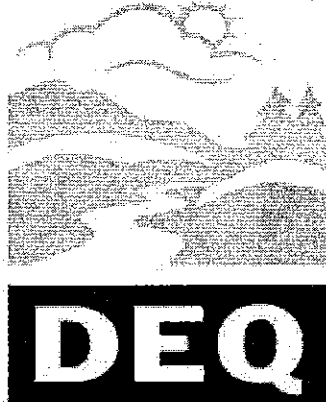


12/16/1977

**OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS**



**State of Oregon
Department of
Environmental
Quality**

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Environmental Quality Commission Meeting

December 16, 1977
Medford City Council Chambers
411 West Eighth Street
Medford, Oregon

- 9:00 a.m. A. Minutes of November 18, 1977 EQC meeting
B. Monthly Activity Report for November 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.
- 9:15 a.m. D. Subsurface Experimental Program - Review of experimental subsurface sewage disposal system installed by Mr. & Mrs. Steven Gunn, Lane County
E. Southwest Region - Report of Region Manager on significant on-going activities in the Southwest Region
- 9:30 a.m. F. Medford Air Quality Maintenance Area - Public hearing to consider amendments to Oregon Clean Air Act Implementation Plan involving particulate control strategy rules for the Medford Air Quality Maintenance Area
G. Medford Corporation, Jackson County - Status report and consideration of citizens petition on Medford Corporation's medium density fiber-board plant
H. City of Cannon Beach Sewerage Project - Request for extension of time schedule for submission of Facility Plan Report
I. NPDES July 1, 1977 Compliance Date - Request for approval of Stipulated Consent Orders for NPDES permittees not meeting July 1, 1977 compliance date
J. Sewage Disposal, Bend Area - Status report on discussions with Deschutes County Commission regarding sewage disposal problems within the Bend Urban Growth Boundary
K. Water Quality Management Plan - Status report on review of Statewide Water Quality Management Plan with local governments and interested citizens
L. City of Bend Sewerage Project - Update on financial considerations of City of Bend Phase I sewerage project
M. Oregon Cup Awards - Request for approval of Oregon Cup Awards Screening Committee recommendations

Because of the uncertain time spans involved, the Commission reserves the right to deal with any item at any time in the meeting, except items D and F. 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 (7:30 a.m.) at VIPS, 2229 Biddle, Medford. Lunch will be catered in Conference Room A, Jackson County Courthouse.

MINUTES OF THE NINETY-SECOND MEETING
OF THE
OREGON ENVIRONMENTAL QUALITY COMMISSION

December 16, 1977

On Friday, December 16, 1977, the ninety-second meeting of the Oregon Environmental Quality Commission convened in the Medford City Council Chambers, 411 West Eighth Street, Medford, Oregon.

Present were Commission members: Mr. Joe B. Richards, Chairman; Dr. Grace Phinney, Vice-Chairman; and Mr. Albert Densmore. Commissioners Ronald Somers and Jacklyn Hallock were absent. Present on behalf of the Department were its Director and several members of the Department staff.

Staff reports presented at this meeting, which contain the Director's recommendations mentioned in these minutes, are on file in the Director's Office of the Department of Environmental Quality, 522 S.W. Fifth Avenue, Portland, Oregon.

AGENDA ITEM A - MINUTES OF NOVEMBER 18, 1977 EQC MEETING

It was MOVED by Commissioner Phinney, seconded by Commissioner Densmore, and carried unanimously that the minutes of November 18, 1977 be approved as presented.

AGENDA ITEM B - MONTHLY ACTIVITY REPORT FOR NOVEMBER 1977

Commissioner Phinney asked about the entry for a temporary parking lot for Washington Square, under Indirect Sources. Director Young told her that this was just for the Christmas season.

In the Air Quality report on Significant Activities, Chairman Richards asked about the statement under "Non-Attainment Areas-Designations", that "the remainder of the State was proposed to be designated 'attainment' for the purposes of applying Prevention of Significant Deterioration (PSD) requirements." He recalled that several times in the past the Commission had on its agenda the question of adopting special PSD areas, and that action was deferred because of upcoming action in the U.S. Congress. Chairman Richards asked what issue the Commission would be facing when Congress promulgated regulations on PSD. Mr. E. J. Weathersbee of the Department's Air Quality Division, replied that the PSD rules were being applied by EPA at the present time. He said that amendments to the Clean Air Act incorporated those rules into the Act. He said that 11 areas in the State were designated Class I and that certain levels of pollution were allowed in those areas. Mr. Weathersbee continued that the rest of the State was designated Class II and that the rules were supposed to be implemented by the State. However, Mr. Weathersbee said, there were several things that had to be done for the State to implement these rules, among them would be to adopt the federal rules as State rules or adopt rules which were more stringent than the federal rules. In response to Chairman Richards, Mr. Weathersbee said that EPA had procedures for reclassifying areas.

Commissioner Densmore MOVED, Commissioner Phinney seconded, and it was carried unanimously that the Monthly Activity Report for November 1977 be approved.

AGENDA ITEM C - TAX CREDIT APPLICATIONS

Commissioner Densmore MOVED, Commissioner Phinney seconded, and it was carried unanimously that Tax Credit Applications T-839R, T-922, T-932, T-933, T-936, T-937, T-939, T-940, T-941, T-942, T-945, T-946, T-947, T-948 and T-950 be approved; that Tax Credit Certificate No. 612 be reissued; and that Tax Credit Certificates No. 740 and No. 695 be revoked.

PUBLIC FORUM

Mr. Tam Moore, Jackson County Commissioner, spoke in regard to the revised subsurface sewage rules which were before the Commission's Hearing Officer. Mr. Moore said that the information the Hearing Officer was working from indicated that the consideration of composting toilets and split systems was not significant. He said that the rules as proposed would require that grey water be placed in a standard subsurface disposal system. Therefore, he said, there would be no point in getting a composting toilet if one had to deal with a standard subsurface disposal system for grey water. Mr. Moore said he could furnish the Commission with some ordinances adopted in California during the drought on alternative disposal methods for grey water.

Additionally, Mr. Moore said, there was a proposal before the Hearings Officer to eliminate rural area treatment. He urged that rural area treatment not be eliminated and that rural area variances be maintained.

Chairman Richards said he would accept Mr. Moore's offer of additional information if it had not previously been presented to Department staff.

Mr. Moore added that he was happy the Commission was in Medford, and he hoped they would listen thoughtfully to the area's air quality problems which would be presented later in the meeting.

No one else wished to speak on any subject.

AGENDA ITEM D - SUBSURFACE EXPERIMENTAL PROGRAM--REVIEW OF EXPERIMENTAL SUBSURFACE SEWAGE DISPOSAL SYSTEM INSTALLED BY MR. AND MRS STEVEN GUNN, LANE COUNTY

Mr. T. Jack Osborne of the Department's Subsurface Sewage Section, said that this agenda item dealt with review of the subsurface sewage disposal system installed by Mr. and Mrs. Steven Gunn of Lane County. Mr. Osborne presented the following report summation and Director's proposed action:

Summation

1. The Gunn system was not installed in accordance with permit conditions and is therefore in violation.
2. The system, as installed, will not provide useful information to the experimental systems program.

Director's Recommendation

Absent change of direction to the contrary by the Commission, the Department will proceed with enforcement.

Commissioner Phinney asked if the pit privy in use on the Gunn's property would be involved in any enforcement action. In response to Commissioner Phinney, Mr. Osborne said he did not know if the privy was in conformance with rules for installation of pit privies and that the Gunns did not now have a permit for a pit privy.

Mr. Steven Gunn appeared before the Commission and presented a statement. A written copy of this statement is filed in the Commission records. Mr. Gunn cited a publication from the State of California and experiments being done in the State of Maine involving grey water systems similar to the plans he submitted to the Department. He said that the plans he submitted were for his specific site, and he was pleased to offer his research to a comprehensive testing program. Mr. Gunn said that after several attempts they thought an agreement on a final plan had been reached with DEQ. He also cited difficulties with local officials in Lane County on the designation of their one bedroom house as a two bedroom house. He also disputed certain items in the DEQ sequence of events (attached to the staff report).

Mr. Gunn said he submitted a testing program and some improvements on their system, and he thought it would be unfortunate to leave any alternative unexplored in the search for adequate alternative sewage disposal methods. He also said that on file was a signed and notarized document relinquishing any responsibility of the state or local governments for the failure of their system. Mr. Gunn then submitted a preliminary set of plans. Chairman Richards asked if those plans had previously been submitted to staff. Mr. Gunn replied that they were similar to plans he originally thought were approved, however some small difficulties had been remedied. Chairman Richards asked if staff had had the opportunity to evaluate these plans. Mr. Gunn replied that they had not.

