EQC MEETING 4/1/1977

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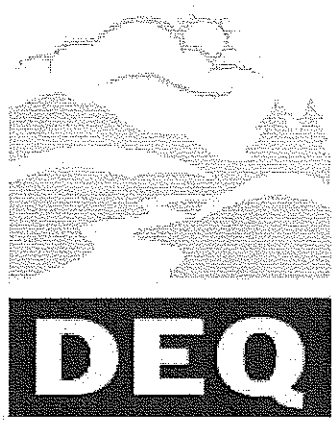
4/1/1977

OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS



State of Oregon
Department of Environmental Quality

Environmental Quality Commission Meeting
April 1, 1977
Seaside Civic and Convention Center
First and Edgewood
Seaside, Oregon

9:00 a.m.

A. Minutes of February 25, 1977 EQC Meeting

B. Monthly Activity Reports for January and February 1977

C. Tax Credit Applications

PUBLIC FORUM - Opportunity for any citizen to give a brief oral or written presentation on any environmental topic of concern. If appropriate the Department will respond to issues in writing or at a subsequent meeting. The Commission reserves the right to discontinue this forum after a reasonable time if an unduly large number of speakers wish to appear

D. Vehicle Emission Testing Rules - Authorization for public hearing to consider revisions to light duty motor vehicle inspection standards, OAR 340-24-300 through 24-330

9:30 a.m.

E. Veneer Dryer Rules - Hearing Officer's report on proposed amendments to OAR 340-25-305 through 25-315 and consideration for adoption

10:00 a.m.

F. City of Hammond - Staff report on sewage program

G. Jeld Wen Co., Klamath Falls - Request for variance (Rescheduled for 4/22/77)

10:30 a.m.

H. Field Burning - EQC Report to the Legislature

11:00 a.m.

I. NPDES Permit Rules - Public hearing to consider adopting as permanent rules a temporary rule providing for amendment of OAR 340-45-035, subsections (2),(4),(6),(7) and (8) which would make Oregon's National Pollution Discharge Elimination System permit rules more comparable with federal rules

11:30 a.m.

J. Water Quality Program - Discussion of DEQ and EQC authority during critical situations

K. Glendale Transfer Station, Douglas County - Discussion of EQC response to Kindricks

- -

Because of the uncertain time spans involved, the Commission reserves the right to deal with any item, except items E,F,H,I & J at any time in the meeting. Anyone wishing to be heard on an agenda item that doesn't have a designated time on the agenda should be at the meeting when it commences to be certain they don't miss the agenda item.

The Commission will breakfast at 7:30 a.m. at the Pig'N Pancake, 323 Broadway, Seaside and any of the above items may be discussed. The Commission will lunch at Dara's Dining, 227 Broadway, Seaside at noon.

MINUTES OF THE EIGHTY-THIRD MEETING

OF THE

OREGON ENVIRONMENTAL QUALITY COMMISSION

April 1, 1977

On Friday, April 1, 1977, the eighty-third meeting of the Oregon Environmental Quality Commission convened in the Seaside Civic and Convention Center, First and Edgewood, Seaside, Oregon.

Present were all Commission members: Mr. Joe B. Richards, Chairman; Dr. Morris Crothers, Vice-Chairman; Dr. Grace S. Phinney; Mrs. Jacklyn Hallock; and Mr. Ronald Somers. Present on behalf of the Department were its Director, Mr. William H. Young, and several members of the Department's staff.

MINUTES OF FEBRUARY 25, 1977 EQC MEETING

It was MOVED by Commissioner Somers, seconded by Commissioner Hallock and unanimously carried that the minutes of the February 25, 1977 EQC meeting be approved as submitted.

MONTHLY ACTIVITY REPORTS FOR JANUARY AND FEBRUARY 1977

It was MOVED by Commissioner Somers, seconded by Commissioner Hallock and unanimously carried that the Monthly Activity Reports for January and February 1977 be approved as submitted.

TAX CREDIT APPLICATIONS

It was MOVED by Commissioner Crothers, seconded by Commissioner Somers and unanimously carried that the Tax Credit Applications be approved as presented.

PUBLIC FORUM

No one wished to speak on any subject.

VEHICLE EMISSION TESTING RULES

Mr. Ronald Householder of the Department's staff presented the staff report asking for authorization for public hearing to consider revisions to light duty motor vehicle inspection standards, OAR 340-24-300 through 24-330. Mr. Householder said this request contained housekeeping amendments; deletion of certain enforcement tolerances which expire June 30, 1977; updating of the specific emission criteria for various vehicle classes; and strengthening of the smoke check procedure. Mr. Householder said that the most significant proposal was to begin enforcing the anti-tampering laws in the inspection program.

It was MOVED by Commissioner Somers, seconded by Commissioner Hallock and unanimously carried that the Director's recommendation be adopted.

VENEER DRYER RULES - HEARING OFFICER'S REPORT ON PROPOSED AMENDMENTS TO OAR 340-25-305 through 25-315 AND CONSIDERATION FOR ADOPTION

Mr. E. J. Weathersbee of the Department's staff presented the staff report and reasons for the proposed rule amendments. Mr. Weathersbee said that the testimony at the public hearing held March 4, 1977 was generally favorable and that the main change in the rule was to change the opacity limit from a 10% maximum to a 10% average and a 20% maximum. Mr. Weathersbee said the rule would also include a self-monitoring program to be administered by the regional offices. Mr. Weathersbee said that the staff would intend that the rules go into effect as soon as they are filed with the Secretary of State's Office, and that by July 1, 1977 either compliance with the rule or an approved compliance schedule would be required.

Mr. Weathersbee said that the staff is working with industry to revise the rule relative to the special Air Quality Maintenance Areas and it was anticipated these rules would be in effect by July 1, 1977 also.

Mr. W. D. Page, Director of Special Services for the American Plywood Association spoke in favor of the adoption of the proposed rule for veneer dryers outside of the special problem areas.

It was MOVED by Commissioner Somers, seconded by Commissioner Hallock and unanimously carried that the Director's recommendation be adopted.

GLENDALE TRANSFER STATION

Mr. Donald K. Neff of the Department's Southwest Region Office presented some recent photographs of the site in operation. Commissioner Somers asked if the drop boxes had been hooked up to an existing domestic septic tank. Mr. Neff replied that the septic tank in question was hooked up to a mobile home on the site and was not connected to the drop boxes. Commissioner Somers asked how the drop boxes were equipped to handle leakage and waste water. Mr. Neff said that so far there had not been any runoff or leachate to cause any problem from the drop boxes. In response to questions from Commissioner Somers, Mr. Neff said that DEQ and the County cannot see any environmental problems caused by these drop boxes. Mr. Neff said the people living in the mobile home adjacent to the site are monitoring the site for the County to spot any problems and inform the County if the boxes need to be emptied more often than the once a week required by permit. Commissioner Phinney asked if there was provision in the permit to require the boxes to be moved in case of high water. Mr. Neff replied that that was part of a general condition in the permit.

Commissioner Somers asked Mr. Neff to clarify that the subsurface system that the mobile home was hooked up to was a previously existing approved system. Mr. Neff confirmed Commissioner Somers' statement.

It was MOVED by Commissioner Crothers, seconded by Commissioner Somers and unanimously carried that the Commission ratify Mr. Peter McSwain's March 17, 1977 letter to Mr. Lee Kindrick.

Mr. Young said he felt that Mr. McSwain's letter fell short of answering Mr. Kindrick's question as to whether or not the Commission would modify the permit.

It was MOVED by Commissioner Crothers, seconded by Commissioner Somers that the wording in the last paragraph of Mr. Young's memorandum to the Commission dated March 11, 1977 be sent in an appropriately worded letter to Mr. Kindrick. Commissioner Somers said that the permit had been issued and the project 80% completed when Mr. and Mrs. Kindrick brought their petition to the Commission to stop the project. Commissioner Somers said he felt that the appropriate action had been taken with Mr. McSwain's letter and that no further action on the part of the Commission was necessary. Commissioner Hallock said that because the Kindricks informally appealed to the Commission that the Commission should informally reply. Commissioner Phinney agreed with Commissioner Hallock and further said that the Kindricks requested the Commission to look into the matter and that the Commission had determined the drop boxes were being handled adequately.

Commissioner Crothers then rephrased his motion to state that the Director's recommendation be approved and that the Director write a letter to the Kindricks informing them that the Commission had reviewed the matter and believed that the transfer station was environmentally acceptable. The motion passed unanimously.

Mr. and Mrs. Lee Kindrick appeared later in the hearing and Chairman Richards explained to them the Commission action. Some discussion followed between Mr. and Mrs. Kindrick and members of the Commission.

NPDES PERMIT RULES

Commissioner Somers MOVED, Commissioner Hallock seconded and it was carried unanimously that the Director's recommendation in this matter be approved.

Commissioner Somers further requested Mr. Ashbaker to send copies of the resolution confirming the Commission's action to Northwest Environmental Defense Center to the four individuals who were plaintiffs in the lawsuit.

Mr. Chris Kittell, attorney for the Northwest Environmental Defense Center, appeared later in the meeting and offered a statement for the record in support of the proposed rule.

CITY OF HAMMOND - NOTICE OF OPPORTUNITY TO APPEAR AND SHOW CAUSE

Mr. Murray M. Tilson of the Department's North Coast Office presented the Director's recommendation in regard to this matter. Chairman Richards asked what the alternatives would be to an enforcement order. Mr. Tilson replied that the enforcement order was in the best interests of the City of Hammond, because without it the City would be in violation after July 1 and subject to federal penalties.

Commissioner Phinney asked if the staff would be looking at the plan for Ft. Stevens State Park at the same time as the Hammond plan so that the Park might be drawn in also. Mr. Tilson said that the City of Hammond was incorporating the sewage requirements for Ft. Stevens. Commissioner Somers asked Mr. Tilson about the possibility of shutting the Park down until the sewers were in. Mr. Tilson said that he did not think that would be necessary at this time if they would cooperate with the program to get sewered.

Chairman Richards said that the City of Hammond had expressed concern over the form of the order to be issued and felt the letter that was sent to them March 4, 1977 was worded too strongly. Chairman Richards said his understanding was that at the time the letter had been written, staff writing the letter believed that other staff had talked to the City and worked out details of the plan. Chairman Richards said this apparently had not taken place before the letter was sent. Chairman Richards asked if the City of Hammond officials had agreed that the time schedule was reasonable. Mr. Tilson replied that the Mayor had indicated to him that it didn't matter what time schedule was put in, that the City was proceeding as rapidly as possible and they didn't know how long it would take. Mr. Tilson said the Department felt the time schedule was fair.

No one appeared to represent the City of Hammond. Chairman Richards said that one of the reasons the City gave for not appearing was that the hearing would be held during the day. Chairman Richards said the EQC offered to have the matter placed on the agenda for the previous evening; however, the City indicated that that would not be acceptable and even if the matter had been placed on the previous evening's agenda, the City would not have appeared.

Commissioner Somers clarified that the Commission would propose by the Director's recommendation to make a grant available to the City of Hammond. However, if the City does not submit final plans and specifications, and a Step III grant construction application is not made, then it would be apparent that a Cease and Desist Order would have to take place as well as civil penalties. Mr. Tilson agreed that that was the intent, but that the Department felt that would not happen because the City is proceeding to put in sewers.

Chairman Richards said he would like to give the City the opportunity to make a voluntary agreement instead of instituting an order. Chairman Richards said he would like to also give the City an opportunity to put the same information into a compliance schedule.

Mr. C. Kent Ashbaker of the Department's Water Quality staff said that Hammond did not have a permit, therefore, a compliance schedule could not be required. Mr. Ashbaker said that the Department could not issue Hammond a permit if the permit stated the requirements would not be met by July 1, 1977. Mr. Ashbaker said that EPA had indicated that the only way they felt the City would be legally bound would be by Commission Order.

Chairman Richards suggested that a compliance schedule be attached to the order which would have the legal effect asked by EPA.

Commissioner Crothers MOVED, Commissioner Hallock seconded and it was carried unanimously that the Order would be entered and effective by the next meeting, April 22, 1977, unless prior to that time there would be submitted to the Commission for its signature, an order based upon a compliance schedule which also contained penalties for violation of the increments of progress.

CLATSOP PLAINS DISCUSSION

Mr. Robert Haskins of the State Department of Justice, said that if the Commission would take action on the Director's recommendation, he would recommend that the first nine pages of the report be adopted as findings of fact.

Mr. Russell Fetrow of the Department's Salem-North Coast Region appeared with responses to the questions and directive of the previous evening's hearing. Mr. Fetrow said the staff would propose that the EQC adopt the Director's recommendation and the proposed rule, 340-71-020. Mr. Fetrow said there would be no change in parts A and C, however, in part B the staff would recommend that the word "technical" be removed before the word "evidence."

Mr. Fetrow presented an Intergovernmental Directive designed as a guideline for what the Department would accept for modification or repeal of the moratorium for any particular area. Mr. Fetrow said that, based on the information he presented, if everyone cooperated, within the next 30 to 90 days the moratorium could be presented to the EQC again and probably lifted.

Chairman Richards said that if the Commission put a short time line on the matter, that the staff feels it can meet in cooperating with the cities and counties, the EQC could then set up the criteria by which evidence is presented that a development would not contaminate the aquifer. Mr. Richards said that if that evidence then proved correct, a plan could be submitted by which building and septic tank permits would be issued, and on that basis large areas could be taken out of the moratorium. At that point the County and City would be making the land use decision.

Commissioner Somers MOVED and Commissioner Crothers seconded, that the first nine pages of the report be adopted as EQC findings, in addition that the statement made by Mr. Fetrow be added as a part of the EQC report and recommendation, and the deletion in the proposed rule of the word "technical" which precedes "evidence" in part B. Mr. Young clarified that the motion was to adopt the first nine pages of the report as findings; adopt the Director's recommendations; adopt the alteration in language in the proposed rule; and adopt the language in the Intergovernmental Directive. The Commission confirmed Mr. Young's explanation of the motion. Commissioner Phinney asked when the rule would become effective. Mr. Haskins said that the rule would become effective upon filing with the Secretary of State's Office which could be done the coming Monday.

The motion was adopted with Commissioner Somers dissenting.

FIELD BURNING - EQC REPORT TO THE LEGISLATURE

Mr. Scott Freeburn of the Department's Air Quality staff presented the Director's recommendations from the staff report. Chairman Richards proposed an addition to the Director's recommendation as follows: In line 5 of the recommendation, after the words "additional acreage" add "of 70,000 acres for a total of 165,000 acres in 1977; and an additional 85,000 acres for a total of 135,000 acres for 1978" and continue "under a strict smoke management plan." Also, add as Criteria A and renumber the rest, "Fields planned for improvement by tiling or otherwise for crops other than grass seed which are not subject to burning." Chairman Richards then explained his reasons for the language additions. Chairman Richards quoted Ms. Janet McLennan of the Governor's Office that they feel this alternative would be very reasonable as a continuation of the phase-down and that it would be fair to allow several more steps to reach the phasing out of field burning.

Commissioner Phinney asked Mr. Freeburn if it would be possible to implement the criteria stated in the report. Mr. Freeburn replied that it would be feasible to propose the criteria, but it would be difficult to implement that type of review on an annual basis. Mr. Freeburn said the Department foresees assistance from the fire districts and some type of self-control as to accurate registration of fields. Mr. Freeburn said that a large number of field personnel would be needed if it were desired that Department staff be used. Some discussion followed regarding this.

Director Young stated that with the significant number of acres that might be added to the management program in the Willamette Valley airshed, closer management methods would be needed in the relationships of field and slash burning. Director Young urged the Commission to consider a monitoring program designed to test the smoke from open burning whether of slash or fields, and that a better job of monitoring be done than is conducted at the present time in the Valley.

Mr. E. J. Weathersbee suggested that the Commission adopt language to clarify that the criteria was adopted by the EQC.

Commissioner Crothers MOVED, Commissioner Hallock seconded and it was carried unanimously that the amendments to the report be adopted.

Commissioner Crothers MOVED, Commissioner Phinney seconded and it was carried unanimously that the Director's recommendation be adopted as amended.

WATER QUALITY PROGRAM - DISCUSSION OF DEQ AND EQC AUTHORITY DURING CRITICAL SITUATIONS

Mr. C. Kent Ashbaker presented the Director's recommendations from the staff report.

Mr. Jan D. Sokol presented a statement on behalf of the Oregon Student Public Interest Research Group (OSPIRG) and a proposed rule made up by OSPIRG. Mr. Sokol urged that before any rule be adopted by the Commission that ample time be allowed for public comment.

Commissioner Somers indicated that the main concern was with stream flows and protection of aquatic life.

Commissioner Somers MOVED that the Director's recommendation be modified to authorize holding of a public hearing on the proposed rule before the hearings officer at the earliest possible date and if it appears warranted, the Commission will hold a special meeting with appropriate notice to adopt the rule. Commissioner Hallock seconded, and the motion carried unanimously.

There being no further business, the meeting was adjourned.

ENVIRONMENTAL QUALITY COMMISSION

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

ROBERT W. STRAUB
GOVERNOR

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item B, April 1, 1977, EQC Meeting

January and February 1977 Program Activity Reports

Discussion

Attached are the January and February 1977 Program Activity Reports.

ORS 468.325 provides for approval or disapproval of Air Quality plans and specifications by the Environmental Quality Commission. Water and Solid Waste facility plans and specifications approvals or disapprovals and issuance, denials, modifications and revocations of permits are prescribed by statutes to be functions of the Department, subject to appeal to the Commission.

The purposes of this report are to provide information to the Commission regarding status of the reported program activities, to provide a historical record of project plan and permit actions, and to obtain the confirming approval of the Commission of actions taken by the Department relative to air quality plans and specifications.

Recommendation

It is the Director's recommendation that the Commission take notice of the reported program activities and give confirming approval to the Department's actions relative to air quality project plans and specifications as described on pages 8 and 9, of the January 1977 report (Appendix A) and the February 1977 report (Appendix B).

Bill

WILLIAM H. YOUNG
Director

RLF:eve
3/17/77

APPENDIX A

Department of Environmental Quality
Technical Programs

Permit and Plan Actions

January 1977

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air, Water & Solid Waste Management Divisions
(Reporting Unit)

January 1977
(Month and Year)

SUMMARY OF PLAN ACTIONS

	Plans Received		Plans Approved		Plans Disapproved		Plans Pending
	Month	Fis.Yr.	Month	Fis.Yr.	Month	Fis.Yr.	
Air							
Direct Sources	9	81	14	74		1	21
Total	9	81	14	74		1	21
Water							
Municipal	74	639	59	576			29
Industrial	11	78	11	79	1	2	3
Total	85	717	70	655	1	2	32
Solid Waste							
General Refuse	1	31	1	38		3	6
Demolition	2	7	2	6		1	1
Industrial	1	13	2	18			1
Sludge		2		2			
Total	4	53	5	64		4	8
Hazardous Wastes		4		4			
GRAND TOTAL	98	855	89	797	1	7	61

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division — January 1977

Plan Actions Completed - 70

County	Name of Source/Project/Site and Type of Same		Date Rec'd	Date of Action	Action	Time to Complete Action
	Municipal Sources - 59					
26	INVERNESS	HIGHWOOD BLOCK 8 & 9	V121576	010377	PROV APP	18
3	ESTACADA	THE FOOTHILLS SUBD	K122076	010577	PROV APP	16
34	TUALATIN	VILLAGE INN PANCAKE HOUSE	J122876	010577	PROV APP	08
26	GRESHAN	NEIGHBORS OF WOODCRAFT	K122776	010677	PROV APP	10
34	USA/ALOHA	PHEASANT DRIVE	K123076	010677	PROV APP	07
15	MEDFORD	EASTWOOD LIVING GROUP	J122076	010777	PROV APP	18
24	SILVERTON	"D"STREET AND RESERVE ST	J122776	010777	PROV APP	11
26	PORTLAND	ADD NO 1 TRYON CR. TRUCK	V010376	011077	APPROVED	07
23	ADRIAN	CHANGE ORDER NO 1	V122276	011077	APPROVED	19
2	CORVALLIS	CHANGE ORDERS ¤EIGHTEEN*	V122876	011077	APPROVED	13
17	REDWOOD CO SD	ADD NO 2	V122776	011077	APPROVED	14
34	USA / ROCK CR.	CONTRACT 50,ADDENDUM 2	V122776	011077	APPROVED	14
26	PORTLAND	CHANGE 4 SCHMEER I	V122376	011077	APPROVED	18
26	PORTLAND	CHANGE 3 SCHMEER II	V122376	011077	APPROVED	18
26	PORTLAND	EXTRA BILLS 10.11-# PTLD RD	V122776	011077	APPROVED	14
26	PORTLAND	CHANGE 6 N E GERTZ RD	V010377	011077	APPROVED	07
26	PORTLAND	COLUMBIA BLVD--CHANGE 5	V122876	011077	APPROVED	13
03	CSSD	TODDS PLACE	K010377	011177	PROV APP	08
2	CORVALLIS	VILLAGE GREEN 2ND ADDITION	091576	011177	PROV APP	120
30	PENDLETON	PENDLETON SQUARE PHASE I	K010377	011277	PROV APP	09
30	HERMISTON	WHEATLAND WEST	K010577	011277	PROV APP	07
24	STAYTON	WESTOWN PARK NO 7	K010777	011277	PROV APP	05
03	MOLALLA	SEWER REHAB	V111976	011277	PROV APP	44
34	TUALATIN	HI-WEST ESTATES	J123076	011277	PROV APP	13
24	SALEM	WALEN WOOD	J010777	011377	PROV APP	04
20	EUGENE	CUL-DE-SAC HILYARD AT 8TH	K011077	011377	PROV APP	06
26	TROUTDALE	BOVER PARK	K121376	011377	PROV APP	31

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division — January 1977

Plan Actions Completed

County	Name of Source/Project/Site and Type of Same		Date Rec'd	Date of Action	Action	Time to Complete Action
3	LAKE OSWEGO	KEN PARELIUS PROPERTY	J122776	011377	PROV APP	17
3	LAKE OSWEGO	TRIUMPHANT KING LUTHERAN CH.	J122876	011377	PROV APP	16
3	LAKE OSWEGO	L I D 182 AND L I D 184	K011177	011477	PROV APP	03
14	HOOD RIVER	PORTWAY AVENUE	090876	011477	PROV APP	10
26	TROUTDALE	SANDEE PALASADES	J010377	011477	PROV APP	11
26	PORTLAND	SW HUBER ST, SW 30TH AVE,	J010677	011477	PROV APP	08
03	CCSD # 1	PHASE 4 CHANGE ORDER NO 1	V011177	011477	APPROVED	03
31	UNION	CHANGE ORDER NO 2	V011177	011477	APPROVED	03
20	FLORENCE	7TH ST - BETWEEN HEMLOCK-IVY	K011277	011777	PROV APP	05
09	STAGE STOP INC	STAGE STOP MEADOWS	V010777	011777	PROV APP	10
17	HARBECK-FRUIT	SKY CREST DRIVE EXTENSION.	J011077	011777	PROV APP	07
03	CCSD # 1	WILDLIFE ESTATES I - PHASE	J011177	011877	PROV APP	07
03	CCSD # 1	WILDLIFE ESTATES I □REVISED*	J011777	011877	PROV APP	01
26	GRESHAM	N W HOYT □162ND TO 165TH*	K011477	011977	PROV APP	05
6	NORTH BEND	DISTRICT 100-76	K011977	012477	PROV APP	05
06	CHARLESTON SD	CHANGE ORDERS □2*	V012177	012477	APPROVED	03
17	NORTH - HIDDENVALLEY	HIGH SCHOOLS	V010377	012477	COMMENT LTTR	21
18	CHILOQUIN	CHANGE ORDER 4	V011977	012477	APPROVED	05
20	VENTA	TIMBERLAND ESTATES CHENEY DR	K011877	012577	PROV APP	07
34	USA/CORNELIUS	SEDGEFIELD CONSTRUCTION	K011477	012577	PROV APP	11
15	BCVSA	PROJECT 76-S	K011977	012577	PROV APP	06
2	CORVALLIS	BELL AND PARK AVE □SE*	K012177	012577	PROV APP	04
10	SUTHERLIN	LANE STREET	J011277	012577	PROV APP	13
20	SPRINGFIELD	208 - TRIHD --235 SHELLY ST	K011277	012677	PROV APP	14
20	SPRINGFIELD	206-KEEN SUBD	K011777	012677	PROV APP	09
26	GRESHAM	EAST POWELL AT RENE AVE	J011477	012877	PROV APP	14
2	CORVALLIS	CHANGE ORDER NO 43	V012477	012877	APPROVED	04

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division — January 1977

Plan Actions Completed

County	Name of Source/Project/Site and Type of Same		Date Rec'd	Date of Action	Action	Time to Complete Action
6	NORTH BEND	CHANGE ORDER NO. 1 - LEASE	V012577	013077	APPROVED	05
30	HERMISTON	MEYER SUBD	K011977	013177	PROV APP	12
27	DALLAS	S E POWELL / SE UGLOW	K012577	013177	PROV APP	06
31	HOT LAKE	SEWERAGE SYSTEM	V120176	013177	CMMNTS SENT	60
31	UNION	CHANGE ORDER NO. 3	V012777	013177	APPROVED	04

INDUSTRIAL WASTE SOURCES - 11

Lane	Weyerhaeuser, Cottage Grove Hot Water Diversion From Effluent	1/ 5/77	Approved
Marion	M. P. Materials, Lancaster Plant, Salem - Spill Contingency System	1/ 5/77	Approved
Lane	Oregon Fish & Wildlife, Willamette Hatchery - Pollution Abatement Facilities	1/14/77	Approved
Polk	Kalsbeek Dairy, Independence Animal Waste Control Facilities	1/18/77	Approved
Clackamas	Publishers Paper, Oregon City Submerged Outfall - Filter Plant	1/19/77	Approved
Curry	Champion Building Products, Gold Beach - Veneer Dryer Waste Water Recirculation	1/25/77	Approved
Coos	Ocean Spray Cranberries, Bandon Waste Water Irrigation	1/27/77	Approved
Multnomah	Rhodia, Inc., Portland HCl Holding Tank For Waste Treatment	1/27/77	Approved
Washington	Tektronix, Inc., Beaverton Temporary Pump Station To USA, Durham	1/28/77	Approved
Washington	Tektronix, Inc., Beaverton Waste Treatment Flume Changes	1/28/77	Approved
Jackson	Oregon Fish & Wildlife, Cole M. Rivers Hatchery, Rogue River Pollution Abatement Facilities	1/28/77	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit) — January 1977 (Month and Year)

SUMMARY OF WATER PERMIT ACTIONS

	Permit Actions Received				Permit Actions Completed				Permit Actions Pending		Sources Under Permits		Sources Reqr'g Permits	
	Month		Fis.Yr.		Month		Fis.Yr.							
	*	**	*	**	*	**	*	**	*	**	*	**	*	**
Municipal														
New				2			7	6		3				
Existing		1		1	1		2	2		5				
Renewals	22		43	2	3	1	32	3	58					
Modifications	1		17	1	3		28	1	6	1				
Total	23	1	60	6	7	1	69	12	64	9	300	60	300	68
Industrial														
New		1	4	5	1		2	6	4	4				
Existing				1			6	11						
Renewals	11	1	38	7	4		23	9	43	5				
Modifications	5		27	2	4	1	37	2	13					
Total	16	2	69	15	9	1	68	28	60	9	430	85	434	89
Agricultural (Hatcheries, Dairies, etc.)														
New	1		2				3	1	2					
Existing								1						
Renewals														
Modifications			9				11							
Total	1		11				14	2	2		64	8	66	8
GRAND TOTALS	40	3	140	21	16	2	151	42	126	18	794	153	800	165

* NPDES Permits
** State Permits

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit) — January, 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (18)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Clackamas	Wesley G. King Gravel Operation	1/ 3/77	State Permit Transferred
Multnomah	Port of Portland Moorage	1/13/77	Modification Denied
Lane	Weyerhaeuser Company Cottage Grove Facility	1/14/77	NPDES Permit Renewed
Lane	Georgia-Pacific Corporation Irving Road Plant	1/14/77	NPDES Permit Renewed
Clatsop	Barbey Packing Corporation Port Docks	1/14/77	NPDES Permit Modified
Multnomah	Ross Island Sand & Gravel Hardtack Plant	1/14/77	NPDES Permit Modified
Washington	Western Foundry Company Sewage Disposal	1/14/77	NPDES Permit Modified
Lane	City of Florence Sewage Disposal	1/14/77	NPDES Permit Modified
Lane	City of Cottage Grove Sewage Disposal	1/14/77	NPDES Permit Modified
Klamath	City of Chiloquin Sewage Disposal	1/19/77	NPDES Permit Renewed
Curry	Ocean Beauty Seafood of California Seafood Processing	1/19/77	NPDES Permit Renewed
Jackson	Boise Cascade Medford Plant	1/19/77	NPDES Permit Renewed
Wallowa	City of Enterprise Domestic Sewage	1/19/77	NPDES Permit Renewed
Curry	Port of Gold Beach Industrial Treatment	1/19/77	NPDES Permit Issued

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit) — January, 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (18 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Washington	Tualatin Development King City Sewage	1/19/77	NPDES Permit Renewed
Yamhill	The Delphian Foundation Sewage Disposal	1/21/77	State Permit Renewed
Tillamook	Port of Tillamook Bay Sewage	1/28/77	Modification Dropped
Jackson	Jackson County Parks Willow Lake Camp	1/28/77	Changed From NPDES Permit To State Permit

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — January 1977 (Month and Year)

PLAN ACTIONS COMPLETED (17)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (17)			
Umatilla (718)	J. R. Simplot Company, New potato processing plant	1/25/77	Approved
Lane (821)	Weyerhaeuser, Rapper on #4 ESP	12/22/76	Approved
Lane (822)	Weyerhaeuser, #3 ESP changes	12/22/76	Approved
Lane (823)	Weyerhaeuser, Transformer for #4 ESP	12/22/76	Approved
Clackamas (833)	Estacada Rock Products, Baghouse on cement silo	12/10/76	Letter to resubmit
Linn (834)	Teledyne Wah Chang, Added scrubbing for Hf	1/18/77	Approved
Benton (839)	Shearer's Smokehouse, Philomath	1/13/77	Letter, invalid plan action
Tillamook (842)	Publishers Paper Co., Scrubber on hog fuel boiler	1/20/77	Approved
Multnomah (844)	Acme Trading and Supply, Aluminum sweat furnace	1/19/77	Approved
Umatilla (848)	Harris Pine Mills, Scrubber on hog fuel boiler	1/18/77	Approved
Jackson (850)	Boise Cascade, Medford, Alter sanderdust cyclones	1/18/77	Approved
Hood River (855)	Tallman Orchards, Orchard fan	12/29/76	Approved
Hood River (856)	Bob G. Willis, Orchard fan	12/29/76	Approved
Marion (859)	Agripac, Inc., Install oil fired boiler	1/10/77	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — January 1977 (Month and Year)

PLAN ACTIONS COMPLETED (17 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (continued)			
Clackamas (861)	Oregon Portland Cement, Lake Oswego, Enclosure for clinker belt	12/29/76	Approved
Marion (863)	Champion Building Prod. - Idanha, Hog to replace wigwam	1/25/77	Approved
Baker (865)	Ellingson Lumber Co., New small log sawmill	1/17/77	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality Division (Reporting Unit) — January 1977 (Month and Year)

SUMMARY OF AIR PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sources under Permits	Sources Reqr'g Permits
	Month	Fis.Yr.	Month	Fis.Yr.			
Direct Sources							
New	2	16	2	19	7		
Existing	3	31	8	57	17		
Renewals	37	122	33	110	99		
Modifications	2	21	8	90	13		
Total	44	190	51	276	136	2200	2224
Indirect Sources							
New	2	15		14	13		
Existing							
Renewals							
Modifications		2		2			
Total	2	17		16	13	49	
GRAND TOTALS	46	207	51	292	149	2249	

TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (51)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Stationary Sources			
Clackamas	Sandy Shake Co. 03-1794, (Modification)	1/24/77	Permit Issued
Clackamas	Wilsonville Concrete Products 03-2475, (Renewal)	12/27/76	Permit Issued
Clackamas	Columbia Sand & Gravel 03-2502, (Renewal)	12/27/76	Permit Issued
Coos	Acme Wood Products 06-0018, Sawmill (Existing)	1/7/77	Permit Issued
Coos	Lillie Mfg. 06-0090, (Existing)	12/27/76	Permit Issued
Douglas	Umpqua Sand & Gravel 10-0116, (Existing)	12/27/76	Permit Issued
Harney	Edward Hines Lumber 13-0001, Addendum	12/8/76	Addendum Issued
Hood River	Krieg Millwork 14-0007, Addendum	1/13/77	Addendum Issued
Jackson	Georgia Pacific 15-0058, (Modification)	1/5/77	Permit Issued
Lake	Louisiana Pacific 19-0002, (Modification)	12/27/76	Permit Issued
Linn	Willamette Industries 22-5193, (Renewal)	12/27/76	Permit Issued
Malheur	Amalgamated Sugar 23-0002, (Renewal)	1/5/77	Permit Issued
Marion	Stayton Lumber Specialities 24-0319, (Renewal)	1/24/77	Permit Issued
Marion	Stuckart Lumber Co. 24-1752, (Renewal)	1/7/77	Permit Issued
Marion	Humane Society 24-2327, (Renewal)	1/7/77	Permit Issued

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (51 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Marion	Columbia Millwork 24-4339, (Renewal)	1/24/77	Permit Issued
Marion	Curly's Dairy 24-4378 (Renewal)	12/27/76	Permit Issued
Marion	Department of Forestry 24-5143, (Renewal)	1/7/77	Permit Issued
Marion	Pioneer Trust 24-5218, (Renewal)	1/7/77	Permit Issued
Marion	H. L. Stiff Furniture 24-5550, (Renewal)	12/27/76	Permit Issued
Marion	Castle & Cooke 24-5747, (Renewal)	1/7/77	Permit Issued
Marion	Overhead Door Corp. 24-5821, (Renewal)	1/24/77	Permit Issued
Marion	Johnson Bros. Lumber 24-6252, (Renewal)	1/7/77	Permit Issued
Multnomah	Holman Garden Apts. 26-0010, (Modification)	12/27/76	Permit Issued
Multnomah	Union Oil Co. 26-2026, (Existing)	12/27/76	Permit Issued
Multnomah	Little Chapels of the Chimes 26-2969, (Existing)	12/27/76	Permit Issued
Multnomah	Walker Electric 26-2975, (New)	12/27/76	Permit Issued
Polk	Pedee Lumber 27-0129, (Renewal)	1/7/77	Permit Issued
Polk	Boise Cascade 27-4078, Addendum	1/7/77	Addendum Issued
Washington	Best Mix Concrete 34-2503, (Modification)	1/24/77	Permit Issued
Washington	Oregon Regional Primate Center 34-2642, (New)	12/27/76	Permit Issued

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (51 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Yamhill	C. C. Meisel Co. 36-5088, (Existing)	12/27/76	Permit Issued
Yamhill	John C. Taylor Lumber Sales 36-7003, (Renewal)	1/7/77	Permit Issued
Yamhill	Willamina Lumber 36-8010, (Renewal)	1/7/77	Permit Issued
Portable	Babler Bros. 37-0020, (Renewal)	1/24/77	Permit Issued
Portable	Roy L. Houck Construction 37-0022, (Renewal)	1/7/77	Permit Issued
Portable	Peter Kiewit Sons 37-0024, (Renewal)	1/24/77	Permit Issued
Portable	L. W. Vail 37-0025, (Renewal)	1/24/77	Permit Issued
Portable	Rogue River Paving 37-0028, (Renewal)	12/27/76	Permit Issued
Portable	Roseburg Paving 37-0029, (Renewal)	1/7/77	Permit Issued
Portable	S. D. Spencer & Son 37-0052, (Renewal)	12/27/76	Permit Issued
Portable	ACCO Contractors 37-0053, (Renewal)	1/7/77	Permit Issued
Portable	L. W. Vail 37-0068, (Renewal)	1/24/77	Permit Issued
Portable	Norcap Construction 37-0086, (Renewal)	1/7/77	Permit Issued
Portable	Angell Asphalt & Aggregate 37-0091, (Renewal)	1/7/77	Permit Issued
Portable	Babler Bros. 37-0094, (Renewal)	1/24/77	Permit Issued

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (51 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Portable	Peter Kiewit Sons 37-0095, (Renewal)	12/23/76	Permit Issued
Portable	S. D. Spencer 37-0109, (Renewal)	1/24/77	Permit Issued
Portable	Babler Bros. 37-0121, (Renewal)	1/24/77	Permit Issued
Portable	Riverbend Construction 37-0149, Crusher (Existing)	1/7/77	Permit Issued
Portable	Modular Crushing 37-0151, Crusher (Existing)	1/1/77	Permit Issued

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — January 1977 (Month and Year)

PLAN ACTIONS COMPLETED (5)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Benton	Tremaine Demolition Site Existing Site Operational Plan	1/5/77	Provisional Approval
Clackamas	Grover H. Poe New Site Operational Plan	1/12/77	Letter of Authorization
Linn	Geil's Pond New Site Operational Plan	1/18/77	Approved
Lake	Oregon Dept. of Fish and Wildlife New Site Operational Plan	1/20/77	Letter of Authorization
Lane	International Paper Co. Veneta Disposal Site Existing Site Operational Plan	1/28/77	Provisional Approval

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — January 1977 (Month and Year)

SUMMARY OF SOLID AND HAZARDOUS WASTE PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sites Under Permits	Sites Reqr'g Permits
	Month	Fis.Yr.	Month	Fis.Yr.			
General Refuse							
New		5		5	2 (*)		
Existing			6	20	27 (*)		
Renewals	1	7	3	14	2		
Modifications	1	5	2	11			
Total	2	17	11	50	31	190	190
Demolition							
New		2		3			
Existing			1	2			
Renewals		1		1	1		
Modifications			1	1			
Total		3	2	7	1	13	13
Industrial							
New		2		5			
Existing	1	1	2	5	7 (*-3)		
Renewals	2	6	2	10	4		
Modifications		1		3			
Total	3	10	4	23	11	86	89
Sludge Disposal							
New		2	1	3			
Existing							
Renewals		1		2	1		
Modifications		2	1	2	1		
Total		5	2	7	2	8	8
Hazardous Waste							
New							
Authorizations	10	56	13	69	2		
Renewals							
Modifications							
Total	10	56	13	69	2	1	1
GRAND TOTALS	15		32	148	47	298	301

(*) Sites operating under temporary permits until regular permits are issued.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (32)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
General Refuse (Garbage) Facilities (11)			
Multnomah	St. John's Landfill Existing Facility	1/8/77	Permit amended
Washington	Franks Landfill Existing Facility	1/12/77	Permit issued (renewal)
Klamath	Beatty Landfill Existing Facility	1/18/77	Permit issued
Klamath	Bly Landfill Existing Facility	1/18/77	Permit issued
Klamath	Bonanza Landfill Existing Facility	1/18/77	Permit issued
Klamath	Chemult Landfill Existing Facility	1/18/77	Permit issued
Klamath	Merrill Landfill Existing Facility	1/18/77	Permit issued
Klamath	Sprague River Landfill Existing Facility	1/18/77	Permit issued
Yamhill	Newberg Landfill Existing Facility	1/28/77	Permit issued
Deschutes	Knott Pit Landfill Existing Site	1/30/77	Permit amended
Columbia	Clatskanie Landfill Existing Site	1/30/77	Permit issued (renewal)
Demolition Waste Facilities (2)			
Multnomah	H.G. LaVelle Landfill	1/10/77	Permit amended
Clackamas	Grover Poe Landfill Existing Facility	1/12/77	Letter authorization issued

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (continued)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Sludge Disposal Facilities (2)			
Klamath	Gilchrist Timber Co. Existing Facility	1/7/77	Permit issued
Douglas	C & D Lumber Co. Existing Facility	1/19/77	Permit issued
Lane	Pope and Talbot, Inc. Existing Facility	1/28/77	Permit issued (renewal)
Lane	International Paper, Vaughn Existing facility	1/28/77	Permit issued (renewal)
Hazardous Waste Facilities (13)			
Gilliam	Chem-Nuclear Systems, Inc. Existing facility	1/5/77	Two (2) disposal authorizations approved. (Plating sludge & Pesticides)
"	" "	1/13/77	One (1) disposal authorization approved. (Beryllium contaminated soil)
"	" "	1/14/77	One (1) disposal authorization approved. (Asbestos waste)
"	" "	1/17/77	One (1) disposal authorization approved. (Pesticides)
"	" "	1/21/77	One (1) disposal authorization approved. (Phenolic waste)

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — January 1977 (Month and Year)

PERMIT ACTIONS COMPLETED(continued)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
"	"	1/27/77	Two (2) disposal authorizations approved. (Printing ink waste and Hydrofluoric acid)
"	"	1/24/77	Five (5) disposal authorizations approved. (Pesticides, photographic chemicals, caustic, and Corosive coal tar dye.

