appropriate data.

Commissioner Richards inquired if Mrs. Frankel's agency was taking no position on the proposed permits and intended only to seek Alumax's application to her agency for review of the Project's consistency with PSD regulations. He received an affirmative answer with the comment that Department Staff had already determined consistency, a determination which was necessary for the EPA to reach also. Mrs. Frankel noted that the data behind staff's determination was absent from the staff report, rendering the report insufficient for her to draw her own conclusions.

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Mrs. Frankel, in response to inquiry by Commissioner Phinney, indicated a central concern to be whether Oregon might wish in the future to designate some nearby area(s) as Class I, to be preserved as pristine areas. An example was the Cold Springs National Wildlife Refuge which, in the estimate of the applicant's consultant and the staff, might suffer deterioration in SO<sub>2</sub> levels close to Class I limitations.

She told Commissioner Somers she had not seen the impact assessment filed by the applicant (or experienced an eastern Oregon dust storm).

In response to Commissioner Crothers, Mrs. Frankel stated that no EPA approval was requisite to granting the permits in issue. She added, however, that such approval with regard to PSD regulations was requisite to construction of the project.

Mrs. Frankel assured the Commission that she was not intending to influence in any way the timing or result of the Commission's action on the proposed permits.

In response to inquiry by Commissioner Somers, she stated that her section (Air Planning in the Seattle Office) had not heard about the proposed facility until two weeks ago when given notice of the public hearing. She had not, she reported, been approached by anyone from the Oregon Operations Office regarding the project.

Mr. Kowalczyk reported that members of EPA's Oregon Operations Office had been fully advised as to the matter.

Mr. Roy Sampsel of the Department of the Interior and a member of the Federal Regional Council addressed the Commission. He applauded local efforts in planning an improved regional water supply system. In his view, the water problem was not to be attributed to the presence of Alumax. Alumax, he felt, would provide opportunity for the Federal Regional Counsel to view the water supply problem in a context of model land and resource development.

Mr. Sampsel held out the possibility that the region's water supply system project might receive construction funding on a multi-agency basis.

In response to inquiry by Commissioner Somers, he stated that single agency grants usually were on a 50% matching basis. With the integrated grant concept, he reported, even construction grants were getting increased matching percentages where they could meet considerations pertinent to more than one agency. An example cited was a sewer project on Washington's Quinault Indian Reservation.

He estimated that funding for a water supply system for the region would probably occur no sooner than 1976 or 1977.

<u>Mr. Harold D. Graymer</u> of the Umatilla County Planning Commission outlined the extensive hearings and studies undertaken prior to his Commission's granting of a Conditional Use Permit for the Alumax facility. In response to inquiry by Commissioner Somers, he explained that all industrial zoned land was still incapable of the installation of specific projects until a Conditional Use Permit was granted after review of project compatibility with other industry.

<u>Mr. John N. Groupe</u> of the Oregon Department of Economic Development stressed the mutually complimentary aspects of increased rural industry. In his view, it fostered a healthier rural economy which, in turn, could support better environmental and other services. A healthy environment, in turn, he said, would invite further industrial development and a better economy. He expressed faith in the ability of Alumax management to operate within environmental protection laws and regulations.

<u>Ms. Deanna Crispon</u> of the Oregon Environmental Council addressed the Commission. She commended the thorough studies of Alumax Consultants and the Department's staff. Alumax's apparent willingness to employ best practicable treatment and control techniques was applauded.

She cautioned, however, that the plant would be the first of its kind ever to simultaneously employ all three of the major pollution control devices planned. She urged the Commission, in the event that the facility would not operate as planned, to refrain from relaxing the standards so as to accommodate the facility. She urged that special emphasis be placed on compliance with permit conditions dealing with planning, installation, monitoring, and expansion of the operation. She concluded that Oregonians would be watching Alumax to see if an industry could fulfill a promise to provide economic benefits without damaging the environment.

Upon the conclusion of public testimony Commissioner Somers noted that the impact statement filed by Alumax, the proposed permits, and staff's information had been available to the Commission for some time. Based on these considerations and the testimony given in the hearing, he <u>MOVED</u> that the Director's recommendation be accepted and that the Commission add thereto a specific finding that the proposed Alumax Plant will be in compliance with the Clean Air Act Implementation Plan of the State of Oregon. Commissioner Crothers seconded the motion and there was a call for discussion.

At the request of Commissioner Phinney, Mr. Kowalczyk expressed confidence that, supplied the data given the Department's staff, EPA would reach, as had staff, the determination that the proposed plant would not offend in terms of PSD regulations. He assured Commissioner Somers that he would make the data available to Mrs. Frankel's office immediately. Commissioner Richards noted that he was impressed with the testimony and singled out the testimony on behalf of the Oregon Environmental Council as commendable. He stated that, in the event the plant does not perform as planned, he personally would be very loath to alter any of the limitations to fit it.

Commissioners Phinney, Crothers, Somers and Richards voted in favor of the motion, carrying the same. Commissioner Hallock voted against the motion on her conviction that, though the siting was commendable, the aluminum plant would use clean hydro power during an energy crunch and contribute to the need for developing new power sources which, in her prediction, would be environmentally damaging and expensive sources.

The Commission discussed matters of pending litigation subject to the executive session provisions of the Public Meetings Law and reached the decision not to appeal an adverse decision in the Circuit Court of Lincoln County.

There being nothing further, the meeting was adjourned.

#### ATTACHMENT A

Elmo Bloom Doris Bounds J. R. Buchanon Joseph E. Burns Lloyd D. Campbell Bernard W. Carper Hiram Compton George Coolk. Mrs. Margaret E. Davis Donald DeMoss A. L. (Bud) Draper Jess Foster Tommie L. Frazier Stanley Gass Dale Gaylord Bruce D. Giddens C. P. Gray Frank J. Harkenrider Irvin J. Howard Charles E. Huxoll Paul H. Kaminga Rupert Kennedy Charles Kik Eddie O. Knopp George Larsen William E. Neuffer Charles R. Norris Nancy Padilla G. M. Reed Lon C. Reed A. F. Rohrman Wally Shurtliff Don Skeen F. K. Starrett L. B. Urbauer Jim M. Vickory William H. Wright

Coordinator, Hermiston Neighborhood Center Inland Empire Bank Hermiston City Council Hermiston Development Corp. Hermiston City Council Hermiston Planning Commission Pendleton Building Trades Council Hermiston Hermiston Rt. 3, Box 519 Mayor, City of Umatilla President, Port of Umatilla McNary Management Corp. Hermiston Area Builder Hermiston School District Hermiston Businessman Mayor, City of Hermiston Hermiston City Council, Hermiston Baseball Comm. Mayor, City of Echo Mayor, City of Stanfield Hermiston City Council Coordinator, Port of Morrow Commission Sanitary Disposal, Inc. Mayor, City of Pendleton Hermiston Jaycees Hermiston City Council Umatilla County Board of Realtors Oregon Rural Opportunities Hermiston Herald Umatilla Planning Commission Hermiston resident Electrical Contractor, Hermiston President, Greater Hermiston Chamber of Commerce Umatilla County Board of Commissioners Good Shepherd Hospital Hermiston Executive Inland Empire Bank



# ENVIRONMENTAL QUALITY COMMISSION

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

Robert W. Straub TO: Environmental Quality Commission GOVERNOR Joe B. Richards FROM: Director Chairman SUBJECT: July 15, 1975, EQC Meeting GRACE S. PHINNEY Corvallis Public Hearing - Proposed Air Contaminant Discharge Permit JACKLYN L. HALLOCK and Water Pollution Control Facilities Permit for Alumax Portland Pacific Corporation 187,000 Tons Per Year Aluminum Reduction MORRIS K. CROTHERS

Plant Near Umatilla, Oregon

MORRIS K. CROTHERS

RONALD M. SOMERS The Dalles

# Background

Alumax Pacific Corporation (Alumax) submitted an Air Contaminant Discharge Permit (ACDP) application to the Department on April 18, 1975 for construction of a 187,300 ton per year primary aluminum reduction plant to be located on a 3,000 acre plot of land four miles east of Umatilla, Oregon (two miles east of McNary Dam Site) on the Columbia River (see Figure 1). A Water Pollution Control Facilities Permit application was subsequently filed with the Department on May 7, 1975.

The Alumax plant site is located on a 500 foot plateau above the Columbia River Valley in a sparsely populated desert area. Some farming of crops such as corn, wheat, potatoes and alfalfa is taking place in the vicinity. Some grazing of cattle is also occurring. The most significant areas of general public interest in the vicinity are the Cold Springs National Wildlife Refuge (five miles southeast of the plantsite) and Hat Rock State Park (four miles east of the plant site).

The Alumax facility will cost nearly \$300,000,000 and will employ approximately 1,800 people at the peak of the three-year construction phase and 800 people during normal operation of the plant after construction.

A public hearing on the proposed Alumax facility was held before the Umatilla County Planning Commission on April 30, 1975. Alumax received a conditional use permit from the Umatilla Planning Commission on May 7, 1975 which contained ten permit conditions -- some related to environmental matters (see Attachment 1).

On June 6, 1975, Alumax completed submission of all information considered necessary for the Department to review the proposed facility in terms of compliance with Department rules and assessment of environmental impact.



The Department has fully evaluated pertinent aspects of the Alumax project and has determined that the facility should comply with all Department rules and that it should not cause any detrimental impact to the local environment. The proposed Air Contaminant Discharge Permit and Water Pollution Control Facility Permit were prepared by the Department (Attachments 2 and 3) and placed on 30-day notice for public comment on June 12, 1975.

#### AIR QUALITY IMPACT

## Compliance with Air Emission Standards

Alumax has proposed to control particulate and fluoride emissions from hooded electrolytic cells by use of a "primary" dry scrubber system in which the air emissions pass through a bed of alumina and are collected by cloth bag filters. Collection efficiency of this system for particulates and fluorides is expected to be approximately 98%. Emissions that escape the cells and enter the building ventilation air are proposed to be captured by a "secondary" wet scrubber which is expected to be approximately 75% efficient for collecting particulates and fluorides. The other major air emission source, the carbon bake furnace, is proposed to be controlled by a system similar to the "primary" dry scrubbers. Sulfur dioxide emissions from the facility would be maintained at a low level by use of low sulfur fuel oil (maximum 0.5% sulfur content).

No other aluminum plant in the world is known to employ all three types of control systems ("primary" cell dry scrubbers, "secondary" wet scrubbers and carbon bake furnace dry scrubbers).

Alumax has projected maximum air emissions from the proposed facility as shown in Table 1.

Air emission data submitted by Alumax in support of its emission projections was collected from the various existing aluminum plants including facilities in Australia and the States of Washington and West Virginia which employ certain portions of the proposed control system. The Department has been concerned about the accuracy of projecting maximum plant emissions from this composite of data particularly for evaluating compliance with Department emission and ambient air standards. The Department has conducted a comprehensive statistical analysis of all data submitted by Alumax and has concluded that maximum expected emissions should not exceed those shown in Table 2.

The Department's analysis indicates that projected maximum air contaminant emissions from Alumax would not exceed limits contained in the Department's emission regulations for new aluminum reduction plants. Proposed EPA new source performance standards for primary aluminum plants should also not be exceeded (as they are less stringent than Department Rules). Opacity (visual) emissions from the facility should also comply with the Department rules based on expected particulate emission concentrations that would be emitted from individual air exhaust points.

# Compliance With Highest and Best Practicable Treatment and Control of Air Emissions

Oregon Administrative Rules (OAR) Chapter 340, Section 20-001 requires new sources to apply "Highest and Best Practicable Treatment and Control" of air emissions. It is the Department's conclusion that Alumax proposes to apply highest and best practicable treatment technology to control air emissions from their proposed aluminum reduction facility.

The Department has investigated a new Alcoa process which is the only system that may have lower air emissions than the facility proposed by Alumax. The new Alcoa system, which is a chloride process, promises to save 30% in electrical power consumption over conventional aluminum reduction processes while emitting no fluorides, has been found to be in the early stages of development. The Department has recently contacted Alcoa and the State of Texas where a 15,000 ton per year demonstration smelter will be operational by the end of this year. Alcoa has indicated that the new process:

- 1. Will not be expanded until there is demonstration of its capabilities.
- Is not available to other companies at this time.
- 3. Will probably be available for licensing to other companies five years, or possibly longer, from now.

It must be concluded, therefore, that the new Alcoa process could not be applied at the Umatilla site at this time.

#### Compliance With Ambient Air Standards

The Department has reviewed ambient air impact modeling of the proposed Alumax plant conducted by the H. E. Cramer Company of Salt Lake City. Cramer's report projects ground level air quality impact caused by Alumax air emissions for short and long-term averaging times based on meteorological data collected by Portland General Electric Company at its nearby Boardman facility. Cramer's work takes into account inversion breakup or fumigation conditions that might occur in the generally desert area of Eastern Oregon and the affect that building downwash or turbulence may have on plant air emissions. The Department has also conducted its own modeling to spot check results provided by Cramer and in all cases has found reasonable agreement.

Table 3 presents a summary of projected maximum ambient air quality impacts based on the following three emission rate conditions:

- Case 1 Alumax projected average emissions
- Case 2 Department projected maximum emissions
- Case 3 Maximum emissions allowed by Department rules for new Aluminum plants

The air quality impact data presented in Table 3 represents the maximum impact point off plant property. A typical area wide impact of air emissions is shown in Figure 2. It should be noted that greatest impact occurs northeast of the plant site. This condition reflects a high persistence of southwest winds in the area.

The air quality impact projections in Table 3 indicate that applicable particulate, sulfur dioxide and gaseous fluoride ambient air standards will not be exceeded in either the states of Oregon or Washington even if air emissions reach limits allowed by the Department's aluminum plant rule.

# Compliance with Significant Air Quality Deterioration Limits

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The Federal Environmental Protection Agency (EPA) has established significant deterioration of air quality limits for the Nation effective January 6, 1975. Generally, all areas of the country where ambient air standards are not being violated have been designated Class II, which allows for only a moderate deterioration in particulate and sulfur dioxide air quality. Substantially more stringent Class I (pristine air quality) deterioration limits would be applicable to an area only after public hearing and approval by EPA.

Table 3 also presents the EPA's significant deterioration limits in comparison to projected Alumax impact. It is apparent that Class II significant deterioration limits will not be **exceeded** anywhere off the plant boundaries.

At the potential Class I Cold Springs National Wildlife Refuge site, which is primarily a bird sanctuary, it appears Class I deterioration limits should not be exceeded, however, sulfur dioxide air quality impact is projected to be close to Class I limits at Cold Springs.

# Vegetation, Animal and Surface Water Impact from Alumax Air Emissions

Since gaseous fluoride is a highly irritant and toxic gas to plants and animal life (that consume vegetation) impact of gaseous fluoride emissions from the proposed Alumax facility on local vegetation, animal life and surface waters was extensively evaluated independently by the Department and Alumax consultants.

A list of predominant plant species including crops near the Alumax plant site along with data indicating their susceptibility to visible damage by gaseous fluorides is shown in Table 4. It is apparent from this data that there should be no injury to vegetation off plant boundaries. Crop yields should not be affected as ambient gaseous fluoride levels would have to exceed levels which could cause visible damage.

Sulfur dioxide concentrations should be below ambient air standards; therefore, no effect on vegetation from this air contaminant is expected. Animals can be affected by fluoride through uptake of vegetation which has been contaminated by fluoride. Table 5 presents a survey of existing animals in the vicinity of the Alumax plant site and their susceptibility to fluoride uptake. Cattle, with a dietary tolerance level of 40 parts per million fluoride ion appear to be the most susceptible animal species. Maximum expected fluoride concentrations in vegetation in the vicinity of the plant site are shown in Figure 3. It is apparent that the 40 parts per million tolerance level will not be exceeded off the plant property; therefore, no threat to animal life is expected.

The Department and Alumax consultant, Beak, Inc., have independently projected impact on surface waters from fluoride and sulfur dioxide **air** emissions from Alumax. Conservative calculations indicate that fluoride concentration in the Columbia River would be increased a maximum of .0023 parts per million or 1% over an existing background of .24 ppm. No significant effects would be expected at this insignificant increase.

Sulfur dioxide air emissions should they be washed out into the Columbia River should not cause any measurable change in pH as this water has a high buffering capacity (a minimum 37 times that necessary to neutralize all of Alumax sulfur dioxide emissions).

#### Air Contaminant Discharge Permit Requirements

The Department's proposed Air Contaminant Discharge Permit for Alumax contains particulate and fluoride emission limits identical to those allowed by Department rules for new aluminum reduction plants. Sulfur dioxide emissions are limited to maximum levels indicated in the Alumax Air Contaminant Discharge Permit application. At the maximum allowable emission levels contained in the proposed permit, impact analysis has indicated that air quality standards and significant deterioration limits would not be exceeded nor would there be any adverse effect on vegetation, animal life or surface waters in the vicinity of the plant site.

Special ACDP conditions have been proposed to insure that plant startup would be conducted with minimal air emissions and no adverse impact (conditions 10, 11 and 12). Extensive monitoring of air emissions, including continuous opacity measurements are also proposed (Conditions 19 and 20).

Special surveillance requirements are proposed to detect and correct potential malfunctioning of equipment (Condition 14).

Alumax has already submitted an air emission monitoring program as required under proposed ACDP Condition 21 and it has been found generally acceptable to the Department with the exception of specifics such as a listing of manufacturers of monitoring devices, etc.

## WATER QUALITY IMPACT

#### Effluent Limitations and Water Quality Standards

Alumax proposes not to discharge any wastewaters to public waters. Process wastewater are proposed to be completely recycled. Contaminated storm water runoff will be disposed of by on-site evaporation ponds. With these wastewater treatment systems Alumax would comply with effluent limitations for primary aluminum plants set by EPA. water quality standards of the State of Oregon and application of highest and best practicable treatment and control.

Provisions to prevent potential contamination of an irrigation aqueduct which runs through the Alumax plant site and to prevent contamination of ground waters are contained in the proposed Water Pollution Control Facilities Permit (Conditions 3 and 5). Also contained in this permit are provisions to insure no discharge of contaminated wastewaters (Conditions 4, 6, 7 and 8) including special provisions to contain cyanide contaminated pot liners.

#### Sewage Treatment

The Alumax facility would generate domestic sewage with a population equivalent of 320 people. The proposed water treatment control permit requires discharge of this sewage into the City of Umatilla Sewage Treatment Plant. The Umatilla Plant, with a design population equivalent of 3,500 people, is sufficient to accept the Alumax sewage provided some minor improvements are made.

# SOLID WASTE IMPACT

Alumax proposes to dispose of its solid wastes by recycle and reuse, recovery for sale to others and the disposal of nonuseable and nonsalable wastes at the Umatilla Butte Landfill.

The wastes proposed for disposal at the county landfill would consist of some 1,350 tons of construction waste over the nearly three year construction period. Plant operation would generate an additional 3,090 tons per year of solid wastes. These wastes would consist of wasted refractory materials (brick), furnace slag, water treatment plant sludges, carbon, iron oxide, fluoride and pitch particulates and lunchroom garbage. No toxic wastes would be permitted to be disposed of at the county landfill.