Chairman Richards asked Mr. Gunn if the sequence of events in the staff report were correct as to the description of the system being used. Mr. Gunn said they were not entirely correct. He cited several places where personnel from different agencies had measured their pit and come up with different sizes for it.

Chairman Richards said he understood the charge of the Legislature was to urge the development of alternatives to standard subsurface systems, and that DEQ had been given the mission of monitoring those alternative systems and determining if they were adequate and useful. He said that some consumer protection was involved in this process; that houses and property may be sold and a system which fits the present owner may not fit the new owner. Chairman Richards said he was hesitant to approve a system which the staff, in its expert opinion, felt would not comply and could not be made to comply with reasonable modifications, even though Mr. Gunn expressed the belief that it would work.

Mr. Gunn said that there were two states doing experiments with systems similar to his, and that they had found them to be successful so far. He said that any changes in sewage disposal habits would necessarily mean a change in living habits. Mr. Gunn said he was not allowed to plumb his house for a grey water system; he had to plumb it for a standard system which would handle such things as a garbage disposal, which a grey water system was not meant to handle, and which he had no intention of installing.

Chairman Richards asked Mr. Gunn if he agreed that the system was not installed in accordance with permit conditions. Mr. Gunn replied that the system was installed in accordance with plans he thought were approved. Mr. Gunn said that DEQ could not produce a set of plans stamped prior to July 8, 1977 which was almost 10 months after his permit was issued.

Commissioner Densmore asked for a staff response to Mr. Gunn's last remark. Mr. Mark Ronayne of the Department's Subsurface Sewage Disposal Section replied that it was true that the original plans on file were missing. However, he said that the Department's Midwest Region had received the plan in advance of the permit being issued at approximately the same time as the Department wrote a letter to the Gunns requesting them to review the plan. Mr. Ronayne said that the plan was based on the Department's field observations and discussions with Mrs. Gunn in July; roughly a month prior to permit issuance. He said that they asked Mr. Jun Lamapas, a former DEQ employee and the one who actually drafted the plan, if he might have taken the plan by mistake when leaving the Department. He said that Mr. Lamapas felt he had taken the plan, but was unable to find it.

Chairman Richards asked if the staff had had opportunity to review the plans which Mr. Gunn was submitting and if those modifications to the system might cause them to believe a delay in action would be warranted. Mr. Osborne replied that if the Gunns were to submit a set of plans that the Department felt would be useful in producing experimental system information then the Department would be receptive to it. He said that the system, as currently installed, was not in conformance with the plans as originally submitted, nor was it in conformance with the plans permitted by the Department. He said the Department would want to insure that if the Gunns wished to pursue another set of plans with a variation on that particular system, that those plans would be followed in accordance with permit conditions.

Chairman Richards said that if based on conditions that the Department felt that modifications to the system were useful in the experimental system program, and the Department could assure itself that the Gunns were still capable of proceeding with an approved system, then action on this matter could be deferred for 30 days for Department review. Mr. Osborne said he would not object to a 30 day delay and that it would be appropriate.

Commissioner Densmore said that he believed that agreement needed to be reached between the Department and Mr. and Mrs. Gunn as to what the approved plans were and that those plans would meet the goals of the experimental system program. He said that unless there was some accommodation on the part of the applicant with the Department, then he would vote for enforcement in 30 days.

Mr. Osborne proposed that the Commission delay for 30 days and give the Department a chance to review the revised plans submitted by the Gunns. However, he doubted that during a 30 day period the Gunns would be able to make the necessary modifications. He said that the Department would be able to come back to the Commission at their next meeting with a report on the acceptability of the plans.

Commissioner Densmore MOVED, Commissioner Phinney seconded, and it was carried unanimously, that action on this matter be deferred for 30 days.

Chairman Richards explained that the disposition of the Commission was to support the staff unless the Department made the evaluation that those changes were critical, and in fact was assured that permit terms would be complied with as they now stand or are modified, then enforcement action would be taken.

AGENDA ITEM F - PUBLIC HEARING TO CONSIDER AMENDMENTS TO OREGON CLEAN AIR ACT IMPLEMENTATION PLAN INVOLVING PARTICULATE CONTROL STRATEGY RULES FOR THE MEDFORD-ASHLAND AQMA

Mr. David Baker of the Department's Air Quality Division staff, presented some overhead slides showing the area of the Medford AQMA; the magnitude of the particulate problem throughout the AQMA; an example of the type of information given to the Advisory Committee; a figure outlining the major points of the proposed rules; and the predicted effect of the rules on the County Courthouse HOV sampler site.

Mr. Baker also outlined some background on the Medford-Ashland Air Quality Advisory Committee, stating that one of its responsibilities was to advise the Department on which control strategies to implement to attain standards in this area. He said that using the information provided the Committee made specific recommendations which were incorporated into the proposed rules.

Mr. Baker said it was the Department's position that the new Clean Air Act Amendments require all sources to attain compliance within three years of amending the state implementation plan. He said this would be achieved for all sources in this area except for the charcoal producing plant, which would require new technology.

Mr. Baker said the proposed regulations represented the highest and best practicable control. He said some industry comments were incorporated into the proposed rules. Mr. Baker said the Department believed these regulations were practical and would be effective in attaining ambient air standards for suspended particulate.

Mr. Baker said the Medford-Ashland AQMA was violating the state daily and annual ambient air standards and the federal secondary daily and annual ambient air standards for total suspended particulate. EPA, he said, had called for a revision to Oregon's state implementation plan to attain and maintain ambient total suspended particulate standards in the AQMA. He said the Medford AQMA Advisory Committee had recommended several control strategies for the reduction of total suspended particulate which the Department concurred with and incorporated into the proposed regulations. The requirements in these proposed regulations, he said, are predicted to bring the AQMA into compliance with TSP standards and maintain that compliance through 1985. He said further study would be done by the Department to identify additional control strategies which would allow maintenance of standards beyond 1985.

Mr. Baker said the Director's recommendation would be to keep the hearing record open until December 28, 1977 and for the Department to evaluate the testimony received, consider such changes as were warranted, and prepare a report with recommended action relative to the proposed rules and the amendment of the Oregon Clean Air Act Implementation Plan for consideration of the Commission at the January 27, 1978 meeting.

Commissioner Phinney said there were several places in the rules where the metric equivalents were not stated and asked if they could be included.

Commissioner Phinney asked about the wording in the last sentence of proposed rule 340-30-005: "In cases of apparent duplication, the most stringent rule shall apply." She asked if "duplication" shouldn't be changed to "conflict", since duplication would mean that identical rules shall apply. Mr. Baker asked for a clarification from Mr. Ray Underwood, Department legal counsel. Mr. Underwood replied that "in cases of conflict" would be more appropriate wording. Commissioner Phinney also stated that there were some words in the proposed rules which were not defined or referred to where they were defined in other rules. She asked that that be rectified.

Commissioner Phinney suggested that a more specific wording should be used in 340-30-065 requiring new sources to comply with the rules, since the rules set out specific compliance dates which new sources might not be able to meet. Mr. Baker said that would be taken care of also.

Mr. Baker submitted for the Commission record additional tables which the Medford Advisory Committee used in making their recommendations.

Ms. Ester Jensen, Chairman of the Medford-Ashland Air Quality Advisory Committee, presented a statement to the Commission she stated three exceptions to the proposed rules which they felt reflected the intent of the committee.

- "1. In the attachments, Table 1, 2, 3, the voting results in Table 3 were based on data from three receptors, the two included in the report and data from the North Medford receptor. Since the North Medford site showed need for a greater reduction in emissions than White City or Medford Courthouse, the Committee has asked that copies of the North Medford Table be made available to members of the Commission.
2. I refer you to page 5, paragraph 5 concerning Wigwam Waste Burners. The Committee did not consider alternative methods of disposing of wastes presently burned in the two remaining wigwams. It was not the intent of the Committee to stifle through time restrictions or restrictive wording, a better method which industry and the DEQ could provide. They have obviously had extensive experience in resolving this program over the years, for there were eleven burners in 1970.
3. The Committee has serious doubts about the adequacy of the source testing timetable outlined in page 7 (2nd part). We do not feel that it reflects our intent to document emission reductions and to provide continuing data for subsequent analysis and study."