APPENDIX B

Department of Environmental Quality
Technical Programs

Permit and Plan Actions

February 1977

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air, Water & Solid Waste Management Divisions (Reporting Unit)

February 1977 (Month and Year)

SUMMARY OF PLAN ACTIONS

	Plans Received		Plans Approved		Plans Disapproved		Plans
	Month	Fis.Yr.	Month	Fis.Yr.	Month	Fis.Yr.	Pending
Air							
Direct Sources	19	100	20	94	0	1	19
Total	19	100	20	94	0	1	19
Water							
Municipal	83	722	72	648			36
Industrial	18	96	10	89	2	4	9
Total	101	818	82	737	2	4	45
Solid Waste							
General Refuse	5	36	6	44		3	8
Demolition		7		6		1	1
Industrial	1	14		18			2
Sludge		2		2			
Total	6	59	6	70		4	11
Hazardous Wastes		4		4			
GRAND TOTAL	126	981	108	905	2	9	75

DEPARTMENT OF ENVIRONMENTAL QUALITY

TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division — February 1977

Plan Actions Completed - 82

County	Name of Source/Project/Site and Type of Same		Date Rec'd	Date of Action	Action	Time to Complete Action
	Municipal Sources - 72					
30	MILTON FREEH2O	RESIDENCE - N. E. 3RD	K011477	012777	PROV APP	13
02	PHILOMATH	APPLEGATE STREET	J011877	020177	PROV APP	13
15	BCVSA	AVENUE @A@ EXT PROJ 76-13	J012177	020177	PROV APP	11
26	TROUTDALE	SANDEE PALASADES OFF SITE	J012477	020177	PROV APP	08
03	CCSD #1	PAW - WA - KA SUBD	J020877	020177	PROV APP	03
24	SALEM	WALLACE ROAD/EMPIRE ST-HOPE	K020877	020177	PROV APP	03
10	ROSEBURG	TODD BLDG @REVISED*	J011277	020277	PROV APP	21
3	LAKE OSWEGO	GRAVITY SEWERS-MTN PK.V-C	I011477	020277	PROV APP	16
8	HARBOR S. D.	SUNSET VIEW ESTATES	K012177	020277	PROV APP	12
03	WEST LINN	DUPLEX - RAY DRIESEL	J012577	020277	PROV APP	08
03	OAK LODGE	LAT. 2A-0-8A	J012777	020277	PROV APP	06
34	USA/DURHAM	KOLL BUSINESS CENTER-PHASE 3	J011877	020377	PROV APP	18
10	TRI-CITY S D	AGEES MAPLETON HEIGHTS SUBD	K012677	020377	PROV APP	08
5	PGE/TROJAN	PRELIM FOR EXPANSION	V010377	020477	CONCEPT APPR	32
34	USA/DURHAM	CHANGE ORDER 32.33	V020277	020777	APPROVED	05
05	CLATSKANIE	CHANGE NO 2	V020277	020777	APPROVED	05
20	LN COMM. COLL.	LAND IRRIG IMPROVEMENTS	V011777	020877	PROV APP	22
29	NET OCEANSIDE	OCEAN OUTFALL	V012177	020877	PROV APP	18
6	DOT/PARKS	BULLARDS BEACH STP MOD	V012577	020877	PROV APP	42
24	STAYTON	GOLF COURSE RD	K013177	020877	PROV APP	08
21	LINCOLN CITY S E	LEE STREET	K020277	020877	PROV APP	06
34	HILLSBORO #2	DRY CREEK PARK	K020477	020977	PROV APP	05
34	HILLSBORO #1	MELODY ACRES	K020477	020977	PROV APP	05
34	HILLSBORO #2	JONESFIELD III	K020477	020977	PROV APP	05
29	NTCSA	SECOND ADD - BUENA VISTA	J012577	021077	PROV APP	16
29	NTCSA	NEHALEM HEIGHTS	J012577	021077	PROV APP	14
34	USA/ALOHA	FARMINGTON WEST NO. 2	J012677	021077	PROV APP	13

DEPARTMENT OF ENVIRONMENTAL QUALITY

TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division — February 1977

Plan Actions Completed (Continued)

County	Name of Source/Project/Site and Type of Same		Date Rec'd	Date of Action	Action	Time to Complete Action
10	ROSEBURG	EAST RAMP TRACTS SUBD	K012777	021077	PROV APP	03
26	GRESHAM	WY EAST	J013177	021077	PROV APP	10
24	SALEM-KEIZER	TERRACE GLEN	J013177	021077	PROV APP	10
34	HILLSBORO-2	24TH . GRANT	J020277	021077	PROV APP	07
15	BUTTE FALLS	CHANGE NO 2	V020377	021077	APPROVED	07
10	ROSEBURG	WILDWOOD EXT. - TERRACE PK	K020877	021077	PROV APP	02
34	USA/ALOHA	MCLAIN WEST NO 3	J020377	021177	PROV APP	08
20	VENETA	HUNTER COURT SUBD	K020377	021177	PROV APP	08
03	LAKE OSWEGO	ADD NO. 1 HARVEY TRUNK	V020877	021177	APPROVED	03
2	CORVALLIS	CHANGE NO. 44	V020877	021177	APPROVED	03
24	STAYTON	CHANGE NO. 2	V020877	021177	APPROVED	03
20	SPRINGFIELD	S-149 E STREET	K020877	021177	PROV APP	03
20	SPRINGFIELD	S-145 N.57TH ST	K020877	021177	PROV APP	03
34	USA/DURHAM BEAV	B,B DEVEL. 20 APTMTS	J020177	021477	PROV APP	13
34	USA/BEAVERTON	DENNY OFFICE PARK	K020977	021477	APPROVED	05
3	GOV'T CAMP SD	CHANGE NO. 1-FRONTAGE RD S	V020977	021477	APPROVED	05
34	USA/ALOHA	MARTIN SUBD.	K020977	021477	APPROVED	05
34	USA/CORNELIUS	IIICEDARS/FERTILE VAL	K020977	021477	APPROVED	05
03	CCSD #1	CHANGE NO. 12	V021177	021577	APPROVED	04
03	CANBY	BROOKS ADD.	J020477	021677	PROV APP	12
03	CANBY	GRACE ADDITION	J020477	021677	PROV APP	12
03	CCSD	QUIETWOODS	J020477	021677	PROV APP	12
34	USA/BEAVERTON	BEAVERTON AUTO CENTER	K020977	021677	PROV APP	07
15	PHOENIX	COLVER ROAD	J021177	021677	PROV APP	05
23	DOT/BRIDGE	FARWELL BEND-PORT OF ENTRY	K012777	021777	PROV APP	21
15	BCVSA	STEWART AVE DIXIE LANE	J020877	021777	PROV APP	09
02	CORVALLIS	LILLY PARK 3RD ADD.	K021477	021777	PROV APP	03

DEPARTMENT OF ENVIRONMENTAL QUALITY

TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division — February 1977

Plan Actions Completed (Continued)

County	Name of Source/Project/Site and Type of Same		Date Rec'd	Date of Action	Action	Time to Complete Action
17	JOSEPHINE CO	TWO H.S. STPS-REVISED	V020477	021877	PROV APP	14
06	COOS BAY	CHANGE NO 1 AND 2 SCHED A	V021477	021877	APPROVED	04
08	GOLD BEACH	CHANGE NO. 2 AND 3	V021477	021877	APPROVED	04
07	PRINNVILLE ST	CHARLES CT	J021877	021877	PROV APP	00
8	GOLD BEACH	HARBOR S.D. DELBERT OLDS	J022377	022277	PROV APP	00
34	USA/DURHAM	TIGARD GREENSWARD PARK	K021577	022477	PROV APP	09
34	USA/DURHAM	ARRANMORE	K021877	022477	PROV APP	06
34	USA/DURHAM	GREENWAY MEADOWS	K022277	022477	PROV APP	02
08	PACIFIC H.S.	STP MODIFICATIONS *REVISED*	V012177	022577	PROV APP	35
18	BONANZA	ADD NOS 3.4	V020877	022577	APPROVED	17
23	ADRIAN	CHANGE NO 2	V021577	022577	APPROVED	10
09	SUNRIVER	STP EXPANSION-PRELIM	V021677	022577	CONCEPT APP	09
24	E SALEM S & D	AUBURN ESTATES NO. 2	K022377	022577	PROV APP	02
20	SPRINGFIELD	S - 141 RECONST. PHASE 1	K022377	022577	PROV APP	02
24	STAYTON	OAK STREET	K022377	022577	PROV APP	02
24	ILLAHE HILLS	ESTATES NO. 2	K020377	022877	PROV APP	25
34	USA/DURHAM	VLADO BARICEVIC	K022277	022877	PROV APP	06
23	JORDAN VALLEY	CHANGE NO. 3	V022477	022877	APPROVED	04

Department of Environmental Quality
Technical Programs

Monthly Activity Report

Water Quality Division (Program) — February, 1977 (Month and Year)

PLAN ACTIONS COMPLETED

City and County	Name of Source/Project/Site and Type of Same	Date of Action	Action
INDUSTRIAL WASTE SOURCES - 12			
Coos	Menasha Corp. - North Bend Wash Recirculation System	2/ 1/77	Approved
Coos	Menasha Corp. - North Bend Venta NIP Recirculation System	2/ 1/77	Approved
Coos	Menasha Corp. - North Bend Molten Sulfur Pump for Spent Liquor Incineration	2/ 2/77	Approved
Lane	Weyerhaeuser Co. - Springfield Aerators	2/ 4/77	Approved
Wasco	The Dalles Cherry Growers Increase Design Flows to New Treatment System	2/ 7/77	Disapproved
Yamhill	Cascade Rolling Mills - McMinnville Scrubber Water Recirculation	2/ 8/77	Approved
Polk	Agripac, Inc. - Salem Chlorination System Control Discharge of Retort Cooling Water	2/10/77	Approved
Tillamook	Edwin Barber - Tillamook Animal Waste	2/11/77	Approved
Tillamook	Robert Christie - Tillamook Animal Waste	2/11/77	Approved
Hood River	Luhr Jensen - Oak Grove Plating Wastes	2/15/77	Notice of Violation and Disapproved
Coos	Menasha - North Bend Spent Liquor Incinerator Venturi Flushing	2/23/77	Approved
Coos	Menasha Corp. - North Bend Cascade Cooling Water Recycle	2/23/77	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit) — February, 1977 (Month and Year)

SUMMARY OF WATER PERMIT ACTIONS

	Permit Actions Received				Permit Actions Completed				Permit Actions Pending		Sources Under Permits		Sources Reqr'g Permits	
	Month		Fis.Yr.		Month		Fis.Yr.							
	*	**	*	**	*	**	*	**	*	**	*	**	*	**
Municipal														
New	2	1	2	3	0	0	7	6	2	4				
Existing	0	0	0	1	0	2	2	4	0	3				
Renewals	27	5	70	7	3	0	35	3	82	5				
Modifications	1	0	18	1	1	1	29	2	6	0				
Total	30	6	90	12	4	3	73	15	90	12	300	62	302	69
Industrial														
New	1	2	5	7	0	1	2	7	5	5				
Existing	0	0	0	1	0	0	6	11	0	0				
Renewals	8	3	46	10	2	1	25	10	49	7				
Modifications	1	0	28	2	1	0	38	2	13	0				
Total	10	5	79	20	3	2	71	30	67	12	430	86	435	91
Agricultural (Hatcheries, Dairies, etc.)														
New	0	0	2	0	1	0	4	1	1	0				
Existing	0	0	0	0	0	0	0	1	0	0				
Renewals	1	0	1	0	0	0	0	0	1	0				
Modifications	0	0	9	0	0	0	11	0	0	0				
Total	1	0	12	0	1	0	15	2	2	0	65	8	66	8
GRAND TOTALS	41	11	181	32	8	5	159	47	159	24	795	156	803	168

* NPDES Permits
** State Permits

TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit) — February, 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (13)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Lane	Pier Point Inn - Joint Venture (Coast Real Estate) Sewage Disposal	2/ 4/77	NPDES Permit Renewed
Multnomah	City of Portland Tryon Creek Plant	2/ 4/77	NPDES Permit Renewed
Linn	City of Albany Adair Plant	2/ 4/77	NPDES Permit Renewed
Lane	Weyerhaeuser Company Fish Hatchery	2/ 4/77	NPDES Permit Issued
Washington	Unified Sewerage Agency Cedar Hills	2/ 4/77	NPDES Permit Modified
Jackson	Department of Transportation Manzanita Rest Area	2/ 9/77	State Permit Modified
Columbia	Boise Cascade Corporation St. Helens Kraft Mill	2/18/77	State Permit Renewed
Jackson	Jackson County Parks & Recreation Willow Lake	2/18/77	State Permit Issued
Jackson	Jackson County Parks & Recreation Howard Prairie	2/18/77	State Permit Issued
Coos	Roseburg Lumber Company Coquille Plywood	2/18/77	NPDES Permit Renewed
Jackson	Valley View Vineyards Beverage Processing	2/18/77	State Permit Issued
Multnomah	Carnation Company Albers Milling	2/21/77	Discharge Eliminated
Linn	Willamette Industries, Inc. Griggs Division	2/28/77	Modification Denied

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — February 1977 (Month and Year)

PLAN ACTIONS COMPLETED (20)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (20)			
Umatilla (827)	Staley Mfg., Stanfield. Potato starch plant.	2/14/77	Approved.
Multnomah (838)	Miller Paint Company. Dust and fume control.	2/11/77	Approved.
Coos (843)	Menasha Corporation. Molten sulfur pump.	2/2/77	Approved.
Linn (845)	Western Kraft. Third lime kiln.	3/4/77	Approved.
Marion (849)	Homette Corporation. Sawdust cyclone.	2/4/77	Approved.
Deschutes (851)	Brooks-Willamette, Bend. Storage building cyclones.	2/11/77	Approved.
Linn (852)	Western Kraft. Renew #3 recovery boiler.	3/4/77	Approved.
Morrow (854)	Western Alfalfa. Alfalfa pelleting plant.	2/22/77	Approved.
Tillamook (857)	Western Farmers Association. Bulk feed reload facility.	2/1/77	Approved.
Multnomah (860)	Collier Carbon. Expansion of bulk urea loading.	2/2/77	Approved.
Hood River (864)	Champion Bulding Products, Dee. New hogged fuel boiler.	2/3/77	Approved.
Yamhill (866)	Valley Concrete Products. Concrete tile and block manufacturing.	2/1/77	Approved.
Yamhill (867)	Coast Range Plywood. New veneer dryer.	2/11/77	Approved.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — February 1977 (Month and Year)

PLAN ACTIONS COMPLETED (20 con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (continued)			
Linn (869)	Woodex, Inc. Modify dust collection.	2/10/77	Approved.
Yamhill (871)	Cascade Steel. New fence post line.	2/16/77	Approved.
Yamhill (875)	Willamina Lumber Company. New shavings cyclone.	2/25/77	Approved.
Lane (876)	Weyerhaeuser Company. Continuous sawdust digester.	2/17/77	Approved.
Deschutes (884)	Deschutes Ready-Mix. Scrubber on asphalt plant.	3/7/77	Approved.
Washington (872)	Oregon Culvert Company. Asphalt spinners.	3/1/77	Approved.
Umatilla (718)	J. R. Simplot Company. New potato processing plant.	1/25/77	Approved.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality Division (Reporting Unit) — February 1977 (Month and Year)

SUMMARY OF AIR PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sources under Permits	Sources Reqr'g Permits
	Month	Fis.Yr.	Month	Fis.Yr.			
Direct Sources							
New	1	17	0	19	8		
Existing	6	37	3	60	21		
Renewals	5	127	28	138	74		
Modifications	4	96	8	98	15		
Total	16	277	39	315	118	2203	2234
Indirect Sources							
New	2	17	1	15	15		
Existing							
Renewals							
Modifications	1	3	0	2	1		
Total	3	20	1	17	16	50	
GRAND TOTALS	19	297	40	332	134	2253	

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — February 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (40)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (39)			
Columbia	Boise Cascade Papers 05-1849, (Addendum)	2/2/77	Addendum Issued
Columbia	Portland General Electric 05-2520, (Renewal)	2/24/77	Permit Issued
Deschutes	Deschutes Farmers Co-op 09-0037, (Existing)	2/24/77	Permit Issued
Douglas	Drain Plywood 10-0054, (Addendum)	1/28/77	Addendum Issued
Hood River	Champion Building Products 14-0002, (Addendum)	2/8/77	Addendum Issued
Jackson	SWF Plywood 15-0006, (Addendum)	2/11/77	Addendum Issued
Klamath	Stukel Rock and Paving 18-0050, (Addendum)	2/2/77	Addendum Issued
Linn	Willamette Industries 22-2509, (Renewal)	2/24/77	Permit Issued
Linn	Willamette Industries 22-3010, (Renewal)	2/24/77	Permit Issued
Linn	Willamette Industries 22-5194, (Renewal)	2/24/77	Permit Issued
Linn	Willamette Industries 22-7128, (Renewal)	2/24/77	Permit Issued
Malheur	Amalgamated Sugar 23-0002, (Addendum)	2/2/77	Addendum Issued
Marion	Stayton Canning Co-op 24-1010, (Renewal)	2/24/77	Permit Issued
Marion	Stayton Canning Co-op 24-1011, (Renewal)	2/24/77	Permit Issued

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — February 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (40 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (continued)			
Marion	Voget Meats 24-1511, (Renewal)	2/24/77	Permit Issued
Marion	Salem General Hospital 24-2331, (Renewal)	2/24/77	Permit Issued
Marion	Deluxe Ice Cream Co. 24-2334, (Renewal)	2/24/77	Permit Issued
Marion	Lee Apts. 24-4867, (Renewal)	2/24/77	Permit Issued
Marion	Meier and Frank 24-4971, (Renewal)	2/24/77	Permit Issued
Marion	Oregon School for the Blind 24-5129, (Renewal)	2/24/77	Permit Issued
Marion	Oregon Military Dept. 24-5152, (Renewal)	2/24/77	Permit Issued
Marion	Salem Memorial Hospital 24-5404, (Renewal)	2/23/77	Permit Issued
Marion	Sears Roebuck 24-5456, (Renewal)	2/23/77	Permit Issued
Marion	State Finance Co. 24-5534, (Renewal)	2/23/77	Permit Issued
Marion	Western Baptist College 24-5843, (Renewal)	2/23/77	Permit Issued
Marion	Stayton Canning Co-op 24-7067, (Renewal)	2/23/77	Permit Issued
Marion	General Foods Corp. 24-9044, (Renewal)	2/23/77	Permit Issued
Morrow	Pioneer Memorial Hospital 25-0010, (Existing)	2/23/77	Permit Issued

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality (Reporting Unit) — February 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (40 - con't)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stationary Sources (continued)			
Multnomah	Reynolds Metals 26-1851, (Addendum)	1/31/77	Addendum Issued
Multnomah	Cargill, Inc. 26-2009, (Addendum)	1/28/77	Addendum Issued
Multnomah	Veterans Administration Hospital 26-2955, (Existing)	2/23/77	Permit Issued
Polk	Oregon College of Education 27-5065, (Renewal)	2/23/77	Permit Issued
Polk	Asten-Hill Mfg. 27-8007, (Renewal)	2/23/77	Permit Issued
Polk	Oregon Fruit Producers 27-8008, (Renewal)	2/23/77	Permit Issued
Washington	Scappoose Sand and Gravel 34-2503, (Renewal)	1/24/77	Permit Issued
Yamhill	Linfield College 36-5313, (Renewal)	2/23/77	Permit Issued
Yamhill	Stone Fuel & Lumber 36-8007, (Renewal)	2/23/77	Permit Issued
Portable	Deschutes Ready Mix, Sand & Gravel 37-0026, (Renewal)	2/23/77	Permit Issued
Portable	KLM Paving 37-0110, (Renewal)	2/23/77	Permit Issued
Indirect Sources (1)			
Washington	Major Sports Complex, 250 parking spaces.	2/4/77	Final permit issued.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — February 1977 (Month and Year)

PLAN ACTIONS COMPLETED (6)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Union	Resource Recovery System New Site Request for Proposal	2/3/77	Approved
Lane	Resource Recovery Facility New Site Contract for Construction	2/3/77	Approved
Deschutes	Alfalfa Landfill Existing Site Operational Plan	2/3/77	Approved
Umatilla	Pilot Rock Sanitary Landfill Existing Site Operational Plan	2/4/77	Approved
Lake	Summer Lake Disposal Site Existing Site Operational Plan	2/8/77	Approved
Lake	Silver Lake Disposal Site Existing Site Operational Plan	2/8/77	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — February 1977 (Month and Year)

SUMMARY OF SOLID AND HAZARDOUS WASTE PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sites Under Permits	Sites Reqr'g Permits
	Month	Fis.Yr.	Month	Fis.Yr.			
General Refuse							
New	3	8	1	6	3 (*)		
Existing	1	1		20	28 (*-1)		
Renewals		7		14	1		
Modifications		5		11	1		
Total	4	21	1	51	33	191	192
Demolition							
New		2		3			
Existing				2			
Renewals		1		1	1		
Modifications				1			
Total		3	0	7	1	13	13.
Industrial							
New	1	3	1	6			
Existing		1	2	7	6 (*-3)		
Renewals	1	7		10	4		
Modifications		1		3			
Total	2	12	3	26	10	86	89
Sludge Disposal							
New		2		3			
Existing							
Renewals		1		2	1		
Modifications		2		2	1		
Total		5	0	7	2	8	8
Hazardous Waste							
New Authorizations	14	70	14	75	6		
Renewals							
Modifications							
Total	14	70	14	75	6	1	1
GRAND TOTALS	20	111	18	166	52	299	303

*Sites operating under temporary permits until regular permits are issued.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — February 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (18)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
General Refuse (Garbage) Facilities (1)			
Umatilla	Pilot Rock Sanitary Landfill New facility	2/22/77	Permit issued
Demolition Waste Facilities (0)			
Sludge Disposal Facilities (0)			
Industrial Waste Facilities (3)			
Linn	Geil's Pond Disposal Site New Facility	2/18/77	Permit issued
Benton	Paul Barber Hardwood Co. Existing Facility	2/18/77	Permit issued
Klamath	Weyerhaeuser, Klamath Falls Existing Facility	2/22/77	Permit issued (renewal)
Hazardous Waste Facilities (14)			
Gilliam	Chem-Nuclear Systems, Inc. Existing Facility	2/1/77	Disposal authorization approved. (Paint sludge)
"	" " "	2/4/77	Disposal authorization approved. (Plating waste)
"	" " "	2/9/77	Two (2) disposal authorizations approved. (Paint sludge & Unwanted chemicals)
"	" " "	2/10/77	Disposal authorization approved. (Ammonia cleaning solution)
"	" " "	2/14/77	Three (3) disposal authorizations approved. (Capacitors; Pesticides; & Herbicides)

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit) — February 1977 (Month and Year)

PERMIT ACTIONS COMPLETED (continued)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Gilliam	Chem-Nuclear Systems, Inc. New facility	2/16/77	Disposal authorization approved. (Pesticides)
"	" " "	2/25/77	Three (3) disposal authorizations approved. (Styrene monomer; Tank car washing; & degreasing solvent.
"	" " "	2/16/77	Four (4) disposal authorizations approved. (Pesticides)

ENVIRONMENTAL QUALITY COMMISSION

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

ROBERT W. STRAUB
GOVERNOR

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. C, April 1, 1977 EQC Meeting

Attached are review reports on 5 requests for Tax Credit action. These reports and the recommendations of the Director are summarized on the attached table.

Director's Recommendation

It is recommended that the Commission act on the tax credit requests as follows:

1. Issue certificates for 4 applications: T-866, T-871, T-872, T-873.

2. Revoke certificate number 501 issued to Permaneer Corporation because of a change in ownership of the claimed facility (authorizing letter attached).

Bill

WILLIAM H. YOUNG
Director

/cs

Attachments
Tax Credit Summary
Tax Credit Review Reports

TAX CREDIT APPLICATIONS

Applicant/Plant Location	Appl. No.	Facility	Claimed Cost	% Allocable to Pollution Control	Dir Rec
Menasha Corporation, North Bend	T-866	Necessary additions to the pulp washing system.	$10,824.00	80% or more	Iss
Pennwalt Corporation, Portland	T-871	Cross-flow scrubber system to control chlorine emissions	24,059.01	80% or more	Iss
Pennwalt Corporation, Portland	T-872	Effluent outfalls and diffusers with continuous monitoring	506,058.73	80% or more	Iss
McCall Oil Company, Portland	T-873	Oily waste collection and oil separation and dock spill reclaim system	75,981.00	80% or more	Iss

TAX CREDIT SUMMARY

Proposed March 1977 Totals:

Air Quality	$ 24,059.01
Water Quality	592,863.73
Solid Waste	0

Calendar Year Totals to Date:
(Exclusing March 1977 totals)

Air Quality	$ 15,890.00
Water Quality	199,842.58
Solid Waste	0
	$358,742.58

Total Certificates Awarded (Monetary Values)
Since Beginning of Program (excluding
March 1977 Totals):

Air Quality	$ 95,661,492.11
Water Quality	69,651,830.71
Solid Waste	12,471,967.79
	$177,785,290.61

Appl. T-866

Date 3/2/77

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

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

The applicant owns and operates a neutral semi-chemical pulp and paper mill producing corrugating medium.

2. Description of Claimed Facility

The claimed facility consists of necessary additions to the pulp washing system such as valves, piping, pump, and controls for supplying screen wash water.

The claimed facility to which these additions were made was originally completed and placed in operation in November, 1975. The above additions were completed in 1976. Application T-866 claims only the costs incurred in 1976. A tax credit was issued for the original project (T-740) which was approved by DEQ letter of July 10, 1975.

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

Facility Cost: $10,824.00 (Accountant's certification was attached to the application).

3. Evaluation of Application

With the press washing equipment, 75 to 85 percent of the spent liquor is collected as compared to 55 percent prior to the total facility. The additions claimed by T-866 were claimed necessary to put the facility into more efficient operation. Plans for the project were approved by DEQ letter of July 10, 1975.

There is no net profit derived from the total project as it exists now.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $10,824.00 be issued for the additional facility in Tax Application T-866 with 80 percent or more allocated to pollution control.

WDL:ts
3/2/77

Appl T-871

Date 3/16/77

State of Oregon
Department of Environmental Quality

Tax Relief Application Review Report

---

1. Applicant

Pennwalt Corporation
Inorganic Chemicals Division
6400 N. W. Front Avenue
Portland, Oregon 97210

The applicant owns and operates an inorganic chemical plant in Portland, Oregon.

2. Description of Facility

The facility claimed in this application consists of a cross-flow scrubber system which is used to control chlorine emissions. The facility costs include:

a.	Cross-flow scrubber	$ 4,413.50
b.	Fan	117.52
c.	Piping	1,000.00
d.	Ductwork	18,527.99
		$24,059.01

The plans for the claimed facility are shown in Pennwalt drawing No. P-03041-V3 and vendors catalogs.

Construction of the claimed facility was started in October, 1976 and completed in November 1976. The facility also started operation in November, 1976. The plans and specifications for the claimed facility were reviewed by the Department and approval to construct and preliminary certification for tax credit was granted on October 13, 1976.

Certification is claimed under current statutes and the percentage claimed for pollution control is 100%.

Facility cost: $24,059.01 (Accountant's certification was provided).

3. Evaluation of Application

Pennwalt was required to reduce emission of chlorine gas from their plant site by the State Occupational Health Section of the Workmen's Compensation Board. The reason for this requirement was that the occupational health standards for chlorine in the neighboring plant were being exceeded due to the emissions from the Pennwalt plant.

Since the scrubber has been installed it has operated satisfactorily and has eliminated the violations of the occupational health standards in the neighboring plant.

A reusable product is not recovered by the claimed facility.

The Department concludes that 100% of the cost of this facility is allocable to air pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of $25,059.01 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-871.

CRC:ds
3/16/77

Appl. T-872

Date 3/2/77

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

Pennwalt Corporation
Inorganic Chemicals Division
P. O. Box 4102
Portland, Oregon 97208

The applicant owns and operates an inorganic chemical manufacturing complex at 6400 N. W. Front Street in Portland, Oregon, on the Willamette River. Process is basically chlor-alkali.

2. Description of Claimed Facility

Six existing plant outfalls were relocated and partially combined to four. Parshall flumes, continuous sampling stations and diffusers were installed in each outfall.

The claimed facility was completed November 30, 1976 and placed into operation before completion on May 21, 1976. Certification is claimed with 100 percent of the cost allocated to pollution control.

Facility cost: $506,058.73 (Accountant's certification was attached to the application).

3. Evaluation of Application

Proper monitoring of flow and the establishment of a mixing zone for the applicant's effluents, as required by NPDES Permit No. 1605-J, was the motivation for the claimed facility. Prior to this construction, flows at each discharge were estimated; and six outfall pipes terminated at low water elevation. The diffusers which were installed insure better mixing with river water and dilution.

Plans for the claimed facility were submitted by the applicant December 13, 1974 and were approved by DEQ letter of March 14, 1975. Staff has inspected the completed claimed facility and found it to be operating as designed.

There is no income to be derived from this facility so that the only benefits are in pollution control.

4. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in T-872, such certificate to bear the actual cost of $506,058.73 with 80 percent or more allocated to pollution control.

WDL:ts
3/2/77

Appl. T-873

Date 3/8/77

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

TAX RELIEF APPLICATION REVIEW REPORT

---

1. Applicant

McCall Oil Company
McCall Marine Terminal
808 S. W. First Avenue
Portland, Oregon 97201

The applicant leases the site from the Port of Portland and operates a marine oil terminal at 5480 N. W. Front Avenue in Portland, Oregon, on the Willamette River.

2. Description of the Claimed Facility

The claimed facilities consist of:

a. Gravity oil/water separator to remove oil from site runoff to river.

b. Dock spill reclaim system including dock sump, sump pump, booms and handling equipment.

c. Truck loading rack sump and drain line to oil separator.

The claimed facilities were completed and placed in operation in September, 1975. Certification is claimed with 100 percent of the cost allocated to pollution control.

Facility cost: $75,981 (Accountant's certification was attached to the application).

3. Evaluation of the Application

The facilities were installed as part of the new McCall marine terminal. Had these facilities not been installed, oil spills within the site would have drained to the Willamette River. The applicant states that the possibility of oil discharge has almost totally been eliminated.

Plans for these facilities were submitted by the applicant in May, 1974, and approved by the DEQ June 19, 1974, by letter.

There is no income to be derived from these facilities so that the only benefits are in pollution control.

Staff has visited the terminal and found the facilities operating as designed.

4. Director's Recommendation

It is recommended that a Pollution Control Certificate be issued for the facilities claimed in application T-873, such certificate to bear the actual cost of $75,981 with 80 percent or more allocable to pollution control.

WDL:ts
3/8/77

PERMANEER DEBTOR IN POSSESSION

PERMANEER CORPORATION
201 Progress Parkway
Maryland Heights, Missouri 63043
(314) 878-1200

15-0027

February 24, 1977

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

Gentlemen:

This letter is to inform you that Permaneer Corporation recently transferred the pollution control facility it previously owned in White City, Oregon. Permaneer's ownership and use of this facility was certified by the Oregon State Environmental Quality Commission by certificate number 501 issued on July 19, 1974.

The transferee is Down River Forest Products Inc., 1790 Avenue G, White City, Oregon 97501. This new owner will be applying for a new certificate under ORS 468.170 and seeking the ad velorem property tax exemption provided by ORS 307.420.

Yours very truly,

PERMANEER CORPORATION

Franz L. Pool

Franz L. Pool
Corporate Tax Accountant

FLP/bs

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

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MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item D, April 1, 1977, EQC Meeting

Vehicle Emission Testing Rules - Authorization for public hearing to consider revisions to light duty motor vehicle inspection standards, OAR 340-24-300 through 24-330.

Background

At the Environmental Quality Commission meeting of August 27, 1976, amendments to OAR 340-24-320 through 24-330, which effectively updated the inspection criteria to include 1976 model year vehicles, were approved. This was part of the annual review and update required to keep the rules current. Review of the 1977 model year vehicles is complete, and it is time to update the inspection criteria to include these vehicles.

Objective

The action proposed in the attached rules provides for the following:

1. Housekeeping changes in the definitions to complement the proposed heavy duty inspection program which is under concurrent consideration.

2. The deletion of certain of the enforcement tolerances which expire June 30, 1977, and the modification of others.

3. The updating of the specific emission criteria for various vehicle classes.

4. The strengthening of the smoke check procedure.

Discussion

Definitions - Changes in sections 24-300 and 24-305 are self-explanatory within the context of the material. They provide for the inclusion of the heavy duty vehicle category, provide minor housekeeping adjustments, and reflect metric categorization in accordance with the U. S. metric conversion policy.

Test Method - The changes in section 24-310 solely reflect housekeeping adjustments.

Test Criteria - The major changes in this section are the deletion of the expiring enforcement tolerances, specifically for idle rpm, enforcement of ORS 483.825, and exhaust gas dilution. Of these expiring enforcement tolerances, the most significant is the one relating to the removal of pollution control equipment.

Inspection Standards - Most changes in the inspection standards are simply extensions of the current (1976) standard through to the 1977 model years. This is especially true for the carbon monoxide limits. A change is proposed in the hydrocarbon standards. The base standard for pre-pollution controlled vehicles has been reduced slightly, and all of the hydrocarbon tolerances have been reduced to 100 ppm. The standard for the smoke check has been strengthened to include all but transient engine operation during the entire test cycle.

Impact

The impact of the updates in the standards and enforcement tolerances will be to change the overall pass rate from 67% to 65% based upon a review of the most recent data.