The major impact of Alumax solid waste would be to shorten the life of the Umatilla Butte Landfill from a projected 1985 date to 1979. Adequate time is available to plan and begin operation of a new site provided this work begins in the very near future.

All solid wastes generated by Alumax would be required to be disposed of in a manner and location approved by the Department (ACDP Condition 17).

## NOISE IMPACT

The Department has reviewed Alumax's acoustical evaluation of the proposed plant and has concluded that the facility should be capable of complying with Department noise rules and regulations. Special requirements to demonstrate compliance with Department noise rules are contained in Condition 16 of the proposed ACDP.

In order to maintain compliance with Department rules, truck traffic may have to be limited and car pools or other mass transit programs for shift workers implemented if actual traffic is significantly greater than now projected.

Construction noise is not regulated by the Department, however, Alumax will be asked to confine noisy operations to daytime hours.

#### Pre- and Post-Monitoring Program

The Department proposes to require an extensive pre- and post-plant monitoring program to gather information to assess actual impact of the Alumax facility on air quality, water quality and plant and animal life. Alumax has submitted a proposed pre- and post-plant monitoring program for Department review which could be implemented two full crop growing seasons prior to plant operation. This program has been found to be generally acceptable by the Department.

The program would include ambient air quality monitoring of particulate, fluoride and sulfur dioxide and meteorological parameters. Five permanent air monitoring sites are proposed and one mobile sampler would be available.

Vegetation would be sampled for fluoride content at 16 sites up to five miles from the plant site, including one site in the State of Washington. A range of vegetation would be analyzed which might include rangeland forage, grain, wheat, sugar beets, alfalfa, soy bean and apricot and peach trees.

Animal sampling would include fluoride analysis of cattle tail vertebral biopsies. Teeth of live cattle would be visually inspected semi-annually and records kept of findings.

Water quality samples would be taken at Cold Springs National Wildlife Refuge and permanent ponds near the plant site and analyzed for fluoride content and pH. -8-

# Impact on Northwest Electrical Power Pool

Use of approximately 300 megawatts of electrical power by Alumax has been a major controversy surrounding the proposed facility. The Department has no direct way of regulating such electrical power usage. There are certain aspects of the power usage which are considered significant from an environmental standpoint and these are as follows:

- 1. If Alumax power became available to the northwest power pool due to a no-build decision, construction of one major electric generating facility in the Northwest might be delayed from a few months to less than one year. (a)
- Alumax power demand would not cause additional operation of Portland General Electric combustion turbines, providing PGE's Trojan Nuclear Plant is operational. (b)
- 3. Location of Alumax at the Umatilla site places the facility near major Northwest electric generating facilities, thereby minimizing transmission line (energy) loss.
- 4. Any new proposed electrical generating facility which would emit air contaminants in the State of Oregon would be reviewed by the Department and be required to comply with ambient air quality and emission standards and significant deterioration limits and other environmental **limits deemed necessary**.

#### Other Environmental Concerns

The proposed Alumax facility will have significant community impacts due to its large size and location (within a relatively sparsely populated area). Many of the impacts are beyond the control or jurisdiction of the Department.

The demand for approximately 600,000 gallons per day of water to replace process water evaporation loss is significant. Port of Umatilla well water is considered the prime supply of this water.

The projected increase in area population of up to 6,700 people would affect local housing, schools, traffic and utilities. Disposal of solid waste and sewage should be adequately controlled by Department regulations with local government assistance. Control of these other impacts would be the responsibility of local governments.

- (a) CH2M-Hill Report to AMAX dated April 12, 1974.
- (b) Oregon Public Utility Commissioner letter to DEQ.

# Conclusions

- Alumax proposes to employ highest and best practicable treatment and control of air emissions by application of dry alumina scrubbing to cell emissions and wet scrubbing to pot room building ventilation air.
- 2. Based on comprehensive statistical analysis conducted by the Department, maximum projected particulate and fluoride air emissions from Alumax would be within the emission limitation requirements of the Department's regulations for new aluminum reduction plants.
- 3. Based on diffusion modeling by Alumax's consultants which has been verified by the Department, air emissions from Alumax should not cause any applicable air quality standard to be exceeded.
- 4. Air emissions from Alumax should not cause applicable Federal Class II significant deterioration of air quality limits (moderate growth limits) to be exceeded anywhere off the plant boundaries.
- Air emissions from Alumax should not cause deterioration of air quality greater than Federal Class I limits (pristine air limits) in the potential Class I Cold Springs National Wildlife Refuge area.
- 6. Air emissions from Alumax should have no adverse affect on animal life, plant life (including crops) and surface water quality in the vicinity of the plant site.
- 7. Alumax proposes to employ highest and best practicable treatment and control of process wastewater and storm water runoff by recycling all process water and disposing of storm water by evaporation pond. There would be no discharge of wastewaters to any waters of the State.
- 8. Domestic sewage from the Alumax facility and support activities would be adequately handled by the Umatilla sewage treatment plant provided some plant improvements are made.
- 9. The Alumax facility and support activities (trucks, motor vehicle traffic) should be able to comply with Department noise regulation, including degradation limits for quite areas. If auto and truck traffic is significantly greater than projected, imposition of car pooling or mass transit for shift working may be necessary to maintain compliance with noise requirements.
- 10. Solid waste generated by Alumax is proposed to be recycled to the maximum extent practicable. Inert, non-toxic wastes would be disposed of in the Umatilla Butte Landfill. No potential problems from waste disposal at the landfill is foreseen, except that landfill life would be shortened from a projected 1985 to 1979 date. Potentially toxic wastes (pot liners) are proposed to be handled and disposed of by methods approved by the Department.

- 11. An adequate pre- and post-plant monitoring program would be undertaken by Alumax as required by the Department beginning at least two crop growing seasons prior to plant operation. Data would be gathered to demonstrate compliance with ambient air standards and determine actual impact on local animal life, plant life, and water quality.
- 12. Regulating the electrical power usage by Alumax is considered beyond the jurisdiction of the Department. It is noteworthy that siting of Alumax at Umatilla locates the plant near major electrical generating facilities in the Northwest, thereby minimizing transmission line (energy) loss.
- 13. The large Alumax facility would have significant local community impact during the construction and operating phases. The demands for over 600,000 gallons per day of water for makeup of evaporation loss would be quite significant. Additional demands on public services such as sewage, housing and solid waste disposal facilities in a relatively sparsely populated area would also be significant. The Department has adequate regulations in conjunction with local government to control potential solid waste and sewage problems. However, significant local government efforts, particularly in the area of water supply, traffic improvements, and housing would be necessary to insure that impact of the Alumax facility is not detrimental to local living conditions.
- 14. The proposed Air Contaminant Discharge Permit for Alumax is conditioned to insure that air emissions are kept to the lowest practicable level during plant startup and operation. Extensive pre- and post- monitoring would be required to detect any significant impact to the environment from air emissions. Approval from the Department will be required for disposal methods of all solid wastes.
- 15. The proposed Water Pollution Control Facilities Permit for Alumax does not allow any discharge of wastewaters to public waterways and contains conditions to assure against accidental discharge of contaminated wastewaters.
- 16. The proposed Alumax Aluminum Reduction Facility at Umatilla would\_betthe cleanest facility of its kind in the world from an environmental standpoint and should not cause any detrimental impact to the local environment.

# Director Recommendation

It is the Director's recommendation that the EQC authorize the Director to issue the attached proposed Air Contaminant Discharge Permit and Water Pollution Control Facilities Permit subject to consideration of testimony received at this hearing.

LOREN KRAMER Director

JFK:cs 7/9/75

Attachments (11)

# ATTACHMENT 1

County Courthouse Pendlelon, Oregon 97801 Phone 276 - 7111 Planning Commission Extension 75

ALUMAX PACIFIC CORPORATION Aluminum reduction plant, McNary, Oregon Conditional Use Permit, May, 1975

<sup>®</sup> Umatilla County

# Conditions

- Applicant's proposed aluminum reduction plant and process shall have no 1. discharge of process waste water or other water pollution. All process waste water shall be treated to remove waste materials and recycled and re-used by the plant.
- All solid waste generated by applicant's proposed aluminum reduction plant 2. and process which cannot either be recycled and re-used by the plant, or sold to others, shall be inert, non-hazardous, non-leaching, suitable for disposal in a sanitary landfill, and it shall be disposed of in a manner approved by and acceptable to the Oregon Department of Environmental Quality.
- All emissions of air contaminants or air pollutants from applicant's proposed З. aluminum reduction plant and process shall meet or exceed all numericallyexpressed state and federal ambient air guality and emission standards and limitations which are or shall have become effective as of the date of commencement of construction of the plant. Such standards have been set at levels which, in the judgment of the state and federal officials having jurisdiction, will not adversely effect and will be protective of: the health and welfare of persons; personal comfort and well-being; soils; water; crops; vegetation: animals: wildlife; man-made materials; visibility; climate; weather, and damage to and deterioration of property. As a condition to this permit, applicant shall secure from the Oregon Environmental Quality Commission and Department of Environmental Quality an air contaminant discharge permit.
- Upon start up of its aluminum reduction plant and process, applicant shall 4. implement a program of air pollution emission and air guality monitoring and surveillance which shall have been approved and found satisfactory by the Oregon Department of Environmental Quality. The purpose of this program shall be to determine whether air pollutant emissions from the plant and process violate applicable ambient air quality or emission standards and limitations, and to ensure that such emission standards and limitations are not exceeded.

Conditions - cont'd:

- 5. There shall be paved vehicle parking at the plant for 540 workers, 25 visitors and 20 process trucks.
- 6. Alumax shall provide its own fire protection facilities, equipment and personnel.
- 7. Alumax shall use existing and future municipal sewage disposal systems.
- 8. Alumax shall hire an Architect and Landscape Architect registered in Oregon to participate in the design of the exterior appearance of all structures on the site and all landscaping around, and on the approaches, to the plant.
- 9. Alumax shall assist in the solution of traffic problems on Highway 730 at the plant (regarding left turns) and at the intersection of Highways 730 and 395.
- 10. Alumax shall assist in the location and development of new landfill sites.

Agreed to by Alumax Pacific Corporation and the Umatilla County Planning Commission, May 7, 1975.

Alumax Pacific Corporation

resident J. Howarth.

Umatilla County Planning Commission

Graymer

- 2 -

PROPOSED 6/1:	3/75 ATTACHMENT 2 Permit Number: <u>30-0074</u> Expiration Date: <u>7/1/80</u> Page <u>1</u> of <u>7</u> DISCHARGE PERMIT
Department of Eng 1234 S.W. Mo Portland, O Telephone: (3 Issued in accordance y	vironmental Quality orrison Street regon 97205 503) 229-5696
ISSUED TO: Alumax Pacific Corporation Umatilla Division 303 East Main Street Hermiston, Oregon 97838 PLANT SITE: 6 kilometers (3.7 miles) East of Umatilla, Oregon East of Umatilla, Oregon ISSUED BY DEPARTMENT OF ENVIRONMENTAL QUALITY LOREN KRAMER Date Director	REFERENCE INFORMATION   Application No. 0529   Date Received 4/21/75   Other Air Contaminant Sources at this Site:   Source SIC   Permit No.   (1)   (2)

#### SOURCE(S) PERMITTED TO DISCHARGE AIR CONTAMINANTS:

# Name of Air Contaminant Source

**Standard Industry Code as Listed** 

Primary Aluminum Production

#### 3334

#### Permitted Activities

Until such time as this permit expires or is modified or revoked, Alumax Pacific Corporation is herewith permitted in conformance with the requirements, limitations and conditions of this permit to construct and operate a primary aluminum production facility with a design capacity of no greater than 169,920 metric tons/year (187,300 tons/year) near Umatilla, Oregon and to discharge air contaminants therefrom.

The specific listing of requirements, limitations and conditions contained herein does not relieve the permittee from complying with all other rules and standards of the Department.

# PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS Issued by the Department of Environmental Quality for Alumax Pacific Corporation

# Issuance Date: Expiration Date 7/1/80 Page 2 of 7 Appl. No.: 0529 File No.: 30-0074

## Performance Standards and Emission Limits

- 1. The permittee shall at all times maintain and operate all air contaminant generating process and all air contaminant control equipment at full efficiency and effectiveness such that the emissions of air contaminants are kept at the lowest practicable levels.
- 2. The total fluoride emissions from all sources shall not exceed:
  - a. A monthly average of 0.65 Kg of fluoride ion per metric ton (1.3 lbs/ton) of aluminum produced,
  - An annual average of 0.5 Kg of fluoride ion per metric ton (1.0 lbs/ton) of aluminum produced,
  - c. 9.2 metric tons (10.1 tons) of fluoride ion per month, and
    - d. 84.9 metric tons (93.6 tons) of fluoride ion per year.
- 3. The total organic and inorganic particulate matter emissions from all sources shall not exceed:
  - a. A monthly average of 3.5 Kg of particulate per metric ton (7.0 lbs/ton) of aluminum produced,
  - b. An annual average of 2.5 Kg of particulate per metric ton (5.0 lbs/ton) of aluminum produced,
  - c. 49.6 metric tons (54.7 tons) of particulate per month, and
  - d. 424.8 metric tons (468.2 tons) of particulate per year.
- 4. The total organic and inorganic particulate matter emissions from any source shall not exceed 0.23 grams per cubic meter (0.10 grains per SCF) based on a one hour average.
- 5. The visible emissions from any source shall not exceed 10 percent opacity at any time.

#### Special Conditions

6. The permittee shall not use fuel oils containing more sulfur than the levels indicated below:

Fuel Oil Grade ASTM Grade 1 ASTM Grade 2, 4, 5, and 6 Maximum Allowable Sulfur Content 0.3% sulfur by weight 0.5% sulfur by weight

PROPOSED	
AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS	
Issued by the	
Department of Environmental Quality for	
Alumax Pacific Corporation	

Issuance Da	ite:			
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Page	3	of	7	
Appl. No.:	0529		-	
File No.:	30-00	074		

- 7. The permittee shall not use any coke containing more than 2.0 percent sulfur by weight nor hard pitch containing 1.0 percent sulfur by weight. Compliance with this condition shall be based on sulfur analyses of a representative composite sample taken from each shipment of coke and pitch.
- 8. The permittee shall, prior to construction of any air pollution control system, submit detailed plans and specifications to the Department for review and approval. These control systems shall include at least the following: potline primary air exhaust treating systems, potline secondary air exhaust treating systems, carbon baking furnace air exhaust treating system, all nuisance dust collectors, and the pitch fume control system. Highest and best practicable treatment and control facilities and procedures shall be incorporated throughout the primary aluminum reduction facility.
- 9. (NOTICE CONDITION) The permittee shall submit, or notify the appropriate responsible party to submit plans and specifications to the Department for review and approval prior to construction or expansion of an alumina storage, handling and transportation system for the Alumax plant in the State of Oregon.
- 10. The permittee shall not begin initial operation of any pots until their respective air pollution control systems are tested for proper functioning to the maximum extent practicable. This testing shall be conducted to insure minimum emissions during plant startup. Special attention shall be given to checks for bag filter leaks. A report on results of the testing shall be submitted to the Department prior to commencing operation of pots.
- 11. The permittee shall initially startup the smallest unit of pots that is practicable and shall not proceed to start up another unit of pots until the previous unit's air pollution control system is functioning properly as indicated by emission monitoring and testing.
- 12. The permittee shall limit emissions and/or operation as specified by the Director if there is a known threat of damage to health or welfare in the vicinity of the plant site during initial potroom startup.
- 13. The permittee shall provide, prior to commencing operation, easily accessible sampling ports and platforms on all emission exhaust stacks unless otherwise approved by the Department in writing. The location and design of these sampling ports and platforms must be reviewed and approved in writing by the Department.
- 14. The permittee shall implement a program upon commencing operation which will enable rapid detection and correction of malfunctioning primary dry collection system bag houses whenever the main stack opacity meter indicates abnormal opacity. The program shall include instrumentation for detection of abnormal particulate emissions from any individual bag house. The complete program shall be submitted to and approved by the Department in writing at least six months prior to commencing operation. The program shall be fully operational upon startup of any pots.

# PROPOSED AIR CONTAMINANT DISCHARGE PERMIT PROVISIONS Issued by the Department of Environmental Quality for Alumax Pacific Corporation

- 15. The permittee shall not conduct furnace fluxing in the cast house operation unless appropriate air pollution control equipment is approved by the Department, installed and operated.
- 16. The permittee shall comply with all applicable Department noise control regulations and demonstrate compliance no later than 90 days after facility startup by submitting a written report. The Department shall be notified prior to compliance measurements.
- 17. The words "NOTICE CONDITION" shall be deleted from condition G6 of this permit.
- 18. The permittee shall conduct a pre and postconstruction monitoring program which has been approved in writing by the Department. The program shall commence at least two growing seasons prior to plant operation and shall measure potential effects of plant emissions on flora and fauna and other resources in the vicinity of the plant site.
- 19. The permittee shall install, operate and maintain a continous opacity monitor, recorder and warning device of a type and in a location approved by the Department in writing for the carbon bake exhaust stack and the potroom primary exhaust stack. The warning device shall be adjusted such that when 10% or greater opacity os recorded the appropriate operating personnel are alerted and necessary corrective measures can be undertaken.

## Monitoring and Reporting

20. The permittee shall effectively monitor the operation and maintenance of the primary aluminum production plant and control facilities. A record of all such data shall be maintained and submitted to the Department of Environmental Quality within thirty (30) days after the end of each calendar month unless requested in writing by the Department to submit this data at some other frequency. Unless otherwise agreed to in writing, the information collected and submitted shall include, but not necessarily be limited to the following parameters and monitoring frequencies:

#### Parameter

### Minimum Monitoring Frequency

- a. Primary Dry Collection System (Pots)
  - 1) Total Particulate
  - 2) ' Fluoride Particulate
  - 3) Fluoride Gases
  - 4) Sulfur Oxides
  - 5) Carbon Monoxide
  - 6) Opacity

5 times per month 5 times per month 5 times per month Once per month Continuous

			Issuance Date:
		PROPOSED	Expiration Date 7/1/80
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Sold and Sold States and Sold States	Alu	max Pacific Corporation	مەرىپىيە بىرىمىيە بىرىمىيە بىرىمىيەر بىرىمىيە
	b.	, Secondary Wet Collection System (Pot	
	<b>، ل</b> ير	1) Total Particulate	5 stacks per month
		2) Fluoride Particulate	5 stacks per month
		3) Fluoride Gases	5 stacks per month
		4) Sulfur Oxides	l stack per month
		5) Carbon Monoxide	1 stack per month
			a black For month
•	c.	Dry Collection System (Anode Baking	Furnace)
•		1) Total Particulate	5 times per month
	•	2) Fluoride Particulate	5 times per month
,	•	3) Fluoride Gases	5 times per month
		4) Sulfur Oxides	Once per month
		5) Carbon Monoxide	Once per month
		6) Opacity	Continuous
	d.	Nuisance Dust Collectors	
	a.		The part Hear
		1) Particulate	Twice per year
	e.	Testing required in a, b, c, and d a	above shall be spaced approximately
		equally throughout the month and with	
		submitted to the Department.	
•	f.	The sulfur content (percent by weigh	
		and quantity of each shipment of fue	el
		oil received at the plant site	
	~	The sulfur content (percent by weigh	t Each shipment
	g.		
		and quantity of each shipment of col and hard pitch received at the plant	
		and hata bicch received at the bight	L DILC.
	h.	Production rate of aluminum and anor	les Daily
		raw material feed rates and cell or	wound
		potline voltages.	
		· · · · · · · · · · · · · · · · · · ·	
21	The	methods procedures and complete det:	ails of the monitoring reporting

21. The methods, procedures and complete details of the monitoring reporting programs required in Condition 20 shall be contained in a document prepared by the permittee and approved by the Department in writing at least six months prior to commencing operation.