Ms. Jensen said the Committee would suggest that the timetable for source testing be reviewed to determine whether or not the frequency was adequate. They also expressed the belief that it was essential to learn more about veneer dryers and wood particle dryers at hardboard and particleboard plants, and perhaps annual source testing until such time that the controls were established and operating routinely would be appropriate.

Chairman Richards said that the pamphlet on "Rogue Valley Air Pollution: Everybody's Problem" outlined specific sources of particulate problems and that most of the Committee's recommendations were aimed at the wood products industry. He asked if the Committee was comfortable with the amount of information obtained from the industry. Ms. Jensen replied that the Committee felt more data was needed on all sources. Ms. Jensen said they did consider other sources and would recommend a pamphlet on the use of home space heating, however there were no controls that could be applied to homeowners. In response to Chairman Richards, Ms. Jensen said that the Committee had discussed in some detail the open burning problems in the Valley and felt that more monitoring was needed to determine the source and extent of this burning.

Commissioner Densmore expressed the Commission's and Department's appreciation to the Committee for their help in drafting the proposed rules for the Medford-Ashland AQMA and hoped that this committee process would work as well in the other AQMA's in the State.

Mr. Clyde Kalahan, American Plywood Association, testified that at the time of the adoption of regulations to cover veneer dryers located outside air quality maintenance areas, dryers inside AQMA's were excluded from the regulation because it was determined that not enough was known about either the scope of the total ambient air quality problems in those special areas, or the contribution of veneer dryers to those problems. Mr. Kalahan said they were still not sure at this time that they had a sound basis to proceed. He recognized the cooperation of the DEQ staff with industry in accumulating data on veneer dryer emissions and said they had no serious disagreement with the major thrust of the proposed rules. He said the plywood industry was committed to clean air and other environmental quality standards, and were willing to expend money for environmental controls which made sense.

Mr. Kalahan said that the American Plywood Association appropriated funds for a study to determine the contribution of their plants to the air problems in the AQMA's. Thus far, he said, they had not reached agreement with DEQ staff as to the exact nature of the research needed. Mr. Kalahan said they chose Washington State University to do the study, and asked them to do a review of the state of knowledge of control in the Medford AQMA.

Mr. Kalahan reiterated the industry's concern for accurate information so that money spent would produce improvement in air quality. He assured the Commission that to what extent their plants were responsible for the air in the Medford area failing to meet acceptable standards, they would be a part of the solution as far as technology would permit.

Dr. Malcolm Cambell, Washington State University, testified that the air quality problems in the Medford area were extremely complicated, and the main reason for this complication was that when things are added to the air they don't stay in the same place forever; they change and become something different. Dr. Cambell said that it was his belief that most of the particles seen in the air in Medford must be photochemical smog particles because they were of the same nature as those found in Los Angeles. He said these particles were not emitted from any place as particles; they originated instead from nitrogen oxides and hydrocarbons. In response to Chairman Richards, Dr. Cambell said that the measurements that were made to identify the nature of the particles in the Medford air were not adequate.

Dr. Cambell said the Commission was confronted with some problems that had not been dealt with effectively elsewhere before and the solutions found for the Medford problems will impact other areas.

Commissioner Densmore asked what sort of measurements Dr. Cambell felt needed to be made. Dr. Cambell said that an identification of the nature of the particles needed to be made.

Commissioner Phinney asked if Dr. Cambell agreed that if the regulations were to be implemented, then the quantity of pollutants in the ambient air would be lowered. Dr. Cambell replied that he suspected that they would not be getting to the primary pollutants in the Medford air. He said he felt the conclusion that control measures would generally reduce the pollution was correct, but he thought the Department's estimates of the amount of reduction were wrong and he didn't think the information available was adequate to estimate the reduction accurately at this point.

Mr. Matthew Gould, Corporate Director of Energy and Environment for Georgia-Pacific Corporation appeared testifying on behalf of the Veneer Dryer Technical Committee of the American Plywood Association. Mr. Gould stated that one of the findings of the Washington University study was that the emission inventory was based on inadequate data. He said that they felt strongly that better information was needed before new regulations were adopted. They also felt, he said, that more conclusive evidence was necessary to exactly define how much their industry contributed to the air quality problems in the Medford AQMA. Mr. Gould said that the strategy they proposed to the Advisory Committee was to first vigorously enforce the existing statewide standards for veneer dryers and hog fuel boilers and while bringing these and other sources into compliance, both DEQ and industry should search for the best information available on the true scope and nature of the problem. He said that bringing veneer dryers into compliance with present standards would make a sizable contribution toward reducing the amounts of suspended particulate associated with veneer dryers in the AQMA.

Mr. Gould objected to the 85 percent efficiency standard for veneer dryers. He said that this requirement was based on the performance of a single unit which was demonstrated at one facility following a pre-scrubber which was specifically designed to operate with it. He then cited some difficulties with this unit and said that until scrubber manufacturers were willing to supply and warrant this equipment to meet DEQ proposed standards, it would be premature to set a numerical performance requirement of 85 percent particulate removal. He suggested that the words "to approximately 85 percent over uncontrolled emissions" in the proposed rule be deleted and replaced with:

"In addition, air pollution control equipment installed to meet the opacity requirements of Section 340-25-315(1) shall be designed such that the particulate collection efficiency can be practically upgraded."

Mr. Gould said they also felt the present standards for hog fuel boilers should be vigorously enforced, bringing all boilers into compliance, which would make a substantial contribution to particulate removal in the area. Mr. Gould suggested that the design requirements be removed and the words "within 90 days after startup, compliance with the average emission limit shall be demonstrated by one or more tests", be added.

Mr. Gould suggested that in the Commission's action on this matter they accompany their decision with a statement recognizing the need for better data and direct the staff and industry to jointly pursue a course of action to develop that information, and that semi-annual reports of progress be jointly made to the Commission. He said that industry was ready to staff a liaison committee and to spend money to fund any reasonable and meaningful research effort.

Mr. Lynn Newbry, Medford Corporation Director of Governmental Affairs, presented a statement on behalf of his company. Mr. Newbry said they agreed with Mr. Gould's testimony regarding veneer dryers and hog fuel boilers.

Mr. Newbry said that the proposed regulation on wood particle dryers was totally unacceptable and could not be achieved within any acceptable time frame. He said they did not understand the method of developing the proposed control strategy. It was unreasonable, he said, to require the relatively small companies, such as are involved in the Medford AQMA, to develop and experiment with new air control equipment. Mr. Newbry said that a wood particle dryer regulation should not be promulgated until EPA's study of these dryers in the Medford area was completed.

Mr. David Junge, Professional Engineering Consultant, testified on the technical nature of the proposed regulations. He said his first concern dealt with the regulation on wood fired boilers. He said that measuring heat input rate for wood fired boilers was extremely difficult and suggested that rather than try to measure the heat input rate, as an alternative, consider the steam generation rate of the boiler which was more easily measured and would ease the implementation of the proposed regulation.

Mr. Junge also suggested that the limit of .050 grains per standard cubic foot of gas be altered to be per standard dry cubic foot of gas, principally because that is the way the tests were carried out. He also said it would be preferable to specify the standard under normal boiler operation wherein normal boiler operation should be construed to mean those periods of operation excluding a two hour period for startup, periods of routine soot blowing and periods of routine grate cleaning. He said it has not been demonstrated that the standard could be maintained under those periods of above normal emissions.

Mr. Junge said that in 340-30-015 of the proposed regulation, some confusion existed in the statement "...0.10 grains per standard cubic foot of exhaust gas corrected to 12 percent carbon dioxide as a two hour average test." He said that to avoid confusion as to which level applied and under what conditions, the second level should either be fully and carefully explained or be dropped entirely.

Mr. Junge said the requirement of equipment demonstrating a capability to meet its design level during the startup phase of operation was not a reasonable period to carry out an emission test. It would be preferable, he said, to specify that emission tests be carried out to determine the effectiveness of control systems within a reasonable time following the startup of the control system, and within a period not to exceed 90 to 120 days, or whatever period seemed most reasonable to DEQ and the companies involved.

Mr. Junge said that regulation 340-30-025 regarding air conveying systems was poorly defined in the sense that it was based on the ability to control air conveying devices with an efficiency equivalent to that of a bag filter. However, he said, the efficiency of a bag filter was not defined. He suggested that air conveying systems be referred to as numatic transport systems and a specific and measurable limit be placed on the emission concentration from each source which involves numatic transport devices.

Mr. Junge said the proposed regulation for wood particle dryers at hardboard and particleboard plants (340-30-030) was also poorly defined. He said it did not clearly state whether the application was to single dryers or to the combined output of all dryers connected to a plant. He said that the technology to meet this proposed regulation had not been demonstrated at this time for all production conditions.