The changes in the limits for hydrocarbon fail points will have minor impact for owners of pre-pollution controlled vehicles. The adjusted limits still are quite liberal, but reflect what the previous standards would be if the existing enforcement tolerance had expired. The other enforcement tolerances for dilution and engine rpm will have very minimal impact, since very few vehicles are currently taking advantage of these limits. There will be some impact on vehicle owners due to the modification of the smoke standard and the enforcement of Oregon's tampering statute (ORS 483.825). The smoke standard was changed to improve the test since the experience gained indicated that a vehicle might pass the smoke check at an engine idle, but when the vehicle left the test station, it did so in the proverbial "cloud of smoke." The total number of vehicles falling into this class is still quite small.

Conclusions

The changes proposed for the inspection program operating rules are reasonable and maintain or improve equity. These changes do not appear to significantly decrease the pass rate. The changes carry through the enforcement of existing Oregon law and should continue to provide the emission reduction for the Portland area air shed as projected with the biennial inspection program.

Director's Recommendation

It is recommended that the Department be granted authorization to schedule a public hearing to receive testimony on the attached proposed amendments to the inspection rules. It is proposed that a hearing be held by a Hearings Officer and be scheduled in the Portland metropolitan area.

Bill

WILLIAM H. YOUNG

WPJ:mg
March 14, 1977
Attachments

MOTOR VEHICLE EMISSION CONTROL INSPECTION TEST CRITERIA, METHODS, AND STANDARDS

24-300 SCOPE. Pursuant to ORS 468.360 to 468.405, 481.190 to 481.200, and 483.800 to 483.825, the following rules establish the criteria, methods, and standards for inspecting [~~light-duty~~] motor vehicles, excluding motorcycles, to determine eligibility for obtaining a certificate of compliance or inspection.

24-305 DEFINITIONS. As used in these rules unless otherwise required by context:

(1) "Carbon dioxide" means a [~~gaseous~~] compound consisting of the chemical formula (CO_2).

(2) "Carbon monoxide" means a [~~gaseous~~] compound consisting of the chemical formula (CO).

(3) "Certificate of compliance" means a certification issued by a vehicle emission inspector that the vehicle identified on the certificate is equipped with the required functioning motor vehicle pollution control systems and otherwise complies with the emission control criteria, standards, and rules of the commission.

(4) "Certificate of inspection" means a certification issued by a vehicle emission inspector and affixed to a vehicle by the inspector to identify the vehicle as being equipped with the required functioning motor vehicle pollution control systems and as otherwise complying with the

emission control criteria, standards, and rules of the commission.

(5) "Commission" means the Environmental Quality Commission.

(6) "Crankcase emissions" means substances emitted directly to the atmosphere from any opening leading to the crankcase of a motor vehicle engine.

(7) "Department" means the Department of Environmental Quality.

(8) "Director" means the director of the [~~d~~]Department.

(9) "Electric vehicle" means a motor vehicle which uses a propulsive unit powered exclusively by electricity.

(10) "Exhaust emissions" means substances emitted into the atmosphere from any opening downstream from the exhaust parts of a motor vehicle engine.

(11) "Factory-installed motor vehicle pollution control system" means a motor vehicle pollution control system installed by the vehicle or engine manufacturer to comply with federal motor vehicle emission control laws and regulations.

(12) "Gas analytical system" means a device which senses the amount of contaminants in the exhaust emissions of a motor vehicle, and which has been issued a license by the Department pursuant to section 24-350 of these regulations and ORS 468.390.

(13) "Gaseous fuel" means, but is not limited to, liquefied petroleum gases and natural gases in liquefied or gaseous forms.

(14) "Heavy duty motor vehicle" means a motor vehicle having a combined manufacturer vehicle and maximum load rating to be carried thereon of more than 3855 kilograms (8500 pounds).

[~~(14)~~] (15) "Hydrocarbon gases" means a class of chemical compounds consisting of hydrogen and carbon.

[~~(15)~~] (16) "Idle speed" means the unloaded engine speed when accelerator pedal is fully released.

[~~(16)~~] (17) "In-use motor vehicle" means any motor vehicle which is not a new motor vehicle.

[~~(17)~~] (18) "Light duty motor vehicle" means a motor vehicle having a combined manufacturer [~~weight of~~] vehicle and maximum load rating to be carried thereon of not more than [~~8,400 pounds (3820 kilograms).~~] 3855 kilograms (8500 lbs.).

[~~(18)~~] (19) "[~~Light-duty m~~] Motor vehicle fleet operation" means ownership, control, or management, or any combination thereof, by any person of 100 or more Oregon registered, in-use, [~~light-duty~~] motor vehicles, excluding those vehicles held primarily for the purposes of resale.

[~~(19)~~] (20) "Model year" means the annual production period of new motor vehicles or new motor vehicle engines designated by the calendar year in which such period ends. If the manufacturer does not designate a production period, the model year with respect to such vehicles or engines shall mean the 12 month period beginning January of the year in which production thereof begins.

[~~(20)~~] (21) "Motorcycle" means any motor vehicle having a seat or saddle for the use of the rider and designed to travel on not more than three wheels in contact with the ground and [~~weighing less than 1,500 pounds (682 kilograms).~~] having a mass of 680 kilograms (1500 pounds) or less with manufacturer recommended fluids and nominal fuel capacity included.

[~~(21)~~] (22) "Motor vehicle" means any self-propelled vehicle used for transporting persons or commodities on public roads.

[~~(22)~~] (23) "Motor vehicle pollution control system" means equipment designed for installation on a motor vehicle for the purpose of reducing the pollutants emitted from the vehicle, or a system or engine adjustment or modification which causes a reduction of pollutants emitted from the vehicle.

[~~(23)~~] (24) "New motor vehicle" means a motor vehicle whose equitable or legal title has never been transferred to a person who in good faith purchases the motor vehicle for purposes other than resale.

[~~(24)~~] (25) "Non-complying imported vehicle" means a motor vehicle of model years 1968 through 1971 which was originally sold new outside of the United States and was imported into the United States as an in-use vehicle prior to February 1, 1972.

[~~(25)~~] (26) "Person" includes individuals, corporations, associations, firms, partnerships, joint stock companies, public and municipal corporations, political subdivisions, the state and any agencies thereof, and the Federal Government and any agencies thereof.

[~~(26)~~] (27) "PPM" means parts per million by volume.

[~~(27)~~] (28) "Public roads" means any street, alley, road, highway, freeway, thoroughfare, or section thereof in this state used by the public or dedicated or appropriated to public use.

[~~(28)~~] (29) "RPM" means engine crankshaft revolutions per minute.

[~~(29)~~] (30) "Two-stroke cycle engine" means an engine in which combustion occurs, within any given cylinder, once each crankshaft revolution.

[~~(30)~~] (31) "Vehicle emission inspector" means any person possessing a current and valid license issued by the department pursuant to section 24-340 of these regulations and ORS 468.390.

24-310 LIGHT DUTY MOTOR VEHICLE EMISSION CONTROL TEST METHOD.

(1) The vehicle emission inspector is to insure that the gas analytical system is properly calibrated prior to initiating a vehicle test.

(2) The department approved vehicle information data form is to be completed [~~prior to~~] at the time of the motor vehicle being inspected.

(3) The vehicle is to be in neutral gear if equipped with a manual transmission, or in "park" position if equipped with an automatic transmission.

(4) All vehicle accessories are to be turned off.

(5) An inspection is to be made to insure that the motor vehicle is equipped with the required functioning motor vehicle pollution control system in accordance with the criteria of section 24-320.

(6) With the engine operating at idle speed, the sampling probe of the gas analytical system is to be inserted into the engine exhaust outlet.

(7) The steady state levels of the gases measured at idle speed by the gas analytical system shall be recorded. Except for diesel vehicles, the idle speed at which the gas measurements were made shall also be recorded.

[~~(7)~~] (8) Except for diesel vehicles, the engine is to be accelerated with no external loading applied, to a speed of between 2,200 RPM and 2,700 RPM. The engine speed is to be maintained at a steady speed within this speed range for a 4 to 8 second period and then returned to an idle speed condition. In the case of a diesel vehicle, the engine is to be accelerated to an above idle speed. The engine speed is to be maintained at a steady

above idle speed for a 4 to 8 second period and then returned to an idle speed condition.

[~~(8)~~] (9) The steady state levels of the gases measured at idle speed by the gas analytical system shall be recorded. Except for diesel vehicles, the idle speed at which the gas measurements were made shall also be recorded.

[~~(9)~~] (10) If the vehicle is equipped with a [~~dual~~] multiple exhaust system, then steps (6) through [~~(8)~~] (9) are to be repeated on the other exhaust outlet(s). The readings from the exhaust outlets are to be averaged into one reading for each gas measured for comparison to the standards of section 24-330.

[~~(10)~~] (11) If the vehicle is capable of being operated with both gasoline and gaseous fuels, then steps (6) through [~~(8)~~] (9) are to be repeated so that emission test results are obtained for both fuels.

[~~(11)~~] (12) If it is ascertained that the vehicles may be emitting noise in excess of the noise standards adopted pursuant to ORS 467.030, then a noise measurement is to be conducted in accordance with the test procedures adopted by the commission or to standard methods approved in writing by the department.

[~~(12)~~] (13) If it is determined that the vehicle complies with the criteria of section 24-320 and the standards of section 24-330, then, following receipt of the required fees, the vehicle emission inspector shall issue the required certificates of compliance and inspection.

[~~(13))~~] (14) The inspector shall affix any certificate of inspection issued to the lower left-hand side (normally the driver side) of the front

windshield, being careful not to obscure the vehicle identification number nor to obstruct driver vision.

[~~(14)~~] (15) No certificate of compliance or inspection shall be issued unless the vehicle complies with all requirements of these rules and those applicable provisions of ORS 468.360 to 468.405, 481.190 to 481.200, and 483.800 to 483.825.

24-320 LIGHT DUTY MOTOR VEHICLE EMISSION CONTROL TEST CRITERIA.

(1) No vehicle emission control test shall be considered valid if the vehicle exhaust system leaks in such a manner as to dilute the exhaust gas being sampled by the gas analytical system. For the purpose of emission control tests conducted at state facilities, except for diesel vehicles, tests will not be considered valid if the exhaust gas is diluted to such an extent that the sum of the carbon monoxide and carbon dioxide concentrations recorded for the idle speed reading from an exhaust outlet is 8% or less, and on 1975 and [~~later~~] newer vehicles with air injection systems 7% or less. [~~For purposes of enforcement through June, 1977, a 1% carbon dioxide tolerance shall be added to the values recorded.~~]

(2) No vehicle emission control test shall be considered valid if the engine idle speed either exceeds the manufacturer's idle speed specifications by over 200 RPM on 1968 and newer model vehicles, or exceeds 1,250 RPM for any [age] pre-1968 model vehicle. [~~For purposes of enforcement through June, 1977, a 100 RPM tolerance shall be added to the idle speed limits.~~]

(3) No vehicle emission control test [~~conducted after June, 1977,~~] for a 1968 or newer model vehicle shall be considered valid if any element of the following factory-installed motor vehicle pollution control systems have been disconnected, plugged, or otherwise made inoperative in violation of ORS 483.825(1), except as noted in subsection (5):

(a) Positive crankcase ventilation (PCV) system

(b) Exhaust modifier system

(A) Air injection reactor system

(B) Thermal reactor system

(C) Catalytic converter system - (1975 and newer model vehicles only)

(c) Exhaust gas recirculation (EGR) systems - (1973 and newer model vehicles only)

(d) Evaporative control system - (1971 and newer model vehicles only)

(e) Spark timing system

(A) Vacuum advance system

(B) Vacuum retard system

(f) Special emission control devices

Examples:

(A) Orifice spark advance control (OSAC)

(B) Speed control switch (SCS)

(C) Thermostatic air cleaner (TAC)

(D) Transmission controlled spark (TCS)

(E) Throttle solenoid control (TSC)

(4) No vehicle emission control test [~~conducted after June, 1977~~] for a 1968 or newer model vehicle shall be considered valid if any element of the factory-installed motor vehicle pollution control system has been modified or altered in such a manner so as to decrease its efficiency or effectiveness in the control of air pollution in violation of ORS 483.825(2), except as noted in subsection (5). For the purposes of this subsection, the following apply:

(a) The use of a non-original equipment aftermarket part (including a rebuilt part) as a replacement part[~~solely for purposes of maintenance according to the vehicle or engine manufacturer's instructions,~~

~~or-for-repair-or-replacement-of-a-defective-or-worn-out-part;~~] is not considered to be a violation of ORS 483.825(2), if a reasonable basis exists for knowing that such use will not adversely effect emission control efficiency. The department will maintain a listing of those parts which have been determined to adversely effect emission control efficiency.

(b) The use of a non-original equipment aftermarket part or system as an add-on, auxiliary, augmenting, or secondary part or system, is not considered to be a violation of ORS 483.825(2), if such part or system is listed on the exemption list maintained by the department.

(c) Adjustments or alterations of a particular part or system parameter, if done for purposes of maintenance or repair according to the vehicle or engine manufacturer's instructions, are not considered violations of ORS 483.825(2).

(5) A 1968 [~~or~~] and newer model motor vehicle which has been converted to operated on gaseous fuels shall not be considered in violation of ORS 483.825(1) or (2) when elements of the factory-installed motor vehicle air pollution control system are disconnected for the purpose of conversion to gaseous fuel as authorized by ORS 483.825(3).

(6) For the purposes of these rules, a motor vehicle with an exchange engine shall be classified by the model year and manufacturer make of the exchange engine, except that any requirement for evaporative control systems shall be based upon the model year of the vehicle chassis.

(7) Electric vehicles are presumed to comply with all requirements of these rules and those applicable provisions of ORS 468.360 to 468.405, 481.190 to 481.200, and 483.800 to 483.825, and may be issued the required certificates of compliance and inspection upon payment of the required fee.

24-330 LIGHT DUTY MOTOR VEHICLE EMISSION CONTROL IDLE EMISSION STANDARDS.

(1) Carbon Monoxide idle emission values not to be exceeded:

	%	Enforcement Tolerance Through June, [~~1977~~] 1979
ALFA ROMEO		
1975 [~~and 1976~~] through 1977	1.5	1.0
1971 through 1974	3.0	1.0
1968 through 1970	4.0	1.5
pre-1968	6.0	0.5
AMERICAN MOTORS CORPORATION		
1975 [~~and 1976~~] through 1977 Non-Catalyst	1.5	0.5
1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1972 through 1974	2.0	1.0
1970 through 1971	3.5	1.0
1968 through 1969	5.0	0.5
pre-1968	6.0	0.5
Above 6000 GVWR, 1974 through [~~1976~~] 1977	2.0	1.0
ARROW, Plymouth - see COLT, Dodge		
AUDI		
1975 [~~and 1976~~] through 1977	1.5	0.5
1971 through 1974	2.5	1.0
1968 through 1970	4.0	1.0
pre-1968	6.0	0.5
AUSTIN - see BRITISH LEYLAND		
BMW		
1975 [~~and 1976~~] through 1977	1.5	0.5
1974, 6 cyl.	2.5	1.0
1974, 4 cyl.	2.0	1.0
1971 through 1973	3.0	1.0
1968 through 1970	4.0	1.0
pre-1968	6.0	0.5

BRITISH LEYLAND

Austin, Austin Healey, Morris, America, and Marina		
1975	2.0	0.5
1973 through 1974	2.5	1.0
1971 through 1972	4.0	1.0
1968 through 1970	5.0	1.0
pre-1968	6.5	0.5
Jaguar		
1975 [~~and 1976~~] through 1977	0.5	0.5
1972 through 1974	3.0	1.0
1968 through 1971	4.0	1.0
pre-1968	6.0	0.5
MG		
1976 and 1977 MG	0.5	0.5
1975 MG, MG Midget and 1976 MG Midget	2.0	0.5
1973 through 1974 MGB, MGBGT, MGC	3.0	1.0
1971 through 1974 Midget	3.0	1.0
1972 MGB, MGC	4.0	1.0
1968 through 1971, except 1971 Midget	5.0	1.0
pre-1968	6.5	0.5
Rover		
1971 through 1974	4.0	1.0
1968 through 1970	5.0	0.5
pre-1968	6.0	0.5
Triumph		
1975 [~~and 1976~~] through 1977	2.0	0.5
1971 through 1974	3.5	1.0
1968 through 1970	4.0	1.0
pre-1968	6.5	0.5

BUICK - see GENERAL MOTORS

CADILLAC - see GENERAL MOTORS

CAPRI - see FORD MOTOR COMPANY, 4 cyl.

CHECKER

1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1973 through 1974	1.0	1.0
1970 through 1972	2.5	1.0
1968 through 1969	3.5	1.0
pre-1968	6.0	0.5

CHEVROLET - see GENERAL MOTORS

CHEVROLET L.U.V. - see L.U.V., Chevrolet

CHRYSLER - see CHRYSLER CORPORATION

CHRYSLER CORPORATION (Plymouth, Dodge, Chrysler)

1975 [~~and 1976~~] through 1977 Non-Catalyst	1.0	0.5
1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1972 through 1974	1.0	1.0
1969 through 1971	1.5	1.0
1968	2.0	1.5
pre-1968	6.0	0.5
Above 6000 GVWR, 1968 through 1971	4.0	1.0
Above 6000 GVWR, 1972 through [~~1976~~] 1977	2.0	1.0

CITROEN

1971 through 1974	3.0	1.0
1968 through 1970	4.0	1.0
pre-1968	6.0	0.5

COLT, Dodge

1975 [~~and 1976~~] through 1977	3.0	0.5
1971 through 1974	5.0	1.0
pre-1971	6.0	0.5

COURIER, Ford

1975 [~~and 1976~~] through 1977	1.5	0.5
1973 through 1974	2.0	1.0
pre-1973	4.0	1.0

CRICKET, Plymouth

1973 through 1974 (twin carb. only)	3.0	1.0
1972 (twin carb. only)	4.5	1.0
pre-1972 (and 1972 through 1973 single carb. only)	7.5	0.5

DATSUN

1975 [~~and 1976~~] through 1977	2.0	0.5
1968 through 1974	2.5	1.0
pre-1968	6.0	0.5

DE TOMASO - see FORD MOTOR COMPANY

DODGE - see CHRYSLER CORPORATION

DODGE COLT - see COLT, Dodge

FERRARI

1975 [~~and 1976~~] through 1977	0.5	0.5
1971 through 1974	2.5	1.5
1968 through 1970	4.0	1.5
pre-1968	6.0	0.5

FIAT

1975 [~~and 1976~~] through 1977 Non-Catalyst	1.5	0.5
1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1974	2.5	1.0
1972 through 1973 124 spec. sedan and wgn.	4.0	1.0
1972 through 1973 124 sport coupe and spider	3.0	1.0
1972 through 1973 850	3.0	1.0
1971 850 sport coupe and spider	3.0	1.0
1971 850 sedan	6.0	0.5
1968 through 1970, except 850	5.0	0.5
1968 through 1970 850	6.0	0.5
pre-1968	6.0	0.5

FORD - see FORD MOTOR COMPANY

FORD MOTOR COMPANY (Ford, Lincoln, Mercury, Capri, except Courier)

1975 [~~and 1976~~] through 1977 Non-Catalyst	1.0	0.5
1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1972 through 1974, except 4 cyl.	1.0	1.0
1972 through 1974, 4 cyl., except 1971-1973 Capri	2.0	1.0

FORD MOTOR COMPANY cont'd.

1971 through 1973 Capri only	2.5	1.0
1970 through 1971	2.0	1.0
1968 through 1969	3.5	1.0
pre-1968	6.0	0.5
Above 6000 GVWR, 1968 through 1971	4.0	1.0
Above 6000 GVWR, 1972 through 1973	3.0	1.0
Above 6000 GVWR, 1974 through [~~1976~~] 1977	2.0	1.0

GENERAL MOTORS (Buick, Cadillac, Chevrolet, GMC, Oldsmobile, Pontiac)

1975 [~~and 1976~~] through 1977 Non-Catalyst	1.0	0.5
1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1972 through 1974	1.0	1.0
1970 through 1971, except 4 cyl.	1.5	1.0
1970 through 1971, 4 cyl.	2.5	1.0
1968 through 1969	3.5	1.0
pre-1968	6.0	0.5
Above 6000 GVWR, 1968 through 1971	4.0	1.0
Above 6000 GVWR, 1972 through 1973	3.0	1.0
Above 6000 GVWR, 1974 through [~~1976~~] 1977	2.0	1.0

GMC - see GENERAL MOTORS

HONDA AUTOMOBILE

1975 [~~and 1976~~] through 1977 CVCC	1.0	0.5
1975 [~~and 1976~~] through 1977, except CVCC engine	1.5	0.5
1973 through 1974	3.0	1.0
pre-1973	5.0	1.0

INTERNATIONAL HARVESTER

1975 [~~and 1976~~] through 1977	2.5	0.5
1972 through 1974	3.0	1.0
1970 through 1971	4.0	1.0
1968 through 1969	5.0	1.0
pre-1968	6.0	0.5

JAGUAR - see BRITISH LEYLAND

JEEP - see AMERICAN MOTORS

JENSEN-HEALEY

1973 and 1974	4.5	1.0

JENSEN INTERCEPTOR & CONVERTIBLE - see CHRYSLER CORPORATION

LAND ROVER - see BRITISH LEYLAND, Rover

LINCOLN - see FORD MOTOR COMPANY

L.U.V., Chevrolet

1974 through [~~1976~~] 1977	1.5	1.0
pre-1974	3.0	1.0

MAZDA

1975 [~~and 1976~~] through 1977	1.5	0.5
1968 through 1974, Piston Engines	4.0	1.0
1974, Rotary Engines	2.0	0.5
1970 through 1973, Rotary Engines	3.0	0.5

MERCURY - see FORD MOTOR COMPANY

MERCEDES-BENZ

1975 [~~and 1976~~] through 1977 Non-Catalyst, 4 cyl.	1.0	0.5
1975 [~~and 1976~~] through 1977, all other	0.5	0.5
1973 through 1974	2.0	1.0
1972	4.0	1.0
1968 through 1971	5.0	1.0
pre-1968	6.0	0.5
Diesel Engines (all years)	1.0	0.5

MG - see BRITISH LEYLAND

OLDSMOBILE - see GENERAL MOTORS

OPEL

1975 [~~and 1976~~] through 1977	1.5	0.5
1973 through 1974	2.5	1.0
1970 through 1972	3.0	1.0
1968 through 1969	3.0	1.0
pre-1968	6.0	0.5

PANTERA - see FORD MOTOR COMPANY

PEUGEOT

1975 [~~and 1976~~] through 1977	1.5	0.5
1971 through 1974	3.0	1.0
1968 through 1970	4.0	1.0
pre-1968	6.0	0.5
Diesel Engines (all years)	1.0	0.5

PLYMOUTH - see CHRYSLER CORPORATION

PLYMOUTH CRICKET - see CRICKET, Plymouth

PONTIAC - see GENERAL MOTORS

PORSCHE

1975 [~~and 1976~~] through 1977	2.5	0.5
1972 through 1974	3.0	1.0
1974 Fuel Injection 1.8 liter (914)	5.0	1.0
1968 through 1971	5.0	1.0
pre-1968	6.5	0.5

RENAULT

1977	1.5	0.5
1976 Carbureted	1.5	0.5
1975 and 1976 Fuel Injection	1.5	0.5
1975 Carbureted	0.5	0.5
1971 through 1974	3.0	1.0
1968 through 1970	5.0	1.0
pre-1968	6.0	0.5

ROLLS-ROYCE and BENTLEY

1975 [~~and 1976~~] through 1977	0.5	0.5
1971 through 1974	3.0	1.0
1968 through 1970	4.0	1.0
pre-1968	6.0	0.5

ROVER - see BRITISH LEYLAND

SAAB

1975 [~~and 1976~~] through 1977	1.5	0.5
1968 through 1974, except 1972 99 1.85 liter	3.0	1.0
1972 99 1.85 liter	4.0	1.0
pre-1968 (two-stroke cycle)	3.0	3.5

SUBARU

1975 [~~and 1976~~] through 1977	1.5	0.5
1972 through 1974	3.0	1.0
1968 through 1971, except 360's	4.0	1.0
pre-1968 and all 360's	6.0	0.5

TOYOTA

1975 [~~and 1976~~] through 1977 Catalyst Equipped	0.5	0.5
1975 [~~and 1976~~] through 1977 4 cyl.	2.0	0.5
1975 [~~and 1976~~] through 1977 6 cyl.	1.0	0.5
1968 through 1974, 6 cyl.	3.0	1.0
1968 through 1974, 4 cyl.	4.0	1.0
pre-1968	6.0	0.5

TRIUMPH - see BRITISH LEYLAND

VOLKSWAGEN

Diesel Engines (all years)	1.0	0.5
1976 and 1977 Rabbit and Scirocco	0.5	0.5
1976 and 1977 All Others	2.5	0.5
1975 Rabbit, Scirocco, and Dasher	0.5	0.5
1975 All Others	2.5	0.5

VOLKSWAGEN cont'd.

1974 Dasher	2.5	1.0
1974 Type 4 Fuel Injection 1.8 liter	5.0	0.5
1972 through 1974, except Dasher	3.0	1.0
1972 through 1974 Dasher	2.5	1.0
1968 through 1971	3.5	1.0
pre-1968	6.0	0.5

VOLVO

1975 [~~and 1976~~] through 1977 6 cyl.	1.0	0.5
1975 [~~and 1976~~] through 1977 4 cyl.	2.0	0.5
1972 through 1974	3.0	1.0
1968 through 1971	4.0	1.0
pre-1968	6.5	0.5

NON-COMPLYING IMPORTED VEHICLES

All	6.5	0.5

DIESEL POWERED VEHICLES

All	1.0	0.5

ALL VEHICLES NOT LISTED and VEHICLES FOR WHICH NO VALUES ENTERED

1975 [~~and 1976~~] through 1977 Non-Catalyst, 4 cyl.	2.0	0.5
1975 [~~and 1976~~] through 1977 Non-Catalyst all except 4 cyl.	1.0	0.5
1975 [~~and 1976~~] Catalyst Equipped	0.5	0.5
1972 through 1974	3.0	1.0
1970 through 1971	4.0	1.0
1968 through 1969	5.0	1.0
pre-1968 and those engines less than 50 cu. in. (820 cc) displacement	6.5	0.5

(2) Hydrocarbon idle emission values not to be exceeded:

Enforcment Tolerance Through June [~~1977~~] 1979		
No HC Check	--	All two-stroke cycle engines & diesel ignition
[~~1600~~] 1500 ppm	[~~250~~] 100	Pre-1968 4 or less cylinder engines, 4 or less cylindered non-complying imports, and those engines less than 50 cu. in. (820 cc) displacement
[~~1300~~] 1200 ppm	[~~250~~] 100	Pre-1968 with more than 4 cylinder engines, and non-complying imports with more than 4 cylinder engines
800 ppm	[~~200~~] 100	1968 through 1969, 4 cylinder
600 ppm	[~~200~~] 100	All other 1968 through 1969
500 ppm	[~~200~~] 100	All 1970 through 1971
400 ppm	[~~200~~] 100	All 1972 through 1974, 4 cylinder
300 ppm	[~~200~~] 100	All other 1972 through 1974
200 ppm	100	1975 [~~and 1976~~] through 1977 without catalyst
125 ppm	100	1975 [~~and 1976~~] through 1977 with catalyst

(3) There shall be no visible emission during the steady-state unloaded and raised rpm engine idle portion of the emission test from either the vehicle's exhaust system or the engine crankcase. In the case of diesel engines and two-stroke cycle engines, the allowable visible emission shall be no greater than 20% opacity.

(4) The Director may establish specific separate standards, differing from those listed in subsections (1), (2), and (3), for vehicle classes which are determined to present prohibitive inspection problems using the listed standards.

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. E, April 1, 1977, EQC Meeting

Adoption of Proposed Amendments to the Air Quality Regulations for the Board Products Industries (i.e., Veneer and Plywood Mills)

Background

The proposed amendments to the Air Quality Regulations relative to veneer and plywood manufacturing operations (OAR Chapter 340, Section 25-305 through Section 25-315), appear in Attachment 2. These proposed amendments are presented to the Commission at this time for the purpose of adoption.

In response to a written request by the American Plywood Association dated August 12, 1976, the Department obtained authorization from the EQC at its August 20, 1976 meeting (See Attachment 4) to hold a public hearing to amend the Air Quality Regulations relative to veneer and plywood manufacturing operations.

The principal proposed amendments are: 1) the establishment of a veneer dryer emission limit; 2) a provision for a self-monitoring system by industry, where warranted; and 3) required compliance or submission of a compliance schedule by July 1, 1977.

Discussion

A public hearing was held on March 4, 1977, (see Attachment 3 for the Staff Report for the Public Hearing) to receive comments on the proposed amendments.

Comments received at the Public Hearing were supportive of the proposed rule changes (see Hearing Officer's Report, Attachment 1), although some reservations about additional, and possibly, more restrictive air contaminant emission rules for special problem areas were expressed. These special problem areas are specified in Section 25-315(14) (Attachment 2) as the formally designated Portland, Eugene-Springfield, and Medford Air Quality Maintenance Areas (AQMA's).

The American Plywood Association along with Department and some industrial representatives of the plywood industry indicated their support of the proposed amendments at the public hearing.

In addition the Department was urged to join with industry relative to establishing emission limits for veneer dryers located in the special problem areas. By letter of March 11, 1977 to the American Plywood Association the Department expressed its intended cooperation in working with the Plywood Association to sample the veneer dryers in the Medford area in order to evaluate veneer dryer hydrocarbon and particulate emission factors. These data will be used to develop Air Quality Rules within the AQMA's.

The Air Quality Rules for the AQMA's are scheduled to be ready for adoption by July 1, 1977.

In a letter dated March 3, 1977 Mr. Donald P. Dubois, Administrator of Region X, U. S. Environmental Protection Agency, questioned the omission of an opacity averaging time in the proposed amendments. The Department and representatives of the Plywood Association discussed several definitions for opacity averaging. For the present in order to provide a degree of flexibility in applying the rule an ordinary mathematical average of opacity observation made is proposed. If defining and using an average opacity becomes problematical, the Department will have to define formally and adopt some specific averaging time.

Summary and Conclusions

This section is based largely on Attachment 3, the Staff Report for the March 4, 1977 Public Hearing.

1. Based upon a written request from the American Plywood Association the Department requested authorization from the EQC at its August 20, 1976 meeting to hold a public hearing to amend the Air Quality Regulations relative to the veneer and plywood manufacturing operations.

2. The Department proposed amended Air Quality Regulations for veneer and plywood manufacturing operations outside the "special problem areas" of the formally designated Portland, Eugene-Springfield, and Medford Air Quality Maintenance Areas.

3. A public hearing on the proposed amendments to the Air Quality Regulations was held on March 4, 1977 and the Department received generally supportive comments on these proposed amendments.

4. The significant rule amendment concerns the modification of the opacity limits for veneer dryer emission points from 10% maximum to 20% maximum, 10% average opacity.

5. A veneer dryer emission self-monitoring program is also proposed and the open-burning prohibition section of the rule is deleted, as this is covered by OAR, Chapter 340, Section 23-005 through 23-020, Open Burning.

6. The proposed amendments are scheduled to go into effect after July 1, 1977 to allow time to meet compliance schedule requirements.

7. Air Quality Rules for veneer and plywood operations within the special problem areas are being developed by the Department as part of the AQMA studies and should be ready for review and adoption by July 1, 1977.

8. Both the Department and The American Plywood Association support the proposed amendments.

9. The American Plywood Association plans to cooperate with the Department in a sampling program in the Medford area which will lead to Air Quality Rules for veneer and plywood manufacturing operations within the AQMA's.

Director's Recommendation

The Director recommends that the Commission adopt the proposed rule, which is attached hereto and marked Attachment 2, and said rule promptly be filed with the Secretary of State.

Bill

WILLIAM H. YOUNG
Director

Attachments Listed Next Page

AFB
3/15/77

PROPOSED REVISIONS TO AIR QUALITY REGULATIONS FOR

BOARD PRODUCTS INDUSTRIES
(VENEER, PLYWOOD, PARTICLE BOARD, HARDBOARD)

(ED. NOTE: Unless otherwise specified, sections 25-305 through 25-325 of this Chapter of the Oregon Administrative Rules Compilation were adopted by the Department of Environmental Quality March 5, 1971 and filed with the Secretary of State March 31, 1971 as Administrative Order DEQ 26.)

25-305 DEFINITIONS.

(1) "Department" means Department of Environmental Quality.

(2) "Emission" means a release into the outdoor atmosphere of air contaminants.

(3) "Hardboard" means a flat panel made from wood that has been reduced to basic wood fibers and bonded by adhesive properties under pressure.

(4) "Operations" includes plant, mill, or facility.

(5) "Particle board" means matformed flat panels consisting of wood particles bonded together with synthetic resin or other suitable binder.

(6) "Person" means the same as ORS 468.005(5) [~~ORS 449.760(1)~~].

(7) "Plywood" means a flat panel built generally of an odd number of thin sheets of veneers of wood in which the grain direction of each ply or layer is at right angles to the one adjacent to it.

(8) "Tempering oven" means any facility used to bake hardboard following an oil treatment process.

(9) "Veneer" means a single flat panel of wood not exceed 1/4 inch in thickness formed by slicing or peeling from a log.

(10) "Opacity" is defined by Section 21-005(4).

(11) "Visual opacity determination" consists of a minimum of 25 opacity readings recorded every 15 to 30 seconds and taken by a trained observer.

(12) "Opacity readings" are the individual readings which comprise a visual opacity determination.

(13) "Fugitive emissions" are defined by Section 21-050(1).

(14) "Special problem area" means the formally designated Portland, Eugene-Springfield and Medford AQMA's and other specifically defined areas that the Environmental Quality Commission may formally designate in the future. The purpose of such designation will be to assign more stringent emission limits as may be necessary to attain and maintain ambient air standards or to protect the public health or welfare.

25-310 GENERAL PROVISIONS.

(1) These regulations establish minimum performance and emission standards for veneer, plywood, particle board, and hardboard manufacturing operations.

(2) Emission limitations established herein are in addition to, and not in lieu of, general emission standards for visible emissions, fuel burning equipment, and refuse burning equipment, except as provided for in Section 25-315.

(3) Emission limitations established herein and stated in terms of pounds per 1000 square feet of production shall be computed on an hourly basis using the maximum 8 hour production capacity of the plant.

(4) Upon adoption of these regulations, each affected veneer, plywood, particle board, and hardboard plant shall proceed with a progressive and timely program of air pollution control, applying the highest and best practicable treatment and control currently available. Each plant shall at the request of the Department submit periodic reports in such form and frequency as directed to demonstrate the progress being made toward full compliance with these regulations.

25-315 VENEER AND PLYWOOD MANUFACTURING OPERATIONS.

(1) Veneer Dryers.

(a) Consistent with Section 25-310(1) through (4), it is the objective of this section to control air contaminant emissions, including, but not limited to, condensible hydrocarbons such that visible emissions from each veneer dryer located outside special problem areas are limited to a level which does not cause a characteristic "blue haze" to be observable. [~~at any point beyond the exterior wall of the building housing the veneer dryer or at any point further than 50 feet in any direction from the veneer dryer, whichever is greater.~~]

(b) No person shall operate any veneer dryer outside a special problem area such that visible air contaminants emitted from any dryer stack or emission point exceed:

(A) A design opacity of 10%,

(B) An average operating opacity of 10%, and

(C) A maximum opacity of 20%.

Where the presence of uncombined water is the only reason for the failure to meet the above requirements, said requirements shall not apply.

[~~No person shall operate any veneer dryer such that visible air contaminants emitted therefrom exceed 10% opacity, as defined by Section 21-005(4), from any one stack. Where the presence of uncombined water is the only reason for the failure to meet this requirement, said requirement shall not apply.~~]

(c) After July 1, 1977 no person shall operate a veneer dryer located outside a special problem area unless:

(A) The owner or operator has submitted a program and time schedule for installing an emission control system which has been approved in writing by the Department as being capable of complying with Subsection 25-315(1)(b)(A), (B) and (C), or

(B) The veneer dryer is equipped with an emission control system which has been approved in writing by the Department and is capable of complying with Subsection 25-315(1)(b)(B) and (C), or

(C) The owner or operator has demonstrated and the Department has agreed in writing that the dryer is capable of being operated and is operated in continuous compliance with Subsection 25-315(1)(b)(B) and (C).

~~[After May 1, 1975 no person shall operate a veneer dryer which is not in compliance with the emission limitations of this rule or which is not subject to a compliance schedule approved by the Department and incorporated into an enforceable air contaminant discharge permit.]~~

(d) Each veneer dryer shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emissions of air contaminants are kept at the lowest practicable levels.

(e) No person shall willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission which would otherwise violate this rule.

(f) Where effective measures are not taken to minimize fugitive emissions the Department may require that the equipment or structures in which processing, handling, and storage are done be tightly closed, modified, or operated in such a way that air contaminants are minimized, controlled, or removed before discharge to the open air.

(g) The Department may require more restrictive emission limits than provided in Section 25-315(1)(b) for an individual plant upon a finding by the Commission that the individual plant is located or is proposed to be located in

a special problem area. The more restrictive emission limits for special problem areas may be established on the basis of allowable emissions expressed in opacity, pounds per hour, or total maximum daily emissions to the atmosphere, or a combination thereof.