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	Alumax P	acific	Corp	pora	tion	L	

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# General Conditions

- G1. A copy of this permit or at least a copy of the title page and complete extraction of the operating and monitoring requirements and discharge limitations shall be posted at the facility and the contents thereof made known to operating personnel.
- G2. This issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
- G3. The permittee is prohibited from conducting any open burning at the plant site or facility.
- G4. The permittee is prohibited from causing or allowing discharges of air contaminants from source(s) not covered by this permit so as to cause the plant site emissions to exceed the standards fixed by this permit or rules of the Department of Environmental Quality.
- G5. The permittee shall at all times conduct dust suppression measures to meet the requirements set forth in "Fugitive Emissions" and "Nuisance Conditions" in OAR, Chapter 340, Section 21-050.
- G6. (NOTICE CONDITION) The permittee shall dispose of all solid wastes or residues in manners and at locations approved by the Department of Environmental Quality.
- G7. The permittee shall allow Department of Environmental Quality representatives access to the plant site and record storage areas at all reasonable times for the purposes of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emission discharge records and otherwise conducting all necessary functions rela ted to this permit.
- G8. The permittee, without prior notice to and written approval from the Department of Environmental Quality, is prohibited from altering, modifying or expanding the subject production facilities so as to affect emissions to the atmosphere.
- **G9.** The permittee shall be required to make application for a new permit if a substantial modification, alteration, addition or enlargement is proposed which would have a significant impact on air contaminant emission increases or reductions at the plant site.

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- GlO. This permit is subject to revocation for cause, as provided by law, including:
  - a. Misrepresentation of any material fact or lack of full disclosure in the application including any exhibits thereto, or in any other additional information requested or supplied in conjunction therewith;
  - Violation of any of the requirements, limitations or conditions contained herein; or

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

- Gll. The permittee shall notify the Department by telephone or in person within one (1) hour of any scheduled maintenance, malfunction of pollution control equipment, upset or any other conditions that cause or may tend to cause a significant increase in emissions or violation of any conditions of this permit. Such notice shall include:
  - a. The nature and quantity of increased emissions that have occurred or are likely to occur,
  - b. The expected length of time that any pollution control equipment will be out of service or reduced in effectiveness,
  - c. The corrective action that is proposed to be taken, and
  - d. The precautions that are proposed to be taken to prevent a future recurrence of a similar condition.
- G12. Application for a modification or renewal of this permit must be submitted not less than 60 days prior to permit expiration date. A filing fee and Application Investigation and Permit Issuing or Denying Fee must be submitted with the application.
- G13. The permittee shall submit the Annual Compliance Determination Fee to the Department of Environmental Quality according to the following schedule:

Amount Due \$175 175 175 175 See Condition G12 Date Due

May 31, 1976 May 31, 1977 May 31, 1978 May 31, 1979 April 30, 1980

## PROPOSED 6/12/75

ATTACHMENT 3

Permit Number: Expiration Date: 7/31/80 Page 1 of 3

# WATER POLLUTION CONTROL FACILITIES PERMIT

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S. W. Morrison Street Portland, Oregon 97205 Telephone: (503) 229-5696

Issued in accordance with the provisions of

ORS 449.083 (Recodified as 468.740)

ISSUED TO: Alumax Pacific Corporation Umatilla Division 303 East Main Street Hermiston, Oregon 97838	REFERENCE INFORMATION 2011 File Number:
PLANT SITE: 6 kilometers (3.7 miles) east of Umatilla, Oregon ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY	Major Basin: Columbia Minor Basin: Type of Disposal Evaporation Ponds
LOREN KRAMER Date -Director	County: Umatilla

#### PERMITTED ACTIVITIES

Until such time as this permit expires or is modified or revoked, Alumax Pacific Corporation is herewith permitted to:

- a. Construct, operate and maintain wastewater control, treatment and disposal facilities.
- b. Dispose of contaminated storm runoff by evaporation.

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

All wastewater discharges to the waters of the state are prohibited.

State of Oregon Department of Environmental Quality

PERMIT CONDITIONS

# Permit Number: Expiration Date: 7/31/80 Page 2 of 3

# SPECIAL CONDITIONS

- 1. The permittee shall not initiate construction of any part of the wastewater control treatment and disposal facilities until detailed plans of all such facilities are approved in writing by the Department. Any modifications or additions to any wastewater control facility shall be approved in writing by the Department.
- 2. All wastewater control facilities shall be constructed in accordance with plans approved in writing by the Department. In addition, all wastewater control facilities shall be constructed and be operable prior to start-up of production.
- 3. Wastewater control facilities shall be provided for the irrigation water aquaduct which crosses the permittee's plant site such that this irrigation water cannot become contaminated by the permittee's operations. Special consideration shall be given to minimizing contamination of this irrigation water by fallout of air contaminants.
- 4. Waste pot liners or any material therefrom shall not be stored at the plant site except under a covered structure. In addition, this material shall not be disposed of in any landfill, disposal site, or at any other location in the State of Oregon.
- 5. Prior to October 31, 1976, the permittee shall submit a proposal to the Department for providing a ground water monitoring program of the plant site area. This program shall not be implemented until it has been approved in writing by the Department, but shall be implemented at least six months prior to start-up of the plant so that ground water background data can be gathered. Should the permittee prove to the satisfaction of the Department that ground water will not be contaminated by the permittee's operations, this requirement may be deleted.
- 6. No process wastewater including, but not limited to, waste scrubber water, cooling water, and cooling tower blowdown, shall be discharged to public waters of the State of Oregon at any time.
- No filter backwash or other wastewater which is generated from any water treatment plant shall be discharged to public waters of the State of Oregon at any time.
- 8. All storm runoff from the process areas, material storage areas, pollution control facility areas, solid waste storage and disposal areas, and all other areas where surface runoff is likely to become significantly containinated shall be collected, contained and otherwise controlled such that . it is not allowed to enter public waters of the State of Oregon.
- 9. All sewage and all other domestic wastewaters shall be discharged to the City of Umatilla sewerage system. All wastewater discharged to the City of Umatilla sewerage system shall be in accordance with all rules, regulations, and limitations of the City of Umatilla.

State of Oregon Department of Environmental Quality

PERMIT CONDITIONS

Permit Number: Expiration Date: 7/31/80 Page 3 of 3

10. Prior to start-up the permittee shall provide an alternative power source sufficient to operate all facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit. In lieu of this requirement the permittee may certify in writing to the Department within 30 days of the issuance of the permit that in the event of a reduction, loss, or failure of a power source the permittee shall halt, reduce or otherwise control production and/or all discharges in order to maintain compliance with the terms and conditions of this permit.

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- 11. An environmental supervisor shall be provided to coordinate and carry out all necessary functions related to maintenance and operation of wastewater collection, treatment and disposal facilities. This person must have access to all information pertaining to the generation of wastes in various process areas.
  - 12. After notice and opportunity for a hearing this permit may be modified, suspended or revoked in whole or in part during its term for cause including but not limited to the following:
    - a. Violation of any terms or conditions of this permit or any applicable rule, standard, or order of the Commission;
    - Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
  - 13. The permittee shall maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.
- 14. In the event the permittee is unable to comply with all of the conditions of this permit because of a breakdown of equipment or facilities, an accident caused by human error or negligence, or any other cause such as an act of nature, the permittee shall:
  - a. Immediately take action to stop, contain and clean up any unauthorized discharges and correct the problem.
  - b. Immediately notify the Department of Environmental Quality so that an investigation can be made to evaluate the impact and the corrective actions taken and determine additional action that must be taken.
  - c. Submit a detailed written report describing the breakdown, the actual quantity and quality of resulting waste discharges, corrective action taken, steps taken to prevent a recurrence and any other pertinent information.









Calculated isopleths of annual average ground-level total particulate concentration in micrograms per cubic meter for the Oregon DEQ maximum projected emission rates (typical impact pattern).

9



Calculated isopleths of fall forage fluoride concentrations (ppm).

# TABLE 1

# Alumax Projected Maximum Air Emissions

. .

	lb/ton Aluminum	tons/year
Particulate	5	468
Total Fluoride	0.5	46.8
Sulfur Dioxide	40.3	3,774

# TABLE 2

# DEQ Maximum Projected Air Emissions from Alumax (lbs/ton Aluminum)

	yearly average	monthly average	short-term <u>average</u>
Particulate	4.1 (5)*	5.1 (7)*	6.5
Total Fluoride	0.5 (1.0)*	• 0.7 (1.3)*	1.0
Gaseous Fluoride	0.1	0.1	0.2
Sulfur Dioxide	40.3	40.3	40.3

\*DEQ new aluminum plant emission limitation
#### Table 3 Maximum\*Air Quality Impact ug/m<sup>3</sup> Alumax, Umatilla

	COLUMN	1	2	3	4	Ś	6	7	8	9	10
l I N - E	Air Contaminant	Plant Site Existing Air Quality Background (estimated)	Impact Based on Case 1 Average Emissions Projected by Alumar.		Impact Based on Case 2 Maximum Emissions Projected by DEQ		Impact Based on Case 3 Emissions at the DEO Standard***		Proposed EPA Significant Air Quality Deterioration Criteria and State Air Quality Standards		oration
	Particulate Matter***	( <u>BKGND</u> )	W/O BKGND	W/BKGND	W/O BKGND	W/BKGND	W/O BKGND	W/BKGND	Class I Area "Clean <u>Air"</u>	Class II Area "Moderate Growth"	Class III Existing State Ambient <u>Standards</u>
7								45.0	-	3.0	- 60
a B	Annual Geometric Mean	39.4	3.5	42.9	4.6	44.0	6.8 (.2)**		<u> </u>	10 30	
Ð	Maximum 24 Hour Average	105	8.0	113.0	10.0	115.0	17.0 (.5)**	122.0	10	30	150
	Sulfur Dioxide										
С	Annual Arithmetic Mean	13.0	14.0	27.0	14.0	27.0	14.0 (.5)**	27.0	2	15	60
D	Maximum 24 hour Average	13.0	41.0	54.0	41.0	54.0	41.0 (4)**	54.0	5	100	260
E	Maximum 3 hour Average	13.0	105.0	118.0	105.0	118.0	105.0 (23)**	118.0	25	700	1300
	Gaseous Fluoride										Wash. DOE Ambient Standards
P	Annual Average	0	0.14	0.14	0.16	0.16	0.30	0.30			
G	Monthly Maximum	0	0.22	0.22	0.24*	0.24	0.45	0.45			(.84)
H	Seasonal Average (Growing Season)	0	0.12	0.12	(0.19)**	0.38	0.38	0.38			(.50)
I	Maximum 24 hour Average	0	0.6	0.6	0.8	0.9	1.5	1.5			(2.9)
J.	Maximum 12 hour Average	0	1.2	1.2	1.6	1.6	3.0	3.0			(3.7)
ĸ	Maximum 3 hour Average	0	5.0	5.0	6.3	6.3	11.8	11.8			



\*Maximums occur northeast of plant just off plant site boundaries.

\_ . . . . . .

\*\*Cold Springs National Wildlife Refuge

\*\*\*Umatilla County (does not include days having obvious dust storms)

\*\*\*\*Estimates based on ratioing impacts calculated for Case 1 and 2 conditions.

#### TABLE 4

### Flora Survey Species Located or Possibly Located Within Five Miles of Alumax

	Suscept	tibility	to Fluc	oride Dam	age*
<u>Plants</u>	Suscept	ible	Interm	ediate	Resistant
Ornamentals	Ø				
Juniper Pines (most sensitive) Young Needles Old Needles Blue Spruce		X(1)	X	·	X X
Maples Russian Olive Lombardy Poplar Honey Locust Sycamores				X X	X X X
Cottonwood Willow Black Locust Peach Cherry Apricot (most sensitive sp.)	X(2)	X(3)	X	X X X	
<u>Native Species</u> Sage Russian Thistle Cheatgrass Cattails, March Plants Pasture Grass Bitterbrush					X X X X X X X
<u>Crops</u> Potatoes Corn Asparagus Pasture Grass Wheat Sugar Beets Grapes (European) Alfalfa Melons		X	X(4)	X	X X X X X
Minimum Level of Exposure Causing Da (1) 3 ug/m <sup>3</sup> F- 24 hour average (2) 1 ug/m <sup>3</sup> F <sup>-</sup> monthly avg. (growing (3) 1 ug/m <sup>3</sup> F <sup>-</sup> monthly avg. (4) 15 ug/m <sup>3</sup> F <sup>-</sup> 24 hour average		1.5 ug/m 24 hour	n3 F- maximum	pact at f	Plant Boundary Ax. (growing season Ax. cimum

\*Reference: "Biologic Effects of Atmospheric Pollutants-Fluorides," National Academy of Sciences, Washington, D.C., 1971.

#### TABLE 5

#### FAUNA SURVEY

The following species are, or could be, located within five miles of the Alumax plant site.

#### SPECIES

DIETARY FLUORIDE TOLERANCES-IN PPM F

Domestic-economically significant

Beef or dairy heifers							
Mature beef or dairy cattle							
Finished cattle	100						
Feeder lambs	150						
Breeding ewes	60						
Horses	60						
Finishing pigs	150						
Breeding sows	150						
Growing or broiler chickens	300						
Laying or breeding hens	400						
Turkeys ,	400						

Native-environmentally significant

Birds Geese, Ducks, Quail, Magpie, Pheasant, etc.

These values assume <u>continual</u> ingestion of fluoride by the animals. They take into account the economic usefullness of the animals and are meant to assure that this role is not impaired. These suggested tolerances are for fluoride in <u>soluble</u> form.

400

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Available data suggest that a threshold for an accumulation of fluoride in forage of more than 40 ppm would be a 30-day average air concentration of gaseous fluoride of about 0.5 ugm/m3.

Annual average air concentrations of gaseous fluoride off the Alumax site are less than 0.2 ugm/m3.

Sources:

Fluorides: National Academy of Sciences, 1971 Effects of Fluorides on Animals: National Academy of Sciences, 1974 Dr. J. W. Suttie, University of Wisconsin. TESTIMONY OF THE OREGON ENVIRONMENTAL COUNCIL BEFORE THE ENVIRONMENTAL QUALITY COMMISSION REGARDING PROPOSED ALUMAX AIR CONTAMINANT DIS-CHARGE PERMIT, HERMISTON, OREGON JULY 15, 1975

Mr. Chairman and members of the Commission, my name is Deanna Crispin and I represent the Oregon Environmental Council. The Council is a coalition of 80 conservation, sportsman, planning and labor organizations and approximately 2,500 environmentqlly concerned Oregonians. Our offices are located at 2637 S.W. Water Avenue, Portland, Oregon 97201.

The Oregon Environmental Council has a long interest in the proposed Alumax aluminum reduction plant. We have read and reviewed the Environmental Impact Statement prepared for the AMAX site at Warrenton and we have studied other public information. We have presented testimony at previous hearings. We have studied the Proposed Air Contaminant Discharge Permit prepared by the Department of Environmental Quality and the attached background statements. We appreciate the scope of the studies prepared by the Alumax Pacific Corporation and its consultants, the H.E. Cramer Company. We commend the apparent willingness of the corporation to install the best practicable treatment and control methods as required by DEO regulations (OAR Chapter 340 Section 20-001). The Council further appreciates the studies undertaken by the DEQ in investigating the Alumax facility planning and the data presented by the corporation and its consultants.

The data presented by Alumax and the DEQ indicate that this proposed aluminum reduction facility should be able to operate successfully in compliance with DEQ emission standards and ambient air standards and without causing significant deterioration of air quality limits as set forth by EPA. This conclusion is based on statistical analysis of data collected from plants which employ portions of the proposed control system. As the DEQ Background paper points out, no existing aluminum plant is known to employ all three of the control systems that together will be necessary to meet the proposed standards. The best assumptions, estimates and projections made in planning can be disproven when a plant becomes operational. If we discover at some future date that the facility cannot meet the projected standards, the Department of Environmental Quality should not then determine that the standards had been set too high and so adjust them accordingly.

Alumax will be a major industry in the Umatilla area; nevertheless, the Oregon Environmental Council feels that the Commission should set strict standards, and require the facility to adhere to them. We urge that particular emphasis be placed on the implementation of Special Conditions contained in the proposed permit detailing planning, specifications and installation of air pollution control systems (items 8-17) and governing the Pre- and Post- Monitoring Program (items 19-21 in the proposed permit). We also urge the Commission to place special emphasis on the General Conditions G-8 and G-9 (modification or enlargement of the facility), G-10 (revocation for cause) and G-11 (notification requirements).

The EQC is the body empowered with formulation of policies which ultimately maintain the quality of life in Oregon. The Oregon Environmental Council supports the adoption of strict regulations for this proposed aluminum reduction facility and urges a program of strict monitoring and enforcement of these regulations. Oregonians will be watching this facility to see if an industry can truly fulfill its promises to provide jobs and economic benefits to the state without damaging the quality of life.

Thank you.

Presented before the Environmental Quality Commission at their Public Hearing on Proposed Air Contaminant Discharge Permit for Alumax Pacific Corporation Aluminum Reduction Plant near Umatilla, Oregon.

Hermiston, Oregon, July 15, 1975

Oregon Environmental Council 2637 S.W. Water Avenue Portland, Oregon 97201

(503) 222-1963

My name is John N. Groupe, Economic Development Specialist with the Oregon Department of Economic Development, serving the Eastern Oregon Region from the regional headquarters in LaGrande, Oregon.

The Oregon Department of Economic Development recognizes:

- That environmental protection and a balanced economy are of great importance to all Oregonians; and that these goals are not, and cannot be permitted to become, mutually exclusive.
- That a program of balanced economic growth and development is necessary to correct an existing imbalance in the geographic distribution, quality and quantity of economic activity within the state.
- 3. That the current imbalance in the geography of economic health that exists between the metro and rural areas is demonstrated in the rural and less developed regions of the state by markedly lower levels of personal income per capita, fewer community services, restricted tax base, narrow economic base, and high outmigration of young people and higher chronic and cyclical unemployment rates.
- 4. That properly planned and properly distributed economic growth can help maintain and improve the total environment by broadening the tax base so that more and better services can be provided to all citizens.
- 5. That Oregon cannot offer an attractive future to its own youth unless additional jobs are made available through the expansion of existing industry and the location of new industries. Without these additional

industrial payrolls the state may suffer a migration of its youth and continuing decline of many of the smaller communities.