In regard to the continuous monitoring section of the proposed rule (340-30-050), Mr. Junge said he felt it was reasonable for the Department to seek cooperative assistance from industrial sources in monitoring pollutant sources, however he felt the proposed rule on this matter was too general in nature. He said that the specific monitoring needs of the Department should be expressed in the rule.

The proposed regulation on source testing (340-30-055), Mr. Junge said, makes the responsible person carry the burden of determining, among other things, the quality of emissions. He said that the term "quality of emissions" was not defined and had little meaning and he proposed that it be dropped.

Mr. Junge urged careful review of the proposed regulations in light of his comments and those of other witnesses.

Ms. Carol Doty, Jackson County Board of Commissioners, testified on behalf of the Board that they supported the recommendations proposed by the Advisory Committee. Ms. Doty expressed the need for citizen education on some of the things they can do to improve the quality of air in the airshed. She also said the Board wanted to thank the EQC for increasing the local DEQ staff. A written copy of Ms. Doty's statement is included in the hearing record on this matter.

Mr. Martin Craine, secretary-manager of the Southern Oregon Timber Industries Association, said that they felt it was important to understand that industry had and continued to do some things to reduce particulate emissions. He said that industry had a lack of confidence in much of the information the staff was presenting, and particularly that information submitted to the Advisory Committee. Mr. Craine said they felt they needed to challenge the advisability of portions of the proposed particulate control strategy. He said that the matter of energy was not adequately addressed and that the DEQ staff report underestimated power requirements. More pollution controls, he said, would make substantially increased power demands.

Mr. Craine said they recognized some problems did exist and agreed that the industry can do better. They contend, he said, that proposed controls should be feasible and the costs should not be so excessive as to raise the question in the minds of some operations of whether or not the investment in control measures exceeds the worth of the installation, thus causing the close of some operations when compliance dates could not be met.

Specifically, Mr. Craine offered the following recommendations:

1. Section 340-30-015, wood waste boilers - adopt the same rule as utilized in Portland AQMA where results have been satisfactory.
2. Section 340-20-030, veneer dryers - supported the testimony and recommendations of the American Plywood Association.
3. 340-30-030, wood particle dryers - supported the testimony and suggestions of the particle board producers.
4. Section 340-30-035, wigwam waste burners - suggested the word "emergency" be deleted so the Department may consider other environmental and operational factors which may make it more desirable to permit burner operation for a limited time specified by the Department.
5. Section 340-30-045, compliance schedules - suggested deadline of January 1, 1980 for wigwam burners instead of January 1, 1979.

Mr. Craine also requested that the official hearing record be held open for 15 days.

Commissioner Densmore asked why the January 1, 1979 date for wigwam burners could not be met. Mr. Craine replied that the ordering and installation of equipment and potential plant modifications probably could not be accomplished in one year.

Mr. Wallace Cory, Environmental Manager for Boise Cascade Corporation's Timber and Wood Products Group, said they concurred with the testimony of the American Plywood Association and Southern Oregon Timber Industries Association. He said that it was their conviction, based upon the work done by Washington State University, that significant improvements in air quality would not result from the new proposed rules. Mr. Cory said they felt that most sources inside the AQMA should be required only to meet statewide regulations and that the proposed special AQMA rules go far beyond the statewide rules and would be extremely difficult, if not impossible to comply with. Mr. Cory then cited specific concerns with the rules similar to those contained in earlier testimony. His written testimony containing those specific concerns is made a part of the hearing record on this matter.

Mr. Gary Grimes, testified on behalf of SWF Plywood Company. For the record, Mr. Grimes said that SWF Plywood Company was also in agreement with and supported testimony of the American Plywood Association and the Southern Oregon Timber Industries Association. Mr. Grimes also cited the impossibility of meeting the January 1, 1979 proposed deadline for wigwam burners and added prohibitive cost to those reasons expressed by Mr. Cory. Mr. Grimes said that they, too, were uneasy about the proposed veneer dryer regulations, for similar reasons expressed in earlier testimony.

Specifically, Mr. Grimes said, they would ask consideration of removing the word "emergency" in 340-30-045(e), and removal of the specific 85% reference to increased efficiency in 340-30-020. A written copy of Mr. Grimes' testimony is made a part of the hearing record on this matter.

Mr. Frank Ball, Louisiana Pacific Corporation, also expressed concern about the proposed wigwam burner regulations and their difficulty in justifying the expense involved in eliminating them. Mr. Ball requested that the deadline on the wigwam burners be extended for at least one year beyond the January 1, 1979 deadline.

Mr. William Coffindaffer, plant engineer for Timber Products Company, expressed his feeling that the proposed guidelines set forth by the Advisory Committee had been fully adopted by the Department, without any deviations. He commended the Advisory Committee on their hard work on this project, however, he said that from his observations the discussions of that Committee were directly aimed at the timber industry and no emphasis was placed on other pollution sources. Mr. Coffindaffer also testified about the several unknowns in tracking the particulate emissions. He said it was his feeling that until the Commission could come up with strategies dealing with all pollution sources in the Valley and not just timber industries, he felt that it might well bring about a discrimination suit. Mr. Coffindaffer's written testimony is made a part of the hearing record on this matter.

Mr. Clarence Casebeer, White City Dry Kiln, said he only wanted to add to earlier testimony that the impact of the proposed rules would possibly cause his plant to close. He said the timber industry was the sole source of supply for his waste fuel boilers.

In response to Commissioner Densmore, Mr. Casebeer said that even with tax credits for the installation of pollution control equipment, he could not afford the modifications needed to bring his plant into compliance with the proposed rules.

Mr. Michael E. Burrill, Vice-President and General Manager of Eugene F. Burrill Lumber Company, testified that he was disturbed with the comments of the audience at the hearing that industry did not have the right to defend themselves. Mr. Burrill expressed concerns about the proposed wigwam waste burner regulations, similar to those expressed in other testimony.

Commissioner Densmore commented that he thought he was doing the best job he could in sorting through all the testimony, but took exception to a comment in Mr. Burrill's written testimony that "...the members of the AQUA (sic) Advisory Committee should be the people who understand business and not environmentalists, retired people, educators and the like, who have nothing to lose from a stop-industry regulation." He said he didn't think that type of comment helped when everyone had the same goal of a balanced environment and economic base.

Mr. Burrill replied that his comment was not directed to any one person, however, he felt that some persons serving on the Committee did not have the time to properly provide technical input.

In response to Mr. Burrill, Chairman Richards said that it may be that industry miscalculated the importance of the recommendations that would be made by the Advisory Committee and did not monitor the Committee or make technical assistance available. He said he was bringing this up for the benefit of those industries in the Eugene-Springfield area and the Portland area as a recommendation to them to have more input to the Advisory Committee. Chairman Richards said he appreciated Mr. Burrill pointing out a problem and he thought the industry could address that at least in the other AQMA's.

Mr. Burrill agreed with Chairman Richards and said they really had no idea of the importance of what was going on, and if they had to go through it again, they would handle it differently. A copy of Mr. Burrill's written statement is made a part of the hearing record on this matter.

Mr. J. J. McGrew, McGrew Brothers Sawmill, said that the air pollution problem in the Medford area was long-standing, and in his opinion a lot of the pollution came from sources other than the timber industry, such as slash burning and other forms of open burning. Mr. McGrew said they also could not afford to upgrade their boilers to meet the proposed regulations.

Mr. McGrew said that the alternatives if he couldn't sell the waste, would be to either shut down, or wait until DEQ shut him down. He said he employed 165 persons.

Mr. Robert Fasel, Double Dee Lumber Company, said that all of the burden of raising the air quality standards had been put upon the lumber industry. He asked what would happen if they did meet the standards, and new industry and new population brought more pollution into the area. He wanted to know if the timber industry would still be the industry looked at as the primary source, therefore causing them to be shut down then they were out of compliance.

Mr. Matt Gould, Georgia-Pacific Corporation, summarized the industry comments. He said the Commission was faced with a difficult task and asked that testimony given at this hearing be taken into consideration and for the Commission to bear in mind that weighing all of the concerns expressed to come out with the best public interest would involve compromise and they looked to the Commission to do the best job it could.

Mr. Gene Hopkins, Greater Medford Chamber of Commerce, said that it was unfortunate that they weren't asked to represent the business sector of the Valley's economy in the Advisory Committee. He said it appeared to them that the overall control strategy was a short-range one. He said they were concerned over the image that the state possessed of business not being welcome and that local governments were difficult to deal with. Mr. Hopkins said that the problem with regulations like those proposed were not in what they did to an industry, but what they did to individual competitors in the industry. He said that higher costs for some would mean competitive advantages for others.