(2) Other Emission Sources.

(a) No person shall cause to be emitted particulate matter from veneer and plywood mill sources, including, but not limited to, sanding machines, saws, presses, barkers, hogs, chippers, and other material size reduction equipment, process or space ventilation systems, and truck loading and unloading facilities in excess of a total from all sources within the plant site of one (1.0) pound per 1000 square feet of plywood or veneer production on a 3/8 inch basis of finished product equivalent.

(b) Excepted from Subsection (a) are veneer dryers, fuel burning equipment, and refuse burning equipment.

(3) Monitoring and Reporting.

The Department may require any veneer dryer facility to establish an effective program for monitoring the visible air contaminant emissions from each veneer dryer emission point. The program shall be subject to review and approval by the Department and shall consist of the following:

(a) A specified minimum frequency for performing visual opacity determinations on each veneer dryer emission point;

(b) All data obtained shall be recorded on copies of a "Veneer Dryer Visual Emissions Monitoring Form" which shall be provided by the Department of Environmental Quality or on an alternative form which is approved by the Department; and

(c) A specified period during which all records shall be maintained at the mill site for inspection by authorized representatives of the Department.

~~[Open-burning.--Upon-the-effective-date-of-these-regulations,-no-person shall-cause-or-permit-the-open-burning-of-wood-residues-or-other-refuse-in conjunction-with-the-operation-of-any-veneer-or-plywood-manufacturing-mill-and such-acts-are-hereby-prohibited.]~~

Hist: Amended 2-15-72 by DEQ 37
Amended 5-5-72 by DEQ 43(T)
Amended 9-20-72 by DEQ 48
Amended 4-9-73 by DEQ 52
Amended 1-30-75 by DEQ 83

Attachment 3
3/15/77

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

Staff Report
for
Public Hearing

March 4, 1977

Subject: Proposed Amendments to the Air Quality Regulations for the Board Products Industries (i.e., Veneer and Plywood Mills)

Introduction

This public hearing is being held for the purpose of receiving testimony relative to proposed revisions to the rules governing air contaminant emissions from veneer dryers, Oregon Administrative Rules (OAR) Chapter 340, Sections 25-305 through 25-315. Amendment of these rules would constitute amendment of the State's Clean Air Act Implementation Plan.

This public hearing was authorized by the Environmental Quality Commission at their August 27, 1976 meeting. At that time the Department presented a staff report to the Commission, including a letter of request to modify the existing veneer dryer regulation from the American Plywood Association.

A similar public hearing was previously scheduled for October 1, 1976 to consider the proposed veneer dryer rule changes. This meeting was cancelled due to Department findings that veneer dryers may significantly contribute to particulate and photochemical oxidant problems where there is a concentration of veneer dryers in densely populated areas, such as Medford.

Proposed Amendments

The proposed rules contained in this staff report are a result of the Department's re-assessment of the rules originally submitted to the Commission on August 27, 1976 and scheduled for the October 1, 1976 public hearing.

The proposed rule amendments under consideration consist of the following:

A. A modification to the veneer dryer visual emission limits.

B. An addition which specifies a veneer dryer emissions self-monitoring program.

C. A July 1, 1977 date by which all veneer dryers will either be in compliance with the emission limitations of this rule or be subject to a Department approved compliance schedule.

D. Several minor revisions, including the addition of five definitions, an update of one definition, two minor wording changes and the deletion of the open burning prohibition; the latter is undertaken because it is covered by OAR Chapter 340, Sections 23-005 through 23-020, Open Burning.

The significant rule amendment concerns the modification of the opacity limit for veneer dryer emission points (i.e., veneer dryer exhaust stacks) and makes it applicable outside special problem areas. This change would occur in Section 25-315(1)(b) where the current veneer dryer visible emission limit of 10% maximum opacity would be revised to read:

> No person shall operate any veneer dryer outside a special problem area such that visible air contaminants emitted from any dryer stack or emission point exceed:
>
> (A) A design opacity of 10%,
> (B) An average operating opacity of 10%, and
> (C) A maximum opacity of 20%.
>
> Where the presence of uncombined water is the only reason for the failure to meet the above requirements, said requirements shall not apply.

The above emission limits are essentially a simplification of the rule proposed in the August 27, 1976 staff report to the Commission.

Definition 25-315(14) specified the "special problem areas" as the formally designated Portland, Eugene-Springfield, and Medford Air Quality Maintenance Areas.

Air Quality Rules for veneer dryer emissions will be developed for special problem areas in the near future.

Two additional changes have been made to the proposed Board Products Industries Air Quality Regulations as they were submitted in the staff report to the Environmental Quality Commission on August 27, 1976. A major revision to Section 25-315(1)(c) is proposed. This section qualifies the implementation date for the opacity limits and provides criteria for operating veneer dryers outside special problem areas after July 1, 1977.

The other change is minor. In the interest of having greater flexibility in the veneer dryer emissions self-monitoring program, Section 25-315(3)(b) has been changed to:

> All data obtained shall be recorded on copies of a "Veneer Dryer Visual Emissions Monitoring Form" which shall be provided by the Department of Environmental Quality or on an alternative form which is approved by the Department;

The clause permitting the use of approved alternative forms has been added.

Discussion

The proposed opacity rule is designed to accommodate occasional visual emissions excursions above 10%, but within the 20% maximum opacity limit. In other words, if veneer dryer emissions are at or below 10% opacity, the dryer is in compliance. If the emissions exceed 20%, the dryer is in immediate violation. If a dryer operates consistently between 10% and 20% opacity, a program must be negotiated to bring the mill down to a 10% average operating capability within a reasonable time limit.

Veneer dryers do not consistently operate at a given opacity range, due to a combination of several factors. The 10% to 20% opacity range therefore accommodates these performance anomalies. If the 10% average opacity cannot be maintained, the Department would evaluate and review the emissions problem at a given mill on an individual basis.

A veneer dryer emissions self-monitoring program is proposed. It is designed to be implemented by mill personnel with the assistance of the Department. The self-monitoring program is intended to be implemented only where necessary to assure data availability for determination of compliance or non-compliance.

The proposed rule revision is not intended to allow the installation of less effective emissions control equipment than would be approved under the existing 10% maximum opacity limit.

The Department proposes to rely heavily on its statutory authority to review and approve plans and specifications for control systems prior to their installation. This is to ensure that the equipment which is installed is adequate for each individual dryer emission problem and for the ambient air quality in the area where the dryer is located. This is considered necessary to protect both the environment and the mill owner.

It is realized that demonstrating noncompliance and subsequently securing compliance with the 10% average opacity portion of the proposed rule may be somewhat burdensome to the Department. To the extent that the problems are not effectively being resolved, the Department then may need to consider revising the rule again to prevent such circumstances. However, with expected cooperation between the Department and industry, it is believed that the proposed rule will provide an effective means for achieving adequate and timely control of veneer dryer emissions.

AFB:lb
2/18/77

Attachments

1. Proposed Board Products Industries Air Quality Regulations, OAR Chapter 340, Section 25-305 through Section 25-315.

2. The Staff Report (Agenda Item No. G) without attachments for the August 27, 1976 Environmental Quality Commission meeting:

   Request for Authorization to Hold a Public Hearing on Proposed Amendments to the Air Quality Regulation for the Board Products Industries (i.e., Veneer and Plywood Mills)

Attachment 4
3/15/77

ENVIRONMENTAL QUALITY COMMISSION

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

ROBERT W. STRAUB
GOVERNOR

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. G, August 27, 1976 EQC Meeting

Request for Authorization to Hold a Public Hearing on Proposed Amendments to the Air Quality Regulation for the Board Products Industries (i.e., Veneer and Plywood Mills)

Background

The proposed rule amendment under consideration consists of the following:

A. A modification to the veneer drier visual emission limits.

B. A rule which specifies a veneer drier self-monitoring program.

C. Several minor revisions in the Board Products section of the Air Quality Regulations which will effect an update where necessary, will provide internal consistency, will eliminate duplication or will provide clarification through the use of definitions.

The significant rule amendment concerns the modification of the opacity limit for veneer drier emission points (i.e., veneer drier exhaust stacks). This change would occur in Section 25-215(1)(b) where the current veneer drier visible emission limit of 10% maximum opacity would be revised to read:

1. A maximum opacity of 20%, and

2. An average opacity of 10%; the average opacity shall be based upon a sufficient number of visual opacity determinations, accumulated over a period of time, which are representative of normal veneer drier operations and which take into account possible seasonal and temporal variations.

The 10% maximum opacity limit for veneer drier visible emissions is currently in effect. After a public hearing was held at the December 20, 1974 EQC meeting (agenda Item No. L), this rule was adopted at the January 24, 1975 EQC meeting (Agenda Item No. E).

The 10% maximum opacity regulation was adopted in lieu of a general requirement to control veneer drier emissions based on either process weight limitations, grain loading, or mass emission versus rate of production. These three requirements would require costly and time consuming particulate emissions source tests. The Department concluded that visible emissions would constitute a sufficient control requirement. Pursuant to this, the 10% maximum opacity requirement was proposed and then adopted.

It should be noted that the adoption of a visible emission standard does not preempt the Department from requiring particulate emission source testing to determine the type, quality and quantity of emissions. Particulate emission source testing is beneficial in the evaluation of veneer drier emissions control equipment, especially for the application of new technology.

The pertinent attachments appear at the end of this report. Attachment I is an outline of the proposed Air Quality Rule changes, while Attachment 2 is the proposed Air Quality Regulations for the Board Products Industries (Veneer and Plywood Manufacturing). Attachment 3 is the current Air Quality Regulations for the Board Products Industries. Attachment 6 is a letter from Mr. W. D. Page of the American Plywood Association, which requests a public hearing before the Environmental Quality Commission for the purpose of revising the Air Quality Regulations for the Board Products Industries. Attachment 4 is the "DEQ Guidelines for Establishing a Self-Monitoring Program for Veneer Drier Visible Emissions and Attachment 5 is a list of systems and strategies for controlling veneer drier visible emissions.

Discussion

In the manufacture of plywood, green veneer is passed through a drier where the moisture content of the wood is reduced to below 10%. The heat which is supplied to vaporize the moisture in the veneer also vaporizes a fraction of the volatile organic compounds in the wood. When the exhaust gas stream from the driers comes in contact with the cooler atmosphere, part of the organic fraction condenses to form tiny droplets (0.1 to 10 μ in diameter).

Due to their small size these droplets remain suspended in the atmosphere for a long time. This factor plus the fact that the droplets both absorb and scatter light, results in diminished visibility when they are present. Hence the characteristic "blue haze" that is often visible over active veneer mills.

Typically a veneer drier has two to four stacks and there usually are two to three driers per mill. Stack height varies, but stacks generally extend about five to eight feet above the roof. The low stack height usually results in poor mixing with the atmosphere.

Due to the many emission points (i.e., stacks) and their proximity to the ground, as well as the light scattering phenomenon of the droplets, veneer drier emissions are often conspicuous. This problem has become to be regarded as primarily a case of aesthetic or psychological pollution.

No human health problems have been reported to be associated with these organi emissions as they occur in the ambient air. Little research has been done in this area.

Since 1969, veneer and plywood manufacturers as well as equipment vendors have worked to develop technology and equipment to control veneer drier visible emissions. Several systems did not progress beyond the pilot plant development stage due to various difficulties encountered. Initial developmental work with other control systems proved more successful. Several of these systems have been scaled-up to production capacity units and were made operational within the past year. Performance and operational data on these production-scale units is being accumulated by the manufacturers and the users. A list of the control systems and strategies which the Department feels are successful in controlling veneer drier emissions appears in Attachment 5.

The Department intends to acquire additional particulate removal data for the various control devices and systems. It is considered important that control systems approved for installations in areas exceeding or close to exceeding particulate standards be compatible with maintenance plans that may be required for the area to meet Federal/State ambient air standards.

Observations by users and Departmental representatives indicate that several of the control systems in use do not always perform within the 10% maximum opacity limit. The exact cause for the performance fluctuations is not known, but several factors are thought to contribute to the problem. To an extent, the weather is a parameter. In the summertime when it is hot, dry, cloudless and with intense sunshine, veneer drier emissions are at their worst. Condensate plumes dissipate more rapidly and the intensity of the sunshine apparently amplifies the visible emissions problem.

Other factors contribute to levels of visible emissions from the drier stacks. Some of these are the type, age and condition of the drier itself, the species of veneer dried and the drier temperature. A visible emissions control system, whether it operates on just one stack, several stacks of the same drier or on stacks from several different driers, must contend with these variations.

Added to this, of course, is any variability in the performance of the control systems themselves.

The Department agrees with the plywood industry that the above factors justify a rule revision to accommodate the situation when veneer drier visible emissions may not be able to assure control below the 10% maximum opacity limit. These excursions above 10% opacity are proposed to be accommodated by a 10% average opacity limit qualified by a 20% maximum opacity. Furthermore, the average opacity of 10% is proposed to be based upon a sufficient number of visual opacity determinations accumulated over a period of time which are representative of normal veneer drier operations and which take into account possible seasonal and temporal variations.

The air quality in the vicinity of veneer mills should not be impaired significantly as the 10% average opacity limit will be of the same order of magnitude as the 10% maximum opacity limit. This means that essentially the same degree of control will have to be employed. The major difference is that allowance is being made for the variability in the drier systems, in the materials that are dried, the control equipment and in the weather.

Equipment vendors have been reluctant to guarantee compliance with the 10% opacity limit at all times and under all conditions. In turn, mill owners have been reluctant to commit themselves to costly control expenditures, especially if there is a possibility that the control equipment will not achieve continuous compliance. These concerns have caused delays in controlling veneer drier emissions. The proposed regulation modifications are designed, in part, to alleviate these concerns and thereby provide impetus to the Departmental control program.

The proposed self-monitoring program for veneer drier visible emissions (Section 25-315(3)) is designed to make mill operators aware of the degree and extent of the opacity problem. The program is intended to be an integral part of the veneer drier emissions control program. Only when the mill operators are fully aware of the problem will there be common ground for achieving corrective action.

The self-monitoring program is designed to be flexible. Each DEQ Regional Office will be responsible for negotiating a self-monitoring program with the mills in its territory on an individual basis. For those mills not yet documented as being in compliance or where a question about compliance exists the self-monitoring program will be more rigorous and intensive. Casual opacity readings would be permitted in the case where the mill is on an approved compliance schedule or where new control equipment is being installed.

OAR Chapter 340, Section 25-315(1)(a) addresses the "blue haze" problem at veneer drier facilities. This section states the objective which is to control veneer drier visible emissions so as to eliminate the "blue haze". The latter part of this section places distance restrictions beyond which the "blue haze" should not be visible.

It has been argued that the objective of eliminating "blue haze," especially within the distance limitations, is confusing with regard to the opacity limits (i.e., 10% average opacity, 20% maximum opacity) set forth in subsequent section 25-135(1)(b). An occasional wisp of "blue haze" might "extend beyond the exterior wall of the building housing a veneer drier or at any point further than 50 feet in any direction from the veneer drier, whichever is greater." This would be a contradiction to the objective stated in Section 25-315(1)(a).

In order to clarify Section 25-315(1)(a) and emphasize that it is the objective of the Department to eliminate "blue haze" from veneer drier emissions, it is proposed that the distance restrictions be deleted from this section.

Finally, when the Board Products Regulations were first proposed, restrictions on open burning were included. These restrictions are also addressed in other parts of the Air Quality Regulations, specifically OAR Chapter 340, Sections 23-005 to 23-020, Open Burning. As they are effectively dealt with in these sections, it is proposed to delete the prohibition in the Board Products Sections, 25-315(3), 25-320(4) and 25-325(5).

Summary and Conclusions

1. Due to their physical and chemical makeup, veneer drier emissions pose an opacity problem which is very difficult to control.

2. A 10% maximum opacity limit rule for veneer drier emissions was recommended for adoption by the EQC in January, 1975.

3. Control technology has been applied to veneer drier emissions; several production-scale control units have gone into operation during the past year.

4. Due to variations in the weather, in the operation of the veneer driers and perhaps to fluctuations in the performance of the control units themselves, some control units cannot always satisfy the 10% maximum opacity limit; there are excursions above 10% opacity, but within 20%.

5. Air quality conditions will not be significantly impaired by a change from 10% maximum opacity to 10% average and 20% maximum.

6. Control systems approved for installations in areas exceeding or close to exceeding particulate standards will have to be compatible with maintenance plans that may be required for the area to meet Federal/State ambient air standards.

7. Self-monitoring is conceived as an integral part of the veneer drier emission control program; it is designed to make mill operators aware of the extent of the veneer drier emissions opacity problem.

8. As a Department objective, it is not necessary for the control of the "blue haze" rule to contain distance limitations.

9. As the main body of the Open Burning Regulations is contained in OAR Chapter 340, Sections 23-005 through 23-020, it is not necessary to have open burning restrictions as part of the Board Products Industries Air Quality Rules.

Director's Recommendation

The Director recommends that the Environmental Quality Commission:

1. Hear public testimony concerning the proposed amendments to the Board Products Industries Air Quality Regulations, specifically those related to the opacity regulation on veneer drier operations; and

2. Take appropriate action on the regulation after giving consideration to the testimony received.

LOREN KRAMER
Director

AFB:cs
8/17/76

Attachments

1. Hearing Officer's Report on March 4, 1977 Public Hearing

2. Proposed Board Products Industries Air Quality Regulations, OAR, Chapter 340, Section 25-305 through Section 25-315.

3. Staff Report for Public Hearing on March 4, 1977 without attachments:

   Proposed Amendments to the Air Quality Regulations for the Board Products Industries (i.e. Veneer and Plywood Mills)

4. The Staff Report (Agenda Item No. G) without attachments for the August 27, 1976 Environmental Quality Commission meeting:

   Request for Authorization to Hold a Public Hearing on Proposed Amendments to the Air Quality Regulations for the Board Products Industries (i.e., Veneer and Plywood Mills)

Attachment 1
3/15/77

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

MEMORANDUM

TO: Environmental Quality Commission

FROM: Hearing Officer

SUBJECT: Hearing Report: March 4, 1977 hearing on proposed amendments to regulations governing emissions from veneer dryers (OAR 340-25-305 through 25-315)

Summary of Procedure

Commencing at 10:00 a.m. on Friday, March 4, 1977 in Room 602 of the Multnomah County Courthouse in Portland, Oregon, the hearing was held pursuant to Notice in the February 1, 1977 OAR Bulletin and as mailed to those on the Department's regular mailing lists for notice of rule-making hearings for air quality rules. Approximately 35 persons were in attendance. Testimony was offered by five persons. Testimony was received through the mails from two additional persons.

Summary of Testimony

C. R. Kalahan, representing the American Plywood Association (copy attached):

Mr. Kalahan reminded that in 1969 studies were commenced by the APA (in liaison with the DEQ and other pollution control agencies) to determine the nature of the veneer dryer emission problem and its solution. The result of such studies was both reported to have shown that the problem was one of visibility only and reported to have remained unchallenged by new information.

It was added that Washington State University had discounted veneer dryer emissions as a significant component of the oxidant problem.

General agreement that logical, methodical progress toward control technology was taking place was said to have resulted from an industry-agency meeting in 1970.

Of about 25 control devices tried, many of the most promising were said to remain experimental.

Citing the history of the present rule, Mr. Kalahan stated industry's position that it is too restrictive and reported puzzlement at Oregon's unique imposition of a standard stricter than that imposed on other industries.

Support was given to the proposed relaxation outside special problem areas and caution was urged in the development of stricter standards for problem areas.

The DEQ was both invited to involve itself in planned APA research regarding the contribution of veneer dryers to the oxidant problem and urged to impose no further restrictions unless factual data show their need.

The system of self-monitoring in the proposal met with Mr. Kalahan's approval.

The Department was urged to join with the industry in proceeding toward such progress in control technology as would bring dryers outside problem areas into compliance.

Michael Fitzgerald, Chairman, Curry County Board of Commissioners:

Commissioner Fitzgerald reported that industry in Curry County had given his Board information indicating the expenditure of some 910,000 dollars on unnecessary construction designed to meet inappropriately stringent regulations of DEQ, EPA, and (primarily) OSHA.

Commissioner Fitzgerald inquired as to how the present rule proposal came about and what information lead to the conclusion that there was a problem in need of regulation. He was aware that the present proposal was one of relaxation but remained curious as to the genesis of regulatory activities such as this one.[1]

Commission Fitzgerald was concerned about the possibility that regulation with regard to veneer dryers might be unsupported by adequate factual data as had reportedly occurred in the area of field burning regulation.

Commissioner Fitzgerald was curious to know if he misunderstood the problem in some way or was in need of more information before acting on the problem.

[1]Mr. Skirvin briefly recounted the rule's reasons and history and Commissioner Fitzgerald was promised additional materials by mail.

Gary Grimes, SWF Plywood Company (copy attached) stated the size of SWF operations in Oregon (owns 17 dryers, operates 16, produces 640 million annual board feet, and employs 1300 persons). Mr. Grimes did not oppose the 20% maximum-10% average opacity proposal but cautioned that SWF, due to admirable emission reduction efforts, combined with energy conservation and solid waste abatement efforts made with the sanction of the Department, would have special needs in bringing "hybrid" systems into compliance. SWF was reported to support the rule only in so far as the Department was willing to exercise flexibility and work with SWF toward reaching environmentally sound, energy conserving compliance by solving unique problems which could not yet be met by "off the shelf" technology.

Mr. Grimes warned of the possibility (as related by the academic sector) that the use of fume incineration or other comtemplated control strategies should await further study (particularly the hydrocarbon-NO_x ratio) lest a premature strategy should aggravate the oxidant problem.

Finally, caution was urged in the adoption of any future standards for problem areas.

In response to inquiry Mr. Grimes added that his company would need more stringent controls to deal with its combined emissions problems and did not (despite energy conservation) expect to gain an economic edge on the general industry through its control strategy.

Linn Newberry, representing the Medford Corporation: Mr. Newberry stated his company to be neither for nor against the Department's proposal.

The primary concern of Medford Corporation was that the staff was reportedly contemplating designation of the Grants Pass area as a special problem area. In such event, Mr. Newberry reported, Medford Corporation would have to immediately seek a variance for its Grants Pass plant.

Due to the unknown requirements of the special control strategy and the antiquated nature of the Grants Pass plant, it was reported, the Company should not be expected to comply with new requirements at present.

Wallace Cory, representing the American Plywood Association Technical Committee on Veneer Dryer Emissions:

Mr. Cory reported his Committee's work with the staff in developing the present proposal and his Committee's support for the proposal.

Donald Dubois, Regional Administrator, EPA Region X (mailed comment, copy attached):

Mr. Dubois evaluated the proposal as calling for "reasonably available technology" and supported its inclusion in the State Implementation Plan.

The language in Section 25-315 relating to plants "outside special problem areas" was questioned because it might imply lesser controls inside such areas.

"The Department shall require equal or more restrictive emission limits..." was language suggested for 25-315(1)(G).

Finally, it was suggested that an averaging period be added to determine the 10% average opacity requirement.

Henry A. Dotter, Jr., representing Roseburg Lumber Company (copy attached):

Mr. Dotter reported his company unable to meet a 10% maximum but able to meet a 20% maximum-10% average if the averaging were done over a period of time representative of the varying conditions encountered in a drying program.

Mr. Dotter recounted the history of his company in spending $3,500,000 to convert to low temperature dryers only to find that additional equipment would be necessary. He reported a system working well at the Green plant and soon to be duplicated at the Dillard and Riddle operations.

Finally, Mr. Dotter agreed that self-monitoring was logical and urged that companies be permitted to train their own plume readers in localized classes where such proved more economical than hiring outside readers.

Recommendations

Your hearing officer makes no recommendation in this matter.

Respectfully submitted,

Peter W. McSwain

Peter W. McSwain
Hearing Officer

PWM:eve

cc: E. J. Weathersbee
Fritz Skirvin

Attachment 1
3/15/77

PROPOSED INDUSTRY STATEMENT
AT
PUBLIC HEARING BEFORE OREGON'S EQC
MARCH 4, 1977

It was February 20, 1969, more than eight years ago, that the APA Board of Trustees made staff and industry committee assignments to aggressively pursue the veneer dryer emission problem - determine the nature of the problem and identify the solution. Shortly thereafter, liaison was established with the Air Pollution Control agencies in the Northwest including Oregon's DEQ. Before the end of 1969, the industry had launched a research project to analyze the nature of the emissions and make preliminary recommendations on approaches to control.

About a year later the research work was complete. Because of the relatively small quantity of hydrocarbons emitted from veneer dryers and an apparent very low order of toxicity, it was deemed that no further research was indicated at that time. The problem was recognized by both regulatory agency and industry to be only one of visibility since there was no indication that any hazard to health was involved. Nothing has been learned since that time to change this evaluation. It is perhaps significant that in its report, Washington State University also considered the contribution of dryer emissions to the oxidant problem and concluded that the contribution was not significant.

At a joint meeting of the Agencies and the industry committee held on October 26, 1970, emphasis was placed on the need for pilot tests of possible control devices. The meeting report indicates that there was general agreement that the industry was proceeding in a logical, methodical manner by first determining the nature of the emissions and then testing various potentially successful methods of control.

To date, about 25 different control devices have been tried, most of them on a scale capable of handling at least one complete stack. Some devices are indeed promising but some of the most promising are still considered experimental.

However, we believe there is a reasonable possibility of meeting a 20% maximum opacity with an average of 10%. To press the technology in an attempt to meet a more stringent regulation has no sound basis at this time.

The development of the veneer dryer regulation in Oregon has been a puzzle to the industry. No other state has felt it needful to promulgate a special regulation for veneer dryers - depending rather on a general regulation covering all industry to control the problem.

Nevertheless, we have tried to cooperate fully with Oregon in the development of a suitable regulation. The first regulation was adopted

on January 24, 1972, setting 20% opacity not to exceed three minutes per hour for existing dryers and 10% opacity for new dryers. Late in 1972, the DEQ staff proposed a revision which would have added a mass emission limitation. This was reported to be an effort to provide a more objective and quantitative means of controlling visible emissions. However, prior to the public hearing, the industry presented evidence demonstrating that there was not adequate correlation between opacity and mass emissions to make this approach workable. The public hearing draft dropped the mass emission requirement and inserted instead a requirement of zero opacity 50 feet from the dryer. It was recognized that technology did not then exist to meet zero opacity but with final compliance two years away, it was argued that we should press for that as a goal. So the regulation was revised to require zero opacity. As December 31, 1974 approached, it was obvious that in spite of strong industry effort, the technology would not be ready. In March 1974, the industry requested a review and after substantial discussion, a public hearing was finally scheduled for December 20, only 10 days before the final compliance date.

Then on January 24, 1975, the EQC approved a revision to the regulation setting required opacity at a maximum of 10%, a level still considered by industry as too restrictive for available technology and unnecessarily strict in the light of the nature of the problem.

Over the past two years, numerous meetings were held with the DEQ staff in attempting to reach a required opacity level which would be acceptable to both DEQ and industry.

A public hearing scheduled for October 1, 1976, to consider revisions which we had agreed to support was suddenly cancelled a few days before the hearing. It was reported that new data had caused DEQ staff concern regarding the adequacy of the proposed standard to deal with air quality problems in Air Quality Maintenance Areas. We did not share that concern and were somewhat dismayed at the cancellation. However, be that as it may, we come today to consider revisions which would make the regulation apply only to dryers located outside AQMA's, and such special problem areas.

It is our understanding that the DEQ staff is continuing to study the AQMA problem and that if veneer dryer emissions prove to be a significant contributor to particulate or oxidant problems in these areas, it may be necessary to set more restrictive limits on dryers located in AQMA's. We know the DEQ is operating under some stringent Federally imposed time constraints but we urge you to not take premature action. Data available is skimpy but what we have seen seems to support the conclusion that veneer dryers are not a major contributor to oxidant or particulate problems in AQMA's. We are planning to conduct research aimed at establishing the degree of contribution of veneer dryers and will welcome

DEQ involvement in this study. But let's not put additional restrictions on veneer dryers in AQMA's unless there is reasonable factual data showing it will significantly help to solve the problem.

In the meantime we think it is extremely important that we get on with the job of getting veneer dryers located outside AQMA's under control and in compliance with a reasonable regulation. Control technology is in its infancy and much needs to be done but the industry believes that a regulation establishing a maximum opacity of 20% with an average opacity of 10% is one that gives DEQ an adequate tool to control a visible problem while at the same time providing industry a regulation it has a reasonable chance of meeting. We are also agreeable to the proposed system of self monitoring.

We urge the Environmental Quality Commission to adopt the proposed revision as set forth in the staff report which documents the need for this hearing. It is time we quit talking and get on with the job at hand.

MARCH 4, 1977

Attachment 1 3/15/77

HEARINGS OFFICER
DEPARTMENT OF ENVIRONMENTAL QUALITY
1234 S.W. MORRISON STREET
PORTLAND, OREGON 97205

TESTIMONY RE: PROPOSED REVISIONS TO VENEER DRYER REGULATIONS
OAR CHAPTER 340, SECTION 25-305 THROUGH 25-315

SWF PLYWOOD COMPANY, A SUBSIDIARY OF SOUTHWEST FOREST INDUSTRIES, APPRECIATES THIS OPPORTUNITY TO ENTER INTO THE PUBLIC HEARING RECORD OUR COMMENTS ON THE PROPOSED AMENDMENTS TO THE AIR QUALITY REGULATIONS FOR THE BOARD PRODUCTS INDUSTRIES. WE WOULD LIKE TO THANK THE DEPARTMENT FOR THE HEARING NOTIFICATIONS AND TIME SPENT BY STAFF IN DISCUSSIONS OF THIS RULE CHANGE PROPOSAL WITH US.

SWF PLYWOOD COMPANY OWNS 17 AND OPERATES 16 VENEER DRYERS AT 7 MANUFACTURING LOCATIONS IN OREGON. OUR ANNUAL PRODUCTION CAPACITY REACHES 640 MILLION SQUARE FEET (3/8" BASIS) OF FINISHED PLYWOOD. TOTAL OREGON EMPLOYMENT EXCLUSIVE OF LOGGING OPERATIONS EXCEEDS 1300 PERSONS AT NEAR CAPACITY PRODUCTION RATES.

THE PURPOSE OF OUR TESTIMONY TODAY IS NOT TO OPPOSE THE PROPOSED 20% MAXIMUM - 10% AVERAGE OPACITY RULE STANDARD FOR VENEER DRYERS CONSISTENT WITH THE OBJECTIVE OF "BLUE HAZE" REDUCTION. WE WOULD, HOWEVER, LIKE TO USE THIS OPPORTUNITY TO ENTER INTO THE RECORD SPECIFIC PROBLEMS AND CONCERNS RELATED TO OUR ATTAINMENT OF THAT STANDARD. HOPEFULLY, WE CAN DEVELOP THE FOUNDATION FOR MORE KNOWLEDGEABLE AND BENEFICIAL DISCUSSIONS WITH STAFF OVER THE IMPLEMENTATION OF THE GENERAL RULE AS IT MAY APPLY TO A "HYBRID" SITUATION.

TESTIMONY RE: PROPOSED REVISIONS TO VENEER DRYER REGULATIONS
OAR CHAPTER 340, SECTION 25-305 THROUGH 25-315

IN 1972, OUR COMPANY ENTERED INTO AN AGRESSIVE CAPITAL EXPENDITURE PROGRAM TO UTILIZE THE WOOD WASTES GENERATED IN THE PLYWOOD PRODUCTION PROCESSES FOR SUPPLYING HEAT FROM WOOD BURNER EXHAUST GASES DIRECTLY TO VENEER DRYERS AT THOSE LOCATIONS WHERE THE LAY-UP PLANT WAS AN ISOLATED FACILITY. AT THAT TIME, THIS WAS AN ADMIRABLE VENTURE:

1) SOLID WASTE WAS ELIMINATED AND AIR QUALITY ENHANCED WITH THE SHUTDOWN OF WIGWAM BURNERS AS THE SYSTEMS USED ALL WOOD WASTE RESIDUES INCLUDING THE TROUBLESOME AND DIFFICULT TO HANDLE SANDER DUST (OVER 1/2 MILLION DOLLARS WAS SPENT JUST TO "BAG-HOUSE" THESE WOOD WASTE PROCESSING SYSTEMS IN THE INTEREST OF AIR QUALITY).

2) THE INDUSTRIAL DEMAND FOR NATURAL GAS AND PROPANE WAS REDUCED BY THE HEAT VALUE OF THE WOOD FUEL (170 CUBIC FEET OF NATURAL GAS EQUIVALENCE TO ONE TON OF WOOD FUEL OR SOME 8,600,000 CUBIC FEET OF NATURAL GAS EQUIVALENTS PER YEAR FOR ALL UNITS).

INCORPORATED INTO EACH UNIT WAS A DRYER EMISSION PARTIAL RETURN SYSTEM TO THE BURNER FOR BLUE HAZE REDUCTION. BY EARLY 1975 WE HAD (WITH DEPARTMENT SANCTION) CONVERTED 10 OF OUR DRYERS TO THIS TYPE OF HEAT SUPPLY SYSTEM AND WERE BEGINNING TO DEVELOP A MORE EDUCATED AWARENESS OVER THE IMPACT OF THE VENEER DRYER EMISSION STANDARDS IN EFFECT AND SUBSEQUENT PROPOSED CHANGES TO THEM.

TESTIMONY RE: PROPOSED REVISIONS TO VENEER DRYER REGULATIONS
OAR CHAPTER 340, SECTION 25-305 THROUGH 25-315

SOURCE TESTS ON BOTH OUR BURNER TYPES (ENERGEX AND MILL CONVERSION UNITS) IN 1976 ENABLED US TO DEFINE AND CHARACTERIZE AN EMISSIONS FROM THE VENEER DRYER STACKS QUITE UNLIKE THE GENERAL VENEER DRYER TYPES (BLUE HAZE OR CONDENSABLE HYDROCARBON) THE EXISTING AND PROPOSED RULE ADDRESS. UNDERSTAND THAT THE DRYER STACK ALSO SERVES AS THE BURNER STACK--TWO SOURCES COMBINED. THE LARGEST PERCENTAGE OF OUR OPACITY PROBLEM WAS FOUND TO BE A SUB-MICRON SODIUM PARTICLE FORMED IN THE COMBUSTION OF PLY-TRIM THAT CARRIED THROUGH TO THE DRYER STACK. THEREFORE, IN ORDER TO ACHIEVE COMPLIANCE WITH OPACITY LIMITS WE WERE DIRECTED TOWARDS SYSTEMS CAPABLE OF HANDLING BOTH THE SODIUM PARTICLE AND THE REMAINING CONDENSABLE HYDROCARBONS AND AT A MINIMUM OF TERTIARY ENVIRON-MENTAL IMPACT - (SECONDARY IMPACT BEING THE UNFORESEEN CONDITION CREATED BY USING THE SOLID WASTE FOR FUEL). THE SYSTEMS EVALUATED BY THE DEPARTMENT AS BEING HIGHEST AND BEST TREATMENT AND CONTROL AVAILABLE FOR VENEER DRYER STACKS WILL NOT HANDLE OUR EMISSIONS.

IT APPEARS THAT CONTROL DEVICES ON THESE WOOD FIRED SYSTEMS MAY REQUIRE SIGNIFICANT QUANTITIES OF WATER (WHICH AT ONE RURALLY LOCATED PLANT SERVED BY LOW VOLUME WELL CREATES A REAL PROBLEM AND ANY NECESSITY TO DISPOSE OF THE SODIUM CONTAMINATED WATER COULD JEOPARDIZE THE PLANT'S "NO DISCHARGE" STATUS). THE POTENTIAL ENERGY REQUIREMENTS ARE A REAL AND PRESSING CONCERN PARTICULARLY IN THIS YEAR OF FORECASTED POWER SHORTAGES AND INDUSTRIAL CURTAIL-MENTS. WHEREAS WE CANNOT " REACH ON THE SHELF", IT IS FELT IMPOR-TANT THAT THE DEQ MAINTAIN THE FLEXIBILITY DURING IMPLEMENTATION OF THE RULE TO ACCEPT COMPLIANCE SCHEDULES ON THESE SYSTEMS THAT DO

NOT FORCE PREMATURE DECISIONS ON COMPLIANCE STRATEGIES. A WELL ENGINEERED, ECONOMICALLY SOUND AND ENVIRONMENTALLY SATISFACTORY SOLUTION TO THIS PARTICULAR EMISSIONS PROBLEM WILL ADD TO INCREASED ACCEPTANCE OF THESE UNIT TYPES BRINGING CONSIDERABLE RELIEF TO NATURAL GAS AND PROPANE USERS. LACKING SUCH A PROGRAM, THE RESULTANT WOULD BE AN ECONOMIC HARDSHIP OF CATASTROPHIC PROPORTION TO SWF.

WHILE WE FEEL THAT OUR PARTICULAR SITUATION IS NOT SPECIFICALLY ADDRESSED BY EITHER THE EXISTING OR PROPOSED RULE, WE FEEL THAT IT CAN BE HANDLED UNDER THE PROPOSED RULE IF COMMON SENSE AND FEEXIBILITY PREVAIL. GIVEN THE STATED BENEFITS OF THE AFOREMENTIONED "HYBRID" SYSTEMS TO THE ENERGY AND SOLID WASTE PROBLEMS, IT WOULD BE UNFORTUNATE TO ELIMINATE THEIR CONTINUED USE AND CONTRIBUTION DUE TO EITHER OVERSIGHT OR LACK OF CONSIDERATION IN APPLICATION OF THE RULE. BE ASSURED THAT IN THAT EVENT, WE WOULD REQUEST FURTHER AUDIENCE WITH THE ENVIRONMENTAL QUALITY COMMISSION.