6. That Oregon's clean air, its streams and forests, its varied regions and mountains and its vast natural beauty are in themselves an economic asset and an incentive to industry; and that a sound, balanced economy in a well-protected environment are worthy and compatible goals.

I sincerely believe that the proposed Alumax Pacific Corporation will contribute to the needed job diversification in the growing Mid-Columbia area. Oregon's cyclical economy has had many peaks and valleys because of a declining wood products industry. Because of automation and increasing shortages in our available timber stands we face the probability of fewer jobs in the wood products industry over the long term.

The proposed aluminum plant will most certainly supply the type of employment desirable by the many young people who prefer to remain in Eastern Oregon.

I feel that the leaders of the Alumax Pacific Corporation have demonstrated that they will protect our environment and operate within the requirements of the laws of Oregon and the directives of the various state agencies. We need this industry now, and I am hopeful that we can interest additional industrial development in rural Oregon to improve the quality of life of many of our citizens who have been existing on substandard incomes.

## TESTIMONY AT OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY HEARING, HERMISTON, OREGON

## JULY 15, 1975 💀

GOOD EVENING LADIES AND GENTLEMEN. MY NAME IS ANITA FRANKEL, AND I AM CHIEF OF THE AIR PLANNING SECTION WITH THE REGION X OFFICE OF THE ENVIRONMENTAL PROTECTION AGENCY. WE WISH TO TAKE THIS OPPORTUNITY TO BRIEFLY REVIEW FOR YOU A FEDERAL AIR POLLUTION CONTROL REGULATION WHICH MAY BE APPLICABLE TO THE CONSTRUCTION OF THIS PROPOSED ALUMINUM REDUCTION PLANT.

AS REQUIRED BY THE CLEAN AIR ACT AMENDMENTS OF 1970, A FEDERAL REGULATION WAS PROMULGATED BY EPA ON DECEMBER 5, 1974, TO PREVENT SIGNIFICANT DETERIORATION (PSD) OF AIR QUALITY IN THOSE AREAS OF THE COUNTRY IN WHICH AIR QUALITY IS BETTER THAN THAT REQUIRED BY THE NATIONAL AMBIENT AIR QUALITY STANDARDS. THE REGULATION IS IMPLEMENTED THROUGH A PRECONSTRUCTION REVIEW AND APPROVAL PROCESS FOR CERTAIN CATEGORIES OF NEW AND MODIFIED INDUSTRIAL SOURCES WHICH EMIT SUBSTANTIAL EMISSIONS OF PARTICULATE MATTER AND SULFUR DIOXIDE, THIS REVIEW IS APPLICABLE TO SOURCES WHICH COMMENCE CONSTRUCTION AFTER JUNE 1, 1975, AND IS SIMILAR TO THE NEW SOURCE REVIEW PROGRAM CONDUCTED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY. HOWEVER, IN ADDITION TO DETERMINING A PROPOSED PROJECT'S EFFECT ON THE ATTAINMENT AND MAINTENANCE OF NATIONAL AIR QUALITY STANDARDS, THIS REGULATION REQUIRES DEMONSTRATION THAT THE PROJECT'S EMISSIONS WILL NOT CAUSE THE AIR QUALITY DETERIORATION LIMIT, ESTABLISHED TO PROTECT THE AREA FROM SIGNIFICANT DETERIORATION, TO BE EXCEEDED. SOURCES SUBJECT TO THIS REVIEW ARE REQUIRED TO CONTROL THEIR EMISSIONS WITH BEST AVAILABLE CONTROL TECHNOLOGY.

The APPLICABLE DETERIORATION LIMITS ARE DETERMINED BY AN AREA'S CLASS DESIGNATION. CLASS I AREAS ARE THOSE WHERE A SMALL INCREASE IN POLLUTANT CONCENTRATIONS WOULD BE CONSIDERED SIGNIFICANT, CLASS II AREAS ARE THOSE WHERE POLLUTANT CONCENTRATION INCREASES ACCOMPANYING MODERATE, WELL-CONTROLLED GROWTH IS NOT CONSIDERED SIGNIFICANT, AND CLASS III AREAS ARE THOSE WHERE CONCENTRATION INCREASES TO THAT LEVEL ALLOWED BY NATIONAL SECONDARY STANDARDS WOULD NOT BE CONSIDERED SIGNIFICANT. EPA HAS INITIALLY CLASSIFIED ALL AREAS OF THE COUNTRY AS CLASS II.

OREGON HAS REQUESTED DELEGATION TO IMPLEMENT THIS PROGRAM. UNTIL THE DELEGATION PROCESS IS COMPLETE, EPA IS ADMINISTERING THE REGULATION. TO PERMIT CONSTRUCTION OF A SUBJECT FACILITY, WE MUST BE ASSURED THAT THE SOURCE'S EMISSIONS DO NOT CAUSE THE ALLOWABLE DETERIORATION LIMIT TO BE EXCEEDED. AN APPLICANT WILL BE ASKED TO SUBMIT TO THE EPA REGIONAL OFFICE INFORMATION ABOUT THE PROJECT INCLUDING APPROPRIATE OPERATING PARAMETERS, SITE INFORMATION, EMISSIONS ESTIMATE, AND THE TYPE OF EMISSIONS CONTROL WHICH WILL BE EMPLOYED, APPLICANTS ARE ENCOURAGED TO SUBMIT THE RESULTS OF MODELLING STUDIES WHICH SHOW THE PROJECT'S EFFECT ON AMBIENT AIR QUALITY CONCENTRATIONS. IN ADDITION, THE REGULATION REQUIRES EPA TO SOLICIT PUBLIC COMMENT ON THE APPLICATION AND ON EPA'S PRELIMINARY DETERMINATION OF WHETHER . . .......... TO APPROVE AN APPLICATION.

SINCE THIS IS A NEW REGULATION, EPA IS STRONGLY ENCOURAGING APPLICANTS TO SEEK A PRE-APPLICATION CONFERENCE WITH US, SO THAT POTENTIAL DELAYS OR MISUNDERSTANDINGS CAN BE AVOIDED.

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(2)

Home Address WALLACE W. McCRAE 1303'NW King Avenue Pendleton, Oregon 97801

> UMATILLA COUNTY DISTRICT 57



HOUSE OF REPRESENTATIVES SALEM, OREGON 97310

JULY 15, 1975

MR. CHAIRMAN---MENBERS OF THE COMMISSION:

I AM WALLACE McCrae-State Representative from Dist.#57.

I AM HERE TONIGHT IN A DUAL ROLE. ONE AS A REPRESENTATIVE OF STATE GOVERNMENT-THE OTHER AS A CITIZEN OF UMATILLA COUNTY.

IN BOTH OF THESE ROLES I WISH TO STRONGLY URGE THE COMMISSION'S FAVORABLE CONSIDERATION OF THE ALUMAX APPLICATION BEING CONSIDERED HERE TONIGHT.

The plans you are being asked to approve tonight are compatible to the State program of Economic Development which stresses disbursement of industry to locations outside of the Metropolitan Area. We are acutely aware of the compounding of urban problems by the continued location of New industries within already conjested areas.

We saw this proposed development slip away from the coastal region. The Umatilla site seems admirably adapted to the Alumax requirements and would avoid the threat of locations in neighboring states.

As a citizen of this area I see this as another step toward the realization of our dream of diversification of our economy by the addition of another major industry to compliment our historic dependence upon agriculture, livestock and lumber.

THIS AREA HAS DEMONSTRATED A WARM WELCOME TO ALUMAX AND A WILLINGNESS TO ACCEPT THE RESPONSIBILITIES THAT ACCOMPANY IT.

I URGE APPROVAL OF THIS APPLICATION,

# ENVIRONMENTAL QUALITY COMMISSION HEARING JULY 15, 1975

MR CHAIRMAN; MEMBERS OF THE COMMISSION: MY NAME IS JAMES A. HOWARTH, I AM VICE-PRESIDENT AND PROJECT MANAGER FOR ALUMAX PACIFIC CORPORATION: I PRESENTLY RESIDE IN OREGON, MAINTAINING RESIDENCES IN ASTORIA, PORTLAND, AND THE TOWN OF MCNARY. I AM HOPEFUL OF MOVING PERMANENTLY TO UMATILLA COUNTY IN THE IMMEDIATE FUTURE AS THE PLANT MANAGER OF MY COMPANY'S PROPOSED ALUMINUM REDUCTION PLANT.

ALUMAX FILED PERMIT APPLICATIONS WITH THE DEPARTMENT OF ENVIRONMENTAL QUALITY ON APRIL 18. SINCE THEN WE HAVE GIVEN THE DEPARTMENT REPORTS, DATA AND INFORMATION NECESSARY TO COMPLETE THESE PERMIT APPLICATIONS AND HAVE FURNISHED ALL THE INFORMATION THE DEPARTMENT REQUESTED TO ASSIST THE STAFF IN ANALYZING AND REVIEWING OUR APPLICATIONS.

ALUMAX BELIEVES THAT WE HAVE DEMONSTRATED THE CHOICE AND USE OF THE HIGHEST AND BEST PRACTICABLE TREATMENT AND CONTROL OF EMISSIONS FROM THE PROPOSED PLANT.

THROUGH THE DEVELOPMENT OF DATA FROM VARIOUS ALUMINUM REDUCTION PLANTS, THROUGH THE USE OF DESPERSION MODELING TECHNOLOGY, AND FINALLY THROUGH CONSULTATION WITH RECOGNIZED EXPERTS IN THE FIELD OF EMISSION EFFECTS ON THE ENVIRONMENT, WE ARE CONFIDENT THAT THE OPERATION OF THE ALUMAX PLANT WILL MEET ALL APPLICABLE QUALITY STANDARDS: AND WILL NOT HAVE ANY ADVERSE EFFECT ON THE NATURAL ENVIRONMENT.

THROUGHOUT THE PAST MONTHS, WE HAVE BEEN IMPRESSED BY THE TECHNICAL COMPETENCE OF DEPARTMENT STAFF AND BY THEIR DILLIGENCE IN BRINGING THE STAFF REPORT TO THE COMMISSION AT THIS TIME. WE HAVE REVIEWED THE PRO-POSED PERMITS -- WE FIND THE CONDITIONS TO BE COMPREHENSIVE AND STRIN-GENT. WE CAN COMPLY WITH ALL THE CONDITIONS SET FORTH.

ALUMAX DOES NOT INTEND TO PRESENT FURTHER FORMAL TESTIMONY AT THIS <u>PUBLIC</u> HEARING: AS YOU MAY BE AWARE, WE DID PRESENT TESTIMONY HERE ON APRIL 30 AT A UMATILLA COUNTY PLANNING COMMISSION HEARING --- WE BELIEVE THE DEPART-MENT STAFF REPORT SAYS EVERYTHING WE COULD SAY, AND SAYS IT BETTER.

IF MR. CHAIRMAN, YOU OR ANY MEMBERS OF YOUR COMMISSION HAVE QUESTIONS TO WHICH WE MAY RESPOND, WE HAVE PRESENT SEVERAL CONSULTANTS, EACH AN EXPERT IN THEIR RESPECTIVE FIELDS, THAT ARE PREPARED TO BE RESPONSIVE TO YOUR QUESTIONS.

THESE CONSULTANTS INCLUDE:

DR. MICHAEL TRESHOW: EFFECTS OF EMISSIONS ON VEGETATION DR. WILLIAM HARRIS: EFFECTS OF EMISSIONS ON CATTLE DR. VICTOR KACZYNSKI: EFFECTS OF EMISSIONS ON WATER AND AQUATIC LIFE DR. HARRISON CRAMER: EFFICTS OF PLANT ON AIR QUALITY MR. WILLIAM BLOSSER: COMMUNITY IMPACTS MR. BERNARD GOLDHAMMER: ELECTRICAL ENERGY Statement by: Roy Sampsel

Member Federal Regional Council, Pacific Northwest Region Special Assistant to the Secretary, Department of the Interior

Federal Agencies in the Pacific Northwest have been working with local leadership in the Hermiston - Umatilla area during the past year analyzing technical data regarding an upgraded water system and available financial sources.

In the process of this informal review some agencies initially questioned the validity of the need and the technical solutions proposed. However, now that studies have been completed, Federal agencies within the Federal Regional Council and others not formally represented on the Council do feel that the facts place this project high on the list of regional priorities.

We have no formal request for Federal assistance before us at this time, but are willing to entertain such a request as soon as the local and state governing authorities have completed the necessary preparatory work.

In our review, we find that the project has the characteristics appropriate to become a demonstration project within multi-agency funding criteria.

It is clear to us because of this review that the water problem is not the result of any single factor such as the Alumax plant or the people this plant will bring to this region. Quite the contrary; this plant allows us to review the project in the context of a model land and resource development.

I am confident that we will be able to provide appropriate Federal funding; more than that, we concur with the State's policy that distributed growth is desirable, and look forward to participating in a project on that basis.

The key ingredient that allows us to take this position in the strong coordiation between each of the local agencies and the way that they are moving so actively to deal with the process of planned development -- not on the basis of looking for a solution after the problems are upon them, but on the basis of preventing them from occuring. For the purpose of this hearing the Federal agencies view is that:

-- the water problem does not stem specifically from the siting of this plant.

-- that, in fact, the siting of this plant in Umatilla contributes to developing an accelerated solution to the problem.

We share with you the need for the best currently available technical data being applied to this planning process and that public participation in the decision making process is essential. Our concern is not how to solve the problem, but how best to solve it for this area of Oregon, this State and region.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

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

ROBERT W. STRAUB

July 30, 1975

Mr. Larry Williams Executive Director Oregon Environmental Council 2637 S. W. Water Avenue Portland, Oregon 97201

#### Dear Larry:

Thank you for expressing your concern that Alumax may not intend to meet the standards imposed upon them by the conditions of their Air Contaminant Discharge Permit as issued on July 22, 1975. Our staff, as you know, has been in lengthy dialogue with representatives of Alumax. We have been presented with voluminous data with regard to the operation of their planned facility near Hermiston. I can assure you that we've been given no reason to doubt that they intend to build the cleanest facility of its kind in the world. While there is some element of risk involved because their operation will be breaking new ground in the area of environmental controls, the permit was based on staff's professional judgment that the plant will meet our stringent state standards for flouride emissions.

With regard to your suggestion that the permit should be revised to include a specification of harsh civil penalties for intentional violation, we are unable to discover in this agency authority to impose civil penalties in excess of \$500 for violation of air quality standards. This holds true even in the case of intentional violation. After consultation with counsel, we conclude that to impose higher civil penalties than the statute authorizes by including them as permit conditions would go beyond the scope of legislative intent. Mr. Larry Williams July 30, 1975 Page Two

Perhaps you can take some comfort from the fact that, should violations occur, the Commission has standing to seek an injunction through the Courts. This, in addition to the present schedule of civil penalties, provides what we feel is an adequate enforcement procedure whose availability, we are confident, is well known to Alumax management.

Consequently, we feel that the permit should stand as issued. Thank you for your concern in this matter.

Sincerely, LOREN KRAMER Director

LK:cm



### OREGON ENVIRONMENTAL COUNCEPTE OF THE DIRECTOR 2637 S.W. WATER AVENUE, PORTLAND, OREGON 97201 / PHONE: 503/222-1963

#### July 24, 1975

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State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY [2] []

JUL 2 8 1975

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Mr. Bud Kramer Department of Environmental Quality 1234 S.W. Morrison Street Portland, Oregon 97204

Dear Bud:

I am sorry that we did not follow up on the proposal I made to you regarding the modification of the Alumax Air Discharge Permit. I thought that it would be included as part of our testimony as given before the commission, but discovered upon return from vacation that the issue had not been dealt with.

Specifically, we suggest that provisions for very stiff civil penalities be included in the air quality discharge permit for Alumax if they violate the permitted air discharge standards more than three days in succession. Under current law you are allowed to fine up to \$500 per day for violation of the established standards. However, if violation appears to be intentional, which it would be if the company received notice and had an opportunity to shut down, then the Department has the authority to impose civil penalties for as large amount as seems appropriate. We propose that civil penalties for as much as \$25,000 to \$50,000 a day for intentional violation of the air quality standards be made part of the permit.

A clause should be written into the permit to allow certain number of days for shake-down and adjustment of the equipment. Your staff is better equipped than I to judge how long it may take to get the equipment into good operating order. After that time, however, the company should be expected to comply with the State's permit as has been agreed upon.

We are concerned that Alumax may not intend to meet They know that their chance of getting the standards. the standards revised after the plant is constructed are very good, and therefore they can accept almost any standards the State promulgates at this time. If they can be assured that they are going to be faced with severe financial penalities for violating the State standards, they may take seriously the need to meet

A.F.T.E.R., Tigard AMERICAN ASSOCIATION OF UNIVERSITY WOMEN, Forest Grave Chapter Portland Chapter AMERICAN INSTITUTE OF ARCHITECTS The Portland Chapter Southwestern Oregon Chapter AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS Oregon Chopter ANGLERS CLUB OF PORTLAND ASSOCIATED GENERAL CONTRACTORS OF AMERCIA JDUBON SOCIETY, Portland, Central Oregon, Corvallis BAY AREA ENVIRONMENTAL COMMITTEE Coos Bay, Oregon CHEMEKETANS, Solem, Oregon CITIZENS FOR A CLEAN ENVIRONMENT Corvallis, Oregon CLATSOF ENVIRONMENTAL COUNCIL EAST SALEM ENVIRONMENTAL COUNCIL ECO-ALLIANCE, Corvallis EUGENE FUTURE POWER COMMITTEE EUGENE NATURAL HISTORY SOCIETY FRIENDS OF THE EARTH GARDEN CLUBS of Cedar Mill, Corvalis, Eastmoreland, Fir Grove, Gervis, Nehalem Bay, McKenzie River, McMinnville, Portland, Scappose, Villa GOOSE HOLLOW FOOTHILLS LEAGUE JUNIOR LEAGUE, Eugene, Portland LEAGUE OF WOMEN VOTERS Central Lane Coos County McKENZIE FLYFISHERS, Eugene, Oregon McKENZIE GUARDIANS, Blue River, Oregon MT. HOOD COMMUNITY COLLEGE OUTDOOR CLUB NEWPORT FRIENDS OF THE EARTH NORTHWEST ENVIRONMENTAL DEFENSE CENTER NORTHWEST STEELHEADERS COUNCIL OF TROUT UNLIMITED, Tigard, Willamette Falls OBSIDIANS, INC., Eugene, Oregon OREGON BASS AND PANFISH CLUB OREGON CITIZENS FOR CLEAN AIR OREGON GUIDES AND PACKERS, Sublimity, Oregon OREGON LUNG ASSOCIATION OREGON PARK & RECREATION SOCIETY Eugene, Oregon OREGON ROADSIDE COUNCIL OREGON SHORES CONSERVATION COALITION O.S.P.1.R.G. PLANNED PARENTHOOD ASSOCIATION, INC. Lane County Portland PORTLAND RECYCLING TEAM, INC. P.U.R.E., Bend, Oregon REED COLLEGE OUTING CLU8 Portland, Oregon ROGUE ECOLOGY COUNCIL Ashland, Oregon SANTIAM ALPINE CLUB Salem, Oregon Salem, Oregon SELLWOOD-MORELAND IMPROVEMENT LEAGUE, Portland SIERRA CLUB Pacific Northwest Chapter Columbia Group, Portland Klamath, Klamath Falls Mary's Peak, Corvollis Mt, Jeiferson, Salem Rogue Valley, Ashland SOLV SPENCER BUTTE IMPROVEMENT ASSOCIATION Eugene, Oregon STEAMBOATERS SURVIVAL CENTER, U. of O., Eugene TEAMSTERS FOOD PROCESSORS UMPQUA WILDERNESS DEFENDERS WESTERN RIVER GUIDES ASSOCIATION, INC. WILLAMETTE RIVER GREENWAY ASSOCIATION WOMEN'S LAW FORUM, U of O, Eugene ZERO POPULATION GROWTH

Lone County Chapter

Bud Kramer July 24, 1975

Page 2

permit requirements and therefore save all of us a lot of headaches in the future. We think the proposed modification would give us all some assurance that Alumax will indeed be all good neighbor.