Mr. Hopkins also raised questions on the data bases used in the Seton, Johnson and Odell report. He said that the 5% population increase projected for Jackson County in 1977 over 1976 did not truly represent what was happening in the area of the study. He said he had information that the popularity of wood fuel for heating and in fireplaces rivaled the annual consumption of almost three wigwam burners. He said that they could foresee the time when the gain from eliminating wigwams would have been lost to the increase in wood fuel for home heating.

Mr. Hopkins said that the Chamber was convinced that research and planning for the proposed regulations did not reflect the professional quality and objectivity they had come to expect from DEQ. He urged that before adoption of any regulations, a comprehensive study of the total problem be instituted. A written copy of Mr. Hopkins' statement is made a part of the hearing record on this matter.

Chairman Richards then concluded the hearing on the Medford-Ashland AQMA regulations, and complimented the witnesses who appeared as to their clarity of suggestions and recommendations.

Commissioner Densmore MOVED, Commissioner Phinney seconded, and it was carried unanimously that the Director's recommendation be approved with the exception that the hearing record be kept open until December 31, 1977, instead of the proposed December 28, 1977.

AGENDA ITEM G - CONSIDERATION OF PETITION ON THE ADEQUACY OF MEDFORD CORPORATION AIR CONTAMINANT DISCHARGE PERMIT 15-0048, AND AIR CONTAMINANT ABATEMENT MEASURES IN EFFECT TO PREVENT NUISANCE CONDITIONS FROM THE MEDIUM DENSITY FIBERBOARD PLANT

Mr. and Mrs. James Madison of Medford, appeared to testify on behalf of petitioners. Mrs. Madison read a letter into the record expressing concern about the fallout from the Medco plant in Medford. She cited instances of particulate fallout accumulation on cars, roofs of houses, etc. Mrs. Madison stated her feeling Medco was morally and legally obligated to do whatever was necessary to stop "this assault on their neighbor's health and property."

Chairman Richards said that Mr. George Archer had submitted a letter for the record on this matter.

Mr. Dennis Belsky of the Department's Medford Branch Office, presented the staff report on this matter. Mr. Belsky said that the Department received a petition signed by 400 persons which stated:

"We, the undersigned, are concerned that the pollution control facilities and the permit conditions for the MEDCO MDF plant are not adequate to prevent nuisance to local residents. We request a Department of Environmental Quality hearing on this matter."

Mr. Belsky said that a source test conducted in early January 1977 found that the emissions from the plant were within limits for compliance. He said that during this time the Department received complaints and held several "town hall" meetings on the matter.

Mr. Belsky said that the particulate fallout the petitioners were concerned about had been identified as primarily coming from the Medco plant. He said that the Department was working with Medco to determine practical controls for upset discharges.

Mr. Belsky said that letters received subsequent to the petition indicated a black soot problem in addition to the particulate fallout. He said that normally the black soot would not be associated with MDF plant emissions, and would be typical of a combustion-type source such as a hog fuel boiler.

Mr. Belsky presented the following Director's Recommendation:

The Director recommends, with due consideration being given to the information received at this meeting, that:

1. The regional staff continue close surveillance of the plant site emissions.
2. Upon receipt and evaluation of the December 31, 1977 report from Medford Corporation that the Department develop a compliance schedule with increments of progress for incorporation with the Air Contamination Discharge Permit, a program for control of upset discharges and fugitive emissions.

3. Upon adoption of the special rules for particulate emissions, sources contributing to the nuisance problem be given highest priority in review and acceptance of control proposals so that these sources are controlled at the earliest practicable date.

Commissioner Phinney asked if it was correct that the proposed controls for these sources would not be in effect before 1981. Mr. Belsky replied that the earliest practicable date would take into account the high priority given those particular discharges which come under the proposed special AQMA rules. Commissioner Phinney asked if it would be practicable to think of a control on total emissions. Mr. Belsky said that was provided for in the permit under present regulations. He said that there was presently a reduction of approximately 1/3 in the mass emissions per week.

Commissioner Densmore asked Mr. Belsky to outline which parts of the proposed AQMA rules would apply to Medco. Mr. Belsky said those parts referring to air conveying systems and wood particle dryers at hardboard and particleboard plants, would apply.

Mr. Lynn Newbry of Medco Corporation, appeared before the Commission. He said they wanted to make it clear that the Department had been extremely helpful to Medco in identifying the problem and lending their help to find solutions to the problem. He said they felt the staff report represented an accurate description of the situation, however, he said they would not agree that their plant was the sole source of the problem the residents of the area were encountering.

Mr. Newbry said that the Department has cooperated in placing a Hi Vol sampler in the area to try to determine if the additional controls were doing any good. He said that they were disappointed to learn that they could not determine from the sampler when the additional controls were started up. He said that the report indicated what they have done to control these emissions.

Mr. Newbry said they try not to have upset conditions, but occasionally, with the type of material they are using, they have plug ups in cyclones. He said they try to catch those upsets as quickly as possible and are experimenting with types of sensing devices to determine when they have a problem with the cyclones.

Mr. Newbry also said they have taken most of the housekeeping measures suggested by the Department and are working on the others. He said that they currently had five cyclones that were not controlled through a baghouse or through entrainment. Those cyclones had a total contribution of 5 1/2 lbs/hour, he said, and two were out of compliance on a grain level standard. However, he said the emission rate from those were so low they were insignificant. He said they have every intention of controlling those cyclone emissions. He also said they intended to put controls on the currently uncontrolled dryer as soon as possible, however, some complications come with the proposed regulations. He said that the scrubber they had on their other dryer would not meet the proposed regulations. Mr. Newbry said that the Company was prepared to go ahead with a strategy to control those two remaining uncontrolled sources, if they could have a rule that would at least allow them time to amortize their investment.

Mr. Newbry urged the Commission to give consideration to a regulation for control of wood fiber dryers that was consistent with control devices that were currently available and could be bought "off the shelf", in order to solve the particulate problem. He said they felt it would not do harm to the air quality in the area.

Commissioner Densmore asked if the proposed rules for air conveying systems would have an impact to improve the situation. Mr. Newbry replied that that rule would apply, but they don't have any cyclones that would be out of compliance with that rule at this time.

In response to Commissioner Densmore, Mr. Newbry said that they had ascertained that there was certain material in the fallout that did not come from their plant. Commissioner Densmore asked if Mr. Newbry could recommend a way of finding out where the rest of that material was coming from. Mr. Newbry replied it would be extremely difficult to do, and he was not saying it could not come from their plant site, but he was saying it couldn't have come from their medium density fiberboard plant.

It was MOVED by Commissioner Phinney, seconded by Commissioner Densmore, and carried unanimously that the Director's recommendation in this matter be approved.

AGENDA ITEM L - CITY OF BEND SEWERAGE PROJECT - UPDATE ON FINANCIAL CONSIDERATION OF CITY OF BEND PHASE I SEWERAGE PROJECT

Mayor Clay Shepard, City of Bend, appeared before the Commission and reiterated some of the information presented to the EQC November 18, 1977 in Bend. He said that they have been pleased with the cooperation received from Department staff and looked forward to continuing to work with them in finding a solution to their problem. Mr. Shepard again expressed their belief that they were eligible for a hardship grant.

Commissioner Densmore asked if any of the alternatives listed in the staff report could be eliminated, if they have not already done so. Mr. Shepard said that at this time they would not consider alternative 1, vote to authorize sale of more bonds; alternative 3, establishing a sewer connection for all homes presently in existence; or alternative 4, forming a local improvement district to assess benefitted properties. He said they had not considered alternative 6 (assuming that only one-half of citizens agree to utilize city financing plan for house sewer construction), but they were looking into the possibility of DEQ purchasing their bonds. Mr. Shepard said that if they could proceed on that basis, they wanted consideration given to assistance with the \$4.7 million deficit.

Mr. Clarence Hilbrick of the Department's Water Quality Division, said the staff report detailed what had happened since the EQC meeting in November in Bend. He said they were evaluating the seven remaining alternatives and intended to have a report on them ready for the Commission's January meeting.

In response to Chairman Richards, Mr. Hilbrick said that there were enough questions about each alternative that the Department could not make a firm recommendation to the Commission at this time.

Chairman Richards said he saw this as a renewal of the City of Bend's request that the Department proceed to request the Emergency Board for a hardship grant for the City.

Commissioner Densmore MOVED, Commissioner Phinney seconded, and it was carried unanimously that the Commission accept the staff report and await the Director's recommendation at their January meeting.