FOR THAT PART OF THE STATE NOT COVERED BY THIS RULE (THE FORMALLY DESIGNATED AQMA'S), WE WOULD STRESS CAUTION BE USED IN THE DEVELOPMENT OF ALTERNATE CONTROL STRATEGIES PARTICULARLY RELATED TO THE OXIDANT ISSUE. IT HAS COME TO OUR ATTENTION VIA THE ACADEMIC SECTOR THAT UNLESS THE OXIDANT PROBLEM IS CLEARLY DEFINED, PARTICULARLY THE HYDROCARBON TO NO_x RATIO, A PREMATURE CALLING OF CONTROL STRATEGY (SUCH AS THE DEPARTMENTS STATED ACCEPTANCE OF FUME INCINERATION FOR THE MEDFORD AREA) MAY LEAD TO AGGRAVATION OF THE OXIDANT PROBLEM. THE INDUSTRY WISHES TO WORK IN CONCERT WITH THE DEPARTMENT TO PREVENT SUCH AN UNFORTUNATE AND EMBARRASSING EXPERIENCE FROM HAPPENING.

TESTIMONY RE: PROPOSED REVISIONS TO VENEER DRYER REGULATIONS
OAR CHAPTER 340, SECTION 25-305 THROUGH 25-315

IN CONCLUSION, GIVEN THE DEQ STAFF'S POSITION STATED IN THEIR REPORT AND THE INDUSTRY'S POSITION DEVELOPED FOLLOWING SEVERAL YEARS OF EXPERIMENTATION AND EVALUATION OF BLUE HAZE CONTROL FEASIBILITY, WE URGE ADOPTION OF THE RULE BEING CONSIDERED TODAY AND THAT CAUTION BE EXERCISED IN FURTHER RULE DEVELOPMENTS FOR AQMA'S.

RESPECTFULLY SUBMITTED,

GARY L. GRIMES
Coordinator of Environmental Programs

SWF PLYWOOD COMPANY
P. O. BOX 820
MEDFORD, OREGON 97501

Attachment 1 3/15/77

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAR 8 1977
AIR QUALITY CONTROL

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAR 7 1977
OFFICE OF THE DIRECTOR

REPLY TO ATTN OF: M/S 625

MAR 3 1977

Mr. William H. Young, Director
State of Oregon
Department of Environmental Quality
1234 SW Morrison Street
Portland, Oregon 97205

Dear Mr. Young:

EPA Region X would like to offer for your consideration the following comments on the proposed revisions to the State of Oregon's rules governing air contaminant emissions from veneer driers scheduled for public hearing on March 4, 1977. We feel the emission limits required by the regulation represent "reasonably available control technology" and support the inclusion of this regulation in the State Implementation Plan. Our other comments relate to specific sections of the regulation.

1. As written, Section 25-315(1)(b) of the regulation establishes emission limitations for sources located outside of "special problem areas." In addition, Section 25-315(1)(g) states that "The Department may require more restrictive emission limits than provided in Section 25-315(1)(b) for an individual plant upon a finding by the Commission that the individual plant is located or is proposed to be located in a special problem area." However, it is unclear whether the emission limits of Section 25-315(1)(b) apply to sources located within special problem areas if the Department does not require more restrictive limits. We suggest that Section 25-315(1)(g) be amended to read, "The Department shall require equal or more restrictive emission limits...."

2. Section 25-315(1)(b)(B) requires that visible air contaminants from any dryer stack or emission point not exceed an average operating opacity of 10 percent but no averaging period is given. We feel there may be some difficulty in implementing this provision of the regulation unless the averaging period is specified.

We hope these comments will be taken into consideration in the Commission's deliberations on the proposed revisions to the regulation.

Sincerely yours,

Donald P. Dubois
Regional Administrator

cc: N. Edmisten

ROSEBURG LUMBER CO.

Reply to: P. O. Box 218
Coquille, Oregon 97423
Phone: 396-2131

P.O. BOX 1088 · ROSEBURG, OREGON 97470 PHONE (503) 679-8741

February 23, 1977

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

Attn: Mr. Fredric Skirvin

Re: Public Hearing 4-1-77
Proposed Revisions to
Air Quality Rules.

Dear Mr. Skirvin:

The Roseburg Lumber Company has experimented extensively and has spent a great deal of money to meet the opacity standards of the State of Oregon and at this time does not feel that it will be able at all times, under all conditions to meet the maximum 10% opacity standard. We do feel that we can live within the 20% maximum opacity and the 10% average opacity levels if based, as proposed, upon a number of visual tests spread out over a period of time sufficiently long to embrace all the conditions encountered in a drying program.

The Roseburg Lumber Company started work on veneer dryer emission control approximately five years ago with its' original decision to convert all of its' dryers to the low-temperature drying principle. It has since that time converted the majority of its' dryers and has added an additional two dryers in order to establish this basic low-temperature concept and still maintain its' historic production pattern. This method of meeting the opacity standards, after conversion and new dryer costs in excess of $3,500,000.00, has proven to be problematical due to engineering difficulties and associated dryer production losses. With this the situation, the Roseburg Lumber Company has taken another, more economically feasible route toward achieving the necessary opacity goal, one that utilizes a minimum air intake approach, supported by a Burley scrubber-condenser system.

In experimenting with low-temperature converted dryers we found that it was possible to stay below 10% opacity under normal conditions but under certain climatical, atmospheric, and operating conditions it became impossible to achieve the 10% opacity level on a continuous basis.

The minimum air intake system coupled with a five stage Burley scrubber unit appears to be our answer to the emission problems if we are to retain an economical dryer production level. The system here mentioned is now in use in our Green (#3) Plywood Plant with an additional unit being installed in both our Dillard and Riddle operations. Here again the dryer normally operates below the 10% opacity level by a good margin; however, a mechanical or cleaning problem coupled with the conditions noted above, elevate the emission level above the 10% opacity, but not above the 20% level.

As before stated, based on experimentation that has been done by the Roseburg Lumber Company both in the area of low-temperature and minimum air intake-scrubber concepts, it would appear that a consistent, under 10% opacity is impossible under the varied conditions of use which are forced upon us throughout a yearly use cycle.

In-so-far as a self-monitoring program is concerned, it would seem to be the logical way to go. It would appear that a company should be allowed to evaluate the cost difference between utilization of an association plume reader and the training of one's own plume reader through possibly areaized courses, and take the route which is least expensive.

We are grateful for an opportunity to tender our thoughts on these matters. Thank you.

Sincerely yours,

ROSEBURG LUMBER COMPANY

Henry A. Dotter, Jr.
Environmental Systems Officer

HAD:rh

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item F, April 1, 1977, EQC Meeting

City of Hammond - Notice of Opportunity to Appear and Show Cause

Since 1967, the City of Hammond has been requested by the Department of Environmental Quality to provide a sewage collection system and related treatment facilities. For one reason or another, including the delay associated with the Clatsop Plains Study, improvements have not been made and federal standards require that secondary treatment be provided for all waste discharges by July 1, 1977.

Background:

1. The City presenty has under its jurisdiction, operation, and control three separate raw sewage collection lines which discharge untreated sanitary wastes into the Columbia River. These lines serve residential and commercial needs of approximately 17,000 gallons/day, and constitute an unpermitted discharge of waste water to the waters of the State.

2. Those structures not connected to the outfalls are served by septic tank and drainfield systems. Malfunctions are frequent over the entire Hammond area and the Clatsop County sanitarians have documented problems essentially everywhere there is development.

3. A soil evaluation of the area conducted in January, 1977 by our Department (Appendix A) shows that approximately 80% of the undeveloped platted streets within the city limits would not be approved for future development due to poorly drained soils and high groundwaters. Additionally, the Clatsop County sanitarians have disapproved all requests for new construction permits for at least the past three years, except for the elevated dune areas on the extreme western edge of town.

4. The City is contemplating some future growth, as evidenced by the many undeveloped platted streets, plus recent actions to approve two new subdivisions totaling 143 lots within the city limits.

5. A master sewerage plan has been developed by the engineering firm of CH_2M/Hill (Clatsop Plains Sewerage Study, March 1975), which provides for a sanitary sewage collection system for Hammond with all their sewage flows disposed of in the municipal system available at the City of Warrenton. Robert E. Meyers and Associates are expanding on this by completing a facility plan study for the City of Hammond.

Conclusions:

1. The three raw sewage discharges to the Columbia River, plus frequent septic tank malfunctions, are creating a potential public health problem.

2. Continued discharge of effluent from the three raw sewage discharges after July 1, 1977 will be in violation of Public Law 92-500, as well as Oregon Water Quality Standards.

3. Subsurface sewage disposal is not a viable means for the City of Hammond to dispose of their sanitary wastes. Coupled with the existing failure rate and adverse soil and groundwater conditions, future development and/or improvements are not feasible.

Director's Recommendations:

1. Unless the City can show cause otherwise, they should be ordered by the Commission to submit an adopted facility plan report and a Step II design grant application by May 31, 1977.

2. Within nine months of award of the Step II grant, submit final engineering plans and specifications and a Step III construction grant application.

3. Within twelve months of award of a Step III grant, complete construction, place facilities into operation, and eliminate raw sewage discharges and septic tank usage within the City.

4. If the Commission decides that an enforcement order is needed, it is recommended the Commission fill in the appropriate dates and subscribe the attached enforcement order (Appendix B).

William H. Young

WILLIAM H. YOUNG
Director

RHF:vt
Attachments
3/21/77

APPENDIX A

TO: Russ Fetrow, Manager, Salem-North Coast Region

FROM: Gary Messer

SUBJECT: Evaluation of Subsurface Sewage Disposal in the City of Hammond

DATE: January 21, 1977

You have requested that I make an evaluation to determine if subsurface sewage disposal is a viable means of continued sanitary waste disposal for the City of Hammond. To prepare this report, I have used the input of the Clatsop County Health Department, the Clatsop County Soil Conservation Service, and my own field reviews of the area.

The soils of Hammond would fall under the classification of the Brallier-Warrenton Association. The soils that make up this Association are characterized by very deep, very poorly drained, nearly level peat soils and poorly drained fine sand soils. As with any soil association, there are inclusions of well drained areas in Hammond, but these are limited to small areas of elevated dune sands. The most practical way to present this is to reference the attached soil map of the City and explain how it relates to the present situation.

You will note that there are primarily seven major soil series we are dealing with:

The Brallier Peat Series occupies roughly the southern 1/3 of the City. This is a very wet, poorly drained peat soil with a ground water table at depths ranging from the ground surface to two feet below the surface almost the entire year. The City has platted streets in this area, but no development has occurred.

The Clatsop Silty Clay Loam Series occupies a substantial area, roughly in the mid-eastern portions of the City. This is a very poorly drained tidal mud and sand soil with high ground waters throughout the year, with November through June being most severe. During this period, the water table is generally present at depths ranging from the ground surface to one and one-half feet below the surface. The City has platted streets in this area but very limited development has occurred.

The Warrenton Loamy Fine Sand Series occupies substantial areas roughly in the mid-western portions of the City and to the west of the Fort Stevens area. This is a poorly drained loamy fine sand soil with high groundwaters throughout the year. The periods of September through May are the most severe, since the water table is generally found at depths ranging from the ground surface to two feet below the surface. The City has platted streets in these areas with limited development. The Clatsop County Health Department reports several homes have attempted repairs of their systems, which were generally flooded out by high groundwaters.

Cut and Filled Lands are present around the boat basin and throughout the Fort Stevens area. Where areas have been filled, drainage is variable depending on the height and type of material used for fill. Fort Stevens proper has fair elevations and some areas are well drained. The Clatsop County Health Department reports several problems occurring in the mobile home park due to small lot sizes and some areas with high groundwaters.

The Gearhart Fine Sand Loam Series is present in two narrow strips which enter the City from the southwest and generally border Clatsop Highway. These are elevated stabilized dune areas with good drainage. No streets are platted and no development has occurred in these areas.

The Dune Land Series is present in a small area which forms the northwest corner of the boat basin. There is no residential development and it primarily serves as parking area for the boat basin activities.

The Westport Fine Sand Series occupies a substantial strip along the northern portion of Hammond and for the most part makes up the town proper. It is primarily a stabilized dune soil with good drainage being dependent on elevation. Those homes located in the higher areas and having adequate lot sizes generally have no problems. Those homes located on the lower and flatter areas tend to have problems due to high groundwaters. The County Sanitarians report frequent complaints and requests for repairs on failing systems. The primary cause noted for failure is a combination of a too-small lot size to install a properly sized system in conjunction with the high water table present in the lower areas.

FINDINGS:

1. Approximately 70% of the land area of the City of Hammond is comprised of the Brallier Peat, Clatsop Silty Clay Loam, and Warrenton Loamy Fine Sand Soil Series. Essentially, these areas take in approximately 60% of the platted street areas in the City, and approximately 90% of the undeveloped platted street areas. Due to poor drainage and high groundwaters, these areas would not be approved for subsurface sewage disposal.

2. Many of the streets located in the City proper are bordered by drainage ditches which serve as points for high groundwater drainage. It is probable that septic tank effluent is entering these drainage ways, either directly or indirectly, through seepage by adjacent homes. In these and other areas where high groundwaters are present, adequate repairs to existing systems are generally not possible.

3. The City of Hammond has three sewage outfall lines to the Columbia River. The school, in particular, is connected to this system and serves as a major source of raw sewage discharge.

4. Septic tank malfunctions are a frequent occurrence over the entire Hammond area. Essentially, the Clatsop County Sanitarians have documented problems everywhere there is development.

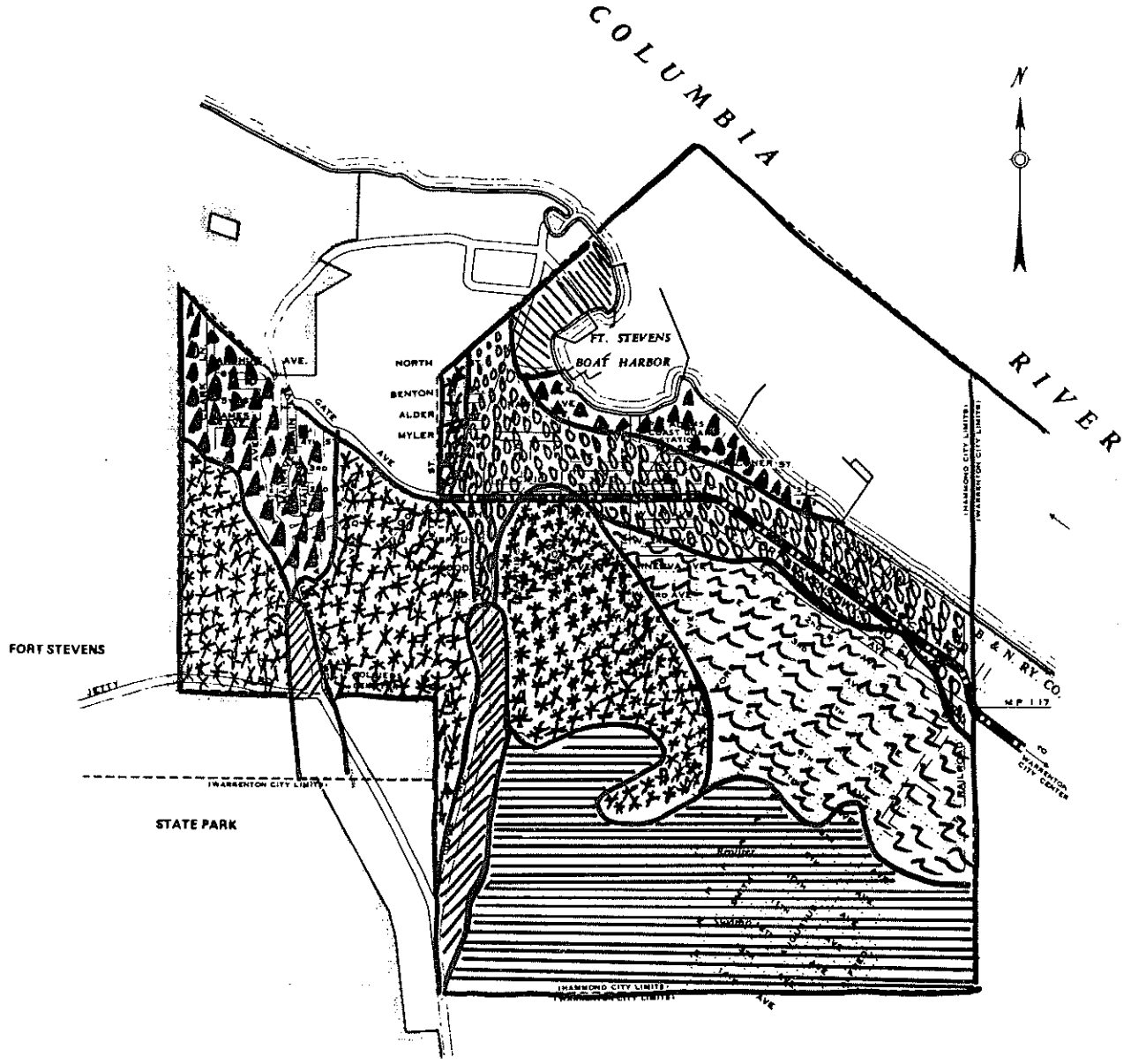
5. The Clatsop County Sanitarians report that with the exception of the elevated dune areas adjacent to Fort Stevens, all requests for new construction permits have been denied for at least the past three years.

6. The City officials are contemplating some future growth, as evidenced by the many platted streets plus their recent actions to approve the platting of a new 130 lot subdivision and a 13 lot subdivision within the city limits.

RECOMMENDATIONS:

1. Subsurface sewage disposal is not a viable means for the City of Hammond to dispose of their present sanitary wastes. Coupled with the existing problems and high groundwaters, future development should not be allowed on septic tank systems.

2. The City should connect all their sewage flows to the municipal system available at Warrenton.



HAMMOND

CLATSOP COUNTY, OREGON

OREGON STATE HIGHWAY DIVISION

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
BUREAU OF PUBLIC ROADS

Population 530

Revised May 1970

KEY

- Westport Fine Sand
- Dune Land
- Gearhart Fine Sand
- Cut and Filled Lands
- Warrenton Loamy Fine Sand
- Clatsop Silty Clay Loam
- Brallier Peat

Detailed Mapping Unit	Soil Name	Capability Class	General Soil Map Association Number
1A	Alluvial land	VIe	9,10,13,17,18,20,
B	Active dune land		21,22,23
2C	Astoria silt loam 3-12%	IIIe	9
2D	Astoria silt loam 12-20%	IVe	9
2E	Astoria silt loam 20-30%	VIe	9
2F	Astoria silt loam 3-30%	VIe	9,15
2G	Astoria silt loam 30-60%	VIIe	9,10,15,16
2-1E	Astoria silt loam, landslide, 3-30%	VIe	9,13,14,15
2-1F	Astoria silt loam, landslide, 30-60%	VIIe	10,13,14,16
	Beaches	VIIIw	
3A	Brailer peat	IVw	2,3,5,6
4A	Brenner silty clay loam	IIIw	1,2
5A	Clatsop silty clay loam	IVw	3
6B	Walluski silt loam 0-7%	IIe	7,8
6C	Walluski silt loam 7-12%	IIIe	7,8
6D	Walluski silt loam 12-20%	IVe	7
g6B	Walluski silt loam, gravelly substratum, 0-7%		-
g6C	Walluski silt loam, gravelly substratum, 7-12%		-
g6D	Walluski silt loam, gravelly substratum, 12-20%		-
7A	Coquille silty clay loam	IIIw	3
8A	Dune land	VIIIe	5
9A	Gearhart fine sand loam 0-20%	VIe	5,6
10B	Chitwood silty clay loam 0-7%	IIw	8
10C	Chitwood silty clay loam 7-12%	IIIw	8
10D	Chitwood silty clay loam 12-20%	IVw	
11A	Hebo silty clay loam	IVw	2,8
12C	Hembre silt loam 3-12%	IIIe	17
12D	Hembre silt loam 12-20%	IVe	17
12E	Hembre silt loam 20-30%	VIe	17
12F	Hembre silt loam 3-30%	VIe	9,17,18
12G	Hembre silt loam 30-60%	VIIe	10,17,18
12H	Hembre silt loam 60-90%	VIIe	18
12-1E	Hembre silt loam, sedimentary rock substratum, 3-30%	VIe	13,14,15,16
12-1F	Hembre silt loam, sedimentary rock substratum, 30-60%	VIIe	13,14,15,16
13F	Ecola silt loam 20-60%	VIe	10
14A	Knappa silt loam 0-3%	IIe	7
14B	Knappa silt loam 3-7%	IIe	7
14C	Knappa silt loam 7-12%	IIIe	7
14D	Knappa silt loam 12-20%	IVe	7
g14D	Knappa silt loam, gravelly substratum 12-20%	IVe	-

Detailed Mapping Unit	Soil Name	Capability Class	General Soil Map Association Number
15A	Freshwater march	VIIIw	9,10,20,21
16A	Nehalem silt loam	IIe	1,2
g16A	Nehalem silt loam, gravelly substratum	IIe	-
16A-1	Nehalem silt loam, overflow	IVw	1
17A	Cut and fill (silty)	VIIIs	3
18A	Riverwash	VIIIw	1
19A	Sauvie silty clay loam	IIIw	4
20E	Klickitat stony loam 5-30%	VIIe	14,17,18,19
20F	Klickitat stony loam 30-60%	VII	17,18
21A	Peat	IVw	4
22A	Tidal marsh (fresh)	VIIIw	3,4
23A	Warrenton loamy fine sand	IVw	5,6
24E	Westport fine sand, 0-20%	VIIIe	5
25A	Gardiner fine sandy loam	IIw	1
26A	Clatsop silty clay loam, sand substratum	IVw	3
27G	Kilchis very stony loam 60-90%	VIIe	18,19
28E	Terrace escarpment	VIIe	7
29A	Nestucca silty clay loam	IIw	2
30A	Rock outcrop	VIII	13,17,18,19
31B	31 silty clay loam (old Svensen) 3-7%	IIIs	3
32C	Meda gravelly loam 3-12%		7
33E	33 silt loam (mottled substratum) 3-30%	VIe	9
33F	33 silt loam (mottled substratum) 30-60%	VIIe	10
34C	Winema silty clay loam 3-12%	IIIe	9
34D	Winema silty clay loam 12-20%	IVe	9
34E	Winema silty clay loam 20-30%	VIe	9
34F	Winema silty clay loam 3-30%	VIe	9,10
34G	Winema silty clay loam 30-60%	VIIe	9,10
35B	35 silty clay loam (old Galvin)3-12%	IIIe	7
37B	Svensen loam 0-7%	IIe	4
37C	Svensen loam 7-12%	IIIe	4
37D	Svensen loam 12-20%	IVe	4
37E	Svensen loam 20-30%	VIe	11,12
37F	Svensen loam 30-60%	VIIe	11,12
38C	Tolovana silt loam 3-12%		20
38D	Tolovana silt loam 12-20%		20
38E	Tolovana silt loam 20-30%	VIe	20
38F	Tolovana silt loam 3-30%	VIe	9,11,20,21
38G	Tolovana silt loam 30-60%	VIIe	12,20,21
38E-1	Tolovana silt loam, sandstone substratum 3-30%		11,22,23
38F-1	Tolovana silt loam, sandstone substratum 30-60%		12,22,23
39F	Trask gravelly loam 5-50%		10
40	Nehalem silt loam (thin surface variant)	IIw	-

DATE: January, 1974 GBT, GEO *Active Dune Land* SERIES . SOILS: 1. *Active Dune Land*

This land type consists of wind-drifted sand in the form of dunes, ridges, or hummocks. The material is not stabilized and has no vegetation established on it. Dunes are generally 5 to 40 feet high; they have a maximum elevation of about 180 feet. The relief is a succession of irregularly distributed dunes and ridges, which rise above the intervening wind-formed valleys and swales. Dunes are bare of vegetation or the growth is not dense enough to protect the sand and to prevent it from blowing. The dunes are constantly shifting under the influence of strong ocean winds. Elevation is 0 to about 180 feet. Average annual precipitation is 60 to 80 inches, average annual temperature is 50 to 52°F.; and the frost-free period is about 202 days. Active Dune Land consists of grayish-brown, single grained, porous sand and fine sand.

This land type is used primarily for wildlife habitat and recreation. This soil occurs in the Coast Range and Valley Resource Area (A1).

(Classification: Entisol)

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
0-72	Fine sand or sand	SM-SP	A-2	0	100	100	60-75	10-30	Nonplastic		6.0>20.0	.05-.07	4.6-5.0	Low

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
0-72	-	Low	High	-	5	1	None			> 6			A

CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS
DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS		
-		> 60		-	

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS	1	Severe	Percolates rapidly
SEWAGE LAGOONS	1	Severe	Percolates rapidly
SANITARY LANDFILL (TRENCH)	1	Severe	Percolates rapidly
SANITARY LANDFILL (AREA)	1	Severe	Percolates rapidly
DAILY COVER FOR LANDFILL	1	Poor	Too sandy
SHALLOW EXCAVATIONS	1	Severe	Too sandy
DWELLINGS WITHOUT BASEMENTS	1	Slight to severe	Slope
DWELLINGS WITH BASEMENTS	1	Slight to severe	Slope, soil blowing
SMALL COMMERCIAL BUILDINGS	1	Slight to severe	Slope, soil blowing
LOCAL ROADS AND STREETS	1	Severe	Soil blowing

SOURCE MATERIAL AND WATER MANAGEMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1	Good	
SAND	1	Fair	Excess fines
GRAVEL	1	Unsuited	Excess fines
TOPSOIL	1	Poor	Too sandy
POND RESERVOIR AREA	1	Severe	Percolates rapidly
EMBANKMENTS DIKES AND LEVEES	1	Severe	Low strength, piping, percolates rapidly
DRAINAGE	1		Not needed
IRRIGATION	1		Not needed
TERRACES AND DIVERSIONS	1		Not needed
GRASSED WATERWAYS	1		Not needed

CONTINUATION SHEET OR-SOILS-1 12/72 *Active Dune Land* SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1	Severe	Too sandy, soil blowing	PLAYGROUNDS	1	Severe	Too sandy, soil blowing
PICNIC AREAS	1	Severe	Too sandy, soil blowing	PATHS AND TRAILS	1	Severe	Too sandy, soil blowing

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY														REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1	VIIIe														

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
	None								

WINDBREAKS

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
	None								

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1	Very poor	Very poor	Poor	-	Very poor	Very poor	Very poor	Very poor	Very poor	Very poor	Very poor	-

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
		None				

FOOTNOTES

SOIL: MADE LAND

This soil is a miscellaneous disturbed land type of variable drainage. The soil textures are also variable and include sand, sandy loam, loam, and silt loam. The soil is composed of dredged material. The relief is nearly level, 0 to 3 percent slopes. Average annual precipitation is 60 - 100 inches; average annual air temperature is 50 - 53° F. The frost free period at 32° F. is 250 days.

Permeability is variable. Runoff is slow to moderate and the erosion hazard is moderate to severe. The available water holding capacity ranges from 3 - 6 inches. The effective root depth varies with the amount of compaction and depth to the water table.

OR-SOILS-1 12/72
FILE CODE SOILS 12 . SOIL INTERPRETATIONS FOR OREGON U.S.D.A. SOIL CONSERVATION SERVICE

DATE: May 9, 1973 GEO WARRENTON SERIES . SOILS: 1. Warrenton loamy fine sand, 0-3% slope

The Warrenton series consists of poorly drained loamy fine sand developed in swales of a stabilized interdunal areas. Where not cultivated, vegetation consists of willow, alder, Sitka spruce, western red cedar and tussocks. Elevations ranges from 0 to 20 feet. The mean annual precipitation is 90 inches; the mean annual air temperature is 50° F; and the frost free season (32°) is 251 days.

Where not cultivated there is about a 3 inch layer of muck above the surface layer. The surface layer is a black, mottled, loamy fine sand about 11 inches thick. The subsoil is very dark grayish brown, mottled, loamy sand about 11 inches thick. The underlying material is very dark grayish brown fine sand many feet thick.

Permeability is rapid. Runoff is slow to ponded and erosion hazard is slight. Total available water holding capacity is 3 to 5 inches. The effective root depth is 2 feet.

The soil is primarily used for permanent pasture. Other uses are blueberry and cranberry production. The soil occurs along the middle and north Oregon coast within the Northern Pacific Coast Range and Valleys Land Resource Area (MLRA A-1).

The Warrenton series is a member of the sandy, mixed, mesic family of Typic Humaquepts.

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
3-0*	Muck	Pt	A-8	0	Organic material				NP	NP	0.6-2.0	0.3-0.4	4.1-6.5	Moderate
0-11	Loamy fine sand	SM	A-4	0	100	100	90-95	40-50	NP	NP	6.3-20.0	.09-.10	5.0-5.5	Low
11-22	Loamy sand	SM	A-2	0	100	100	50-75	15-30	NP	NP	6.3-20.0	.06-.08	4.5-5.0	Low
22-60	Fine sand	SM	A-2	0	100	100	65-80	20-35	NP	NP	6.3-20.0	.05-.07	4.5-5.0	Low

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
3-0	- -	High	High		5	2*	None			0-2.0	Apparent	Sept-May	B/D
0-11	- -	High	High				CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS	
11-22	- -	High	High				DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS			
22-60	- -	High	High				- -		> 60		- -		

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS	1	Severe	Wet
SEWAGE LAGOONS	1	Severe	Wet, percolates rapidly
SANITARY LANDFILL (TRENCH)	1	Severe	Wet, percolates rapidly
SANITARY LANDFILL (AREA)	1	Severe	Wet, percolates rapidly
DAILY COVER FOR LANDFILL	1	Severe	Wet
SHALLOW EXCAVATIONS	1	Severe	Wet, cut banks cave
DWELLINGS WITHOUT BASEMENTS	1	Severe	Wet
DWELLINGS WITH BASEMENTS	1	Severe	Wet
SMALL COMMERCIAL BUILDINGS	1	Severe	Wet
LOCAL ROADS AND STREETS	1	Severe	Wet

SOURCE MATERIAL AND WATER MANAGEMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1	Severe	Wet
SAND	1	Poor	Excessive fines
GRAVEL	1	Unsuited	Excessive fines
TOPSOIL	1	Severe	Wet, too sandy
POND RESERVOIR AREA	1	Severe	Percolates rapidly
EMBANKMENTS DIKES AND LEVEES	1	Moderate	Piping
DRAINAGE	1	Severe	Wet
IRRIGATION	1	Fair	Percolates rapidly, wet
TERRACES AND DIVERSIONS	1		Not needed
GRASSED WATERWAYS	1	Moderate	Wet, rooting depth

CONTINUATION SHEET OR-SOILS-1 12/72 WARRENTON SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1	Severe	Wet, excess humus	PLAYGROUNDS	1	Severe	Wet, excess humus
PICNIC AREAS	1	Severe	Wet, excess humus	PATHS AND TRAILS	1	Severe	Wet, excess humus

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY		Pasture AUM		Cranberry lbs		Blueberry lbs								REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1	IVw		9	12		1500	3500								

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
	NONE								

WINDBREAKS

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
	None								

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1	Poor	Fair	Fair	Fair	Fair	Fair	Fair	Good	Fair	Fair	Fair	- -

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
	None					

FOOTNOTES

* The organic layer loses identity when soil is cultivated.

OR-SOILS-1 12/72
FILE CODE SOILS 12

SOIL INTERPRETATIONS FOR OREGON

U.S.D.A. SOIL CONSERVATION SERVICE

DATE: February 1974 RJK,FWG,GBT TIDAL MARSH SERIES SOILS: 1. Tidal marsh
2. Tidal marsh (fresh)

This land type consists of high tide lands of bays, sloughs, inlets, and estuaries along the coast. The marshes are formed on deposits of alluvium in drowned bays and river valleys above mid-tide level. Salt-marsh grasses trap more sediment and build up a dense rootmat and peat to form vegetative islands and narrow to broad flats with variable amounts of sand, silt, clay, and peat. The marshes include barren surge channels, which are covered by all tides. The marsh is usually covered only by high tides. Fresh water marshes are inundated and soluble salts removed by river flooding. Vegetation is mostly salt tolerant species such as eelgrass, seaside arrow-grass, Pacific bulrush, tufted hairgrass, Baltic rush, and other sedges and grasses. Dense, tall shrub communities of Sitka spruce, red alder, willows, black cottonwood, and Oregon ash form fresh water marsh islands. Normally, this land type has excessive soluble salts.

Tidal marshes are used by wildlife like herons, egrets, ducks, and geese. Clams and fish are found in the surge channels. Some areas of this land type are used for log storage or as a site for spreading dredging spoils; they have been filled and used for buildings. This land type is extremely important in the food chain for many birds, fish, and crustaceans. Marsh lands are along the Columbia River and coastal bays of the northern Pacific coast (MLRA-A1,A2).

(Classification: Entisols and Histosols).

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
	Too variable to rate													

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
-	1. >16 2. -	High	High	-	-	-	*	-	-	*	-	-	-

CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS
DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS		
-	-	>60	-	-	* Covered by high tides several times per month

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT			
USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS	1,2	Severe	Tidal flooding
SEWAGE LAGOONS	1,2	Severe	Tidal flooding
SANITARY LANDFILL (TRENCH)	1,2	Severe	Tidal flooding
SANITARY LANDFILL (AREA)	1,2	Severe	Tidal flooding, leachate may contaminate wildlife areas
DAILY COVER FOR LANDFILL	1,2	Poor	Wood debris scattered throughout, tidal flooding, layers too clayey
SHALLOW EXCAVATIONS	1,2	Severe	Tidal flooding
DWELLINGS WITHOUT BASEMENTS	1,2	Severe	Tidal flooding
DWELLINGS WITH BASEMENTS	1,2	Severe	Tidal flooding
SMALL COMMERCIAL BUILDINGS	1,2	Severe	Tidal flooding
LOCAL ROADS AND STREETS	1,2	Severe	Tidal flooding

SOURCE MATERIAL AND WATER MANAGEMENT			
USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1,2	Poor	Wood debris scattered throughout, wet, layers of low strength
SAND	1,2	Unsuited	Excess fines
GRAVEL	1,2	Unsuited	Excess fines
TOPSOIL	1,2	Poor	Excess salts, layers too clayey or excess humus
POND RESERVOIR AREA	1,2	Severe	Tidal flooding
EMBANKMENTS DIKES AND LEVEES	1,2	Severe	Layers with low strength, compressible, piping
DRAINAGE	1,2	Unsuited	Tidal flooding
IRRIGATION	1,2		Not needed
TERRACES AND DIVERSIONS	1,2		Not needed
GRASSED WATERWAYS	1,2		Not needed

CONTINUATION SHEET OR-SOILS-1 12/72

TIDAL MARSH SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1,2	Severe	Tidal flooding	PLAYGROUNDS	1,2	Severe	Tidal flooding
PICNIC AREAS	1,2	Severe	Tidal flooding	PATHS AND TRAILS	1,2	Severe	Tidal flooding

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY														REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1,2	VIIIw														Can be reclaimed by ditching, diking, cleaning debris, and installing tide gates. 1/

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
	None								

WINDBREAKS

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
	None								

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1	-	Very poor	Fair	-	-	-	Good	Good	-	-	Good	-
2	-	Very poor	Fair	Poor	Poor	Fair	Good	Good	-	Poor	Good	-

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
	None					

FOOTNOTES

1/ Reclaimed areas may be Brallier, Clatsop, Coquille, or Heceta soils or fill land.

DATE: January, 1974 GEO CLATSOP SERIES SOILS: 1. *Clatsop silty clay loam*

The Clatsop series consists of very poorly drained soils that formed in fine textured alluvium consisting of tidal "mud". They occupy nearly level or depressional topography in coastal bays. Where not cultivated the vegetation consists of grasses, reeds and sedges. Elevation is 1 to 5 feet. Average annual precipitation is 60 to 100 inches, average annual temperature is 50 to 52° F, and the frost free period is about 202 days.

The surface layer is about 6 inches of peat mixed with some mineral soil that is underlain by mottled very dark grayish-brown silty clay loam about 7 inches thick. The subsoil is dark gray silty clay with common mottles about 33 inches to many feet thick.

Permeability is slow. Runoff is very slow to ponded. The erosion hazard is slight. The total available water holding capacity is 7 to 9 inches.

This soil is used mainly for hay, pasture and wildlife habitat. These soils occur in the Coast Range and Valley Resource Area (A1).