Sincerely,

I∕a⁄rry Wi

Larry Williams Executive Director

LW:alh

cc: George Tsongas Janet McLennan



UMATILLA COUNTY

#### BOARD OF COMMISSIONERS

F. K. "Woody" Starrett Barbara Lynch Raymond Bevans

P.O. Box 1427 Ph: 503 276-7111

216 Southeast 4th Pendleton, Oregon 97801

J. Dean Fouquette, Administrative Assistant

July 15, 1975

Gentlemen:

Very simply stated, Umatilla County supports this project. It can be the cornerstone for county industrial development to go hand in hand with our great agricultural growth. It meets the concept of Governor Straub for dispersal of State industry.

There is a cooperative effort between the principals to develop additional energy from coal at the Carty Site (Boardman). This will strengthen our energy resources.

In summary, your favorable decision can enhance the liveability for residence in Umatilla County. I would feel very "comfortable" to welcome our new friend, Alumax.

Sincerely,

F. K. Starrett, Chairman Board of Commissioners

FKS:mw

To: The State of Oregon Environmental Quality Commission Hermiston, Oregon July 15,1975

#### ALUMAX

#### Social Impact on Area Communities

A statement by A.F. Rohrman, a resident of the city of Hermiston for over 45 years.

It has been of various concern about the SOCIAL impact the construction and operation of the Alumax Aluminum Plant will have upon the communities in the West end of Umatilla County and Northern Morrow County.

For The Environmental Commission to arrive at decisions, a knowledge of past experiences will be of value. Therefore, a little history may be in order at this meeting.

Historically, this has been our actual experiences:

- (1). In 1941 during the construction of the Umatilla Army Depot, just West of Hermiston, over an area that was 4 miles wide and 6 miles long, we had at the peak, over 8000 workers on this project, (not 80 or 800 but over 8000). Hermiston's 1940 census was at about 850 and the neighboring towns had a proportionate density. We had problems, we survived, and in a manner, pulled thru. All this without the aid of any Governmental Agency; this was unknoun at the time.
- (2). Shortly after World War II, Col. Tudor of the Army Engineers had a meeting with a group of local citizens here in Hermiston. His mission was to advise us that McNary Dam wæ to be built and at the peak of construction there would be 3500 workers and it was up to us to take care of this influx of workers. After our experiences with the Army Depot, the McNary Dam construction posed no problem.
- (3). Since the completion of these 2 major projects, the area has continued to grow and upgrade the services to it's citizenry. More recently we have had the development at Hinkle, Marlette, Lamb-Weston, the Agri-Business, and Johns-Manville. These, together, will employe more than is planned for the construction of Alumax.

A. T. Mohmin

All this activity has been taken in stride by the communities involved. From our past experiences in actually going thru periods of peak employment I feel that we shouldn't be too concerned about the SOCIAL IMPACT ALUMAX will have on our communities.

WE CAN HANDLE IT.

#### To: ENVIRONMENTAL QUALITY COMMISSION

FROM: L.B. Urbauer, Administrator Good Shepherd Hospital Hermiston, Oregon 97838

The operation of the Alumax plant in our hospital area would increase the utilization of the hospital facility and services. The hospital is licensed for 56 beds and by State Health Department survey has a capacity of 69 beds. Our present occupancy computed on 56 beds is 53.17%. Computed on 69 beds it would be 42.9%. The past increase in population of the area has not increased hospital utilization. Total patient days 1973 was 13,371, 1974 - 12, 266, 1975 - 10,775.

The 3 acute care hospitals in Umatilla County are in need of increased utilization to maintain the resources necessary to provide good quality health care. The availability of quality health care will decrease and although the cost has risen rapidly in the past the rate will be accelerated unless productivity can be increased.

In conclusion Alumax would not be a problem to area hospitals, it could well be the cure for present and future problems.



#### CHAMBER OF COMMERCE

Phone (503) 567-6151 P. O. Box 185 Hermiston, Oregon 97838

July 15, 1975

Dear Commissioners:

I am president of the Creater Hermiston Chamber of Commerce who represents merchants, industry, agriculture interests in the west end of Umatilla County. I wish to submit the following statement to you on behalf of the Board of Directors and the general membership of the Chamber of Commerce.

We in the Hermiston area are delighted Alumax Pacific Coproration choose the Port of Umatilla for the location of a primary reduction plant. The development of this plant would strengthen the economic base and give us the diversification in our industry and employment needs and offer an economic balance without destroying the quality of life that we enjoy. Their effort to locate here has been broadly supported by those interests that I have been choosen to represent. Alumax Pacific Corporation personal interest and personal effort to meet or exceed county, state, and federal regulations in regard to the environment and their personal interest in regard to local matters such as water, sewer, solid waste and housing further encourage us to believe they would be a very welcome neighbor. As a responsible corporate citizen we feel Alumax Pacific Corporation here would be part of the solution rather than part of the problem.

This position of The Greater Hermiston Chamber of Commerce is not Sour grapes approach but rather one of continued and increasing support for this industry. Our existing agriculture development and future agriculture development and our existing local industry all rely heavily on Aluminum products.

We feel this would be a model plant one in which we can be proud of and encourage you to find favorable on their request.

UMATILLA IRRIGON BOARDMAN BOARDMAN BOARDMAN BOARDMAN BOARDMAN BOARDMAN BOARDMAN BOARDMAN BOARDMAN Sincerely,

Don Skeen, President

July 15, 1975

Enviromental Quality Commission Department of Enviromental Quality State of Oregon

Dear Commission Members:

As a lifetime resident of Hermiston, I am extremely interested in the further development and potential of this area.

It has been my privelege to have been actively involved with many phases of the recreational opportunities over the past years. I am presently President of the Hermiston Baseball Commission and can readily attest to the extremely fine baseball program we have available for the enjoyment of all interested participants.

Hermiston alone provides facilities for tennis, bowling, roller skating, horse-shoe pitching and swimming in addition to the many varied sports offered through the schools. Animal projects and horse-back riding are available through 4-H groups as well as riding clubs. Hunting and fishing are available and there is an active gun club.

Our geographic location near the Columbia River provides unlimited boating and water skiing and ample beach area for swimming and picnicing. Winter sports are easily accessible both privately and through the school.

Hermiston exceeds the national requirements for parks and recreation land area per person and the proposed increase of population and further development will only serve to improve the many recreational facilities and opportunitues.

Very truly yours, rand Vackensie

Frank J. Harkenrider President Hermiston Baseball Commission

FJH/bbh

SHEECO ELECTRIC, INC.

Phone 567-5532

2150 NORTH FIRST STREET · · ·HERMISTON, DREGON 97838

July 15, 1975

Environmental Quality Commission

Chairman and Members:

My name is Wally Shurtliff. I own and operate Shelco Electric, Inc. I have been in the electrical contracting business in the Hermiston area for approximately 25 years.

As an electrical contractor in the community, I am very familiar with the capabilities of local housing builders. I can assure you that the local industry can adequately meet the housing requirements of the anticipated increased population.

Yours very truly,

SHELCO ELECTRIC, INC.

Shurtiff

W. N. Shurtliff

WNS:mh

MY NAME IS WM. H. WRIGHT AND I AM THE MANAGER OF THE UMATILLA BRANCH OF INLAND EMPIRE BANK. I WOULD LIKE TO GO ON RECORD THAT I SUPPORT THE GRANTING OF THE ALUMAX ENVIROMENTAL PERMITS ON THE BASIS THAT THEY WOULD BE COMPATABLE INDUSTRY WITH THE COMMUNITY OF UMATILLA AND THE SURROUNDING AREA.

MAULISH



#### CHAMBER OF COMMERCE

Phone (503) 567-6151 P. O. Box 185 Hermiston, Oregon 97838

July 15, 1975

Dear Commissioners:

I am George Cook, of the L.W. Vail Co. of Hermiston, Oregon and Kennewick Washington.

It is all just this simple: the produce of this plant is needed in this world of commerce. The Mid Columbia local is the ideal location without reservation.

The people here and nearby need the jobs to feed their families and insure the economic future of their loved ones.

I say let's get on with it! !

Georg Cook

L. W. Wall Co.

George Cook P.D. Box 183 Hermiston, Oregon 1703 S. Vancouver, Kennewick, Washington.





## **McNary Management Corporation**

July 15, 1975

Department of Environmental Quality 324 S.E. 6th Pendleton, Oregon 97801

Gentlemen:

McNary Management Corporation is in full support of the proposed Alumax Aluminum Plant to be located in Northwest Umatilla County.

The function of our projects during this anticipated growth and expansion will be in the area of housing, light commercial development and office space at McNary Townsite in Umatilla. The total McNary project has a capacity of 1800 living units with a mixture of mobile home lots, single and multi-family sites, and condominium sites.

At present we have available 95 single family lots and 175 mobile home sites. In progress now and ready for construction within 120 days will be another 130 single family lots. Developed land for 250 multi-family units can be made available when needed. This total of 650 living units can be utilized by new families.

In addition to using local builders, we are prepared to bring in other builders, if necessary, from the Pacific Northwest to Keep current with any expansion program. If local sources of financing are unable to handle construction due to volume, we have other lenders that are prepared to invest in the local communities.

Our secondary interest is providing land or buildings for light commercial development and office space for the anticipated requirements for services.

We look forward to working with Alumax, municipalities, and other governmental bodies in creating a desireable living and working environment.

Sincerely,

sommy L. Snaguer

Tommy L. Frazier McNARY MANAGEMENT CORPORATION

TLF/vg

····· · ····· ······ . ...... Oregon Russel Opportunition ······ Nary Palla . . \_ . \_ . \_ . . . . . . . . . . . growthen the area. regarding support our extend and we also -----pledge to kupert an community as a whale The Reavest in the world, dates betwee their the community their pledge to make there your Concerned, I feel that alema there gener we and ----aux unemployed in their. a few as pellation is ..... a great impact on our under up layed a well ac ...... a great need for more employment set would have Thus plant suiden the area. Afred we have punciple ones of an in facer of Uluman having for Origen Russ O pportuntion. Com office · · · · · · · · · ----- -Dear Line, "Try mane is Many Calibo dan arange Exercinental Quedily Lonnesson) Hermieter Oreager a to E de des

Oregon Russel

Hermiston, Oregon July 14, 1975

To the Environmental Quality Commission

Dear Sirs:

I have worked with the low-income, elderly and minority people in this area, as a Community Action coordinator, since 1967.

I have read everything I can find on the proposed Alumex Reduction Plant and I do not find anything to be alarmed about.

The Alumax Company has already proven that they are interested and want to help all of the communities in the area, by helping plan and offering financial help.

The jobs provided at the plant, plus the extra jobs that will be available to provide services for the growing area, will help many of our low-income people, as well as businesses, child care, and other services.

The majority of our Senior Citizens are on a fixed income and are really hurting, with the ever increasing cost of electricity, fuel, rent, food, clothing, and especially medical expenses, and Senior Citizens have more than their share of medical expenses.

The Alumax Company will make a broader tax base, which in turn would cut down on taxes, and my people need all the help they can get, just to exist.

mo p

Elmo Bloom, Coordinator Hermiston Neighborhood Center

## The Hermiston Herald

THE OFFICIAL NEWSPAPER OF THE CITY OF HERMISTON AND THE COUNTY OF UMATILLA

PUBLISHERS AND PRINTERS OF THE HERMISTON HERALD AND BUYER'S GUIDE ... OFFERING TOTAL SATURATION COVERAGE OF THE ENTIRE TRADING AREA

### July 15, 1975

158 MAIN STREET HERMISTON, OREGON PHONE (503) 567-6457

Gentleman;

My name is G.M. Reed, and I am the Publisher of the Hermiston Herald newspaper which is the official newspaper of the city of Hermiston and surrounding area.

It has been my observation as an individual property owner in the area as well as the Publisher of the paper, that the proposed Alumax plant would be readily accepted by an overwhelming majority of the people of this area.

I would urge you vote of acceptance on this proposed plant at the Port of Umatilla site.

Thank you.

Respectfully, G.M Reed

Publisher

I have lived in the area 3 to 4 miles Southeast of the proposed Alumax site for 57 years. I have been engaged in agriculture during my working years.

We feel this plant will definately benefit Eastern Oregon and are in favor of Alumax becoming a part of our community.

Signed Donald Demark

My name is Stanley Gass I have been a builder in the Hermiston area for 6 years. There has been some concern ever since Alumax was proposed for this area, about where the incoming people would live. With the size and variety of projects that are being proposed for the area it looks to me like we are going to be well prepared for this tremendous growth. I personally am working on two projects that I hope to be building by the end of summer. One being a 44 acre, 540 unit multiple family planned unit development inside the Hermiston city limits. The other being a 200 lot single family subdivision with homes of  $\frac{1}{2}$  acre lots. I think all of the builders in this area are getting ready to meet the challenge.

The last two years I have perved as chairman of a building committee for a new library facility. As I have become more knowledgeable of the city and county tay situation I realize This area needs a broader tay base to provide services. alumay evile offer this community the opportunity De provide the quality of living posible with low renemployment, a bread tax base and good Salaries.

Segned, Margaret E Davis

July 15, 1975

PHONE 567-5233

**193 MAIN STREET** 

# Burnham's Department Store, Inc.

HERMISTON, OREGON 97838

July 15, 1975

ENVIRONMENTAL CONTROL COMMISSION

Gentlemen:

My name is Bruce Giddens, President of Burnham's Dept. Store, Inc. and a resident of Hermiston, Oregon.

I would like at this time to request your approval of the permit of Alumax Corporation. It is this writers opinion that the approval of this Corporations' application is of the essence to the community and Umatilla County.

Yours truly, Bruce D. Siddens, President

BURNHAM'S DEPARTMENT STORE, INC.

## **CITY OF ECHO**

P. D. BOX 669 ECHO, OREGON 97826

#### PHONE 376-8211

DEPARTMENT OF ENVIRONMENTAL QUALITY STATE OF OREGON

DEAR GENTLEMAN:

THE CITY OF ECHO HAS JUST PUT INTO OPERATION A NEW WELL AND ARE VERY NEAR THE COMPLETION DATE FOR OUR NEW SEWER SYSTEM.

WE FEEL WITH THE NEW WELL, AND THE COMPLETION OF THE SEWER SYSTEM, THE CITY OF ECHO IS PREPARED TO MEET THE CHALLENGE OF GROWTH IN THIS AREA.

PERMITTING ALUMAX TO COME INTO OUR AREA, WILL ALLOW US TO BETTER OUR COMMUNITY, AND PROVIDE STIMULUS FOR OUR PLANS.

I FEEL, AS THE MAYOR OF THE CITY OF ECHO, ALUMAX SHOULD BE ALLOWED THESE PERMITS.

Jevine J. Howard

MAYOR, IRVINE J. HOWARD



INLAND EMPIRE BANK

DORIS SWAYZE BOUNDS Chairman of the Board

FIRSTAND MAIN, HERMISTON, DREGON 97838

We have real admiration for the care and consideration Alumax has given to assure themselves and their neighbors here that the quality of living will be protected in this area -- the cooperation and in-depth technical approach to the problems of ecology, services, schools, housing and general impact has been in the finest tradition.

We at the Inland Empire Bank are confident their high standards of operation and community participation will continue.

We welcome the Alumax Plant and its employees!

Inin Mounte

7-14-75

Home Owned -- Independent

- Deposits Insured up to \$20,000 -MEMBER OF FEDERAL DEPOSIT INSURANCE CORPORATION
# hermiston development corporation 295 EABT MAIN STREET / HERMISTON, OREGON

July 15, 1975

Environmental Quality Commission

Mr. Chairman, distinguished members of the commission, ladies and gentlemen:

My name is Joe Burns, and I represent the Hermiston Development Corporation, a non-profit group of 13 people dedicated to providing a sound, basic economy in our area. Our goal is providing employment, jobs and seeking a diversified economy that enhances our livability. We seek only those companies that have proven management ability and success and those companies that are financially sound. Jobs are so important nationally, statewide and locally. Our diligent research has convinced us that ALUMAX is a positive step forward and a very desirous addition to our area. The unusually large capital investment infuses our tax base with an excess of three hundred million dollars. This will help all taxpayers in Umatilla County. We respectfully request you vote favorably for this permit application by the ALUMAX Company.

> Joseph E. Burns President

payh 2 Bains

# RD <sup>I</sup> N. ROYAL Development & Management, Inc.

July 15, 1975

Chairman and Nembers Environmental Quality Commission

My name is Jim Vickery my office is at 240 K. Gladys, here in Nermiston and I want to address my remarks to the additional need for bousing in this area, that the coming of Alumax will create. How we as developers intend to satisfy that need and some of the ways we intend doing this with as little disruption in the operation of City Goverment and our way of life as possible.

- lst. The need for additional housing is and was here, whether Alumax moves to this area or not.
- 2nd..We have 72 lots ready for home construction now, with severs, water, curbs, streets, and all utilities. We have completed this Subdivision in a 6 month period.
- 3rd...We have aquired land in Mermiston and Stanfield for an additional 135 homes and 250 apartment units, which we are planning and engineering at this time.
- 4th...We are not so concerned with the number of units that can be ready for this increase in population but are more interested in orderly growth and the unique living environment this area offers to all those that wish to take advantage of it. I'm sure that this is one of the reason's that Alumax decided to move to this area, and we are sure that they will make us a good neighbor.

Lincerely. ton my Wihun

Jim M. Vickery, President Doyal Development & Management, Inc.

JMV/sw



TO: Chairman, Environmental Quality Commission

As the Chairman of the Umatilla Planning Commission for the City of Umatilla, I would like to go on record that the Planning Commission of the City is supporting the approval of the air discharge permit for the Alumax Corporation.

ON C. REEP. DAVED MULL

Vice Chairman Umatilla Planning Commission

CRe

#### JESS FOSTER

I AM JESS FOSTER AND RESIDE AT 860 S. W. 10th STREET IN HERMISTON. I AM THE PRESIDENT OF THE PORT OF UMATILLA, HAVING SERVED ON THE COMMISSION SINCE 1972.