AGENDA ITEM E - REPORT OF SOUTHWEST REGIONAL MANAGER ON SIGNIFICANT ON-GOING ACTIVITIES IN THE SOUTHWEST REGION (JACKSON-JOSEPHINE COUNTIES)

Chairman Richards noted that this report was meant as a chance to communicate with persons in the community that had been present earlier in the meeting, but who had now left. Mr. Richard P. Reiter, Southwest Region Manager, said he would forego comment on all but one issue.

Mr. Reiter said that the vehicle emission test demonstration had been conducted in Medford with approximately 600 vehicles tested. He said the information from those tests was still being evaluated. He said that although they could have tested approximately 2000 vehicles in the same time period, they felt the demonstration had been a moderate success.

Chairman Richards asked if Mr. Reiter had any comments on the statements made by County Commissioner Moore during the public forum section of the meeting. Mr. Reiter replied that Mr. Moore's concerns were partly due to a communication problem with the public in general. He said that people had read newspaper articles which said that composting toilets and grey water systems were the answer, but the Department was still evaluating those systems and as yet had not come to the same conclusion. He said that the Department felt that the grey water system had the potential for transmission of disease. In regard to the rural area variances, Mr. Reiter said that from a practical point of view the practice had been successful however from a legal point of view they had no choice but to eliminate it.

Commissioner Phinney asked if the reclamation projects in the landfills, referred to in Mr. Reiter's report, were being carried out by the landfill operators or volunteer groups. Mr. Reiter said that most were being done by operators.

AGENDA ITEM H - CITY OF CANNON BEACH EXTENSION OF TIME SCHEDULE TO ADOPT FACILITY PLAN REPORT

Mr. Murray Tilson, of the Department's North Coast Branch Office, said a typographical error had been made in the Order. He said that in line 18 "...on March 31, 1977" should read "...on March 31, 1978".

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

AGENDA ITEM I - NPDES JULY 1, 1977 COMPLIANCE DATE - REQUEST FOR APPROVAL OF STIPULATED CONSENT ORDERS FOR PERMITTEES NOT MEETING JULY 1, 1977 COMPLIANCE DEADLINE

Commissioner Densmore asked what impact this had on the City of Gold Hill having to boil their water. Mr. Merlyn Hough of the Medford Branch Office, said that the City of Gold Hill did not have a water treatment plant and occasionally had to boil their water because of the lack of capacity in their chlorination system. He said that this problem mostly occurred during periods of high storm water runoff. In response to Commissioner Densmore, Mr. Hough said that these permits would not have an impact on the Gold Hill water purification problem.

Commissioner Phinney MOVED, Commissioner Densmore seconded, and it was carried unanimously that the Consent Orders for the following be issued:

1. City of Corvallis, Stipulation and Final Order No. WQ-MWR-77-249.
2. City of Donald, Stipulation and Final Order No. WQ-SNCR-77-178.
3. City of Gold Hill, Stipulation and Final Order No. WQ-SWR-77-253.
4. City of St. Paul, Stipulation and Final Order No. WQ-SNCR-77-256.
5. City of Winston, Stipulation and Final Order No. WQ-SWR-77-252.
6. City of Amity, Stipulation and Final Order No. WQ-SNCR-77-266.
7. City of Jefferson, Stipulation and Final Order No. WQ-SNCR-77-267.
8. City of Wheeler, Stipulation and Final Order No. WQ-SNCR-77-244.

AGENDA ITEM J - PUBLIC SEWERAGE CONSIDERATIONS WITHIN BEND URBAN GROWTH BOUNDARY - PROGRESS REPORT NO. 1

Commissioner Densmore MOVED, Commissioner Phinney seconded, and it was carried unanimously that the following Director's recommendation be approved:

1. The Director recommends that the Commission direct the staff to continue to work with Deschutes County officials and the City of Bend to obtain a written agreement outlining how DEQ, Deschutes County and City of Bend can work together to solve the problems discussed in the November 18, 1977 report.
2. The Director recommends no Commission action at this time and that the Commission consider a staff progress report at the January meeting.

AGENDA ITEM K - WATER QUALITY MANAGEMENT PLAN - STATUS REPORT ON REVIEW OF STATEWIDE WATER QUALITY MANAGEMENT PLAN WITH LOCAL GOVERNMENTS AND INTERESTED CITIZENS

In response to Commissioner Densmore, Mr. Harold Sawyer of the Department's Water Quality Division, said that the fact that only one reply was received out of 700 copies distributed, did not necessarily mean that everyone was happy with the product. He said that they stressed that this would not be the only opportunity to make comments.

Commissioner Phinney asked if any notification was made to citizen groups. Mr. Sawyer said that the local governments were the ones who felt the most left out before, and therefore this was directed primarily to them. He said that the public meeting process which was coming up would be a better opportunity for input from citizen organizations.

Commissioner Phinney MOVED, Commissioner Densmore seconded, and it was carried unanimously that the Director's recommendation to receive additional testimony from the public be approved.

AGENDA ITEM M - OREGON CUP AWARDS

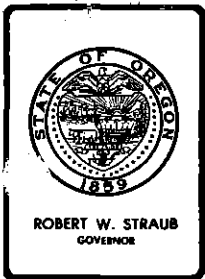
Mr. David Gemma of the Department's Public Affairs Office, presented the summation and Director's recommendation from the staff report.

It was MOVED by Commissioner Densmore, seconded by Commissioner Phinney and carried unanimously that Oregon Cup Awards be made to American Can Company, Halsey; Fowler Manufacturing; Mr. Zenon F. Rozycki; and Tektronix, Inc.; and that Letters of Commendation be sent to Esco Corporation and Columbia Steel Casting Company.

There being no further business, the meeting was adjourned.

Respectfully submitted,


Carol A. Spletstaszer
Recording Secretary



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 B, December 16, 1977, EQC Meeting
November Program Activity Report

Discussion

Attached is the November Program Activity Report.

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 page 12 of the report.

Bill

WILLIAM H. YOUNG

M. Downs:mjb
229-6485
12-12-77



Contains
Recycled
Materials

Department of Environmental Quality
Technical Programs

Permit and Plan Actions

November 1977

Water Quality Division

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Permit Actions Completed - Listing	7
133 . . Permit Actions Pending - Summary	6

Air Quality Division

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DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air, Water &
Solid Waste Divisions
(Reporting Unit)

November 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.	
<u>Air</u>							
Direct Sources	9	63	5	52	1	1	33
Total	9	63	5	52	1	1	33
<u>Water</u>							
Municipal	78	641	76	731			25
Industrial	8	48	6	42			13
Total	86	689	82	773			38
<u>Solid Waste</u>							
General Refuse	3	19	2	10			13
Demolition	2	5	1	2			3
Industrial	3	14	1	8			10
Sludge	1	2		1			1
Total	9	40	4	21			27
<u>Hazardous Wastes</u>							
<u>GRAND TOTAL</u>	<u>104</u>	<u>792</u>	<u>91</u>	<u>846</u>	<u>1</u>	<u>1</u>	<u>98</u>

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division

November 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
	<u>Municipal Sources - 76</u>				
6	CHARLESTON SD COOS HEAD NAVAL FACILITY	PREJ071577	090777	CMMT LTR	54
10	WINCHESTER SALMON HARBOR	J081777	101077	PROV APP	54
10	WINCHESTER SALMON HARBOR DOUG CO PARKS	J110777	101077	PROV APP	03
10	REDFORT COHO REC VEHICLE PARK	J102077	110177	CMMT LTR	12
21	LINCOLN CITY INDIAN SHORES PHASE 2 REV	J101177	110277	PROV APP	22
17	CAVE JUNCTION CAVE JUNCTION STP	V101477	110277	COMMENTS	19
15	MEDFORD ATWATER PARK SURD	J103177	110377	PROV APP	03
24	SALEM WALLACE MILARK PARK WEST NO 6	J103177	110477	PROV APP	04
24	SALEM WILLOW BATTLE CREEK ESTATES NO 5	J102577	110477	PROV APP	10
10	WILDLIFE ROCK CR FISH HATCHERY	VC90177	110477	APPROVED	60
3	GLANSTONE OAK MEADOWS SURD	J102577	110877	PROV APP	14
24	SALEM SUNNYRIDGE PUMP STATION	J103177	110877	PROV APP	03
27	INDEPENDENCE BONITA ESTATE NO 5	K110777	110977	PROV APP	02
27	INDEPENDENCE BONITA ESTATE NO 4	K110777	110977	PROV APP	02
34	USA DURHAM CENTRAL PARK CONDONS	K110477	110977	PROV APP	05
27	INDEPENDENCE BONITA ESTATES NO 3	K110477	110977	PROV APP	05
21	TOLEDO TOLEDO REPL BET MH 125-126-UJ	102877	111077	PROV APP	13
9	BEND QUAIL HOLLOW	B111077	111077	PROV APP	00
26	PORTLAND SE 31ST AVE	J110777	111077	PROV APP	03
21	TOLEDO TOLEDO REHAB	J110477	111077	PROV APP	06
26	PORTLAND SE RAMONA ST	J110477	111077	PROV APP	06
10	WINCHESTER SALMON HARBOR DOUG CO PARKS	J110777	111077	PROV APP	03
15	MEDFORD WEST OF SUNRISE EXT	J110777	111577	PROV APP	08
15	BOVSA RAPP ROAD EXT TALENT	J110777	111577	PROV APP	08
3	CCSD KELLOGG SUNNYFIELD GREEN	J110777	111577	PROV APP	08
9	BEND WILLIAMSON PARK	K110477	111577	PROV APP	11
26	LAKE OSWEGO BRB DEV EAGLE CREST DR	J110477	111577	PROV APP	11