(Classification: Histic Humaquepts; fine, mixed, acid, mesic family)

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
6-0	Peat	Pt	A-8	0		organic material			--	NP	0.6-2.0	.3-.4	4.5-5.0	Low
0-7	Silty clay loam	ML,OL	A-7	0	100	100	95-100	85-95	41-50	11-20	0.6-2.0	.15-.21	4.6-5.5	Moderate
7-40	Silty clay,Clay	MH	A-7	0	100	100	95-100	85-95	50-60	15-25	.06-2.0	.15-.17	5.1-6.5	Moderate

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
6-0	- -	High	High	--	--	--	Frequent	Brief	Dec-Mar	0.0-1.5	Apparent	Nov-June	D
0-7	- -	High	High	--									
7-40	- -	High	High	--									

CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS
DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS		
--		> 60		--	

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS	1	Severe	Floods, percolates slowly, wet
SEWAGE LAGOONS	1	Severe	Floods, wet
SANITARY LANDFILL (TRENCH)	1	Severe	Floods, wet
SANITARY LANDFILL (AREA)	1	Severe	Floods, wet
DAILY COVER FOR LANDFILL	1	Poor	Wet, excess humus, thin layer
SHALLOW EXCAVATIONS	1	Severe	Floods, wet
DWELLINGS WITHOUT BASEMENTS	1	Severe	Floods, wet
DWELLINGS WITH BASEMENTS	1	Severe	Floods, wet
SMALL COMMERCIAL BUILDINGS	1	Severe	Floods, wet
LOCAL ROADS AND STREETS	1	Severe	Floods, wet, low strength

SOURCE MATERIAL AND WATER MANAGEMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1	Poor	Wet, low strength
SAND	1	Unsuited	Excess fines
GRAVEL	1	Unsuited	Excess fines
TOPSOIL	1	Poor	Wet
POND RESERVOIR AREA	1	Slight	Favorable
EMBANKMENTS DIKES AND LEVEES	1	Moderate	Shrink-swell, excess humus
DRAINAGE	1	Severe	Floods, wet
IRRIGATION	1		Not needed
TERRACES AND DIVERSIONS	1		Not needed
GRASSED WATERWAYS	1		Not needed

CONTINUATION SHEET OR-SOILS-1 12/72 CLATSOP SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1	Severe	Floods, wet	PLAYGROUNDS	1	Severe	Floods, wet
PICNIC AREAS	1	Severe	Floods, wet	PATHS AND TRAILS	1	Severe	Floods, wet

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY		Pasture AUM/Ac												REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1	IIIw		9-12												Pastured on diked land

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
	None								

WINDBREAKS.

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
	None								

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1	Fair	Fair	Poor	--	Poor	Poor	Good	Good	Fair	Poor	Good	---

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
		None				

FOOTNOTES

DATE: November 1973 RJK-FWG COQUILLE SERIES

SOILS:
1. Coquille peaty silt loam, 0-1% slopes
2. Coquille sandy loam, 0-1% slopes
3. Coquille silt loam, 0-1% slopes
4. Coquille and Brenner silt loams, 0-1% slopes

The Coquille series consists of very poorly drained very strongly acid soils that formed from sediments deposited in water subject to tidal fluctuations. The soils are on level and depressional flood plains and stream deltas along coastal tidelands. Slopes are 0 to 1 percent. Elevations are from sea level or below to 10 feet. Where not cultivated, the vegetation is rushes, sedges, marsh grass, and tules. Average annual precipitation is 60 to 90 inches, average annual air temperature is 50 to 53 degrees F., and the frost-free period is 180 to 220 days.

Typically, the surface layer is very dark grayish-brown, mottled silt loam about 13 inches thick. The subsoil is dark grayish-brown, mottled silty clay loam about 27 inches thick. Very dark gray, massive, silty clay and clay, stratified with thin layers of peat, sandy, and loamy materials occur below 40 inches.

Permeability is slow. Runoff is slow to ponded on all Units. The erosion hazard is alight except where a river or stream can change channels. Effective rooting depth is limited to between 20 and 40 inches by the massive silty clay layer and by the seasonal water table. Available water holding capacity is 7.5 to 8.5 inches. The water supplying capacity is 23 to 25 inches. Workability is fair when not wet. The soils are subject to tidal overflow at high tide if not protected by dikes.

Coquille soils are used for pasture and forage crops, wildlife habitat, and recreation. These soils are along the Oregon Pacific Coast (MLRA-A1).

(Classification: Typic Fluvaquents; fine-silty, mixed, acid, mesic.)

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
0-13	Silt loam	ML	A-4	0	100	100	90-100	70-90	30-35	5-10	6-2.0	.19-.21	4.5 - 5.0	Low
13-40	Silty clay loam	CL	A-6	0	100	100	95-100	85-95	30-40	12-20	.2-.6	.19-.21	4.5 - 5.0	Moderate
40-60	Silty clay	CL or CH	A-7	0	100	100	95-100	90-95	45-55	25-35	.06-.2	.15-.17	4.5 - 5.0	Moderate

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
0-13	-	High	High	.28	3	-	Frequent	Long	Oct.-May*	0-2	Apparent	Oct.-June	D
13-40	-	High	High	.40									
40-60	2.0-4.0	High	High	.28									

CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS
DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS		
-	-	> 60	-	-	*Daily tidal flooding and permanent water table if not diked or drained.

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS	1,2,3,4	Severe	Wet, floods
SEWAGE LAGOONS	1,2,3,4	Severe	Wet, floods
SANITARY LANDFILL (TRENCH)	1,2,3,4	Severe	Wet, floods
SANITARY LANDFILL (AREA)	1,2,3,4	Severe	Wet, floods
DAILY COVER FOR LANDFILL	1,2,3,4	Poor	Wet
SHALLOW EXCAVATIONS	1,2,3,4	Severe	Wet, floods
DWELLINGS WITHOUT BASEMENTS	1,2,3,4	Severe	Wet, floods
DWELLINGS WITH BASEMENTS	1,2,3,4	Severe	Wet, floods
SMALL COMMERCIAL BUILDINGS	1,2,3,4	Severe	Wet, floods, corrosive
LOCAL ROADS AND STREETS	1,2,3,4	Severe	Wet, floods

SOURCE MATERIAL AND WATER MANAGEMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1,2,3,4	Poor	Wet
SAND	1,2,3,4	Unsuited	Excessive fines
GRAVEL	1,2,3,4	Unsuited	Excessive fines
TOPSOIL	1,2,3,4	Poor	Wet
POND RESERVOIR AREA	1,2,3,4	Slight	Favorable
EMBANKMENTS DIKES AND LEVEES	1,2,3,4	Moderate	Piping, low strength
DRAINAGE	1,2,3,4	Severe	Wet, floods, poor outlets
IRRIGATION	1,2,3,4	Severe	Wet, floods
TERRACES AND DIVERSIONS	1,2,3,4		Not needed
GRASSED WATERWAYS	1,2,3,4		Not needed

CONTINUATION SHEET OR-SOILS-1 12/72 COQUILLE SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1,2,3,4	Severe	Wet, floods	PLAYGROUNDS	1,2,3,4	Severe	Wet, floods
PICNIC AREAS	1,2,3,4	Severe	Wet, floods	PATHS AND TRAILS	1,2,3,4	Moderate to severe	Wet, floods

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY		PASTURE (AUM/AC)		REED CANARY GRASS (AUM/AC)										REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1,2,3,4	IVw		6		10										Diked and drained with tidegates and ditches

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
1,2,3,4	None								

WINDBREAKS

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
1,2,3,4	None								

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1,2,3,4	Very poor	Poor	Very poor	Very poor	Very poor	Poor	Good	Good	Very poor	Very poor	Good	

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
None	1,2,3,4					

FOOTNOTES

OR-SOILS-1 12/72
FILE CODE SOILS 12

SOIL INTERPRETATIONS FOR OREGON

U.S.D.A. SOIL CONSERVATION SERVICE

DATE: January, 1974 GEO BRALLIER SERIES SOILS:

1. *Brallier peat, 0-1% slopes*
2. *Brallier peat, 0-2% slopes*
3. *Brallier peat, 0-3% slopes*

The Brallier series consists of very poorly drained peaty soils formed mainly of slightly decomposed fibrous organic residues from water tolerant plants. These soils occupy nearly level basins on tidelands and basins or flood plains along sluggish streams near tidelands. Where not cultivated, the vegetation is brush, willow, and spruce or tussock grasses. Elevation is from 0 to 8 feet. Average annual precipitation is 90 to 100 inches, average annual temperature is 50 to 52° F., and the frost-free period at 32° F. is 150 to 200 days.

Typically, the surface layer is about 6 inches of dark brown extremely acid peat. The subsoil is dark grayish brown and grayish brown strongly to extremely acid peat to about 40 inches, below which is very dark grayish brown and gray slightly acid peat and muck.

Permeability is moderate. Runoff is very slow to ponded. The erosion hazard is slight. The total available water holding capacity is 12 to 25 inches. The water supplying capacity is 20 to 26 inches.

Brallier soils are used mainly for hay, pasture, and wildlife habitat. These soils are in the Northern Pacific Coast Range and Valleys Land Resource Area (MLRA A1).

(Classification: Hemic Medisaprists; dysic, mesic family)

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
0-60	Peat or muck	Pt	A-8	0	Organic material				Non-plastic		.6-2.0	0.3-0.4	4.1-6.5	Moderate

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
0-60	---	High	High	--	--	--	~~Frequent~~	Long	Dec-Apr	0.0-2.0	Apparent	Jan-Dec	D

CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS
DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS		
--		>60		--	

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS	1,2,3	Severe	Floods, wet
SEWAGE LAGOONS	1,2,3	Severe	Floods, wet
SANITARY LANDFILL (TRENCH)	1,2,3	Severe	Floods, wet
SANITARY LANDFILL (AREA)	1,2,3	Severe	Floods, wet
DAILY COVER FOR LANDFILL	1,2,3	Poor	Floods, wet, excess humus
SHALLOW EXCAVATIONS	1,2,3	Severe	Floods, wet, excess humus
DWELLINGS WITHOUT BASEMENTS	1,2,3	Severe	Floods, wet, excess humus
DWELLINGS WITH BASEMENTS	1,2,3	Severe	Floods, wet, excess humus
SMALL COMMERCIAL BUILDINGS	1,2,3	Severe	Floods, wet, excess humus
LOCAL ROADS AND STREETS	1,2,3	Severe	Floods, wet, excess humus

SOURCE MATERIAL AND WATER MANAGEMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1,2,3	Poor	Wet, excess humus
SAND	1,2,3	Unsuited	Excess humus
GRAVEL	1,2,3	Unsuited	Excess humus
TOPSOIL	1,2,3	Unsuited	Wet
POND RESERVOIR AREA	1,2,3	Severe	Excess humus
EMBANKMENTS DIKES AND LEVEES	1,2,3	Severe	Low strength
DRAINAGE	1,2,3	Severe	Floods, wet
IRRIGATION	1,2,3		Not needed
TERRACES AND DIVERSIONS	1,2,3		Not needed
GRASSED WATERWAYS	1,2,3		Not needed

CONTINUATION SHEET OR-SOILS-1 12/72 ~~BRALLIER~~ SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1,2,3	Severe	Floods, wet, excess humus	PLAYGROUNDS	1,2,3	Severe	Floods, wet, excess humus
PICNIC AREAS	1,2,3	Severe	Floods, wet, excess humus	PATHS AND TRAILS	1,2,3	Severe	Floods, wet, excess humus

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY		Pasture AUM/Ac												REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1,2,3	IVw		12												

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
	NONE								

WINDBREAKS

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
	NONE								

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1,2,3	Poor	Fair	Poor	Poor	--	Poor	Good	Good	Poor	Good	Good	--

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
		None				

FOOTNOTES

SOIL INTERPRETATIONS FOR OREGON

U.S.D.A. SOIL CONSERVATION SERVICE

DATE: 1/74 GBT-GEO

WESTPORT SERIES

SOILS:

1. *Westport fine sand, 0 to 12 percent slopes*
2. *Westport fine sand, 0 to 20 percent slopes*
3. *Westport fine sand, 12 to 30 percent slope*
4. *Westport fine sand, 30 to 70 percent slope*
5. *Westport loamy sand, 0 to 12 percent slope*
6. *Westport loamy sand, 12 to 30 percent slop*
7. *Westport-Yaquina loamy sands, 0 to 30 percent slopes*
8. *Westport-Duneland complex, 12 to 30 percen slopes*

The Westport series consists of deep, excessively drained soils that formed in wind-deposited material on nearly level to steep stabilized dunes. The vegetation is Sitka spruce, shore pine, manzanita, evergreen huckleberry, dune grass, forbs and other shrubs. Elevation is 0 to 300 feet. Average annual precipitation is 60 to 100 inches; average annual air temperature is 50 to 53° F. The frost-free period at 32° F. is 200 to 250 days.

A mat of mosses, litter and roots is on top of the mineral soil. Typically, the surface layer is very dark grayish-brown and dark grayish-brown fine sand to loamy fine sand about 16 inches thick. The subsoil is brown to olive gray fine sand to depths greater than 60 inches.

Permeability is very rapid. Runoff is slow from all units. The erosion hazard is high for all units, assuming the vegetation is removed. The total available water holding capacity is 3 to 4 inches. The water supplying capacity is 18 to 20 inches. Effective rooting depth is over 60 inches.

Westport soils are used for homesites, wildlife habitat, and recreation. These soils are in the Northern Pacific Coast Range and Valleys Land Resource Area (MLRA-A1).

(Classification: Typic Udipsamments; mixed, mesic family)

ESTIMATED SOIL PROPERTIES

DEPTH FROM SURFACE (in.)	CLASSIFICATION			COARSE FRACT. OVER 3 IN.	% OF MATERIAL PASSING SIEVE				LIQUID LIMIT	PLASTICITY INDEX	PERMEABILITY (in/hr)	AVAIL. WATER CAP. (in/in)	SOIL REACTION (pH)	SHRINK SWELL POTENTIAL
	USDA TEXTURE	UNIFIED	AASHO		#4	#10	#40	#200						
0-60	fine sand	SM	A-2	0	100	100	65-80	20-35	non-plastic		6.0->20.0	.05-.07	5.1-6.0	low

DEPTH (in.)	CONDUCTIVITY (mmhos/cm)	CORROSIVITY		EROSION FACTORS		WIND EROD. GROUPS	FLOODING			HIGH WATER TABLE			HYDROLOGIC GROUP
		STEEL	CONCRETE	K	T		FREQUENCY	DURATION	MONTHS	DEPTH (ft.)	KIND	MONTHS	
0-60	-	Low	Moderate	-	5	1	none			> 6			A

CEMENTED PAN		BEDROCK		FROST ACTION	REMARKS
DEPTH (in.)	HARDNESS	DEPTH (in.)	HARDNESS		
-		>60		-	

SANITARY FACILITIES AND COMMUNITY DEVELOPMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
SEPTIC TANK ABSORPTION FIELDS 1/	1,5	Slight-Mod	Slope
	2,7	Slight to Severe	Slope
	3,4,6,8	Severe	Slope
SEWAGE LAGOONS 1/	1,2,3,4, 5,6,7,8	Severe	Percolates rapidly, slope
SANITARY LANDFILL (TRENCH) 1/	1,2,3,4, 5,6,7,8	Severe	Percolates rapidly, too sandy, slope
SANITARY LANDFILL (AREA) 1/	1,5	Severe	Percolates rapidly
	2,3,4,6, 7,8	Severe	Percolates rapidly, slope
DAILY COVER FOR LANDFILL	1,5	Poor	Too sandy
	2,3,4,6, 7,8	Poor	Too sandy, slope
SHALLOW EXCAVATIONS	1,2,5	Severe	Too sandy
	3,4,6,7, 8	Severe	Too sandy, slope
DWELLINGS WITHOUT BASEMENTS	1,2,5	Moderate	Slope
	3,4,6,7, 8	Severe	Slope
DWELLINGS WITH BASEMENTS	1,2,5	Moderate	Slope
	3,4,6,7, 8	Severe	Slope
SMALL COMMERCIAL BUILDINGS	1,2,3,4, 5,6,7,8	Severe	Slope
LOCAL ROADS AND STREETS	1,5	Slight	-
	3,6	Moderate to Severe	Slope
	2,4,7,8	Severe	Slope

SOURCE MATERIAL AND WATER MANAGEMENT

USE	SOIL	RATING	RESTRICTIVE FEATURES
ROADFILL	1,5	Good	-
	3,6	Fair-Poor	Slope
	2,4,7,8	Poor	Slope
SAND	1,2,3,4, 5,6,7,8	Poor	Excess fines
GRAVEL	1,2,3,4, 5,6,7,8	Unsuited	Excess fines
TOPSOIL	1,2,3,4, 5,6,7,8	Poor	Too sandy
POND RESERVOIR AREA	1,2,3,4, 5,6,7,8	Severe	Percolates rapidly
EMBANKMENTS DIKES AND LEVEES	1,2,3,4, 5,6,7,8	Severe	Piping, percs rapidly
DRAINAGE	1,2,3,4, 5,6,7,8	-	Not needed
IRRIGATION	1,2,3,4, 5,6,7,8	-	Not needed
TERRACES AND DIVERSIONS	1,2,3,4, 5,6,7,8	-	Not needed
GRASSED WATERWAYS	1,2,3,4, 5,6,7,8	-	Not needed

CONTINUATION SHEET OR-SOILS-1 12/72 WESTPORT SERIES

RECREATION

USE	SOIL	RATING	RESTRICTIVE FEATURES	USE	SOIL	RATING	RESTRICTIVE FEATURES
CAMP AREAS	1,5 2,3,4,6,7,8	Moderate Severe	Too sandy Slope	PLAYGROUNDS	1,2,3,4,5,6,7,8	Severe	Too sandy, slope
PICNIC AREAS	1,5 2,3,4,6,7,8	Moderate Severe	Too sandy Slope	PATHS AND TRAILS	1,2,3,5,6,7,8 4	Severe Severe	Too sandy Slope, too sandy

CAPABILITY AND PREDICTED YIELDS - CROPS AND PASTURE (HIGH LEVEL MANAGEMENT)

SOIL	CAPABILITY		Pasture AUM/Ac												REMARKS
	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	NIRR	IRR	
1,5	VIe		1	3											
2,3,4,6,7,8	VIIe		-	1											

WOODLAND SUITABILITY

SOIL	POTENTIAL PRODUCTIVITY		WOOD SUIT. GROUP	MANAGEMENT PROBLEMS					NATIVE SPECIES
	SPECIES	SITE INDEX		EROSION HAZARD	EQUIPMENT LIMIT.	SEEDLING MORTALITY	WINDTHROW HAZARD	PLANT COMPET.	
1,2,3,4,5,6,7,8	Sitka spruce	-	-	Severe	Severe	High	High	Slight	Sitka spruce, shore pine

WINDBREAKS

SOILS	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE	SPECIES	HT. AGE 20	PERFOR-MANCE
1,2,3,4,5,6,7,8	Shore pine	30	Fair	Sitka spruce	30	Fair			

WILDLIFE HABITAT SUITABILITY

SOIL	POTENTIAL FOR HABITAT ELEMENTS								POTENTIAL AS HABITAT FOR:			
	GRAIN & SEED	GRASS & LEGUME	WILD HERB.	HARDWD TREES	CONIFER PLANTS	SHRUBS	WETLAND PLANTS	SHALLOW WATER	OPENLAND WILDLIFE	WOODLAND WILDLIFE	WETLAND WILDLIFE	RANGELAND WILDLIFE
1,2,3,5,6,7,8	Poor	Poor	Fair	-	Poor	Poor	V.poor	V.poor	Poor	Poor	V.poor	-
4	V.poor	V.poor	Fair	-	Poor	Poor	V.poor	V.poor	Poor	Poor	V.poor	-

RANGELAND

RANGE SITE NAME	SOIL	KEY SPECIES AND % COVER	POTENTIAL YIELDS		NORMAL SEASON	
			TOTAL lb/Ac	USABLE Ac/AUM	GROWING	GRAZING
None						

FOOTNOTES

1/ Ground water pollution hazard.

OR-002274-8

Form Approved
OMB No. 158-R0096 File No. 36475
Application No. OR-002274-8

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
APPLICATION FOR PERMIT TO DISCHARGE - SHORT FORM A

To be filed only by municipal wastewater dischargers

FOR AGENCY USE	APPLICATION NUMBER
	DATE RECEIVED
	YEAR MO. DAY
	MAY 14 1973

Do not attempt to complete this form before reading the accompanying instructions

Please print or type

1. Name of organization responsible for facility Town of Hammond

2. Address, location, and telephone number of facility producing discharge:

   A. Name Town of Hammond

   B. Mailing address:

      1. Street address _____
      2. City Hammond
      3. County Clatsop
      4. State Oregon
      5. ZIP 97121

   C. Location:

      1. Street _____
      2. City Hammond
      3. County Clatsop
      4. State Oregon

   D. Telephone No. 503 861-2256
      Area Code 503

If all your waste is discharged into a publicly owned waste treatment facility and to the best of your knowledge you are not required to obtain a discharge permit, proceed to item 3. Otherwise proceed directly to item 4.

3. If you meet the condition stated above, check here ☐ and supply the information asked for below. After completing these items, please complete the date, title, and signature blocks below and return this form to the proper reviewing office without completing the remainder of the form.

   A. Name of organization responsible for receiving waste _____

   B. Facility receiving waste:

      1. Name _____
      2. Street address _____
      3. City _____
      4. County _____
      5. State _____
      6. ZIP _____

4. Type of treatment:
   A. ☒ None B. ☐ Primary C. ☐ Intermediate D. ☐ Secondary E. ☐ Advanced

5. Design flow (average daily) of facility _____ mgd.

6. Percent BOD removal (actual):
   A. ☒ 0-29.9 B. ☐ 30-64.9 C. ☐ 65-84.9 D. ☐ 85-94.9 E. ☐ 95 or more

7. Population served:
   A. ☒ 1-199 B. ☐ 200-499 C. ☐ 500-999 D. ☐ 1,000-4,999
   E. ☐ 5,000-9,999 F. ☐ 10,000 or more

8. Number of separate discharge points:
   A. ☒ 1 B. ☐ 2 C. ☐ 3 D. ☐ 4 E. ☐ 5 F. ☐ 6 or more

9. Description of waste water discharged to surface waters only (check as applicable). OR-002274-8

Discharge per operating day	Flow, MGD (million gallons per operating day)							Volume treated before discharging (percent)				
	0-0.0099 (1)	0.01-0.049 (2)	0.05-0.099 (3)	0.1-0.49 (4)	0.5-0.99 (5)	1.0-4.9 (6)	5 or more (7)	None (8)	0.1-34.9 (9)	35-64.9 (10)	65-94.9 (11)	95-100 (12)
A. Average	9,000 gal											
B. Maximum	12,000 gal											

10. If any waste water, treated or untreated, is discharged to places other than surface waters, check below as applicable.

Waste water is discharged to	Flow, MGD (million gallons per operating day)						
	0-0.0099 (1)	0.01-0.049 (2)	0.05-0.099 (3)	0.1-0.49 (4)	0.5-0.99 (5)	1.0-4.9 (6)	5 or more (7)
A. Deep well							
B. Evaporation lagoon							
C. Subsurface percolation system							
D. Other, specify:							

11. Is any sludge ultimately returned to a waterway?

A. ☐ yes B. ☒ no

12. a. Do you receive industrial waste?

1. ☐ yes 2. ☒ no

b. If yes, enter approximate number of industrial dischargers into system _____

13. Type of collection sewer system:

A. ☒ Separate sanitary

B. ☐ Combined sanitary and storm

C. ☐ Both separate and combined sewer systems

14. Name of receiving water or waters Columbia River

15. Does your discharge contain or is it possible for your discharge to contain one or more of the following substances: ammonia, cyanide, aluminum, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, zinc, phenols.

A. ☒ yes B. ☐ no

I certify that I am familiar with the information contained in the application and that to the best of my knowledge and belief such information is true, complete, and accurate.

R. T. Carruthers
Printed Name of Person Signing

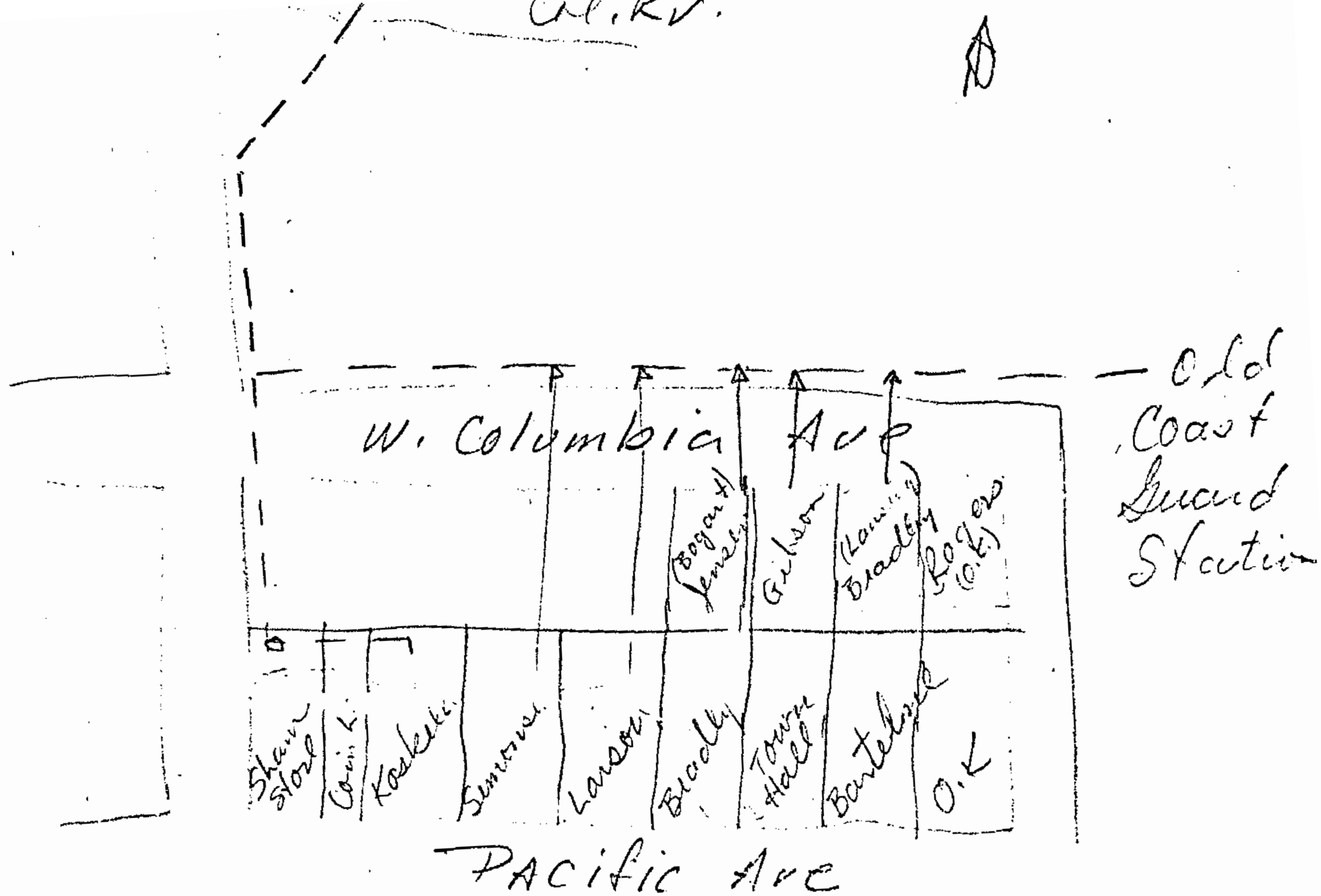
Mayor
Title

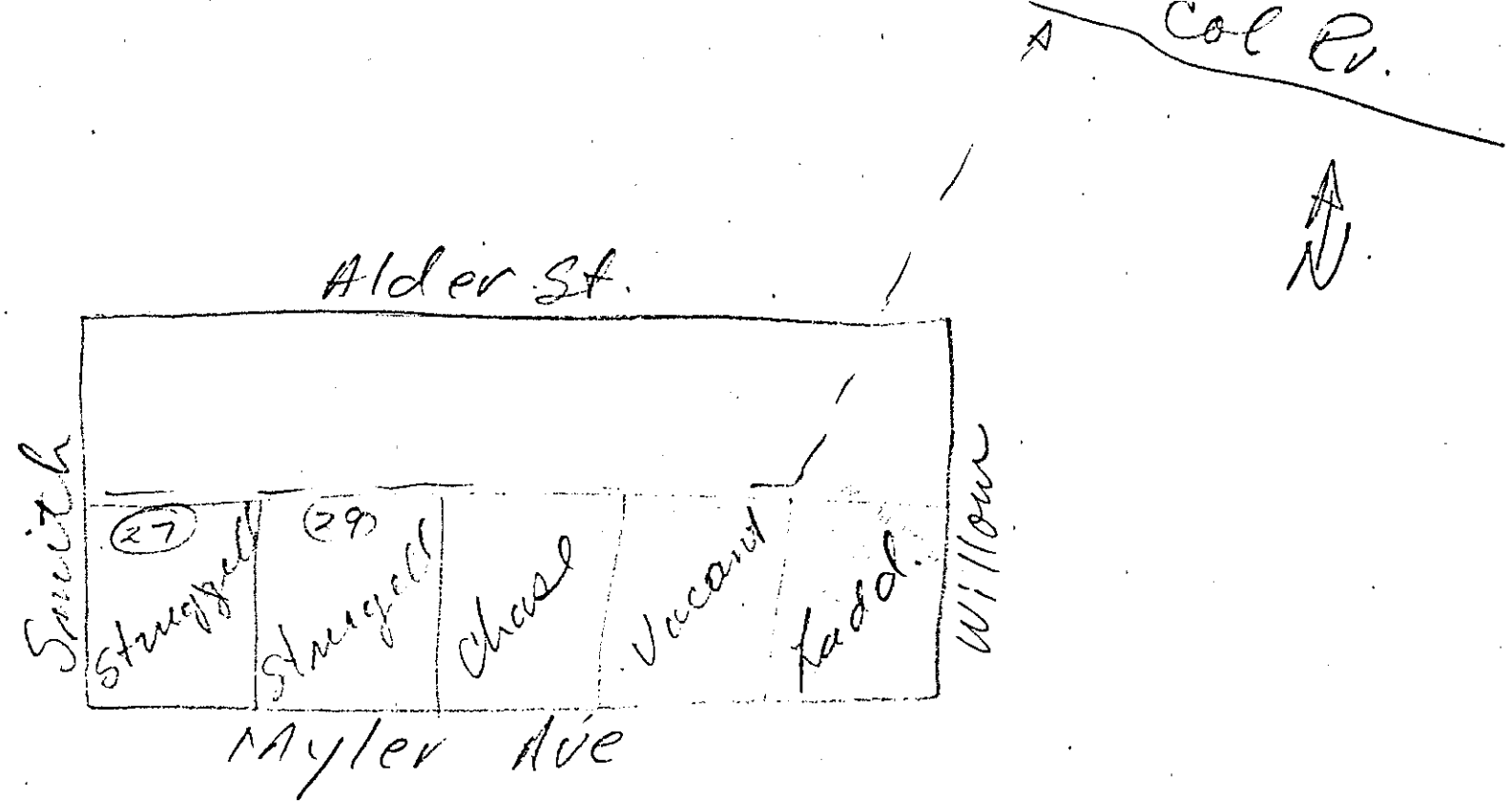
16 April 1973
Date Application Signed

Signature of Applicant

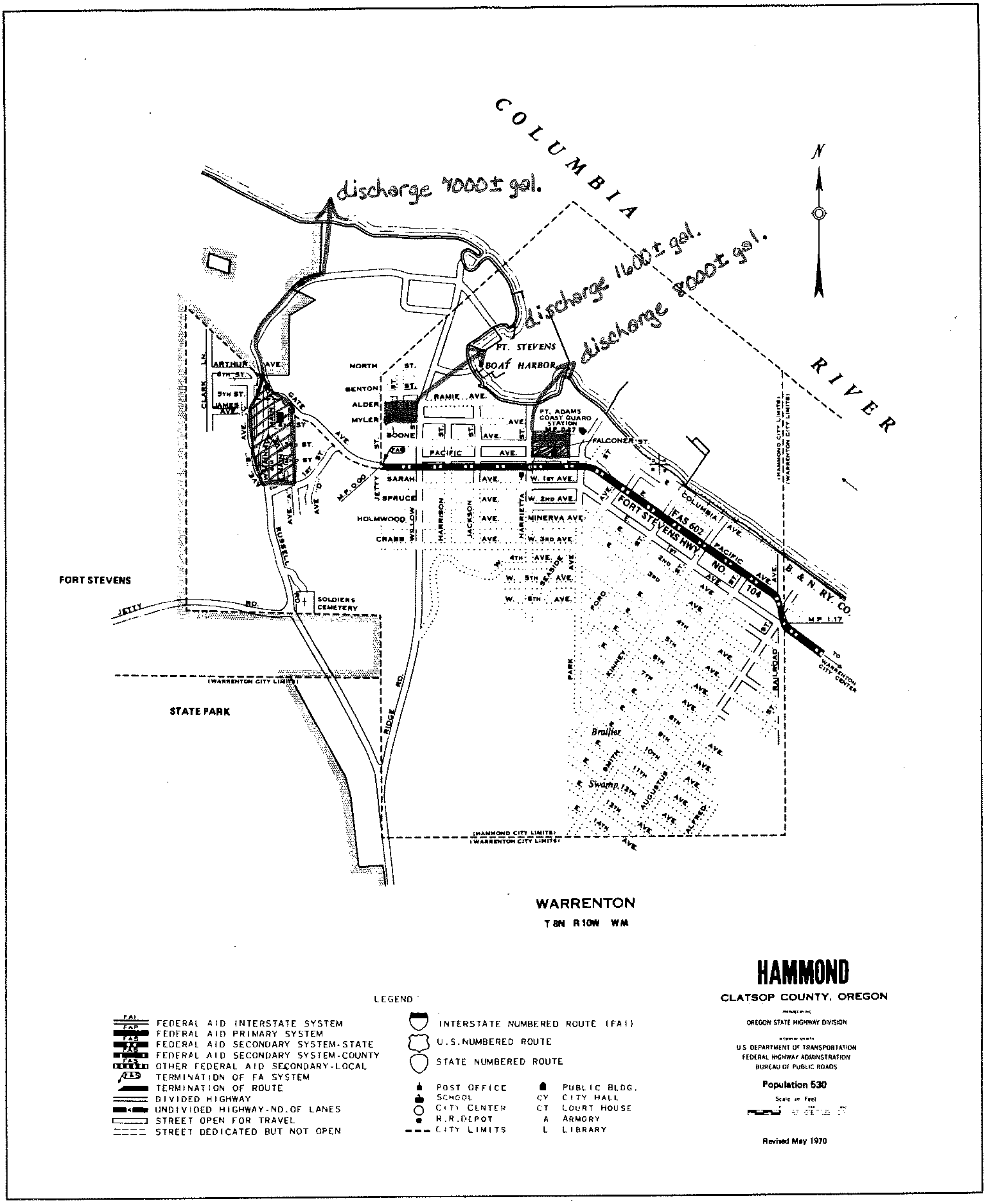
18 U.S.C. Section 1001 provides that:

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious, or fraudulent statements or representations; or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than $10,000 or imprisoned not more than 5 years, or both.


W. Columbia Ave
Pacific Ave
Old Coast Guard Station
Shaw Store
Comm. L.
Koskela
Simonsen
Larson
Bradly
(Bogart) Jensen
Town Hall
Gibson
Bartelme
(Lamming) Bradley
O.K.
Rogers (O.K.)


Col Ct.
N
Alder St.
Smith
(27)
Struggell
(29)
Struggell
Chase
Vacant
Tadd.
Willow
Myler Ave

Gwm



COLUMBIA RIVER
N
discharge 7000± gal.
discharge 1600± gal.
discharge 8000± gal.
FT. STEVENS BOAT HARBOR
FT. ADAMS COAST GUARD STATION
FORT STEVENS
STATE PARK
SOLDIERS CEMETERY
JETTY RD.
RUSSELL
RIDGE RD.
(WARRENTON CITY LIMITS)
(HAMMOND CITY LIMITS)
(WARRENTON CITY LIMITS)
NORTH ST.
BENTON ST.
ALDER
MYLER
BOONE
RAMIE AVE.
PACIFIC AVE.
FALCONER ST.
SARAH AVE.
SPRUCE AVE.
HOLMWOOD AVE.
CRABB AVE.
W. 1ST AVE.
W. 2ND AVE.
MINERVA AVE.
W. 3RD AVE.
W. 4TH AVE.
W. 5TH AVE.
W. 6TH AVE.
JETTY
WILLOW
HARRISON
JACKSON
HARRIETTA
SEASIDE
ARTHUR AVE.
6TH ST.
5TH ST.
JAMES AVE.
CLARK LN.
GATE AVE.
1ST ST.
AVE. A
AVE. D
M.P. 0.00
FAS
FORT STEVENS HWY NO. 104
FAS 602
COLUMBIA AVE.
PACIFIC AVE.
B. & N. RY. CO.
M.P. 1.17
TO WARRENTON CITY CENTER
RAILROAD
PARK
FORD
KINNEY
SMITH
AUGUSTUS
ALFRED
Braillier
Swamp
2ND AVE.
3RD AVE.
4TH AVE.
5TH AVE.
6TH AVE.
7TH AVE.
8TH AVE.
9TH AVE.
10TH AVE.
11TH AVE.
12TH AVE.
13TH AVE.
14TH AVE.
WARRENTON
T 8N R 10W WM
LEGEND
FEDERAL AID INTERSTATE SYSTEM
FEDERAL AID PRIMARY SYSTEM
FEDERAL AID SECONDARY SYSTEM-STATE
FEDERAL AID SECONDARY SYSTEM-COUNTY
OTHER FEDERAL AID SECONDARY-LOCAL
TERMINATION OF FA SYSTEM
TERMINATION OF ROUTE
DIVIDED HIGHWAY
UNDIVIDED HIGHWAY-NO. OF LANES
STREET OPEN FOR TRAVEL
STREET DEDICATED BUT NOT OPEN
INTERSTATE NUMBERED ROUTE (FAI)
U.S. NUMBERED ROUTE
STATE NUMBERED ROUTE
POST OFFICE
SCHOOL
CITY CENTER
R.R. DEPOT
CITY LIMITS
PUBLIC BLDG.
CY CITY HALL
CT COURT HOUSE
A ARMORY
L LIBRARY
HAMMOND
CLATSOP COUNTY, OREGON
OREGON STATE HIGHWAY DIVISION
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
BUREAU OF PUBLIC ROADS
Population 530
Scale in Feet
Revised May 1970

APPENDIX B

APPENDIX C

5372

CERTIFIED MAIL
Return Receipt Requested

March 4, 1977

Honorable Mayor and City Council
Town of Hammond
Town Hall
Hammond, Oregon 97121

Re: S - Hammond
Clatsop County
Salem North-Coast Region

Gentlemen:

For the last ten years the town of Hammond has been requested by the Department of Environmental Quality to provide a sewage collection system and related treatment facilities. These facilities have been needed to eliminate raw sewage discharges to the Columbia River and sewage health hazards in the town.