DURING THIS PERIOD OF TIME WE HAVE CONSIDERED MANY POTENTIAL INDUSTRIES WHICH HAVE WANTED TO LOCATE IN OUR PORT DISTRICT. THE PRIME CONSIDERATIONS OF THE COMMISSION HAVE CONSISTANTLY BEEN, TO LOCATE ONLY THOSE INDUSTRIES WHICH WE FEEL WOULD BE GOOD INDUSTRIAL NEIGHBORS WITH THE VERY HIGHEST STANDARDS.

IN ALUMAX, WE ARE MAINTAINING THIS CONSISTANCY. WE FIND THE REPRESENTATIVES OF THIS COMPANY TO BE HIGH QUALITY PEOPLE WHO ARE CONCERNED. THEIR INTENT IS TO BUILD THE CLEANEST ALUMINUM PLANT IN THE WORLD.

I URGE YOUR APPROVAL OF THE ALUMAX APPLICATION AND THAT THE PERMITS BE GRANTED.



TO: Chairman, Environmental Quality Commission

I am Mayor A. L. (Bud) Draper, representing the City of Umatilla. I am here tonight to assure the Commission that the City of Umatilla is ready to accept the challenge to serve the influx of people from the Alumax plant.

If this Commission finds negatively on granting this permit for this plant, it could be located across the river from Umatilla. This would result in the same influx of people on our city services and in our school district, with no tax benefit to Umatilla County.

<u>SEWER</u> - In 1973, we completed a project to update our sewer system, which will handle the first influx of people from the Alumax plant. We have an inter-tie with McNary Townsite and the Port of Umatilla planned, on which construction will start as soon as Federal grant moneys are made available.

<u>WATER</u> - Our water system needs more water and some updating. The City has contracted with CH2M Hill to update the water system to serve the present needs of the City.

<u>HOUSING</u> - We have developers building in the area, which will provide homes and apartments for these needs. We have land which has been requested to be annexed which will provide additional area for housing. We presently have 426 residential lots available for building within the city limits, with an additional 205 lots and 60 apartments proposed. There are also several apartments presently available for rent, with a number of houses available for sale.

When the plant was asked to locate in this area, the City of Umatilla put out petitions to get the feeling of the people and there were 531 in favor of the plant locating here and 33 against. On this result the City of Umatilla asks your Commission to act favorably on this permit.

A. L. Draper, Mayor City of Umatilla

P. D. BOX 190 PENDLETON, DREGON 97801

July 14, 1975

TO WHOM IT MAY CONCERN:

At its meeting on January 21, 1975, the Pendleton City Council adopted Resolution No. 901, pledging its support and cooperation to the Port of Umatilla in its negotiations with AMAX to locate their aluminum plant at the Port of Umatilla industrial park.

The City of Pendleton continues to support and endorse the location of Alumax (previously AMAX) on Port of Umatilla property.

Sincerely, Eddie C Angos.

Eddie O. Knopp Mayor



hermiston

295 EAST MAIN STREET / HERMISTON, DREGON/97838

July 15, 1975

### Environmental Quality Commission

Chairman and Members:

I am L. P. Gray, mayor of the City of Hermiston. On behalf of the over 90% of the citizens of this area who have indicated that they are in accord, I support the location of the ALUMAX plant at the proposed site at the Port of Umatilla. It is my considered judgment that it is an industry that has environmental controls that enable it to be a desirable neighbor.

The tax base it will provide to all of Umatilla County, thereby improving the potential for required services and at the same time permitting tax relief to home owners, will be a welcomed feature.

The wage base will serve to raise the standard of living in the surrounding area. The City of Hermiston has continually updated its water, sewer, housing and airport programs over the past years in anticipation of such an industrial development as ALUMAX. An early and affirmative decision from this commission will permit us to implement those plans in time to meet the needs and thus justify the planning effort involved.

Juan Gray Mavor

city

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STATEMENT FROM THE HERMISTON SCHOOL DISTRICT .....

I am Dale Gaylord, Administrative Assistant to the Superintendent of the Hermiston School District, and I have been delegated as official representative of the District.

We would respectfully submit:

- 1. That the great property tax base of the proposed Alumax plant will be of major economic benefit to all of Umatilla County.
- 2. That the Hermiston School District is impressed and pleased with the willingness of the Alumax representatives to work closely with public agencies.
- 3. That there is a close cooperative tone among the various public agencies of western Umatilla County in general, and the cities and school districts in particular. We feel that this spirit of cooperation will provide a bridge toward solution of any specific impact or tax problems faced by individual entities.

7/14/75



July 15, 1975

My name is Rupert Kennedy, Coordinator for the Port of Morrow Commission, Boardman, Oregon. We are pleased to testify in favor of Alumax siting. The Governor of Oregon called us at 5:30 P.M. on New Years Eve and asked if we would offer siting and endeavor to keep Alumax in Oregon. We told him that, Commission willing, we would offer a site if Warrenton didn't perform.

It is a pleasure for us to see the exceptional manner in which the people of our area hosted the very capable Alumax Company.

The area is one of the economic hot spots of the nation with great Food and Energy projects. Our neighbors to the north of the Columbia have an equally expanding Food and Energy project.

The Port of Morrow Commission is ready to finance and construct power plants needed by the utilities, industry and creating jobs for our young people, who want a better livelihood than Food Stamps, Welfare and Unemployment checks. The population of the United States was 150,000,000 in 1950 and in 1975 it is 215,000,000. Lets get on with the jobs.

Alumax will develop over 790 new jobs, running their plant 24 hours a day 365 days a year, with a good pay scale. The commercial development needed addeteed w to serve the industry will create many opportunities. Star - 3

GARLAND SWANSON President

Oregon Beache

DEWEY W. WEST, JR. Secretary

LAWRENCE LINDSAY Treasurer

Commissioner

LeROY GARDNER RUPERT W. KENNEDY Coordinator

city

of hermiston

295 EAST MAIN STREET / HERMISTON, DREGON/97838

July 15, 1975

### Environmental Quality Commission

Chairman and Members:

I am Paul H. Kaminga, Hermiston City Council member. The City of Hermiston has experienced during the past several years an increase in population due to the expanding agricultural activities in this area. The construction of the Lamb-Weston potato processing plant employing 800 people was not a severe impact upon this city's service capabilities and apparently did not generate any state-wide attention. The plant site location for the ALUMAX plant has generated state-wide attention far beyond normal for other industries. We here in the Hermiston area have adequately handled past population increases and can handle this one. Therefore, we urge the commission to approve this permit.

eminga

Paul H. Kaminga Councilman

295 EAST MAIN STREET / HERMISTON, OREGON/97838

July 15, 1975

Environmental Quality Commission

hermistan

Chairman and Members:

My name is Frank J. Harkenrider, a member of the Hermiston City Council. One of the continuing efforts of our community has been to diversify the economy of the area and to create additional employment for our youth. Past studies have indicated that the population percentage is quite low in comparison to the state-wide average for those people between the ages of 18 and 25. With further expansion and diversification, this deficiency in employment opportunities may be overcome and the ALUMAX plant location in our area will be of a major benefit.

I, therefore, as a member of the Hermiston City Council, encourage the issuance of this permit so that the local youth in our area will have opportunities which will permit them to remain in their hometown.

Frank J. Harkenrider

Councilman

Frank & Markemich

city

of

295 EAST MAIN STREET / HERMISTON, DREGON/97838

July 15, 1975

# Environmental Quality Commission

Chairman and Members:

hermiston

My name is J. R. Buchanan, a member of the Hermiston City Council. We on the council have already begun to plan for the impact of the ALUMAX plant on our city. We have met the requirements of a rapidly expanding population in the past and with advance notice and planning can do even a better job now.

Bellenen

J. R. Buchanan Councilman

of

city

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hermiston

295 EAST MAIN STREET / HERMISTON, DREGON/97838

July 15, 1975

### Environmental Quality Commission

Chairman and Members:

My name is William E. Neuffer, a member of the Hermiston City Council. The past history of the City of Hermiston concerning the various population increases due to the construction of the Umatilla Army Depot in the early 1940s, the construction of McNary Dam and the construction of the Union Pacific Railroad Yards have permitted experience that most cities have not encountered. As a result of these past population increases, the City has spent a great deal of money in the planning field so that proper land use development could occur in a relatively short period of time that would be beneficial to the over-all development of the city. Having modern subdivision, zoning and comprehensive plans completed in 1963, and continued upgrading and revision of these controlling land use ordinances, we feel this city is one of the few of our size in the state of Oregon that is well prepared for any sudden population influx that would result from the location of the ALUMAX plant in our area.

Therefore, the city council - with confidence - encourages the commission to grant permission for the ALUMAX Corporation to locate their plant in our area.

n E. Mulfer

Councilman

295 EAST MAIN STREET / HERMISTON, OREGON/97838

July 15, 1975

Environmental Quality Commission

Chairman and Members:

hermiston

I am Lloyd D. Campbell. As a member of the Hermiston City Council I would like to assure you that we have already been working with other governmental units in the area to be sure that the ALUMAX plant will be a positive impact on our region. I am confident that through continued intergovernmental cooperation we will be able to meet the challenge.

Lloyd D. Campbell

Lloyd D. Campbell Councilman

of

What I believe and have to say goes beyond, but does include, an aluminum reduction plant in Western Umatilla County. The overriding issues are the viability of free enterprise and free choice within the law.

Our way of life, our relative freedom from want, and, in fact, our personal freedom are founded and sustained on an economic and social system of private capital investment and reasonable freedom of choice as to the object, time and place of that investment. As a society we have increasingly constrained that freedom of choice by laws and regulations  $\frac{444}{444}$  at all levels of government and by vocal displays of philosophical dissent. In particular, of late, we have, through attitude and law, severely altered the relative values of economic productivity and the condition of the environment in which we exist. Yet, we cannot realistically achieve our environmental goals without the financial resources available only through economic productivity.

When an enterprise persists in the face of and in full compliance with those external, socio-political constraints to exercise freedom of choice in capital investment, they should be permitted to make that choice. Having complied with the statutory and regulatory demands of society, such an enterprise should not be thwarted by those who do not share the economic risk.

It would appear that Alumax Pacific has conscient/ously sought to obey all relevant laws and regulations. Their end product is legal and beneficial. Therefore, I believe that personal opinions as to the desirability of a specific, legitimate enterprise are irrelevant. In that context, which I believe transcends all others, it is my firm belief and recommendation that Alumax Pacific should be permitted to invest their capital and talent to create the industrial plant which they propose.

Also President of the Charles R. Norris Also President of the P.O. Box 121,725 E. Highland Ave Unatile County Board of P.O. Box 121,725 E. Highland Ave REALTORS but not here to Hermiston, DR 97838 present a mandate (to me) of that Board. However, we did as a group and in writing support the zoning actions fevorable to Aluwax.

July 15, 1975

Enviromental Quality Commission Department of Enviromental Quality State of Oregon

Dear Commission Members:

I, Charles Kik, as Vice President of Sanitary Disposal, Inc. would like to submit the following information with reference to the proposed impact the Alumax Plant will have on our company who presently serve this area for the collection and disposal of solid waste.

The amount of solid waste created by the inflated population during construction, the solid waste of the actual plant operation and the waste created by permanent employees and additional population which will be generated by Alumax and other new businesses and industries will present no problem for our facilities for at least ten (10) years. We have ample space in our present landfill, adequate equipment to collect and dispose of solid waste and the personnel to handle the collection and disposal of solid waste for our franchised area.

We are aware of the future development and growth of this area and are willing and able to meet this challenge.

Very truly yours,

Charles Kik Vice President Sanitary Disposal, Inc.

Ck/bbh

July 15, 1975

### TC: Alumax Dearing

The City of Hermiston Planning Commission supports the Alumax development at the Port of Umatilla site. The location of the plant at this proposed site utilizes land that has very little utility value for other than industrial use. Important considerations for a development of an industrial site of this type is the probable emissions of smoke, dust, noise, noxious odors and refuse water. The careful engineering and controls developed for these industrial related problems by Alumax will provide for a premium industrial development. All factors considered the City of Hermiston Planning Commission feels this development makes for excellent land use and compliments the comprehensive land use planning with the City of Hermiston.

Respectfully submitted, Bernard W. Carper, Chairman

Bernard W. Carper, Chairman Planning Commission, City of Hermiston

POLICE CHIEF PHONE 449-3245 Emergency 911

STANFIELD, DREGON 97875 CITY HALL PHONE 449-3522

CITY OF STANFIELD

July 16, 1975

FIRE DEPARTMENT PHONE 449-3231 Emergency 911



Environmental Quality Commission 1234 S.W. Morrison Street Portland, regon 97205

OFFICE OF THE DIRECTOR

Re: Proposed Alumax plant.

Dear <sup>M</sup>r. Chairman and Members of the Commission:

The City of Stanfield wants to go on record in support of the proposed Alumax plant to be located on a 3,000 acre plot of land four miles east of Umatilla . Oregon.

On March 3rd 1975 a letter was signed by the Stanfield City Mayor and Counvilmen witnessed by the City Recorder sent to David Mayers welcoming the Alumax plant to Umatilla, then on March 11, Mr. Mayers sent a letter to the Stanfield City Hall thanking the City and relat-ing that they had retained the consultant firm (CH2M) to make a study showing the impact that their proposed plant would have on the area.

Since that time housing development has been started in the City at this writing we have a 24 unit apartment house complex nearing completion located within easy walking distance from the business sector of the town.

The City has had several inquiries since March as to the availability of land and to possible housing sites.

In April the City remitted petitions signed by Stanfield residents in support of the Alumax plant, these petitions were signed by approximately 300 persons.

In May the City rezoned 66.27 acres of former Al Agricultural, to Cl Commercial R 3 Residential including Multiple Family Dwellings, also included in this rezoning was 23.52 acres of Residential R 2 approximately 18 acres will eventually be a trailer court, with housing for at least 30 units.

the meeting in <sup>H</sup>ermiston last evening July 15, 1975 at the Armand At Larvive Junior High two representatives from the City were present and listened to testimonies in support of the proposed Alumax plant , these were the President of the Council and the City Recorder. The City wants to thank you and other members of your commission for your co-operation and your approval of the needed Discharge permit.

We are in support of this proposed plant, and feel that we will be ready to offer housing to incoming personnel tof this plant.

Thank You Sincerely

harles E. Huxoll Mayor of Stanfield

I, George Larsen, President of the Hermiston Jaycees, am here tonight to inform the Environmental Quality Commission that the Hermiston Jaycees give full support to the Alumax plant, as long as it passes all of the required environmental questions.

We believe that properly planned industry will benefit everyone in Umatilla County. The Hermiston Jaycees will be the first to try to stop industry from changing the environment around us. But we feel Alumax is doing everything humanly possible to protect our environment. Let's move forward for ourselves and our children.



DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Kess

Date: May 16

From: McSwain

Subject: PA at July 15, EQC Hearing - Alumax

Mr. Ken Smith of Umatilla County Planning Commission per telephone call on May 16 informs as follows:

He has two speakers, a mixer, and four microphones which, along with jacks borrowed from IED, were used successfully in Hermiston Jr. High Auditorium. Mixer allows for direct taping by Sony Equipment with special adaptor. The adaptor, mikes, speakers, and mixer will be available for pickup in the Umatilla County Courthouse on the day of the hearing.

Mr. Pete Watson of the Umatilla County Planning Commission set up the previous hearing and would presumably be happy to talk to James Van Domelen of our region office to explain any pitfalls.

We would expect to use the Hermiston Jr. High podium mike in addition to the four above. It would be desirable to discover if the podium mike plugs into the Planning Commission's mixer along with the other four mikes.

Perhaps Mr. Van Domelen could coordinate the arrangement and equipping of the room.

We can bring our portable PA with 2 mixes for backup and use our Sony recorder.



# DEPARTMENT OF ENVIRONMENTAL QUALITY

### 1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-6210

May 16, 1975

ROBERT W. STRAUB GOVERNOR

KESSLER R. CANNON Director

> Mr. Ken Smith Umatilla County Planning Commission Umatilla County Courthouse Pendleton, Oregon 97801

Dear Sir:

This is to confirm our telephone arrangement of May 16 whereby you offered to make available to us your Public Address System together with attachments borrowed from the Intermediate Education Department as used in the Hermiston Junior High School Auditorium for a recent public hearing before your Commission.

We contemplate using the equipment on the evening of July 15 in the Hermiston Junior High facility. We plan to pick the equipment up in the early part of the day at the Umatilla County Courthouse.

Your time and trouble in helping us is greatly appreciated.

Sincerely,

KESSLER R. CANNON Director

Peter W. McSwain Hearings Officer

PWM:lg





# DEPARTMENT OF ENVIRONMENTAL QUALITY

### 1234 S.W. MORRISON STREET · PORTLAND, ORE. 97205 · Telephone (503) 229-6219

May 16, 1975

ROBERT W. STRAUB GOVERNOR

KESSLER R. CANNON Director

Mr. Al Meunier Principal, Hermiston Junior High School 199 E. Ridgeway Hermiston, Oregon 97838

Dear Mr. Meunier:

Re: EQC Public Hearing July 15, 1975

This is to confirm our telephone arrangement whereby we have reserved your auditorium for the evening of July 15, to conduct a public hearing beginning at 7:00 p.m. before the Environmental Quality Commission.

We would like to use your podium and microphone in conjunction with other equipment we will supply. Our meeting calls for seating theater style facing six persons seated on stage or up front. A podium facing the Commissioners with public address is needed. An additional table or tables to place handout information, sign up sheets, etc. is desired.

We would like to know what arrangements are necessary to open up the building, turn on the lights, etc. Is there someone we can call when we arrive in town? Do we understand correctly there is no fee involved? Can we occupy the room from about 5:00 p.m. until quite late in the evening?

We appreciate very much the opportunity to use your facility and hope that you can further help us in the unsettled arrangements mentioned above.

Sincerely,

KESSLER R. CANNON Director

Peter W. McSwain Hearing Officer



PWM:lg

# HERMISTON SCHOOL DISTRICT NO. 8R



ARMAND LARIVE JUNIOR HIGH SCHOOL

199 EAST RIDGEWAY AVENUE Hermiston, Oregon 97838 Phone 567-6427

May 21, 1975

Mr. Peter McSwain Department of Environmental Quality 1234 Morrison Street Portland, Oregon 97205

Dear Mr. McSwain,

You are welcome to use our auditorium on the evening of July 15, 1975. We will be able to provide the items designated in your letter of May 16, 1975.

Since I will be out of town on that date you should contact Mr. Dale Gaylord in the district office, 567-5574, if you have last minute questions. We will have the building open for you at 5:00 p.m.

Sincerely yours,

alfred 91. Meanuer

Alfred H. Meunier, Principal

AHM:mg

cc: Mr. Dale Gaylord



DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Peter

Date:

From: Linnea

Subject: Alumax Hearing

Al Meunier, Hermiston Jr. High principal, said the 15th of July will be okay. There is only a 1 speaker system there though so unless you get your own system, each person who wants to speak has to step up to the podium.

If you want another system, he suggested borrowing one from the Umatilla County Planning Commission, or renting one from Blue Mountain Communications in Hermiston.