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division

November 1977

PLAN ACTIONS COMPLETED (82 - cont.)

County	Name of Source/Project/Site and Type of Same	Date Rec'd	Date of Action	Action	Time to Complete Action
34 USA ALOHA	ALOHA PUMP STATION NO 2	V110477	111577	APPROVED	11
34 USA ALOHA	HARTUNG FARMS 3	K110477	111577	PROV APP	11
24 SALEM	BRUSH COLL ESTATES PH 1	J110477	111577	PROV APP	11
15 CENTRAL POINT	FLAGSTONE SUBD	J111477	111677	PROV APP	02
21 GLENEDEEN SD	LAT 2.5A1A EXT	J111477	111677	PROV APP	02
25 BOARDMAN	BOARDMAN PHASE II IMPS	K111077	111677	PROV APP	06
24 SALEM-KEIZER	SHOP CTR CHEMAWA RD RELOC	J110777	111677	PROV APP	09
22 LERANON	CHESTNUT COURT	K110777	111677	PROV APP	09
16 MADRAS	MADRAS LAT A101A EXT	K110777	111677	PROV APP	09
27 MONMOUTH	SOUTHGATE DRIVE	K111477	111777	PROV APP	03
21 TOLEDO	GODDARD #3 J 518-2	J111477	111777	PROV APP	03
17 WARR-ER SD	PROPOSED LATERAL J 21	K111477	111777	PROV APP	03
26 GRESHAM	NE 181ST EVERETT TO COUCH	J111077	111777	PROV APP	07
20 SPRINGFIELD	LOT 16 BLOCK 4 EAST PARCEL	K111077	111777	PROV APP	07
26 GRESHAM	SE VISTA AVE & SE 2ND ST	K110877	111777	PROV APP	09
21 TOLEDO	GODDARD NO 3 INCL PUMP STA	J110477	111777	PROV APP	13
26 PORTLAND-COLUMB	SW CASCADE DR	K111577	111877	PROV APP	03
34 TUALATIN	SHANIKO II SUBDIV	K111477	112177	PROV APP	07
20 EUGENE	MAHLON SWEET FIELD EUGENE	APK110477	112377	PROV APP	19
24 SALEM	LILLY ADD	J111877	112877	PROV APP	10
6 RANDON	TENTH ST SW IMPS	K111777	112877	PROV APP	11
6 RANDON	LEXINGTON AVE SEWERS	K111777	112877	PROV APP	11
34 USA ALOHA	KENT ESTATES 653	J111777	112877	PROV APP	11
24 SALEM-WILLOW	IRONWOOD ESTATES NO 4	J111577	112877	PROV APP	14
3 OAK LODGE SD	HARWAY SIX SUBD-GLADSTONE	K110777	112877	PROV APP	20

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality Division

November 1977

PLAN ACTIONS COMPLETED (82-cont.)

County	Name of Source/Project/Site and Type of Same	Date Rec'd	Date of Action	Action	Time to Complete Action
20	SPRINGFIELD MILLS SUBD	K111877	112877	PROV APP	10
30	UKIAH UKIAH CHANGE 3	V102677	112977	APPROVED	34
5	CLATSKANIE CLATSKANIE CHANGE 5	V102677	112977	APPROVED	34
29	WHEELER WHEELER CH ORD B-1	V102877	112977	APPROVED	32
3	SANDY CHANGE ORDER NO 1	V112877	112977	APPROVED	01
12	CANYON CITY CHANGE ORDER NO 1	V111577	112977	APPROVED	14
21	NETARTS OF STP CHANGE ORDERS 1 AND 2	V110477	112977	APPROVED	25
21	SILETZ STROM SUBD	J112977	112977	PROV APP	00
8	PORT ORFORD PORT ORFORD 2300E77 ADD #2	V112577	112977	APPROVED	04
6	NORTH BEND GREENWAY TERRACE	K112177	112977	PROV APP	08
24	SALEM RIVERA SUBD NO 1 IMPS	J111877	112977	PROV APP	11
10	SUTHERLIN SUTHERLIN PR 1858E74 ADD 263V	V111477	112977	APPROVED	15
30	UKIAH UKIAH CHANGE 5	V110877	112977	APPROVED	21
21	NETARTS OF SO OCEAN OUTFALL CH ORDS 1-8	V110477	112977	APPROVED	25
9	BERYOND BERYOND BACKHOE LOADER	V110477	112977	APPROVED	25
10	SUTHERLIN SUTHERLIN ADD #1	V110477	112977	APPROVED	25
34	TUALATIN TUAL LID NO 3 SURGE-HLOG CH	J111777	112977	PROV APP	12
1	BAKER FOOTHILL DRIVE	K112577	113077	PROV APP	05
1	BAKER SEVENTEENTH ST	K112577	113077	PROV APP	05
1	BAKER SOUTH BRIDGE ST	K112577	113077	PROV APP	05

DEPARTMENT OF ENVIRONMENTAL QUALITY
 TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
 (Reporting Unit)

November 1977
 (Month and Year)

PLAN ACTIONS COMPLETED (82-cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
INDUSTRIAL WASTE SOURCES (6).			
Tillamook	Carl W. Tohl - Tillamook Animal Waste	11-2-77	Approved
Marion	Belozer Fryer Farms - Donald Animal Waste	11-8-77	Approved
Klamath	Weyco - Klamath Falls Bark and Debris Control	11-15-77	Approved
Multnomah	Anodizing, Inc. - Portland Effluent Neutralization	11-23-77	Approved
Lane	International Paper - Veneta Steam Vat Recirculation	11-30-77	Approved
Lane	Weyco - Springfield Weak Liquor Filter System	11-30-77	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
(Reporting Unit)

November 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.			* **	* **	* **	* **	
	*	**	*	**	*	**	*	**						
<u>Municipal</u>														
New	0	0	0	1	1	0	1	2	2					
Existing	0	0	0	2	0	0	0	3	0					
Renewals	3	0	14	0	37	0	50	3	49					
Modifications	0	0	7	0	5	0	8	0	6					
Total	3	0	21	3	43	0	59	8	57	6	300	72	302	75
<u>Industrial</u>														
New	0	0	4	6	2	1	5	6	1	5				
Existing	0	4	0	6	1	0	1	4	0	6				
Renewals	6	0	21	5	12	0	35	5	42	5				
Modifications	0	0	7	1	5	0	11	1	9	0				
Total	6	4	32	18	20	1	52	16	52	16	437	100	438	111
<u>Agricultural (Hatcheries, Dairies, etc.)</u>														
New	1	0	1	1	0	0	1	1	1	0				
Existing	0	0	0	0	0	0	0	0	0	0				
Renewals	0	0	0	0	0	0	0	0	0	0				
Modifications	0	0	0	0	0	0	0	0	1	0				
Total	1	0	1	1	0	0	1	1	2	0	66	10	67	10
GRAND TOTALS	10	4	54	22	63	1	111	25	111	22	803	182	807	196