Federal Standards required that adequate treatment be provided for all waste discharges by July 1, 1977. We are aware that you are again underway to plan, design, and construct the necessary facilities.

As you will not be able to meet the deadline date, you will find attached an order issued by the Environmental Quality Commission requiring the town of Hammond to appear to show cause why the Commission should not request legal staff to initiate appropriate enforcement action.

A hearing will be conducted by the Commission at Seaside Convention Center on the subject of Clatsop Plains, starting at 7:30 p.m. on March 31, 1977. You are scheduled to appear at their regular meeting on April 1, 1977 at 10 a.m. in the Seaside Convention Center.

If you need assistance on these matters, please contact Murray Tilson, our Regional Engineer in Tillamook, or this office.

Sincerely,

WILLIAM H. YOUNG
Director

Fred M. Bolton
Administrator
Regional Operations

FMB/bw
Attachment
cc: Page Two

cc: Water Quality, DEQ
cc: Salem North-Coast Region
cc: Environmental Protection Agency
Oregon Operations Office
cc: North Coast Branch Office
cc: Robert E. Meyer Engineering
14250 S. W. Allen
Beaverton, Oregon 97005
cc: Raymond P. Underwood
Department of Justice

bcc: Mike Downs, DEQ

bcc: Jerry McCallister
City Attorney
P. O. Box 508
Astoria, Or. 97103

BEFOR THE ENVIRONMENTAL QUALITY COMMI ION
of the
State of Oregon

NOTICE OF OPPORTUNITY TO
APPEAR AND SHOW CAUSE

WHEREAS the Commission finds it has reasonable grounds to believe that

1) The City of Hammond is not equipped with an adequate sewage treatment plant and

2) The City of Hammond has under its jurisdiction, operation, and control a sewer system serving residential, commercial, and industrial needs and

3) Said sewer system collects, channels, and discharges untreated or insufficiently treated sewage into the Columbia River through one or more outfalls and

4) Said discharge is an unpermitted discharge to the waters of the State which is contrary to law and regulation with the force of law and

5) The septic tank and drainfield disposal systems serving many residences in the City of Hammond are failing and present hazards to the public health and waters of the State and

6) The Department has unsuccessfully endeavored by conference, conciliation and persuasion to eliminate the cause of the above-mentioned unlawful pollution of waters of the State.

BE IT RESOLVED AND ORDERED that the incorporated City of Hammond, be given notice that it shall be heard before the Commission commencing at 10:00 a.m. on April 1, 1977 at the Seaside Convention Center, First and Edgewood, in Seaside, Oregon. At said time and place, the City of Hammond shall show cause, if any there be, why the Commission should not instruct legal counsel to initiate appropriate civil penalty, injunctive, or such other legal proceedings against the City of Hammond as may be

necessary and proper to require the City of Hammond to properly fund, plan, install, and use exclusively such a collection and interceptor system as will collect, channel, and divert all sanitary sewage from residential, industrial, and commercial sources in the City of Hammond to the Community Sewage Treatment Plant at Warrenton, Oregon; said diversion to result in the complete cessation of the discharge of insufficiently or untreated sanitary sewage to the waters of the State.

SO ORDERED this 25th day of February, 1977.

(typed in on March 4, 1977)

Joe B. Richards, Chairman

TOWN OF HAMMOND

HAMMOND, OREGON 97121

11 March 1977

Mr. Fred M. Bolton, Administrator
Regional Operations
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, Oregon 97205

Dear Fred:

Thank you for your letter of 4 March. I have several points I would like to make in regard to it.

1. Certainly one of the reasons (there are others, of course), that Hammond does not have a sewer today are the past actions of the DEQ and it's predecessor organization. At the time we completed the Green report, you told us you couldn't have every little town with its own sewer plant and that we would have to go in with Warrenton. When some progress was made toward an equitable agreement we were then told that every gaggle of little towns couldn't go planning their sewers alone - that they would have to conform to a master plan. This plan was made available to us in 1976 and we are proceeding in conformance with it. Under the circumstances your opening sentence simply does not sqare with the facts. The DEQ has more nearly played an obstructionist role and apparently you insist on continuing to do so.

2. The Town is involved now in completing a facilities plan. When it is completed it will be given to the citizens of Hammond and they will vote on its recommendations. Interference at this point can only slow things up again. The principle reason we are as late as we are is because DEQ took eight months off the front end of this project in getting around to approving the grant. You can scarcely hold Hammond responsible for your staff problems.

3. If the DEQ wants to persist in this asinine behavior, threatening legal action, - there is not much I'm willing to do to dissuade you. On the other hand you should know that 75% of your problems in this area are closely related to this heavy-handed, arrogant, insensitive handling of local people.

Your lack of sensitivity to the problems of small cities is amply demonstrated in your scheduling a 10:00 am meeting. We are all working people and have no one available to attend a meeting at that time. In any case, we question what authority you have to command our appearance. If you wish to be heard by the Common Council, we meet at 7:15 pm on the second Wednesday of each month at the Town Hall. I suggest this would be a far more effective way to approach problem solving. An abrasive approach can only result in a lessening of co-operation. The Town is making a genuine effort to get sewers in. We need your help, not this sort of thing. There are local needs that will be addressed on our timetable! Your delaying tactics may well cause us to miss a year's construction time.

I suggest that you rescind your letter and notice immediately. There is no excuse for such a letter to have ever been written or such a notice issued.

Cordially yours,

T O W N O F H A M M O N D

R. T. Carruthers
Mayor

cc: Governor Robert Straub
Sen. Dell Isham
Sen. Edward Fadeley
Sen. Charles Hanlon
Rep. Nancie Fadeley
Rep. Ted Bugas
Mr. Don Jones
Mr. Loren Kramer
Mr. Bill Young
Mr. Joe B. Richards
Mr. Morris K. Crothers
Mrs. Jacklyn L. Hallock
Mrs. Grace S. Phinney
Mr. Ronald Somers

TOWN OF HAMMOND

HAMMOND, OREGON 97121

RECEIVED
MAR 21 1977
DEPT. OF ENVIROMENTAL QUALITY

10 March 1977

van Hammond cc Murray T. file! cc Russ F. cc LWQ cc Peter McSwain

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAR 11 1977
OFFICE OF THE DIRECTOR

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

Dear Bill:

In regard to your staff proposals regarding scheduling of deadlines in North Clatsop Plains and in particular, the Hammond area. The Plan will essentially be completed by May 31, but there is no possibility of completing necessary negotiations with Warrenton and Fort Stevens State Park by that time. Any attempt to do so would be shortcutting the legitimate planning process and would shortchange the citizens' right to review the actions of their own local governments.

We are making progress in solving our problem. Slight modifications of the schedule at this critical stage are not likely to result in any change in the date sewers are finally in and hooked up. Internal DEQ problems with expenditures of Federal grant funds are not adequate reasons for interference in the normal planning process. The planning document is only a small part of the process. Your staff must be sensitive to historic rivalries between Hammond and Warrenton and to the need for adequate public exposure and the delicate job of reaching a consensus on exactly how the plan will be put into effect.

Local voter's opinions may easily get lost in an accelerated schedule. It is very apt that local voters and officials will react adversely to interference in local affairs. We are making a genuine attempt to put sewers in. Interference at this point will be more likely to result in delay of the final goal.

Cordially yours,

TOWN OF HAMMOND

R. T. Carruthers
Mayor

cc: Robert E. Meyer, Engineer

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

MEMORANDUM:

To: Environmental Quality Commission

From: Director

Subject: Agenda Item H, April 1, 1977 EQC Meeting

Field Burning - EQC Report to the Legislature

No written report on the above item.

This is the report which was presented to the EQC.

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

TO: Environmental Quality Commission Date: April 1, 1977

FROM: Director

SUBJECT: Report on Field Burning to the 59th Legislative Assembly

Background

At the February 25, 1977 meeting, the Environmental Quality Commission received a proposed report on field burning acreage to be burned in 1977 and 1978. Among other things, Commission members recommended revisions to the conclusions format and inclusion of a statement of the Commission's concern over the impact of slash burning. A revised report and letter (concerning slash burning) were forwarded to the commissioners in time for a conference call scheduled for March 10, 1977.

Commissioners Hallock and Crothers indicated they wished further review and a face-to-face meeting to discuss the report.

Discussion

Commissioner Hallock expressed concern chiefly with recovery of straw and slash as resource materials for fertilizer and energy production. Some efforts have of course been made in this direction. Notably, the Oregon Field Sanitation Committee has initiated many studies of the uses of straw at the Straw Center, OSU, Golden 'B' Products, and at other locations. Animal feed trials have also been carried out in central Oregon. The Committee's consultant has layed much valuable groundwork for future uses of straw as both fibre and chemical feedstock.

Wood waste (from sawmills) as a result of years of market development finds varied uses as fuel, wood products, charcoal briquets, etc., however, slash recovery has been mainly for pulping and the activity has been closely tied to the economic situation of that industry. As is the case with straw, known technology offers many possible uses for these materials. However, both straw and slash recovery operations await major capital investors. Since such investors could be either public or private, Mrs. Hallock's comments seem appropriate for legislative consideration. (Senator Hanlon has already suggested state financing of a straw pyrolysis plant for the Willamette Valley.)

The staff has included expanded discussions of field burning complaints as requested by Commissioner Hallock. These are included in the Director's recommendation.

Commissioner Crothers expressed concern about the evolution of field burning control. He indicated that a proper strategy should control rather than limit acreage burned to prevent violation of standards. In general, the field burning (and slash) smoke management programs operate with the intent to allow burning such that certain "standards" are not violated. (Most often the "standard" is one of visibility reduction as it is the easiest to recognize, measure, and identify the cause.) Daily operation of a smoke management program does not, therefore, rely heavily on an overall emission (acreage) limitation. Weather conditions are a much more significant control factor on a day-by-day basis. Since smoke management is based on weather criteria, it can go a long way toward minimizing violations of certain air quality criteria due to field burning (at ever increasing cost) but it cannot guarantee zero violations.

Application of current acreage limits provides for:

1. Reduced emission whether they impact people directly or not.

2. Reduced air quality problems (though the correlation between acreage and impact is probably not 1 to 1).

Long term considerations would indicate acreage limits to be the most acceptable solution. However, within the Department's current control strategy of source compliance based on best available technology and economic considerations, present acreage limitation is an inconsistency which could best be remedied by an extension of the present schedule. Given such an extension, the Department would maintain the smoke management program essentially as currently formulated subject to the availability of funds and supported by an expanded monitoring system designed to assess the impact of field burning.

The state Department of Forestry currently implements the state's slash burning smoke management plan. The plan, which outlines the criteria for slash burning releases, is ascribed to by all entities currently involved in slash burning in the state. These include:

Oregon State Department of Forestry
U. S. Forest Service
Bureau of Land Management
Bureau of Indian Affairs
Private Land Owners
Oregon Forest Protection Association

Under current law, the plan requires approval by both DEQ and the state Department of Forestry.

Operation of the slash management program was assigned to the Forestry's Forest Protection Division which already had weather forecasting duties relating to fire safety. The Department of Forestry staffing and weather data gathering capabilities exceed those of the DEQ and, it is believed implementation of any currently conceived program would not be limited by Forestry's forecasting capabilities.

Recently, the Department has discussed with state Forestry the feasibility of plan improvements including:

1. Revisions to burning release criteria. (Tonnage burned vs. distance to smoke sensitive areas.)

2. More centralization of release authority. (Burn release authority is currently vested in district foresters.)

3. Improved smoke intrusion reporting and smoke incident analysis.

4. Control of burning based on existing air quality.

At present, Forestry has responded cooperatively indicating a willingness to revise plan procedures to implement many of DEQ's proposals.

Currently, more meetings are planned with the Department of Forestry beginning with a meeting between the two Department Directors and staff on April 8, 1977. It is hoped this meeting will lead to a meeting between the Commission and the state Board of Forestry scheduled at a later date.

Director's Recommendation

The Director recommends approval of the proposed report (Attachment A). The following revisions have been made to the report of March 10, 1977.

1. INSERT THE FOLLOWING AFTER PARAGRAPH 4, PAGE 2:

These complaints and medical studies indicate that some individuals are severely affected by field burning smoke. Effects are most severe when respiratory disorders are already present. The Findley-Service report noted treatment of 201 patients between July 9 and August 29, 1969, 83% of which had prior respiratory ailments. Eighty-six percent of the patients were required to purchase medicine and 131 work days were lost.

A recent report relating field burning and respiratory problems was issued by Peggy Bartells with cooperation of the Oregon Lung Association. The report which dealt with the Eugene-Springfield area, consisted of three parts:

1. A correlation analysis between Intermittent Positive Pressure Breathing (IPPB) treatments and acreage burned.

2. The results of a survey of patients with respiratory disorders.

3. An analysis of the geographic distribution of complainants.

Summarizing briefly, it appears from the data there may be a positive correlation between peaks in IPPB treatments and peaks in field burning acreage burned though no such conclusion is stated. Approximately

two-thirds of the patients responding to the survey indicated that field burning affected their respiratory problems. Finally, some areas of Eugne-Springfield and the vicinity do have disproportionately higher numbers of complaints.

Complaints of eye irritation and headaches related to field burning smoke are common. Ash fallout and odor nuisance related to field burning are also commonly noted in complaints registered by the Department. Medical and clean-up costs associated with smoke are known to exist but are not well documented.

2. INSERT THE FOLLOWING AFTER PARAGRAPH 4, PAGE 3:

Finally, use of the present mobile field sanitizers requires removal and disposal of approximately one half of the average straw load. Valuable research accomplished by the Oregon Field Sanitation Committee and tax credits developed under current legislation have laid the groundwork for the start of major straw utilization efforts. Large capital investments, either public or private, are required to stimulate major straw utilization projects.

3. INSERT THE FOLLOWING AFTER PARAGRAPH 1, PAGE 4:

The current program operated by the Department has been aimed at reducing smoke intrusion into cities and other smoke sensitive areas with severity of intrusions being assessed by the associated visibility reductions. Major cities have received the prime attention. It is the Commission's belief that this informal visibility criteria does not allow adequate assessment of the impacts of field burning smoke on air quality and public health and safety. Further efforts have not been made primarily due to the phaseout/phasedown legislation which has been in effect since 1971. The Commission also recognizes that though the majority of the affected people live in Eugene, Salem, Albany, Lebanon and Corvallis, intrusions in other areas such as Stayton and Sweet Home (which have at times incurred severe intrusions) must also be minimized.

If field burning is to be allowed beyond the current phasedown program, three possible additions to smoke management operational procedures appear to offer some promise for incremental improvements in minimizing smoke effects from field burning. They are special rapid lighting techniques, an improved communication system, and an expanded air monitoring system specifically designed to assess field burning smoke impact.

4. TABLE THE PROPOSED LETTER TO THE ASSEMBLY REGARDING SLASH BURNING AND ATTACH THE FOLLOWING PARAGRAPH TO THE REPORT AFTER THE SMOKE MANAGEMENT SECTION:

Slash Burning

Both the Department of Environmental Quality and the Environmental Protection Agency have reviewed summertime air quality (and particularly smoke intrusion) problems in the southern Valley and have found slash

burning contributes at least as much smoke to this area as does field burning. Based upon this evidence, it may seem arbitrary to penalize or otherwise severely limit the grass seed industry on the basis of its effect on the southern Willamette Valley air shed and continue to allow slash burning under its present program.

To minimize any such discrimination, the Commission is very interested in improving control of slash burning. Further improvement in control of slash smoke may require revision to the current slash smoke management plan or its implementation. The Commission believes applicable features of the DEQ's program (such as central release authority) should be incorporated into the slash smoke management program.

To this end, DEQ and Department of Forestry staff members have already met to discuss possible improvements in the existing smoke management program.

It is the Commission's intention to meet with the state Board of Forestry to constructively discuss improvements to the slash smoke management program.

5. SUBSTITUTE THE FOLLOWING RECOMMENDATION FOR THE EXISTING RECOMMENDATION ON PAGE 5:

Recommendation

Based on the long term goal of better air quality, retention of phasedown of acreage to be open burned is recommended. However, in view of the limited alternatives available to seed growers at this time, the Commission recommends that legislation be enacted which would authorize EQC to permit additional acreage under a strict smoke management program supported by continued enforcement and in accordance formally adopted criteria with which may include but not be limited to the following:

(a) Fields not burned for the previous one or two year period.

(b) Fields with soil types or slopes which make them unsuitable for alternative cropping.

(c) Fields located such that they could be burned under specified conditions and not impact any sensitive receptor.

(d) Fields qualifying under the emergency of hardship provision of ORS 468.475(5).

In addition, the EQC recognizes that straw, slash, and other combustibles cannot long be considered waste, but must be considered resources. The Commission recommends that the legislature act to discourage open burning, and to encourage collection and conversion of these resources to usable products such as fertilizer and energy.

Finally, if significant increases in acreage burned are authorized, it is recommended that funding for adequate monitoring of field burning smoke impact be provided.

WILLIAM H. YOUNG, DIRECTOR

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

To: The 59th Legislative Assembly

From: Environmental Quality Commission

Subject: Open Field Burning Acreage Limitations in 1977 and 1978

BACKGROUND

The Environmental Quality Commission is required by Oregon Law (ORS 468.475(2)(e)) to report to the 59th Legislative Assembly its recommendation for acreage to be open field burned in the Willamette Valley with particular regard to the acreage phasedown limitations of Oregon Revised Statutes 468.475(2). These limitations are currently 95,000 acres during 1977 and 50,000 after 1977.

The Environmental Quality Commission, as the policy making body for the Department of Environmental Quality, must concern itself with preserving and improving the land, air, and water quality of this State. Though a change in agricultural practices is likely to affect all three of these areas of concern, field burning's major deleterious effect is on air quality and, therefore, the Commission must emphasize air quality when reviewing possible recommendations regarding acreage limitations. Any assessment regarding effects on land and water quality due to changes in acreage burned would be highly speculative due to the dearth of assembled information.

DISCUSSION

Air Quality

In general, open burning and the geography of the Willamette Valley are not compatable with good air quality. Smoke, from any source, released during periods of poor atmospheric ventilation will have an adverse effect on air quality. Such periods are common in the Willamette Valley.

Field burning smoke causes increased particulate loading, periods of reduced visibility, disagreeable odor, ash fallout, and contributes to violations of state and federal particulate standards and tend to aggravate respiratory problems. Though not all of the above effects are standard measurements of air contaminants together they comprise "smoke effect indicators" which are used to identify and compare the air quality impacts of field burning.

Total suspended particulate (TSP) data from the Eugene-Springfield area show violations of the secondary ambient air quality standards for both annual geometric mean and 24 hour average. Such violations are contributed to by field burning smoke. TSP data collected during the summers of 1973-1976 indicate roughly 20% higher loadings for days with a minimum estimated visibility of 12 miles or less due to field burning compared to days not so affected. However, due to the relatively light weight of field burning particulate, violation of the 24 hour standard due solely to a smoke intrusion is not likely.

The most obvious effect of field burning smoke is reduced visibility. In general, southern valley summertime visibilities have been improving over the last several years. This may be attributed, in great part, to the Department's smoke management program. During 1976, visibility reductions attributable to field burning and estimated to be 12 miles or less by nephelometer readings, occurred for about 10 hours in Eugene and Springfield. These 10 hours were accumulated over 3 days of the season. Salem had no visibility reduction below 12 miles attributable to field burning. Field burning also contributes to visibility reductions in the Eugene and Salem area with minimums greater than 12 miles on a more or less regular basis as well as in non-monitored areas throughout the Willamette Valley.

Two reports, produced external to the Department also indicate field burning as a serious air quality problem. The Environmental Protection Agency (EPA), after their own analysis, reported field burning and slash burning in connection with visibility reductions and contributing to 24 hour particulate violations. Microscopic analyses by McCrone and Associates (for both EPA and DEQ) again indicate field and slash burning contribute substantially to particulate loadings in the Eugene-Springfield area.

Finally, citizen complaints are filed each summer recording a variety of problems ranging from difficulty in breathing to ash fallout and odor. In 1975, 761 complaints were filed in comparison to 318 filed in 1976.

These complaints and medical studies indicate that some individuals are severely affected by field burning smoke. Effects are most severe when respiratory disorders are already present. The Findley-Service report noted treatment of 201 patients between July 9 and August 29, 1969, 83% of which had prior respiratory ailments. Eighty-six percent of the patients were required to purchase medicine and 131 work days were lost.

A recent report relating field burning and respiratory problems was issued by Peggy Bartells with cooperation of the Oregon Lung Association. The report which dealt with the Eugene-Springfield area, consisted of three parts:

1. A correlation analysis between Intermittent Positive Pressure Breathing (IPPB) treatments and acreage burned.

2. The results of a survey of patients with respiratory disorders.

3. An analysis of the geographic distribution of complainants.

Summarizing briefly, it appears from the data there may be a positive correlation between peaks in IPPB treatments and peaks in field burning acreage burned though no such conclusion is stated. Approximately two-thirds of the patients responding to the survey indicated the field burning affected their respiratory problems. Finally, some areas of Eugene-Springfield and the vicinity do have disproportionately higher numbers of complaints.

Complaints of eye irritation and headaches related to field burning smoke are common. Ash fallout and odor nuisance related to field burning are also commonly noted in complaints registered by the Department. Medical and clean-up costs associated with smoke are known to exist but are not well documented.

The Commission has noted a general improvement in smoke effects indicators in the first two seasons of the acreage phasedown. This appears to be a promising trend. However, considering the wet conditions of the previous two summers, the effects of other smoke sources, and the evolutionary improvements in smoke management program, it is probably too early to draw a direct correlation between acreage burned and smokiness in the valley.

Mobile Field Sanitizers

The current acreage phasedown was predicated upon a clean alternative to open field burning becoming available to seed growers. Hopes have been placed with the mobile field sanitizer as the most likely alternative. Though other alternative treatments of grass fields, such as increased use of herbicides, straw incorporation, and "crew-cutting" have been explored to varying degrees with some limited successes, the bulk of phased-out acreage was contemplated by current legislation to be treated by a successful field sanitizer.

After careful analysis of this year's mobile field sanitizer emission data, DEQ staff cannot show mass emissions of fine particulate from machines to be less than those from open field burning. Therefore, DEQ cannot verify the results of the report of the consulting engineers to the Oregon Field Sanitation Committee which indicated a 98% reduction in fine particulate. This situation reflects the data which was limited and of wide variability. Such wide variability is to be expected considering the conditions under which the machines operated, but makes accurate assessment of their capabilities difficult. Extensive additional testing during 1977 on the current generation of machines is necessary to allow comparison with present emission data. The Department intends to provide backup support to the Oregon Field Sanitation Committee consulting engineers in their testing program during 1977. In the meantime, a reduction in fine particulate emission cannot be guaranteed by switching from open burning to machine burning.

If machine emissions are not substantially less than open burning emissions, their effects on air quality and people are expected to be greater due to their much reduced plume height compared to open burning. If, on the other hand, machine emissions (after further testing) prove to

be lower than open burning, some form of elaborate mathematical modeling will be required to better compare the two types of sources. The Department can, to a limited degree, do such modeling. However, a much more thorough analysis of comparative air quality than can be reasonably contemplated by the Department is currently underway at Oregon State University. The Livermore Regional Air Quality (LIRAQ) computer model is being applied to the Willamette Valley. Present plans for LIRAQ include a comparative analysis of mobile field sanitizer and open burning emissions under typical conditions in the valley. Unfortunately, the most useful results from LIRAQ are not expected to be available until late 1977 or 1978, though unverified results may be available sooner.

It is concluded that field sanitizing machines have not developed so far to the point where they should be considered either a substitute for open burning or a large-scale practical alternative method of field sanitizing.

Finally, use of the present mobile field sanitizers requires removal and disposal of approximately one half of the average straw load. Valuable research accomplished by the Oregon Field Sanitation Committee and tax credits developed under current legislation have laid the groundwork for the start of major straw utilization efforts. Large capital investments, either public or private, are required to stimulate major straw utilization projects.

Smoke Management

Under a smoke management program, smoke impacts, their strength and probability of occurrence are tied closely to daily weather, acreage burned, human decision making and decision implementation. Estimates of the overall annual smoke intrusions due to field burning therefore must consider the variability of the season's weather, the number of decisions to be made, the average acreage involved in each decision and the precision to which each decision can be carried out. Though in general reduced acreage can be expected to result in reduced smokiness, non-seasonal or highly variable weather can severely alter the expected smoke situation.

The current program operated by the Department has been aimed at reducing smoke intrusion into cities and other smoke sensitive areas with severity of intrusions being assessed by the associated visibility reductions. Major cities have received the prime attention. It is the Commission's belief that this informal visibility criteria does not allow adequate assessment of the impacts of field burning smoke on air quality and public health and safety. Further efforts have not been made primarily due to the phaseout/phasedown legislation which has been in effect since 1971. The Commission also recognizes that though the majority of the affected people live in Eugene, Salem, Albany, Lebanon and Corvallis, intrusions in other areas such as Stayton and Sweet Home (which have at times incurred severe intrusions) must also be minimized.

If field burning is to be allowed beyond the current phasedown program, three possible additions to smoke management operational procedures appear to offer some promise for incremental improvements in minimizing smoke

effects from field burning. They are special rapid lighting techniques, an improved communication system, and an expanded air monitoring system specifically designed to assess field burning smoke impact.

Tests during 1976 indicated ground level smoke emissions from open field burning could be reduced below the levels now resulting from the use of typical lighting procedures by employing rapid lighting techniques on relatively large acreages.

Meteorological requirements generally restrict burning release times to the afternoon. To minimize the time required for burning release after meteorological criteria have been met requires direct DEQ to farmer contact. A properly designed radio system could accomplish this goal. In addition, the radio system would provide the direct communication link desired to stop burning when wind directions change unexpectedly.

A valley-wide visibility and particulate monitoring system would be immediately useful to the smoke management program as it would provide smoke effect data useful for curtailment of inappropriate burning. In addition, it would allow better analysis of smoke incidents, especially in areas not now monitored.

Each of these changes would require relatively large additional expenditures compared to the present smoke management budget.

Slash Burning

Both the Department of Environmental Quality and the Environmental Protection Agency have reviewed summertime air quality (and particularly smoke intrusion) problems in the southern valley and have found slash burning contributes at least as much smoke to this area as does field burning. Based upon this evidence, it may seem arbitrary to penalize or otherwise severely limit the grass seed industry on the basis of its effect on the southern Willamette Valley air shed and continue to allow slash burning under its present program.

To minimize any such discrimination, the Commission is very interested in improving control of slash burning. Further improvement in control of slash smoke may require revision to the current slash smoke management plan or its implementation. The Commission believes applicable features of the DEQ's program (such as central release authority) should be incorporated into the slash smoke management program.

To this end, DEQ and Department of Forestry staff members have already met to discuss possible improvements in the existing smoke management program.

It is the Commission's intention to meet with the state Board of Forestry to constructively discuss improvements to the slash smoke management program.

RECOMMENDATION

Based on the long term goal of better air quality, retention of phase-down of acreage to be open burned is recommended. However, in view of the limited alternatives available to seed growers at this time, the Commission recommends that legislation be enacted which would authorize EQC to permit additional acreage under a strict smoke management program supported by continued enforcement and in accordance formally adopted criteria with which may include but not be limited to the following:

(a) Fields not burned for the previous one or two year period.

(b) Fields with soil types or slopes which make them unsuitable for alternative cropping.

(c) Fields located such that they could be burned under specified conditions and not impact any sensitive receptor.

(d) Fields qualifying under the emergency of hardship provision of ORS 468.475(5).

In addition, the EQC recognizes that straw, slash, and other combustibles cannot long be considered waste, but must be considered resources. The Commission recommends that the legislature act to discourage open burning, and to encourage collection and conversion of these resources to usable products such as fertilizer and energy.

Finally, if significant increases in acreage burned are authorized, it is recommended that funding for adequate monitoring of field burning smoke impact be provided.

Joe Richards, Chairman

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

TO: Environmental Quality Commission Date: March 31, 1977

FROM: Director

SUBJECT: Report on Field Burning to the 59th Legislative Assembly

Background

At the February 25, 1977 meeting, the Environmental Quality Commission received a proposed report on field burning acreage to be burned in 1977 and 1978. Among other things, Commission members recommended revisions to the conclusions format and inclusion of a statement of the Commission's concern over the impact of slash burning. A revised report and letter (concerning slash burning) were forwarded to the commissioners in time for a conference call scheduled for March 10, 1977.

Commissioners Hallock and Crothers indicated they wished further review and a face-to-face meeting to discuss the report.

Discussion

Commissioner Hallock expressed concern chiefly with recovery of straw and slash as resource materials for fertilizer and energy production. Some efforts have of course been made in this direction. Notably, the Oregon Field Sanitation Committee has initiated many studies of the uses of straw at the Straw Center, OSU, Golden 'B' Products, and at other locations. Animal feed trials have also been carried out in central Oregon. The Committee's consultant has layed much valuable groundwork for future uses of straw as both fibre and chemical feedstock.

Wood waste (from sawmills) as a result of years of market development finds varied uses as fuel, wood products, charcoal briquets, etc., however, slash recovery has been mainly for pulping and the activity has been closely tied to the economic situation of that industry. As is the case with straw, known technology offers many possible uses for these materials. However, both straw and slash recovery operations await major capital investors. Since such investors could be either public or private, Mrs. Hallock's comments seem appropriate for legislative consideration. (Senator Hanlon has already suggested state financing of a straw pyrolysis plant for the Willamette Valley.)

The staff has included expanded discussions of field burning complaints as requested by Commissioner Hallock. These are included in the Director's recommendation.

Commissioner Crothers expressed concern about the evolution of field burning control. He indicated that a proper strategy should control rather than limit acreage burned to prevent violation of standards. In general, the field burning (and slash) smoke management programs operate with the intent to allow burning such that certain "standards" are not violated. (Most often the "standard" is one of visibility reduction as it is the easiest to recognize, measure, and identify the cause.) Daily operation of a smoke management program does not, therefore, rely heavily on an overall emission (acreage) limitation. Weather conditions are a much more significant control factor on a day-by-day basis. Since smoke management is based on weather criteria, it can go a long way toward minimizing violations of certain air quality criteria due to field burning (at ever increasing cost) but it cannot guarantee zero violations.

Application of current acreage limits provides for:

1. Reduced emission whether they impact people directly or not.

2. Reduced air quality problems (though the correlation between acreage and impact is probably not 1 to 1).

Long term considerations would indicate acreage limits to be the most acceptable solution. However, within the Department's current control strategy of source compliance based on best available technology and economic considerations, present acreage limitation is an inconsistency which could best be remedied by an extension of the present schedule. Given such an extension, the Department would maintain the smoke management program essentially as currently formulated subject to the availability of funds and supported by an expanded monitoring system designed to assess the impact of field burning.

The state Department of Forestry currently implements the state's slash burning smoke management plan. The plan, which outlines the criteria for slash burning releases, is ascribed to by all entities currently involved in slash burning in the state. These include:

Oregon State Department of Forestry
U. S. Forest Service
Bureau of Land Management
Bureau of Indian Affairs
Private Land Owners
Oregon Forest Protection Association

Under current law, the plan requires approval by both DEQ and the state Department of Forestry.

Operation of the slash management program was assigned to the Forestry's Forest Protection Division which already had weather forecasting duties relating to fire safety. The Department of Forestry staffing and weather data gathering capabilities exceed those of the DEQ and, it is believed implementation of any currently conceived program would not be limited by Forestry's forecasting capabilities.

Recently, the Department has discussed with state Forestry the feasibility of plan improvements including:

1. Revisions to burning release criteria. (Tonnage burned vs. distance to smoke sensitive areas.)

2. More centralization of release authority. (Burn release authority is currently vested in district foresters.)

3. Improved smoke intrusion reporting and smoke incident analysis.

4. Control of burning based on existing air quality.

At present, Forestry has responded cooperatively indicating a willingness to revise plan procedures to implement many of DEQ's proposals.

Currently, more meetings are planned with the Department of Forestry beginning with a meeting between the two Department Directors and staff on April 8, 1977. It is hoped this meeting will lead to a meeting between the Commission and the state Board of Forestry scheduled at a later date.

Director's Recommendation

The Director recommends approval of the proposed report (Attachment A) with the following revisions:

1. INSERT THE FOLLOWING AFTER PARAGRAPH 4, PAGE 2:

   These complaints and the 1969 medical study of Doctors Findley and Service indicate that some individuals are severely affected by field burning smoke. Effects are most severe when respiratory disorders are already present. The Findley-Service report noted treatment of 201 patients, 83% of which had prior respiratory ailments. Eight-six percent of the patients were required to purchase medicine and 131 work days were lost. Complaints of eye irritation and headaches related to field burning smoke are common. Ash fallout and odor nuisance related to field burning are also commonly noted in complaints registered by the Department. Medical and clean-up costs associated with smoke are known to exist but are not well documented.

2. INSERT THE FOLLOWING AFTER PARAGRAPH 4, PAGE 3:

   Finally, use of the present mobile field sanitizers requires removal and disposal of approximately one half of the average straw load. Valuable research accomplished by the Oregon Field Sanitation Committee and tax credits developed under current legislation have laid the groundwork for the start of major straw utilization efforts. Large capital investments, either public or private, are required now.

3. INSERT THE FOLLOWING AFTER PARAGRAPH 1, PAGE 4:

The current program operated by the Department has been aimed at reducing smoke intrusion into cities and other smoke sensitive areas with severity of intrusions being assessed by the associated visibility reductions. Major cities have received the prime attention. It is the Commission's belief that this informal visibility criteria is appropriate for the protection of public health and safety as well as aesthetic considerations. Though the majority of the affected people live in Eugene, Salem, Albany, Lebanon and Corvallis, intrusions in other areas such as Stayton and Sweet Home (which have at times incurred severe intrusions) must also be minimized.

4. SUBSTITUTE THE FOLLOWING RECOMMENDATION FOR THE EXISTING RECOMMENDATION ON PAGE 5:

Recommendation

Based on the long term goal of better air quality, retention of phase down of acreage to be open burned is recommended. However, in view of the limited alternatives available to seed growers at this time, the Commission recommends that legislation be enacted which would authorize EQC to permit additional acreage under a strict smoke management program supported by continued enforcement and in accordance with which may include but not be limited to the following:

(a) Fields not burned for the previous one or two year period.

(b) Fields with soil types or slopes which make them unsuitable for alternative cropping.

(c) Fields located such that they could be burned under specified conditions and not impact any sensitive receptor.

(d) Fields qualifying under the emergency of hardship provision of ORS 468.475(5).

In addition, the EQC recognizes that straw, slash, and other combustibles cannot long be considered waste, but must be considered resources. The Commission recommends that the legislature act to discourage open burning, and to encourage collection and conversion of these resources to usable products such as fertilizer and energy.

5. TABLE THE PROPOSED LETTER TO THE ASSEMBLY REGARDING SLASH BURNING AND ATTACH THE FOLLOWING PARAGRAPH TO THE REPORT AFTER THE SMOKE MANAGEMENT SECTION:

Slash Burning

Both the Department of Environmental Quality and the Environmental Protection Agency have reviewed summertime air quality (and particularly smoke intrusion) problems in the southern Valley and have found slash

burning contributes at least as much smoke to this area as does field burning. Based upon this evidence, it may seem arbitrary to penalize or otherwise severely limit the grass seed industry on the basis of its effect on the southern Willamette Valley air shed and continue to allow slash burning under its present program.

To minimize any such discrimination, the Commission is very interested in improving control of slash burning. Further improvement in control of slash smoke may require revision to the current slash smoke management plan or its implementation. Since the DEQ field burning smoke management program has brought about significant reductions in field burning related smoke problems in the south Valley, the Commission believes applicable features of the DEQ's program (such as central release authority) should be incorporated into the slash smoke management program.