He would like to know if it is decided not to use the system already there.

Maybe it would be best to draft a letter after this is decided. 567-6427

DEQ-16

SP\*76014-340

## DEPARTMENT OF ENVIRONMENTAL QUALITY

May 16, 1975

Date:

То:	, EJW,	PWM,	HMP,	JFK
From:	H-Kess			

Subject:

Dr. Crothers, Ron Somers, and Jackie Hallock all will be available for a July 15 hearing on the Alumax permit at Hermiston. Others of the EQC also may be available, but contacts have not been made.

When details -- place, time, etc. -- are firmed, let me know so the EQC can be informed. Thanks.

KRC:cm



DEPARTMENT OF ENVIRONMENTAL QUALITY

Tot	Lin	inea Date:			
From:	Pet	e			
Subject:	Alumax Hearing				
	Could you:				
	1.	Make up a file and put this in it			
	2.	Go to John Kowalczyk <sup>®</sup> s Office and get name and phome number of individual capable of granting reservation of Auditorium of Hermiston Jr. High in Hermist <b>i</b> on Oregon.			
	3.	Call him and make reservation for July 15 beginning at 6:00 PM into the evening. We will need theater seating for audience, podium for speakers to address the Commission, Commission Seating (about six people) up fromt to face the podium and audience, and Public Address for Commission and Podium.			
	4.	Find out if there is a fee involved for either the hall or the			
DEQ-16	5,	custodial help. Draft a confirming letter re: any reservation arrangements made. $_{\rm SP^{*13648-340}}$			



KESS CANNON Director

Pete McSwain: For your appropriate action at appropriate time.

LAW OFFICES OF

## KEANE, HAESSLER, HARPER, PEARLMAN AND COPELAND

GORDON H. KEANE ERIC R. HAESSLER DAVID W. HARPER DONALD H. PEARLMAN MARK G. COPELAND ALAN L. SCHNEIDER THOMAS M. LANDYE 3500 FIRST NATIONAL TOWER PORTLAND, OREGON 97201

> Telephone 224-4100 Area Code 503

April 1, 1975

DIARMUID F. O'SCANNLAIN MICHAEL J. ESLER J. DAVID BENNETT CHARLES A. GALFORD ROBERT B. HOPKINS ROBERT E. STOLLER RICHARD L. SADLER

1975

Mr. Kessler Cannon Director Department of Environmental Quality 1234 S.W. Morrison Portland, Oregon 97205

OFFICE OF THE DIRECTOR

APR

State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

RE: DEQ Mailing List

Dear Mr. Cannon:

Pursuant to ORS 183.335(3), we hereby request that we be placed on your mailing list for all notices of intended action with respect to the following matters:

1. Alumax Pacific Corporation application(s) for permits with respect to an aluminum reduction facility in or near Warrenton, Oregon, or in or near McNary, (or elsewhere within Umatilla County) Oregon; and

2. Designation of a portion of Clatsop County as a "special area" for pollution control purposes.

Notices should be sent to:

Mr. Donald H. Pearlman Keane, Haessler, Harper, Pearlman & Copeland 3500 First National Tower Portland, Oregon 97205

I would appreciate it if you would acknowledge this request and maintain my name on your mailing list for all notices of intended action with respect to the matters cited above, as well as all meetings of the Environmental Quality Commission.

Very truly yours,

Pachuan

Donald H. Pearlman

DHP:jm

### June 17, 1975

Administrative Rules Division Secretary of State's Office Salem, Oregon 97310

Attn: Mrs. Ione Hanson

Gentlemen:

Attached is a copy of the Notice of Public Hearing for Issuance of an Air Contaminant Discharge Permit and Water Pollution Control Facilities Permit to Alumax Pacific Corporation.

Please file this Notice in the July 1, 1975 Secretary of State's news bulletin.

Cordially,

KESSLER R. CANNON Director

Peter McSwain, Hearings Officer

PWM:kok

Attachment

cc: Ray Underwood

6210



# DEPARTMENT OF ENVIRONMENTAL QUALITY

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

Peter all'es

ROBERT W. STRAUB GOVERNOR

KESSLER R. CANNON Director

### NOTICE OF PUBLIC HEARING FOR ISSUANCE OF AN AIR CONTAMINANT DISCHARGE PERMIT AND WATER POLLUTION CONTROL FACILITIES PERMIT TO

ALUMAX PACIFIC CORPORATION

NOTICE IS HEREBY GIVEN that a Public Hearing will be held before the Environmental Quality Commission for the purposes of considering the issuance of an Air Contaminant Discharge Permit and Water Pollution Control Facilities Permit to:

> Alumax Pacific Corporation Umatilla Division 303 East Main Street Hermiston, Oregon 97838

The Public Hearing will be held at the time and place listed below:

Auditorium Armond Larive Junior High School 199 East Ridgeway Avenue Hermiston, Oregon Tuesday, July 15, 1975 at 7:30 p.m.

Any interested person desiring to submit written testimony concerning the proposed permits, the permit conditions or policy related to these matters may do so by forwarding them at any time prior to the Public Hearing to the Department of Environmental Quality, or may be heard orally at the Public Hearing on the date and at the time mentioned above.

Copies of the proposed permits are available upon request from the Department of Environmental Quality, 1234 S. W. Morrison Street, Portland, Oregon 97205, Attention: Air Quality Control Division

Dated June 12, 1975

KESSLER R. CANNON, DIRECTOR



CS

### STATE OF OREGON

#### DEPARTMENT OF ENVIRONMENTAL QUALITY

In the matter of the Public Hearing
for Issuance of an Air Contaminant
Discharge Permit and Water Pollution
Control Facilities Permit to Alumax

AFFIDAVIT OF

atty Okeepe \_\_\_\_, being first duly sworn, depose and say that:

- a) I am and at all times herein material have been an employee of the Department of Environmental Quality of the State of Oregon;
- b) attached hereto are copys of a notice of public hearing to be conducted on July 15, 1975
  - in the matter of <u>Alumax Pacific Corporation -- Issuance of an Air Contaminant</u>. Discharge Permit and Water Pollution Control Facilities Permit.

and the names and addresses from certain mailing lists routinely maintained by the Department of Environmental Quality;

- c) On \_\_\_\_\_\_, 19\_\_\_\_, while in the routine course of my employ, I placed or caused to be placed in the mails envelopes containing copies of the afore-said notice and bearing the attached names and addresses;
- d) and that the postage on each envelope was fully paid.

attleen E

,19 75 Sworn and subscribed before me this 13 of June Notary Public for My Commission expires:

• 1111 State Engineer Paul A. DeBonny, Director AMAX Pacific Aluminum Corp.State Engineer1600 SW 4th Ave., Suite 2501178 Chemeketa Street N.E.Portland, Oregon 97201Salem, Oregon 97310Attn: Ian R. MacDonaldSalem, Oregon 97310 Dept. of Planning & Development Jackson County 32 West 6th Street Wedford, Oregon 97501 AMAX Pacific Aluminum Corp.Engine Manufacturers AssociationJ.C. Penney Company, Inc.<br/>Nary A. Dahl, Legal Dept.James A Howarth, Vice Pres.111 East Wacker DriveNary A. Dahl, Legal Dept.P.O. Box 220Chicago, Illinois 60601333 So. Hope St., Suite 4730Warrenton, Oregon 97146Attn: Thomas C. Young, Exec. DirLos Angeles, Ca 90017 P.O. Box 220 . Mr. Frank Josselson Environmental Protection Agency Enforcement Division Attorney at Law Bruce H. Anderson, Esq. 777 High Street 900 S.W. 5th, Suite 2300 1200 6th Avenue Seattle, WA 98101 Portland, Oregon 97204 Suite 355 Eugene, Oregon 97401 Suite 355 Jerry Anderson DK: U.A. Essiet Howard Kalkstein 8704 S.W. Terwilliger Blvd. 2930 S.E. 184th Place | 113 Johnson Street Portland, Oregon 97219 Gresham, Oregon 97303 Highland Park, N.J. 08904 Howard Kalkstein Radio Station KEDO John E. Evans Steve Nicholl Mrs. Denny Associated General Contractors Box 661 L & C College 1008 N.E. Multnomah St. Portland, Oregon 97219 P.O. Box 779 Longview, Washington 98632 Portland, Or. 97232 Office of the Governor · State Capitol Salem, Oregon 97310 Lane Regional Air Pollution Associated Press 1302 S.W. Broadway Portland, Oregon 97201 Authority 16 Oakway Mall Eugene, Oregon 97401 Mr. Lynn C. GreeneLeague of Women Voters ofP.O. Box 521Klamath CountySt. Helens, Oregon 970511824 TiffanyKlamath Falls, Oregon 97601 David M. Benforado Environmental Legislation 3 M Company P.O. Box 37331 Attn: Zon Gerbert St. Paul, Minnesota 55133 League of Women Voters of Oregon Thomas Guilbert,Esq.League of Women Vota900 S.W. 5th Avenue, Suite 212Suite 2300495 State StreetPortland, Oregon, 97204Salem, Oregon 97301 Cheryl Burkey 2521 S.W. 18th Avenue Portland, Oregon 97201 Mail Tribune 33 North fir Wedford, Oregon 97501 Mrs. Jacklyn L. Hallock 2445 N.W. Irving Street Portland, Oregon 97210 Coalition for Clean Air in Oregon/Washington 830 Medical Arts Building Portland, Oregon 97205 Jean Maley 10 N.E. 127th Avenue Portland, Oregon 97230 HUghes & Associates, INc. 1590 Woodland Terrace Morris K. Crothers, M.D. 1517 Court Street N.E. Lake Oswego, Oregon 97034 SAlem, ORegon 97301 Maritime Administration : News Desk Editor Astoria Department of Human Resources Health Division 1400 S.W. Fifth Ave Portland, Oregon 97201 Rm. 1894 Federal Building 915 Second Ave. Seattle, Washington 98174 Attn: Ms. Sheirbon Astoria, Oregon 97103 Mr. B.A. McPhillips P.O. Box 571 Industrial Forestry Association 1220 SW Columbia St. Portland, Oregon 97201 Davies, Biggs, Strayer, Stoel & Boley 900 S.W. Fifth Avenue Portland, Oregon 97204 McMinnville, Oregon 97128 Attn: Harold Hartman John Meeker 03 SW Brugger St. Portland, Oregon 97219 Dale Hermann DailyJournal of Commerce 621 S.W. Alder Street P.O. Box 10134 PortlAnd, Oregon 97210 Room 807 Portland, Oregon 97205

K-Rda, Inc Honorable E.D. Potts -Oregon Environmental Council > 2637 SW Water St. P.O. Box 20476 , Oregon State Senator Portland, Oregon 97201 , 12 State Capitol Bldg. Portland, Oregon 97220 Attn: D.L. Stevens Salem, Oregon 97310 · -·. 1 Rhidian Morgán, Esq. 2546 S.W. Arden Road Portland, Oregon 97201 The Oregonian 1320 S.W. Eroadway Portland, Oregon 97201 The Oregonian Reynolds Aluminum 1800 SW FIrst Ave. Portland, Oregon 97201 Attn: Joseph Moffatt University of North Carolina The Oregon Journal 1320 S.W. Broadway 1320 S.W. Broadway Susan Scharr 13275 N.E. Thompson Court Chapel H111, N.C. 27514 Portland, Oregon 97201 Portland, Oregon 97230 Attn: Professor Thad Beyle Northwest Environmental Defense Steve Schell Oregon State University Air Resources Center Corvallis, Oregon 97331 Black, Helterline, Beck & Center Rappleyea c/o Northwestern Law School Corvallis, Oregon 97351 Attn: R.M. Alexander, Director Bank of California Tow Portland, Oregon 97205 10015 SW Terwillizer Blvd. Bank of California Tower Portland, Oregon 97219 -Oregon State University Sierra Club Northwest Natural Gas Company 2637 SW Water Street Dept. of Political Science 123 NW Flanders Portland, Oregon 97209 123 NW Flanders Corvallis, Oregon 97331 Portland, Oregon 97201 Attn: Price Zimmerman Attn: D. Jay Doubleday Attn: Dwayne Foley Water Resources Research Inst. Sierra Club , Pacific NW Chapter Covell Hall 115 2738 Baker Blvd. Oregon State University • Eugene, Oregon 97401 Corvallis, Oregon 97331 Ronald M. Somers, Esq. OSPIRG 408 S.W. Second Avenue Portland, Oregon 97214 106 East 4th Street The Dalles, Oregon 97058 Southwest Air Pollution Authorit Grace S. Phinney, Ph.D. 7601 N.E. Hazel Dell 1107 N.W. 36th Streat Vancouver, Washington 98665 Corvallis, Oregon 97330 Pihas Schmidt Westerdahl Co. E. R. Thompson 7040 N. Seward Ave. Suite 430, Pacific Bldg. 520 S.W. Yamhill Portland, Oregon 97217 Portland, Orezon 97204 Attn: Walter Hitchcock United Press-International Port-of Portland 1320 S.W. Broadway Box 3529 Portland, Oregon 97208 Portland, Oregon 97201 Attn: Walter Hitchcock Universing Center Office of the Mayor 304 Warner-Milne 1220 SW Fifth Portland, Oregon 97205 Oregon City, Oregon 97405 Attn: Alan Webber City of Portland---U.S. Public Health Service 424 S.W. Main Street P.O. Box 25287 Portland, Oregon 97204 Denver, \_Colorado. Attn: Donald F. Mazziotti Attn: Michael E. Jensen Izaak Walton League of America PSU-OSPIRG Smith Memorial Center, Rm 333 124 PAcific Building toseburg - Oregon 97470 Portland State University ... Portland, Oregon 97201

17 Carolyn Langley Roy F. Weston, Inc. Weston Way Westchester, PA 19380 Weyerhaeuser Corporation P.O. Box 275 Springfield, Oregon 97477 Attn: Jerry Harper Lawrence E. Wilkinson 6582 Ganon STreet S.E. Salem, Oregon 97301 Stan Wiley Realtors 200 Market Building 200 Market St. Portland, Ore-on 97201 Attn: Pat Neiger, Closing Dept. Dan Wilson 960 Mill St. S.E. Salem, Oregon 97301 The World 350 Stadden Coos Bay, Oregon 97420 Attn: Grace Thill

Ben Allen Director, Dept. of Agriculture Agriculture Building, Room 103 635 Capitol N.E. Salem, Oregon 97310

Air Pollution Equip. Co. 6234 S. E. Carlton Portland, Oregon 97206

Dr. R. M. Wade Albany Clinic 1050 W. Seventh Ave. Albany, Oregon 97231

Albany Democrat Herald City Desk P.O. Box 130 Albany, Oregon 97231

City Recorder City of Albany City Hall Albany, Oregon 97231

American Can Company #512 P.O. Box 215 Halsey, Oregon 97348 Attn: Manager, Western Woodlands

Bill Hamilton Amfac Mortgage Corp. Lloyd Building, Suite 250 700 N.E. Multnomah Portland, Oregon 97232

Mike Huddleston Asphalt Paving Association P.O. Box 228 Salem, Oregon 97308

Associated General Contractors of America 1008 N.E. Multhomah St. Portland, Oregon 97232 Jack R. Kalinoski Public Affirs Manager

Tom Donaca Associated Oregon Industries 2187 S.W. Main Street Portland, Oregon 97205 Port of Astoria P.O. Box 569 Astoria, Oregon 97103

City Recorder City of Astoria City Hall Astoria, Oregon 97103

Atlantic Richfield Company Products Division Box 2679 - T.A. Los Angeles, CA 90051 Attn: W.F. Fisher, Manager

City Recorder City of Baker Baker, Oregon 97814

County Clerk Baker County Courthoûse Baker, Oregon 97814

Baker County Planning Com. Baker County Courthouse Baker, Oregon 97814

Port of Bay City Box 228 Garibaldi, Oregon 97118

Michaels J. Downs Director, Air Quality Services Beak Consultants Inc. 1336 S.W. 2nd Avenue Portland, Oregon 97201

City of Beaverton City Recorder City Hall Beaverton, Oregon 97005

Bend Bulletin News Desk Bend, Oregon 97701

City Recorder City of Bend City Hall Bend, Oregon 97701 Jeanette Simerville, Comm. Board of County Commissioner Benton County Courthouse Corvallis, Oregon 97330

Benton county Health Dept. 126 N.W. Flfth Corvallis, Oregon 97330 Attn: Roger Heyden, Supervising Sanitarian

Blue Mountain Council of Gov Union County Courthouse LaGrande, Oregon 97850

The Blue Mountain Eagle 120 N.W. First Avenue John Day, Oregon 97845

City Recorder Brookings City Hall Brookings, Oregon 97415

Brookings-Harbor Pilot 507 Chetco Avenue Brookings, Oregon 97415

Delbert Johnson Burlington Northern American Bank Building Portland, Oregon 97204

Environmental Control Manage Burlington Northern, Inc 176 East Fifth Street St. Paul Minnesota 55101

City Recorder City of Burns Burns, Oregon 97720

Bob Pailthorp CH2M-H111 1600 Western Bv. Corvallis, Oregon 97330

CH2M-HIII P.O. Box 428 Corvallis, Oregon 97330 Attn: Richard S. Reid
Central Oregon Intergovernmental CouncilIntergovernmental Council1106 W. Highland Ave.CoaliRedmond, Oregon97756Attn:Russell ReeckPort

County Clerk Clackamas County Courthouse Oregon City, Oregon 97045

Citizens for Clean Environment P.O. Box 255 Corvallis, Oregon 97330

Clackamas County Health Dept. Environmental Health Section 1425 S. Kaen Road Oregon City, Oregon 97045

Clatsop County Health Dept. 857 Commercial Astoria, Oregon 97103

Clackamas County Planning Dept. 940 Warner Milne Road Oregon City, Oregon 97045

Winston Kurth Clackamas County Public Works 902 Abernathy Road Oregon City, Oregon 97045

County Clerk Clatsop County Courthouse Astoria, Oregon 97103

Clatsop County Planning Comm. Clatsop County Courthouse Astoria, Oregon 97103

Clatsop Environmental Council Box 504 Astoria, Oregon 97103

Clatsop-Tillamook Intergovernmental Council P.O. Box 488 Cannon Beach, Oregon 97110 Coalltion for Clean Air 1020 S.W. Taylor St. Portland, Oregon 97205

County Clerk Columbia County Courthouse St. Helens, Oregon 97051

Columbia County Health Dept. Environmental Sanitation Div. Rm. 112, County Courthouse St. Helens, Oregon 97051

Columbia County Organization of Governments County Courthouse,Rm. 308 St. Helens, Oregon 97051

Columbia County Planning Dept. Columbia County Courthouse St. Helens, Oregon 97051

Columbia Region Association of Governments 527 S.W. Hall Portland, Oregon 97204 Attn: Tom Vanderzanden

Columbia River Gorge Comm. 920 N.E. Seventh Ave. Portland, Oregon 97232

Condon Globe Times Box 746 Condon, Oregon 97823

City Recorder Coos Bay City Hall Coos Bay, Oregon 97420

Port of Coos Bay P.O. Box 787 Coos Bay, Oregon 97420

Coos Bay World South Fourth Coos Bay, Oregon 97420 County Clerk Coos County Courthouse Coquille, Oregon 97423

Coos County Health Dept. Coos County Courthouse Coquille, Oregon 97423

Coos County Planning Dept. Coos County Courthouse Coquilie, Oregon 97423

Coos-Curry Council of Governments P.O. Box 434 Coos Bay, Oregon 97420

Coos Head Timber Co. Pulp Division Empire, Oregon 97420

Eric Silverstein Corbett-Terwilliger Neighborhood Association 3627 S.W. Kelly Avenue Portland, Oregon 97201

City Recorder City of Corvallis City Hall Corvallis, Oregon 97330

<u>The Courier</u> Box 268 Reedsport, Oregon 97467

County Clerk Crook County Courthouse Prineville, Oregon 97754

Crook County Extension Age Crook County Courthouse Prineville, Oregon 97754 Crook County Health Dept. Crook County Courthouse 97754 Prineville, Oregon

Environmental Services Director Crown Zelferback Corporation 904 N.W. Drake Street Camac, Washington 98607

County Clerk Curry County Courthouse Gold Beach, Oregon 97444

Curry County Extension Agent P.O. Box 488 Gold Beach, Oregon 97444

Curry County Health Dept. P.O. Box 1277 Gold Beach, Oregon 97444

Curry County Planning Dept. County Courthouse Gold, Beach, Oregon 97444

Curry County Reporter Box 766 Gold Beach, Oregon 97444

City Recorder Dallas City Hall 97338 Dallas, Oregon

Democrat-Herald Baker, Oregon 97814

County Clerk Deschutes County Court Deschutes County Courthouse Bend, Oregon 97701

Deschutes County Extension Agent 922 West Highland 97756 Redmond, Oregon

Deschutes County Health Dept. Deschutes County Courthouse Annex Bend, Oregon 97701

Deschutes County Planning Dept. Deschutes County Courthouse Bend, Oregon 97701

George A, Dewey George A. Dewey and Associates 180 Commercial St. NE Salem, Oregon 97301

County Clerk Douglas County Courthouse Roseburg, Oregon 97470

Douglas County Health Dept. Douglas County Courthouse Annex 2 205 S.E. Jackson 97470 Roseburg, Oregon

Douglas County Planning Dept. Douglas County Courthouse Roseburg, Oregon 97470

Douglas County Water Resrouces Survey Douglas County Courthouse Roseburg, Oregon 97470

Ronald R. Hall, Executive Director Eugene City Manager Office East Central Oregon Association of Countles 116 S. Main Room 15 Pendleton, Oregon 97801

East Oregonian 211 S.E. Byers Avenue Pendleton, Oregon 97801

El Paso Natural Gas. Co Environmental Affirs P.O. Box 1492 El Paso, Texas 79978 Attn: Linda Caine

City Recorder City of Enterprise City Hall Enterprise, Oregon 97828

Allen LeFobn EPA NERL 200 S,W. 35th Corvallis, Oregon 97330 Library, Region X M/S 541 Environmental Protection Agency 200 6th Avenue Seattle, Washington 98101

Richard F. White Region X EPA 1200 6th Avenue Seattle, WA 98101

Ed Coate EPA Region X 1200 Sixth Avenue Seattle, WA 981**01** 

Ms. Norma Jean Germond State Env. Qual. Comm. The League of Women Voters 224 Iron Mountain Bv. Lake Oswego, Oregon 9703

Environmental Sciences Lib Union Oll Co. of Californi P.O. Box 7600 Los Angeles, CA 90051

Assistant City Manager P.O. Box 1967 Eugene, Oregon 97401

Eugene REgister Guard News Desk 975 High Eugene, Oregon 97401

Dr. Ronald A. Findlay 316 Eugene Medical Cntr. B 123 East Broadway Eugene, Oregon 97401

City Recorder City of Fossil Fossil, Oregon 97830

Gazette Times News Desk 310 S.W. Third 97330 Corvallis, Oregon

Gazette Times Heppner, Oregon 97836

Matthew Gould Georgla Pacific Corp, 900 S.W. Fifth Avenue Portland, Oregon 97204

Vincent Tretter Georgia Pacific Corp. 900 S.W. Fifth Avenue Portland, Oregon 97204

Judge Leo Barnett Gilliam County Court P.O. Box 705 Condon, Oregon 97823

Mark E. Mann MD Gilliam County Health Dept. P.O. Box 705 Condon, Oregon 97823

Gilliam County Planning Commission Gilliam County Courthouse Condon, Oregon 97823

Gold Coast Motorcycle Assoc. 1350 Ocean Bv. Coos Bay, Oregon 97402 Attn: Andrew W. Adams

Mrs. Barbara Gonigam 580 First St. Lake Oswego, Oregon 97034

J.C. Nathanson Dewey & Almy Chemical Div, W.R. Grace & Co. 62 Whittemore Avenue Cambridge, Mass 02140

County Clerk Grant County Courthouse Canyon City, Oregon 97820

Grant County Health Dept, P.O. Box 68 Canyon City Oregon 97820 Grant County Planning Comm. Grant County Courthouse Canyon City, Oregon 97820

City Recorder City Hall Grants Pass, Oregon 97526

Grants Pass Courier 409 SE Seventh Grants Pass, Oregon 97526

Earnest W. Hahn, Inc. 2311 West El Segunda Bv. Hawthorne, Ca. 90250

Harney County Clerk Harney County Courthouse Burns, Oregon 97720

John Weare, MD Harney County Health Dept. P,O. Box 551 Burns, Oregon 97720

Harney County Planning Comm. Harney County Courthouse Burns, Oregon 97720

Stan Heisler 214 E. 5th The Dalles, Oregon 97058

City Recorder City of Heppner City Hall Heppner, Oregon 97836

Herald and News 1301 Esplanade Avenue Klamath Falls, Oregon 97601

City Recorder City of Hood River City Hall Hood River, Oregon 97031

County Clerk Hood River County Courthouse Hood River, Oregon 97031

County Extension Agent Hood River County Courthouse Hood River, Oregon 97031

Hood River County Health Dept. Hood River, County Courthouse Hood River, Oregon 97031

County Planning Commission Hood River County Courthouse Hood River, Oregon 97031

Port of Hood River P.O. Box 239 Hood River, Oregon 97031

Assistant Administrator Dept. of Environmental and Community Services Idaho State House Boise, Idaho

lizro inc. 292 Madison Ave. New York, NY 10017 Attn: Jerome F. Cole

International Paper P.O. Box 854 Gardiner, Oregon 97441

Oliver Fick International Paper Co. 2905 NW Taft Corvallis, Oregon 97330

<u>Itemizer-Observer</u> News Desk 555 Court Dallas, Oregon 97338

County Clerk Jackson County Courthouse Medford, Oregon 97501

Jackson County Planning Dept. Jackson County Courthouse Medford, Oregon 97501

Jackson-Josephine Comprehensive Health Planning Countil, Inc. 1313 Maple Grove Drive Medford, Oregon 97501

Patty Jameson 1408 Cedar St. Lake Oswego, Oregon 97034

Jefferson County Health Dept. Jefferson County Courthouse Madras, Oregon 97741

County Clerk Jefferson County Courthouse Madras, Oregon 97741

Jefferson County Extension Agent McClou Building Madras, Oregon 97741

Jefferson County Planning comm. Jefferson County Courthouse Madras, Oregon 97741

City Recorder John Day City Hall John Day, Oregon 97845

Joint Interim Committee on Env. Agricultural and Natural Resources 2828 S.W. Front Street Room 407 State Capitol Salem, Oregon 97310 Attn: Lois Nuss, Commitee Clerk

County Clerk Josephine County Courthouse Grants Pass, Oregon 97526

C. William Olson Assist Health Administrator County Health Dept. Josephine County 714 N.W. A Street Grants Pass, Oregon 97526

Josephine County Planning Dept. Josephine County Courthouse Grants Pass, Oregon 97526

Mrs. Cathleen Katz 3433 S.W. Canby St. Portland, Oregon 97219

KG₩ 1501 S.W. Jefferson St. Portland, Oregon 97201

City Recorder City of Klamath Falls City Hall Klamath Falls, Oregon 97601

Klamath County Clerk Klamath County Courthouse Klamath Fall, Oregon 97601

Klamath County Commissioners Klamath County Courthouse Klamath Falls: Oregon 97601

Klamath County Extension Agent US Post Office Bidg. Klamath Falls, Oregon 97601

Klamath County Health Dept. 3300 Vandenberg Road Klamath Falls, Oregon 97601

KOAP FM-TV Portland, Oregon 97201

KOIN-TV 140 S.W. Columbia St. Portland, Oregon 97204

Mayor's Office City of LaGrande City Hall LaGrande, Oregon 97850

Lake County Clerk Lake County Courthouse Lakeview, Oregon 97630

George Carlon, chairman Lincoln County Clerk Lake County Bd. of CommissionersLincoin County Courthouse Lake County Courthouse Newport, Oregon 97365 Lakeview, Oregon 97630

Lamb Weston 6600 S.W. Hampton Portland, Or 97223

Bureau of Land Management Oregon State Office P.0. Box 2965 Portland, Oregon 97208

Lane County Building & Sanitation Dept. 135 East 6th - Annex Eugene, Oregon 97401

Lane County Clerk Lane County Courthouse Eugene, Oregon 97401

Lane County Planning Comm. 135 East 6th - Annex Eugene, Oregon 97401 Lee Miller, Director

Lane Council of Govts. 135 6th Avenue East Eugene, Oregon 97401

League of Oregon Cities 1201 Court NE Salem, Oregon 97301 Attn: Gary Carlson

Mrs. David Anderson League of Women Voters 15315 S.E. Linden Ave. Milwaukie, Oregon 97222

Mrs. William 1. Firey League of Women Voters 3700 Sylvan Road NW Corvallis, Or. 97330

Walter E. Lewis Suite 7, Standard Ins. Bldd 475 Cottage St. NE Salem, Oregon 97301

Lincoln County Health Dept. 225 West Olive St. Newport Oregon 97365

Linn County Health Dept. Linn County Courthouse Albany, Oregon 97321 Attn: Env. Sanitation Div.

Linn County Clerk Linn County Courthouse Albany, Oregon 97321

Linn County Courthouse Albany, Or 97321

Lincoln County Planning Comm. 225 West Olive Newport, Oregon 97365

Virginia Valeri Literature Research Section Arthur D. Little, Inc. Acorn Park Cambridge, Mass, 02140

Robert G. Cameron LLoyd Corp. Ltd 700 N.E. Multhomah Suite 1050 Portland, Oregon 97232

Louisiana Pacific Corp. Samoa, California 95564 Attn: Kelly Stalker

City Recorder City of Madras City Hall 97741 Madras, Oregon

County Clerk Matheur County Courthouse 97918 Vale, Oregon Attn: Ray Huff, Sanitarian

Malheur County Planning Comm. Malheur County Courthouse Vale, Oregon 97918

Malheur Enterprise Vale, Oregon 97918 Box 310

Marion County Clerk Marlon County Courthouse Salem, Oregon 97301

Marion County Health Dept 3180 Center St. N.E. Room 230 Salem, Oregon 97301

Linn County Planning commission Marion County Planning Dept. 3180 Center St. N.E. Rm. 230 Salem, Oregon 97301 Attn Randy Curtis Director

> Marion County Public Works Dept. Marion County Courthouse Salem, Oregon 97301 Attn: John Anderson, Director

Joseph L. Byrne Martin Marietta Aluminum Box 711 The Dalles, Oregon 97058

Mrs. Mary Kenefick The May Department Stores 6th and Olive Streets St. Louis, Missouri 63101

McMinnville News-Register News Desk 401 N. Evans McMinnville, Oregon 97128

City Recorder City of Medford City Hall Medford, Oregon

Earl Sutherland MEL-chariton Laboratories P.O. Box 1048 Portland, Oregon 972**07** 

Menasha Paper Co. P.O. Box 349 North Bend, Oregon 97459 Mid Columbia Economic Dev Dist. P.O. Box 280 The Dalles, Oregon 97058

Carolyn Wood, Secretary Mid Columbia Environmental Council 415 W. 15th Street The Dalles, Oregon 97058

Midland-Ross Corp. 55 Public Square Cleveland, Ohio 44113

Mid-Willamette Valley Air Pollution Authority c/o Shauna Thomas 2585 Stat Street Salem, Oregon 97301

Mid-Willamette Valley Council of Govts. 305 Salem Civic Center Salem, Oregon 97302 Attn: Curt Smelser

Montana Dept. of Health Division of Air pollution Cont. Cogswell Building Helena, Montana 5960I

County Clerk Morrow County Courthouse Heppner, Oregon 97836

C.D. Tibbles Morrow County Health Dept. P.O. Box 662 Heppner, Oregon 97836

97501 Morrow County Planning Comm. Morrow County Courthouse Heppner, Oregon 97836

> Multnomah County Clerk Multhomah County Courthouse Portland, Oregon 97201

Dave Hupp Research Assistant, Multnomah County1008 S.W. 6th, Rm 1203 Portland, Oregon 97204

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Benton County Planning Comm. 501 S.W. Madison Corvallis, OR 97330 Alan Cooper, Director

#### ADDITIONAL MAILINGS FOR ALUMAX PACIFIC CORPORATION HEARING NOTICES

(30) (60) 1. All Oregon Senators and Representatives

- U. S. Dept. of Interior Permit Review Officer
   P. O. Box 3261
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- 3. John Denny, Information Consultant Economic Development, Dept. of 317 S.W. Alder Street Ninth Floor Portland, Oregon 97204
- Mr. Dick Pearson, Director Mid-Columbia Economic Development District Wasco County Courthouse, Annex B 502 East 5th The Dalles, Oregon 97058
- 5. Umatilla County Commissioners P. O. Box 1427 Pendleton, Oregon 97801
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- Eddie O. Knopp Mayor, City of Pendleton P. O. Box 729 Pendleton, Oregon 97801
- 9. Charles Huxoll Mayor, City of Stanfield 105 W Wood Street Stanfield, Oregon 97875
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#### State of Oregon

#### DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

Tor	Kess

Date: May 16

From	1 -	McSwain
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Subject: PA at July 15, EQC Hearing - Alumax

Mr. Ken Smith of Umatilla County Planning Commission per telephone call on May 16 informs as follows:

He has two speakers, a mixer, and four microphones which, along with jacks borrowed from IED, were used successfully in Hermiston Jr. High Auditorium. Mixer allows for direct taping by Sony Equipment with special adaptor. The adaptor, mikes, speakers, and mixer will be available for pickup in the Umatilla County Courthouse on the day of the hearing.

Mr. Pete Watson of the Umatilla County Planning Commission set up the previous hearing and would presumably be happy to talk to James Van Domelen of our region office to explain any pitfalls.

We would expect to use the Hermiston Jr. High podium mike in addition to the four above. It would be desirable to discover if the podium mike plugs into the Planning Commission's mixer along with the other four mikes.

Perhaps Mr. Van Domelen could coordinate the arrangement and equipping of the room.

We can bring our portable PA with 2 mixes for backup and use our Sony recorder.



Robert W. Straub GOVERNOR

Joe B. Richards <sup>Chairmar</sup>, Eugene

> GRACE S. PHINNEY Corvailis

JACKLYN L. HALLOCK Portland

MORRIS K. CROTHERS Salem

RONALD M. SOMERS The Dailes

# ENVIRONMENTAL QUALITY COMMISSION

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

Environmental Quality Commission

From: Director

To:

Subject: 1975 Policy for Authorization of Experimental Burning by Use of Mobile Field Sanitizers

The Commission received testimony at the July 10th hearing that mobile field sanitizers are essentially experimental. F. Glen Odell testified that the Field Sanitation Committee had stated a need for Department flexibility in the operation of experimental burners in respect to both Committee machines and machines of other private individuals.

Under Senate Bill 311, the fee required for burning shall be refunded for any acreage where efficient burning of stubble is accomplished with equipment using an auxiliary fuel or mobile field sanitizer which has been approved by the Field Sanitation Committee and the Department.

A policy clarifying use and approval of mobile field sanitizers is necessary. Considering the current status of mobile field sanitation equipment and the testimony received from the Field Sanitation Committee, the Department prepared the attached policy for consideration of the Commission to provide for use of mobile field sanitizers and meet statutory obligations during the 1975 season.

Previously existing rules relating to field burning and the rules as amended on July 10th allow the Department to authorize burning on an experimental basis (Section 26-013(6)) and Section 26-013(4) allows approved field sanitizers to be operated under either marginal or prohibited conditions.

The Department believes the adopted rules and the proposed policy provide for the maximum of flexibility for mobile field sanitizer use during the 1975 season.

### Recommendation:

It is recommended the proposed policy be adopted to be immediately in effect for the 1975 season.

HMP:h - 7/15/75

2. certats

LOREN KRAMER Director

## (PROPOSED)

#### DEPARTMENT OF ENVIRONMENTAL QUALITY

# 1975 SEASON POLICY FOR AUTHORIZING EXPERIMENTAL FIELD BURNING PURSUANT TO OREGON ADMINISTRATIVE RULES, CHAPTER 340, SUBDIVISION 6, SUB-SECTION 26-013(6)

In order to minimize to the extent practicable the open burning of fields and to encourage the development and use of mobile field sanitizers and provide for early season sanitizing of fields, it shall be the policy of the Department to approve field sanitizers for experimental use during the 1975 season in accordance with the following conditions:

- The Field Sanitation Committee shall maintain information which includes at least the following:
  - a) Name, type or description of sanitizer
  - b) Owner of the sanitizer
  - c) Grower
  - d) Field to be sanitized

Registration Number

Fire District

Fire District Field Number

Field Description

Size in acres

Type of crop: Per

Perennial

Annual

Cereal

Regular or Priority acreage

- e) Dates experimental burner was used:
- Written verification of the above information is submitted to the Department by the Field Sanitation Committee either upon request or at appropriate intervals.

- 3. Individual mobile sanitizers shall not be approved unless there is evidence that reasonably efficient burning can be accomplished by the mobile sanitizers, and that adequate provisions are made for suppression of fire spread. The advice and assistance of the appropriate Fire Permit issuing agency shall be sought in making this determination.
- 4. The Department Field Burning Manager is advised in advance of the location and day of operation for each field sanitizer burner. The Field Burning Manager shall have veto power over operation of any experimental burner if, in his judgment, the operation has or will have an unacceptable impact on air quality.

### PROCEDURE

- A. Persons wishing approval of a field sanitizer shall apply to the Field Sanitation Committee. Applications submitted to the Department shall be referred directly to the Field Sanitation Committee for processing.
- B. The Field Sanitation Committee shall complete an evaluation of the application on behalf of the Committee and the Department, considering the Department policy.
- C. The Field Sanitation Committee shall confer with the Department and the Department shall approve or deny the application.

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- D. The Field Sanitation Committee shall advise the applicant on behalf of the Committee and the Department of the acceptance or denial of the application.
- E. The Department's Field Burning Manager may require the Field Sanitation Committee to stop or appropriately modify operation of field sanitizers that are concluded to be having an adverse effect on air quality in Eugene or other sensitive areas.