To this end, DEQ and Department of Forestry staff members have already met to discuss possible improvements in the existing smoke management program.

It is the Commission's intention to meet with the state Board of Forestry to constructively discuss improvements to the slash smoke management program.

ENVIRONMENTAL QUALITY COMMISSION

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

ROBERT W. STRAUB
GOVERNOR

MEMORANDUM

To: Environmental Quality Commission

From: William H. Young, Director

Subject: Agenda Item No. J, April 1, 1977, EQC Meeting

Water Quality Program - Discussion of DEQ and EQC Authority During Critical Situations

Background

The Department has received a number of inquiries relative to the options available for dealing with water quality standards and permit compliance during the drought.

House Speaker Phil Lang has suggested the need for legislation to relax water quality standards.

Senate President Jason Boe's staff has expressed the opinion that the EQC has sufficient authority to deal with problems and suggested the possibility of a Senate resolution urging the EQC to take necessary action.

Cities and industries are concerned that even with their best and extraordinary efforts, strict water quality standards compliance may be impossible. They are unsure of their legal position in the event of possible citizen suits.

Cities, for example, can envision the possibility of the following:

Water shortage produces energy shortage which necessitates curtailment of chlorine production which produces chlorine shortage. Under a priority allocation system, chlorine for all sewage treatment plants is not available. Yet, permits require disinfection to control bacteria levels and water quality standards contain bacteria standards. To deal with the problem, it may be necessary to temporarily -

a. Suspend enforcement of the disinfection condition of selected permits (below any water supply intakes).

b. Suspend enforcement of or temporarily modify the bacterial standards in selected areas.

c. Post streams as potential health hazard areas.

This is not unreal. Chlorine shortages did occur during the 1973 energy shortage.

As another example, the major cities and industries along the mainstem Willamette are presently pursuing alternatives for temporarily reducing discharges to the river this summer and fall. It is possible that even with these costly and extraordinary efforts, the Department's Dissolved Oxygen standard would not be met due to extremely low flow. To achieve strict standards compliance, extended industrial plant closures or curtailments may be required (several months). The Dissolved Oxygen standard in the Willamette was set at a generally desirable level to protect anadromous fish passage. It has a small margin of safety built into it. There may be times, however, when D.O. levels below the standard for a specified duration would not cause irreparable damage to the Willamette River fishery. Thus a drought-related control program which -

a. Requires extraordinary source control and temporarily reduces the D.O. standard for a specific 2 to 3 month period, and then

b. Returns the D.O. standard to the present value and requires some industrial closure or production curtailment for a 2-week period to provide water quality suitable for fish passage -

may be in the best overall interest of the public.

Present Authorities

The following authorities presently exist for handling critical situations such as the drought:

1. The EQC can change any existing rule or adopt new rules. Such rule changes or additions can be temporary or permanent. Rule making procedures are governed by the Administrative Procedures Act and the Department's procedural rules.

2. The EQC can issue orders. Such orders are enforceable.

3. The Director can modify, suspend or revoke Waste Discharge Permits, subject to the procedures set forth in Department rules. Such actions can be appealed to the EQC.

4. The Director can exercise discretion in the enforcement of permits or standards. This offers no relief, however, from possible citizen suits or direct federal enforcement action.

> All permits generally contain a condition which requires compliance with standards regardless of other permit conditions. They also contain a condition which recognizes the possible inability to comply with permit conditions due to acts of God and specifies actions to be taken. This latter condition was originally intended to cover power outages or similar things which would affect that plant. It was not intended to cover a problem such as those anticipated with the drought.

Alternative Actions

The following options are open for discussion:

1. Rely on existing authorities and handle any critical situations by using the most appropriate combination of authorities at the time.

2. The Commission can provide some policy direction for the Director -- either informal or formal (codified into Oregon Administrative Rules).

3. The Commission can provide specific procedural direction.

The Department believes the third alternative is desirable to clearly spell out the procedure for dealing with possible critical situations. This would eliminate some fear and uncertainty on the part of cities and industries. It would convey that the EQC and DEQ are prepared to reasonably deal with critical situations. It would also clearly indicate the level of review and opportunity for input into any final decision.

Director's Recommendation

The Director recommends that the attached language be adopted as a temporary rule to be added to the section of the Water Quality Management Plan which was adopted as Administrative Rule in December 1976.

The Director further recommends that the Department be authorized to schedule a hearing and proceed toward adoption as a permanent rule.

Bill

WILLIAM H. YOUNG
Director

HLS:ak
March 18, 1977

Attachment

Attachment - Agenda Item No. J, April 1, 1977, EQC Meeting

Add a new section to OAR Chapter 340, Division 4, Subdivision 1 as follows:

340-41-011 PROCEDURAL AUTHORITY DURING CRITICAL SITUATIONS

(1) The EQC recognizes that critical situations may arise where action to enforce compliance with the provisions of this plan, including but not limited to water quality standards or the conditions of permits issued pursuant to ORS 468.740, would be inconsistent with the protection of public health, safety and welfare.

(2) As used in this section, "critical situations" means flood, drought, fire, windstorm, or other comparable natural disasters where such substantial damage to property occurs that the health, safety, welfare or economic stability of the state is thereby affected and if the above described standards and conditions were rigidly enforced, such health, safety, welfare or economic stability would be more materially affected.

(3) In such cases, the EQC may by rule temporarily modify any portion of this plan and, by order, suspend enforcement of any condition of a waste discharge permit or impose more stringent control requirements if necessary upon:

(a) giving such public notice as is required and practicable under the circumstances;

(b) making findings that one or more critical situations contemplated in subparagraph (2) do exist;

(c) setting forth the program for control during the critical situation;

(d) specifying the geographical area or areas affected and specifying the powers, if any, to be delegated to the Director during the critical situation;

(4) Any such action taken pursuant to subparagraph (3) shall be reviewed by the EQC at least every 60 days and the EQC shall then modify or terminate the action as necessary to protect public health, safety and welfare or prevent irreparable damage to any resources of the state. No such action may remain in effect for more than one year from the date of the EQC's original action.

HLS:ak
March 18, 1977

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. I, April 1, 1977, Public Hearing Before the Environmental Quality Commission

Adoption As Final Rules Certain Temporarily Adopted Amendments to the NPDES Permit Processing Rules

Background

The rule modifications being considered at this public hearing were adopted as temporary rules on December 20, 1976. They were adopted as temporary rules as part of an agreement to settle a court order in the case of Northwest Environmental Defense Center, et al., v. Russell Train, et al., United States Court of Appeals for the Ninth Circuit, No. 73-3599. After the temporary rule changes were adopted, a stipulation was filed with the Court and the original order was withdrawn. Now that the lawsuit has been satisfied, the rule changes should be made permanent.

Explanation of the Rule Modifications

The modified rule changes are attached. They consist of minor changes to Oregon Administrative Rules Chapter 340, Section 45-035, Subsections (2), (4), (6), (7), and (8). They also include a change in Section 45-065.

Director's Recommendation

Subject to any changes the Commission may deem appropriate after reviewing testimony delivered at this hearing, the Director recommends that the temporary rules be adopted as permanent rules.

Bill

WILLIAM H. YOUNG

CKA:ts
3/15/77

PROPOSED RULE CHANGES

ENVIRONMENTAL QUALITY COMMISSION

December 20, 1976

Amend Oregon Administrative Rules Chapter 340, Division 4, Subdivision 5, Section 45-035, Subsections (2), (4), (6), (7) and (8), to read as follows (new material underlined):

45-035 ISSUANCE OF NPDES PERMITS.

(1) Following determination that it is complete for processing, each application will be reviewed on its own merits. Recommendations will be developed in accordance with provisions of all applicable statutes, rules, regulations and effluent guidelines of the State of Oregon and the U. S. Environmental Protection Agency.

(2) The Department shall formulate and prepare a tentative determination to issue or deny an NPDES permit for the discharge described in the application. If the tentative determination is to issue an NPDES permit, then a proposed NPDES permit shall be drafted which includes at least the following:

(a) Proposed effluent limitations,

(b) Proposed schedule of compliance, if necessary, <u>established in conformance with the Federal Act and regulations issued pursuant thereto</u>,

(c) And other special conditions.

RULE CHANGES ADOPTED

AS TEMPORARY RULES

DECEMBER 20, 1976

Amend Oregon Administrative Rules Chapter 340, Division 4, Subdivision 5, Section 45-035, Subsections (2), (4), (6), (7) and (8), to read as follows (new material underlined):

45-035 ISSUANCE OF NPDES PERMITS.

(1) Following determination that it is complete for processing, each application will be reviewed on its own merits. Recommendations will be developed in accordance with provisions of all applicable statutes, rules, regulations and effluent guidelines of the State of Oregon and the U. S. Environmental Protection Agency.

(2) The Department shall formulate and prepare a tentative determination to issue or deny an NPDES permit for the discharge described in the application. If the tentative determination is to issue an NPDES permit, then a proposed NPDES permit shall be drafted which includes at least the following:

(a) Proposed effluent limitations,

(b) Proposed schedule of compliance, if necessary, <u>established in conformance with the Federal Act and regulations issued pursuant thereto</u>,

(c) And other special conditions.

(3) In order to inform potentially interested persons of the proposed discharge and of the tentative determination to issue an NPDES permit, a public notice announcement shall be prepared and circulated in a manner approved by the Director. The notice shall tell of public participation opportunities, shall encourage comments by interested individuals or agencies and shall tell of the availability of fact sheets, proposed NPDES permits, applications and other related documents available for public inspection and copying. The Director shall provide a period of not less than 30 days following the date of the public notice during which time interested persons may submit written views and comments. All comments submitted during the 30-day comment period shall be considered in the formulation of a final determination.

(4) For every discharge which has a total volume of more than 500,000 gallons on any day of the year, the Department shall prepare a fact sheet which contains the following:

(a) A sketch or detailed description of the location of the discharge;

(b) A quantitative description of the discharge, <u>including the rate or frequency of the discharge</u>;

(c) The tentative determination required under Section 45-035(2);

(d) An identification of the receiving stream with respect to beneficial uses, water quality standards, and effluent standards;

(e) A description of the procedures to be followed for finalizing the permit; and,

(f) Procedures for requesting a public hearing and other procedures by which the public may participate.

(5) After the public notice has been drafted and the fact sheet and proposed NPDES permit provisions have been prepared by the Department, they will be forwarded to the applicant for review and comment. All comments must be submitted in writing within 14 days after mailing of the proposed materials if such comments are to receive consideration prior to final action on the application.

(6) After the 14-day applicant review period has elapsed, the public notice and fact sheet shall be (~~circulated in a manner prescribed by the Director.~~) sent to any person upon request. The Director shall add the name of any person or group upon request to a mailing list to receive copies of public notices and fact sheets. Any public notice and fact sheet under this section shall be prepared and circulated consistent with the requirements of regulations issued under the Federal Act. The fact sheet, proposed NPDES permit provisions, application and other supporting documents will be available for public inspection and copying. The Director may, in his discretion, charge a reasonable fee for reproduction and distribution of the public notice, fact sheet and other supporting documents.

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

(8) At the conclusion of the public involvement period, the Director shall make a final determination as soon as practicable and promptly notify the applicant thereof in writing. Any NPDES permit issued hereunder shall contain such pertinent and particular conditions as may be required to comply with the Federal Act or regulations issued pursuant thereto. If the Director determines that the NPDES permit should be denied, notification shall be in accordance with Section 45-050. If conditions of the NPDES permit issued are different from the proposed provisions forwarded to the applicant for review, the notification shall include the reasons for the changes made. A copy of the NPDES permit issued shall be attached to the notification. In any case before the Director will issue an NPDES permit which applies effluent limitations in accordance with effluent guidelines rather than water quality standards, he will make a determination that the permitted discharge will not violate applicable water quality standards and will provide some justification for that determination. Such justification will include but not necessarily be limited to:

(a) A description of the anticipated effect on water quality at the mixing zone boundary of the chemical and/or physical parameter(s) upon which the size and shape of the mixing zone are based; and

(b) A statement of anticipated effect of the discharge on aquatic life.

(9) If the applicant is dissatisfied with the conditions or limitations of any NPDES permit issued by the Director, he may request a hearing before the Commission or its authorized representative. Such a request for hearing shall be made in writing to the Director within

20 days of the date of mailing of the notification of issuance of the NPDES permit. Any hearing held shall be conducted pursuant to the regulations of the Department.

Amend Oregon Administrative Rules Chapter 340, Division 4, Subdivision 5, Section 45-065, to read as follows:

45-065 OTHER REQUIREMENTS.

(1) Prior to commencing construction on any waste collection, treatment, disposal or discharge facilities for which a permit is required by Section 45-015, detailed plans and specifications must be submitted to and approved in writing by the Department as required by ORS 468.742; and for privately owned sewerage systems, a performance bond must be filed with the Department as required by ORS 454.425.

(2) Monitoring, recording and reporting procedures used to meet the requirements of an NPDES permit shall conform with the Federal Act and regulations issued pursuant thereto.

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

MEMORANDUM:

To: Environmental Quality Commission

From: Director

Subject: Agenda Item K, April 1, 1977 EQC Meeting

Glendale Transfer Station, Douglas County - Discussion of EQC Response to Kindricks

Attached please find copies of the correspondence on this matter.

Bill

WILLIAM H. YOUNG
Director

PWM:vt
Attached

March 17, 1977

Mr. Lee Kindrick
P.O. Box 218
Azalea, Oregon 97410

Re: Glendale Transfer Station

Dear Mr. Kindrick:

Thank you for providing me with your letter of January 25, 1977 from Congressman Weaver.

My understanding of your problem includes the information I've learned from you, from Ms. Wooten of Congressman Weaver's office, and from members of the Department's staff.

As I told Ms. Wooten by telephone, I am happy to investigate the procedural law and regulation to determine if you have some formal right to a proceeding before this agency in the matter of your opposition to the Glendale Transfer Station.

I've been unable to find any unexhausted formalities.

You have been granted an informal opportunity to address the Commission with your problem. However, if the Commission does not find it appropriate to grant your request that the Department's permission for the transfer station be rescinded, I know of no formal standing you would have to be heard further by this agency.

The Commission is, of course, giving due consideration to your request and will take it no less lightly for lack of your being a party to a contested case proceeding.

You've informed me by telephone that you and your fellow petitioners presently intend to retain an attorney and challenge the transfer station in court if it appears the Commission cannot honor your request.

Any delay in your access to the courts should not be founded in confidence that the Commission intends to honor your request.

Review of the records of the meeting on February 25 indicates the Commission has taken no position as yet. The Commission is scheduled to deal further with the issue on April 1 in the Seaside Civic and Convention Center. A copy of that meeting agenda is enclosed.

Since we've learned that the project's completion is expected after only an additional few days of construction, it's been decided that it would be inappropriate to assemble the Commission for a special meeting on this matter because the situation will be essentially the same when the meeting at Seaside convenes.

If you choose to see an attorney and you so wish, you are welcome to consult with him as to whether I have correctly appraised your standing with the agency to date.

Enclosed is a copy of the Director's report to the Commission on this matter.

Also enclosed for return to you is Congressman Weaver's letter.

Please let me know if you need further information.

Sincerely,

WILLIAM H. YOUNG
Director

Peter W. McSwain
Hearing Officer

PWM:vt
Enc.
cc: Joe Richards
Mike Downs
Don Neff
Rob Haskins
Cynthia Wooten

ROBERT W. STRAUB
GOVERNOR

Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5395

March 11, 1977

TO: Environmental Quality Commission

FROM: Bill Young

As you recall, Mr. and Mrs. Lee Kindrick appeared before the Commission at our last meeting in Salem. Their concern related to the location of the Glendale Transfer Station in Douglas County.

Department staff have been involved in the review and approval of this site for about two years.

Hearings were conducted by Douglas County including a hearings officer's extensive review in February, 1976 to determine if a conditional use permit to construct the station should be issued.

Following the local actions, the Department approved the plans in April 1976, and issued a Solid Waste Disposal Permit in May 1976. The county received a state grant to construct the station and construction is about 80% complete.

In regard to some of the items mentioned by Mrs. Kindrick, we have not experienced seepage from these types of stations, and they are essentially free from flies, odors, and rats. True, fires can start anywhere but we do not anticipate a problem at transfer stations like at open dumps. The site is next to Cow Creek and is built above the 100-year flood plain. If a blocked channel allows higher water levels than predicted the drop box could easily be removed.

The county purchased adjacent property with an existing mobile home on it. The mobile home is presently served by septic tank and drainfield which is permitted by the county. At this time, the county expects to use the mobile home, as is, and it is occupied by the station caretaker. No new permit or connection permit is needed.

The Department considers the transfer station drop box, which is proposed to serve the Glendale area, to be environmentally acceptable.

WHY:cm

cc: Solid Waste Division
Southwest Region

JIM WEAVER
4TH DISTRICT, OREGON

COMMITTEES:
AGRICULTURE
INTERIOR AND INSULAR AFFAIRS

Congress of the United States
House of Representatives
Washington, D.C. 20515

WASHINGTON OFFICE:
1723 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-6416

DISTRICT OFFICE:
FEDERAL BUILDING
211 EAST 7TH AVENUE
EUGENE, OREGON 97401
(503) 687-6732

January 25, 1977

Mr. Lee Kindrick
P.O. Box 218
Azalea, Oregon 97410

Dear Mr. Kindrick:

The pack of information you sent has been very useful to me in understanding in further detail the situation regarding the Barton Road Drop Box Transfer Station.

At my direction my Eugene staff has spoken with many people in Douglas County on both sides of the issue.

Newly elected Commissioner Vian has his reservations about the site location, but naturally feels reticent to intercede in a decision made prior to his election. He said intercession at this point would be tantamount to undermining county government decision making.

To date we have not reviewed the written findings of the DEQ Solid Waste Division in issuing the permit. We expect to be in touch with Mr. Don Neff very soon.

There are several things you might do to help resolve your problem.

1. Make an appointment with:

   Mr. Richard Reeter
   Regional Manager
   DEQ
   1937 W. Harvard Blvd.
   Roseburg, Oregon
   672-8204

He will be very responsive to your concerns regarding proper maintenance of all drop box transfer stations. If debris is allowed to contaminate state waters or the facility is generally not operated competently, Douglas County could be subject to civil penalties. Mr. Reeter's office is responsible for day to day enforcement procedures.

2. You can consider requesting a review of the decision issuing the permit to the State Chairman of the Department of Environmental Quality. Any citizen has this right. You may send your formal request to:

Mr. Joe B. Richards
Chairman
DEQ
1234 S.W. Morrison Street
Portland, Oregon 97205

You can telephone Mr. Richards at his business office in Eugene, 484-9292. If you choose this course of action, I would suggest you ask Mr. Richards for an expedient reconsideration in as much as construction on the transfer station is proceding each day.

3. If the DEQ review is not favorable to your perspective, you may inquire about formal redress through a public hearing by contacting:

Mr. Peter McSwain
Hearings Officer
DEQ
1234 S.W. Morrison
Portland, Oregon 97205
229-5383

4. Please keep me informed of your progress. If I can be of any further service, do not hesitate to call.

Sincerely,

JIM WEAVER
Member of Congress

cc: Mr. W.F. Martin

JW/cw/kn

OSPIRG
Oregon Student Public Interest Research Group
918 S.W. Yamhill
Portland, Oregon 97205
(503) 222-9641

TESTIMONY BEFORE THE

ENVIRONMENTAL QUALITY COMMISSION

Seaside, Oregon

April 1, 1977

My name is Jan D. Sokol, and I am a staff member of the Oregon Student Public Interest Research Group (OSPIRG). I am here to speak on Agenda Item J, relating to Department of Environmental Quality (DEQ) and Environmental Quality Commission (EQC) authority during critical situations.

The DEQ staff has proposed a rule for your consideration which would allow, inter alia, temporary suspension of conditions of waste discharge permits during critical situations. Under ORS 183.335 (5) (1975) and OAR 340-11-052 (effective 9-13-76), EQC does have the authority to adopt this rule without public notice and without a public hearing. Practically, the Commission should hold a public hearing with sufficient notice to give interested citizens an opportunity to comment before taking what some people consider to be drastic action. Such action defeats the purpose of recent legislative enactments which require full public participation in governmental decision-making.

The rule and the staff report accompanying it seem to imply that only industry and cities will be effected by the drought this summer. It fails to take into account the effect of such conditions on citizens, public water supplies and aquatic life.

Government, industry and the people of Oregon have worked hard in the last decade to clean up the rivers in the state. The clean rivers are not the result of industry moving away from the water's edge, but are the result of everyone, including industry, joining together to limit the amount and kinds of pollutants going into the rivers. The Willamette and other rivers which had once been allowed to deteriorate, are again clean enough for swimming and fish runs. OSPIRG urges EQC to closely examine

any proposed rule to insure that the work of so many people over so many years is not seriously damaged.

It is suggested that EQC adopt the staff rule as a temporary rule pursuant to ORS 183.335 (5) (1975) and OAR 340-11-052 (effective 9-13-76). However, it is OSPIRG's position that the staff's proposal is not a temporary rule within the meaning of the aforementioned sections. The rule attempts to deal with floods, droughts, fires, windstorms and other critical situations. Except for the winter drought, none of these natural disasters are seriously facing Oregonians today. It is unclear to OSPIRG how the EQC can possibly find "that its failure to act promptly will result in serious prejudice to the public interest" as required by ORS 183.335 (5) (1975).

To better serve the interests of all Oregonians, including industry, agriculture, municipalities and citizens, OSPIRG would like to present an alternative rule for your consideration (A copy of the proposed rule is attached hereto). This rule deals exclusively with the drought; it recognizes that the drought will have not only economic consequences, but also social and environmental.

Subsection (2) of our proposed rule requires DEQ to research and develop alternate waste disposal techniques which do not require discharges into water, before EQC can modify portions of the Water Quality Management Plan or suspend conditions of waste discharge permits. The latter action, if taken, must insure "adequate protection of property and preservation of the public health, safety, welfare and resources of the state" (subsection 3). It should be noted that any action taken in relation to the Plan must be approved by the Administrator of the Environmental Protection Agency. 33 USC § 1313 (c) (2) (Supp. I, 1974).

Subsection (4) requires EQC to re-evaluate any modification or suspension of the Plan or permits every 30-days to make sure that such modifications or suspensions are still necessary. Subsection (5) requires EQC to review any modification, suspension or revocation of a waste discharge permit taken by DEQ because of the drought. DEQ can modify a permit upon 20-days notice (OAR 340-14-040, OAR 340-

45-055) and may suspend a permit without notice (340-14-045, OAR 340-45-060) if it is in the public interest.

If Oregon's drought continues to the point where rivers all over the state do reach a critical stage, there should be consideration of appropriate action. But consideration should be done carefully, in the open, and with all interested parties having a chance to voice their opinions. All of us must accept some of the consequences of the drought—protection of the public health, safety and welfare includes continuance of a healthy environment as well as economic prosperity. OSPIRG's rule better addresses the concerns of <u>all</u> Oregonians.

Agenda Item No. J, April 1, 1977, EQC Meeting

Add a new section to OAR Chapter 340, Division 4, Subdivision 1 as follows:

340-41-011 EMERGENCY AUTHORITY

(1) The Commission recognizes that the winter drought has lowered the levels of Oregon rivers so as to create critical situations in some of the waters of this state. In order to deal with this critical situation:

(a) Action to enforce compliance with the provisions of the Water Quality Management Plan, OAR 340-41-___ (adopted December 1976) including water quality standards or the conditions of waste discharge permits issued pursuant to ORS 468.740, may be inconsistent with the economic stability of the state; or

(b) More stringent control requirements may be necessary to insure adequate protection of property and preservation of the public health, safety, welfare and resources of the state; or

(c) Alternate waste disposal techniques may be necessary to protect the quality of the waters of the state for public water supplies, for the propagation of wildlife, fish and aquatic life and for domestic, agricultural, industrial, municipal and recreational uses.

(2) Before the Commission takes any action pursuant to subsection (3):

(a) The Department shall:

(i) investigate, research and develop waste disposal techniques which do not require discharge of wastes into the waters of the state; and

(ii) present their findings to the Commission.

(b) The Commission may by order require a holder of a waste discharge permit issued pursuant to ORS 468.740 to utilize the waste disposal techniques investigated, researched and developed by the Department pursuant to paragraph (2)(a), or any other technique which does not require discharge into the waters of the state.

(3) Subject to subsection (2), the Commission may by rule temporarily modify any portion of this Plan and, by order, suspend enforcement of a waste discharge permit issued pursuant to ORS 468.740, or impose more stringent control requirements upon:

(a) giving such public notice as is required and practicable under the circumstances;

(b) making findings of fact that the critical situation described in subsection (1) exists;

(c) setting forth a program for control during this critical situation which insures adequate protection of property and

preservation of the public health, safety, welfare and resources of the state;

(d) specifying the portion or portions of the Plan or waste discharge permit affected; and

(e) specifying the powers, if any, to be delegated to the Director during this critical situation.

(4) The Commission shall review any action taken pursuant to subsection (3) at least every 30-days and then modify or terminate the action if necessary to insure adequate protection of property and preservation of the public health, safety, welfare and resources of the state. No action taken pursuant to this rule may remain in effect for more than 120-days from the date this rule is filed with the Secretary of State.

(5) If the Department, because of the critical situation described in subsection (1), modifies, suspends, revokes or issues a waste discharge permit pursuant to OAR 340-14-040, 340-14-045, 340-14-050, 340-45-055, or 340-45-060, the Commission shall within 10-days review such modification, suspension, revocation or issuance and if necessary to insure adequate protection of property and preservation of the public health, safety, welfare and resources of the state, modify or terminate the Department's action.

NORTHWEST ENVIRONMENTAL DEFENSE CENTER

10015 Southwest Terwilliger Blvd.
Portland, Oregon 97219
(503) 244-6161, Ext. 545

March 29, 1977

Mr. Joe Richards
Chairman
Environmental Quality Commission
1234 SW Morrison
Portland, Oregon 97204

Dear Mr. Richards:

While realizing that the effects of the current drought may create certain critical situations with respect to water levels in Oregon rivers, NEDC is concerned that all precautions be taken to insure that control requirements continue to protect the water resources of the state. It is our hope that such critical situations which arise will be thoroughly researched and documented before water quality standards are significantly altered.

With this in mind, NEDC supports the OSPIRG proposed rule pertaining to emergency authority for the Environmental Quality Commission.

Thank you for your consideration of our concerns.

Sincerely,

Suzanne Fennell

Suzanne Fennell
Executive Director

Phone call conference

Sent to EQC, discussed in phone conference and tabled.

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

EMERGENCY power field burning

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Attached Field Burning Report

Attached is a copy of the proposed EQC report to the 59th Legislative Assembly regarding acreage to be open burned in 1977 and 1978. It has been revised by the staff to reflect the discussion at the February 25 meeting.

Also attached is a letter to the Assembly drafted to highlight the Commission's concern with slash burning as was also discussed. Staff opinion is that the separate letter format (as opposed to inclusion in the report) better emphasizes the Commission's position and eliminates any question of what is appropriate content for the report required by statute (ORS 468.475(2)(e)).

A conference call is scheduled for Thursday March 10, 1977 at 11:00 a.m. to allow discussion of and further revision to these documents.

Serious problem

JACKIE

Bill

WILLIAM H. YOUNG

46% only in summer in ~~Summer~~ orig report

SAF:lb

3/4/77

Morris Crothers Environmental Improvement

Fresh look is warranted

Fugitive dust has great impact

See TABLE in DEQ report # of hours of reduced visibility

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

Where is Bonaca's memo?

To: The 59th Legislative Assembly

From: Environmental Quality Commission

Subject: Forest Slash Burning Smoke Management — Request for EQC Program Administration

The Environmental Quality Commission has already expressed its concerns regarding the impact of field burning smoke on the Willamette Valley in our report submitted pursuant to ORS 468.475(2)(e). ~~In that report, the commission also made clear its concern for the economic problems of the grass seed grower~~. However, since that report was specifically written to fulfill the requirements of the above referenced statute it did not specifically address other considerations important to good air quality. In particular, the Commission feels an injustice would be done if it did not point out the detrimental impact which smoke from slash burning has on Willamette Valley air quality.

Both the Department of Environmental Quality and the Environmental Protection Agency have reviewed summertime air quality (~~and~~ particularly smoke intrusion) ~~problems~~ problem in the southern Valley and have found slash burning contributes at least as much smoke to this area as does field burning. Based upon this evidence, it may seem arbitrary to ~~penalize or otherwise~~ severely limit the grass seed industry burning on the basis of its effect on the southern Willamette Valley air shed and continue to allow slash burning under ~~the~~ present program.

To minimize any such discrimination, the commission is very interested in improving control of slash burning. Further improvement in control of slash smoke may require revision to the current slash smoke management plan or its implementation following procedures outlined in ORS 477.515(3)(a). To this end, DEQ and Department of Forestry staff members have already met to discuss possible improvements in the existing smoke management program. Currently, the Environmental Quality Commission's authority over slash burning is embodied in its approval or disapproval of the smoke management plan developed in cooperation with the Department of Forestry. The Department of Forestry actually implements the plan. It is the commission's intention to seek clarification of ~~and thereafter to exercise~~ its ~~full~~ legal authority to exercise ~~insure~~ adequate control of slash burning under current statutes.

Since the DEQ field burning smoke management program has brought about significant reductions in field burning related smoke problems in the south valley, the commission believes applicable features of the DEQ's program (such as central release authority) should be incorporated into the slash smoke management program and ~~perhaps~~ legislative consideration should be given to integration of the two smoke management programs under one overall authority.

Have we advised State Forestry we are writing the letter

cc STATE Forester

3/3/77

Need more detail on why we do a better job —?

Joe Richards, Chairman

ROBERT W. STRAUB
GOVERNOR

Environmental Quality Commission

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5696

To: The 59th Legislative Assembly

From: Environmental Quality Commission

Subject: Open field Burning Acreage Limitations in 1977 and 1978

BACKGROUND

The Environmental Quality Commission is required by Oregon Law (ORS 468.475(2)(e)) to report to the 59th Legislative Assembly its recommendation for acreage to be open field burned in the Willamette Valley with particular regard to the acreage phasedown limitations of Oregon Revised Statutes 468.475(2). These limitations are currently 95,000 acres during 1977 and 50,000 after 1977.

The Environmental Quality Commission, as the policy making body for the Department of Environmental Quality, must concern itself with preserving and improving the land, air, and water quality of this State. Though a change in agricultural practices is likely to affect all three of these areas of concern, field burning's major deleterious effect is on air quality and, therefore, the Commission must emphasize air quality when reviewing possible recommendations regarding acreage limitations. Any assessment regarding effects on land and water quality due to changes in acreage burned would be highly speculative due to the dearth of assembled information.

DISCUSSION

Air Quality

In general, open burning and the geography of the Willamette Valley are not compatible with good air quality. Smoke, from any source, released during periods of poor atmospheric ventilation will have an adverse effect on air quality. Such periods are common in the Willamette Valley.

Field burning smoke causes increased particulate loading, periods of reduced visibility, disagreeable odor, ash fallout, and contributes to violations of state and federal particulate standards and tend to aggravate respiratory problems. Though not all of the above effects are standard measurements of air contaminants together they comprise "smoke effect indicators" which are used to identify and compare the air quality impacts of field burning.

Total suspended particulate (TSP) data from the Eugene-Springfield area show violations of the secondary ambient air quality standards for both annual geometric mean and 24 hour average. Such violations are contributed to by field burning smoke. TSP data collected during the summers of 1973-1976 indicate roughly 20% higher loadings for days with a minimum estimated visibility of 12 miles or less due to field burning compared to days not so affected. However, due to the relatively light weight of field burning particulate, violation of the 24 hour standard due solely to a smoke intrusion is not likely.

The most obvious effect of field burning smoke is reduced visibility. In general, southern valley summertime visibilities have been improving over the last several years. This may be attributed, in great part, to the Department's smoke management program. During 1976, visibility reductions attributable to field burning and estimated to be 12 miles or less by nephelometer readings, occurred for about 10 hours in Eugene and Springfield. These 10 hours were accumulated over 3 days of the season. Salem had no visibility reduction below 12 miles attributable to field burning. Field burning also contributes to visibility reductions in the Eugene and Salem area with minimums greater than 12 miles on a more or less regular basis as well as in non-monitored areas throughout the Willamette Valley.

Two reports, produced external to the Department also indicate field burning as a serious air quality problem. The Environmental Protection Agency (EPA), after their own analysis, reported field burning and slash burning in connection with visibility reductions and contributing to 24 hour particulate violations. Microscopic analyses by McCrone and Associates (for both EPA and DEQ) again indicate field and slash burning contribute substantially to particulate loadings in the Eugene-Springfield area.

Finally, citizen complaints are filed each summer recording a variety of problems ranging from difficulty in breathing to ash fallout and odor. In 1975, 761 complaints were filed in comparison to 318 filed in 1976.

The Commission has noted a general improvement in smoke effects indicators in the first two seasons of the acreage phasedown. This appears to be a promising trend. However, considering the wet conditions of the previous two summers, the effects of other smoke sources, and the evolutionary improvements in smoke management program, it is probably too early to draw a direct correlation between acreage burned and smokiness in the Valley.

Mobile Field Sanitizers

The current acreage phasedown was predicated upon a clean alternative to open field burning becoming available to seed growers. Hopes have been placed with the mobile field sanitizer as the most likely alternative. Though other alternative treatments of grass fields, such as increased use of herbicides, straw incorporation, and "crew-cutting" have been explored to varying degrees with some limited successes, the bulk of phased-out acreage was contemplated by current legislation to be treated by a successful field sanitizer.

After careful analysis of this year's mobile field sanitizer emission data, DEQ staff cannot show mass emissions of fine particulate from machines to be less than those from open field burning. Therefore, DEQ cannot verify the results of the report of the consulting engineers to the Oregon Field Sanitation Committee which indicated a 98% reduction in fine particulate. This situation reflects the data which was limited and of wide variability. Such wide variability is to be expected considering the conditions under which the machines operated, but makes accurate assessment of their capabilities difficult. Extensive additional testing during 1977 on the current generation of machines is necessary to allow comparison with present emission data. The Department intends to provide backup support to the Oregon Field Sanitation Committee consulting engineers in their testing program during 1977. In the meantime, a reduction in fine particulate emission cannot be guaranteed by switching from open burning to machine burning.

If machine emissions are not substantially less than open burning emissions, their effects on air quality and people are expected to be greater due to their much reduced plume height compared to open burning. If, on the other hand, machine emissions (after further testing) prove to be lower than open burning, some form of elaborate mathematical modeling will be required to better compare the two types of sources. The Department can, to a limited degree, do such modeling. However, a much more thorough analysis of comparative air quality than can be reasonably contemplated by the Department is currently underway at Oregon State University. The Livermore Regional Air Quality (LIRAQ) computer model is being applied to the Willamette Valley. Present plans for LIRAQ include a comparative analysis of mobile field sanitizer and open burning emissions under typical conditions in the valley. Unfortunately, the most useful results from LIRAQ are not expected to be available until late 1977 or 1978, though unverified results may be available sooner.

It is concluded that field sanitizing machines have not developed so far to the point where they should be considered either a substitute for open burning or a large-scale practical alternative method of field sanitizing. //

Smoke Management

Under a smoke management program, smoke impacts, their strength and probability of occurrence are tied closely to daily weather, acreage burned, human decision making and decision implementation. Estimates of the overall annual smoke intrusions due to field burning therefore must consider the variability of the season's weather, the number of decisions to be made, the average acreage involved in each decision and the precision to which each decision can be carried out. Though in general reduced acreage can be expected to result in reduced smokiness, non-seasonal or highly variable weather can severely alter the expected smoke situation.

Three possible additions to smoke management operational procedures which appear to offer some promise for incremental improvements in minimizing smoke effects from field burning are special rapid lighting techniques, an improved communication system, and an improved air monitoring system.

Tests during 1976 indicated ground level smoke emissions from open field burning could be reduced below the levels now resulting from the use of typical lighting procedures by employing rapid lighting techniques on relatively large acreages.

Meteorological requirements generally restrict burning release times to the afternoon. To minimize the time required for burning release after meteorological criteria have been met requires direct DEQ to farmer contact. A properly designed radio system could accomplish this goal. In addition, the radio system would provide the direct communication link desired to stop burning when wind directions change unexpectedly.

A valley-wide visibility and particulate monitoring system, providing real time information, would be immediately useful to the smoke management program as it would provide smoke effect data useful for curtailment of inappropriate burning. In addition, it would allow better analysis of smoke incidents, especially in areas not now monitored.

Each of these changes would require relatively large additional expenditures compared to the present smoke management budget.

RECOMMENDATION

Based strictly on air quality considerations, retention of the current statutory acreage limitations on open field burning is recommended; however, if the legislature is inclined to provide some relief to the current acreage limitations, the commission recommends that legislation be enacted which would authorize EQC to permit "Special" open burning of additional acreage up to 30,000 acres per year in 1977 and 1978 in accordance with formally adopted criteria such as:

(a) Fields not burned for the previous one or two year period.

(b) Fields with soil types or slopes which make them unsuitable for alternative cropping.

(c) Fields located such that they could be burned under specified conditions and not impact any sensitive receptor.

(d) Fields qualifying under the emergency of hardship provision of ORS 468.475(5).

Joe Richards, Chairman

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