* NPDES Permits
** State Permits

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (64)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Yamhill	Sokol Blosser Winery Wine Processing	11-1-77	State Permit Issued
Benton	Corvallis Mobile Home Park Sewage Disposal	11-14-77	NPDES Permit Renewed
Jackson	City of Gold Hill Sewage Disposal	11-14-77	NPDES Permit Renewed
Columbia	City of Clatskanie Sewage Disposal	11-14-77	NPDES Permit Renewed
Coos	City of Coquille Water Treatment Plant	11-14-77	NPDES Permit Renewed
Coos	City of Bandon Sewage Disposal	11-14-77	NPDES Permit Renewed
Lane	Berry Creek Construction Gravel Operation	11-14-77	NPDES Permit Renewed
Multnomah	Columbia Way Court Sewage Disposal	11-14-77	NPDES Permit Renewed
Lane	Champion Building Products Mapleton Mill	11-14-77	NPDES Permit Renewed
Columbia	P.G.E. Beaver Electrical Power	11-14-77	NPDES Permit Renewed
Linn	City of Lebanon Sewage Disposal	11-14-77	NPDES Permit Modified
Multnomah	Rhodia, Inc. Agricultural Division	11-14-77	NPDES Permit Renewed
Clatsop	Bioproducts, Inc. Fish Food	11-14-77	NPDES Permit Modified
Marion	City of Hubbard Sewage Disposal	11-14-77	NPDES Permit Modified

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (64 - cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Lane	City of Eugene Airport STP	11-17-77	NPDES Permit Renewed
Clatsop	City of Warrenton Sewage Disposal	11-17-77	NPDES Permit Renewed
Marion	City of Woodburn Sewage Disposal	11-17-77	NPDES Permit Renewed
Tillamook	City of Bay City Sewage Disposal	11-17-77	NPDES Permit Renewed
Linn	City of Halsey Sewage Disposal	11-17-77	NPDES Permit Renewed
Clackamas	Crown Zellerbach West Linn	11-17-77	NPDES Permit Renewed
Douglas	Hanna Nickel Smelting Nickel ore Smelting	11-17-77	NPDES Permit Modified
Columbia	City of Vernonia Sewage Disposal	11-17-77	NPDES Permit Renewed
Klamath	City of Malin Sewage Disposal	11-17-77	NPDES Permit Renewed
Clackamas	Publishers Paper Oregon City Mill	11-17-77	NPDES Permit Renewed
Washington	U.S.A. Somerset West Sewage Disposal	11-25-77	NPDES Permit Modified
Josephine	City of Cave Junction Sewage Disposal	11-25-77	NPDES Permit Modified
Tillamook	Port of Tillamook Bay Sewage Disposal	11-25-77	NPDES Permit Renewed
Jackson	City of Jacksonville Sewage Disposal	11-25-77	NPDES Permit Renewed

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (64-cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Marion	City of Aumsville Sewage Disposal	11-25-77	NPDES Permit Renewed
Lincoln	City of Siletz Sewage Disposal	11-25-77	NPDES Permit Renewed
Marion	City of Gervais Sewage Disposal	11-25-77	NPDES Permit Renewed
Marion	City of Jefferson Sewage Disposal	11-25-77	NPDES Permit Renewed
Yamhill	City of Dayton Sewage Disposal	11-25-77	NPDES Permit Renewed
Linn	Skyline West Sanitary Dist. Sewage Disposal	11-25-77	NPDES Permit Renewed
Yamhill	City of Sheridan Sewage Disposal	11-25-77	NPDES Permit Renewed
Yamhill	City of Amity Sewage Disposal	11-29-77	NPDES Permit Renewed
Yamhill	City of Dundee Sewage Disposal	11-29-77	NPDES Permit Renewed
Benton	City of Corvallis Airport Lagoon Sewage Disposal	11-29-77	NPDES Permit Renewed
Baker	City of Dufur Sewage Disposal	11-29-77	NPDES Permit Renewed
Josephine	Josephine Co. School Dist. Hidden Valley School - Sewage Disposal	11-29-77	NPDES Permit Issued
Curry	South Coast Lumber Co. Sawmill & Planning Mill	11-29-77	NPDES Permit Renewed
Clackamas	City of Molalla Sewage Disposal	11-29-77	NPDES Permit Renewed

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (64 - cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Coos	Lakeside Water District Water Treatment Plant	11-20-77	NPDES Permit Renewed
Clackamas	City of Lake Oswego Water Treatment Plant	11-30-77	NPDES Permit Issued
Multnomah	Pennzoil Company Portland	11-30-77	NPDES Permit Issued
Douglas	California Shellfish Hallmark Fisheries	11-30-77	NPDES Permit Renewed
Clatsop	Barbey Packing Seafood	11-30-77	NPDES Permit Modification
Jackson	Bear Creek Valley San. Auth. Sewage Disposal	11-30-77	NPDES Permit Modification
Clatsop	Bumble Bee Seafood Hanthorne	11-30-77	NPDES Permit Modification
Clatsop	Bumble Bee Seafood Elmore Cannery	11-30-77	NPDES Permit Modification
Clatsop	Pacific Shrimp Inc. Fish Processing	11-30-77	NPDES Permit Renewed
Lincoln	Georgia Pacific Toledo Plywood	11-30-77	NPDES Permit Renewed
Coos	Bandon Fisheries Inc. Bandon Plant	11-30-77	NPDES Permit Renewed
Polk	City of Monmouth Sewage Disposal	11-30-77	NPDES Permit Renewed
Lane	City of Cresswell Sewage Disposal	11-30-77	NPDES Permit Renewed
Columbia	Tagg Elementary School Sewage Disposal	11-30-77	NPDES Permit Renewed

DEPARTMENT OF ENVIRONMENTAL QUALITY
 TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Water Quality
 (Reporting Unit)

November 1977
 (Month and Year)

PERMIT ACTIONS COMPLETED (64 - cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Linn	City of Scio Sewage Disposal	11-30-77	NPDES Permit Renewed
Wheeler	City of Fossil Sewage Disposal	11-30-77	NPDES Permit Renewed
Benton	City of Monroe Sewage Disposal	11-30-77	NPDES Permit Renewed
Gilliam	City of Condon Sewage Disposal	11-30-77	NPDES Permit Renewed
Douglas	City of Winston Sewage Disposal	11-30-77	NPDES Permit Renewed
Douglas	Green Sanitary District Sewage Disposal	11-30-77	NPDES Permit Renewed
Polk	City of Independence Sewage Disposal	11-30-77	NPDES Permit Renewed
Douglas	Roseburg Lumber Co. Dillard Operation	11-30-77	NPDES Permit Renewed

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality
(Reporting Unit)

November 1977
(Month and Year)

PLAN ACTIONS COMPLETED

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
<u>Direct Stationary Sources (6)</u>			
Malheur (NC945)	The Amalgamated Sugar Company. Scrubber on two boilers.	10/25/77	Approved.
Washington (NC973)	Durametal Foundry. Salvage of baghouse dust.	11/2/77	Approved.
Benton (NC985)	Brand S Corporation. Convert gas dryer to wood fuel.	11/3/77	Denied.
Coos (NC986)	Menasha Corporation. Hog fuel boiler scrubber.	11/2/77	Approved.
Hood River (NC1016)	Bickford Orchards, Inc. Orchard fans.	10/31/77	Approved (Tax Credit Only).
Hood River (NC1018)	Lage Orchards, Inc. Orchard fans.	11/7/77	Approved (Tax Credit Only).

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality
(Reporting Unit)

November 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.			
<u>Direct Sources</u>							
New	5	27	1	14	13		
Existing	8	61	8	28	33		
Renewals	14	60	1	20	40		
Modifications	501*	793	496*	775	18		
Total	528	941	506	837	104	1,768	1,814
<u>Indirect Sources</u>							
New	6	14	1	12	15		
Existing							
Renewals							
Modifications	2	3	1	2	1		
Total	8	17	2	14	16	64	
<u>GRAND TOTALS</u>	536	958	508	851	120	1832	

*Includes 488 permits converted to Minimal Source Permits.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (508 - cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
<u>Direct Stationary Sources (506)</u>			
	488 permits converted to Minimal Source Permits		Permits Issued
Clackamas	G. L. Althausen 03-2666, Existing	10/31/77	Permit Issued
Coos	Menasha Corporation 06-0015, Modification	11/10/77	Addendum Issued
Crook	Prineville Stud Co. 07-0007, Existing	10/11/77	Permit Issued
Crook	Prineville Mouldings, Inc. 07-0016, Existing	10/11/77	Permit Issued
Douglas	International Paper Co. 10-0065, Modification	10/25/77	Addendum Issued
Jackson	Boise Cascade Corporation 15-0004, Modification	10/27/77	Addendum Issued
Jackson	White City Dry Kilns 15-0053, Modification	10/27/77	Permit Issued
Klamath	Nu-Mix Concrete 18-0043, Existing	10/12/77	Permit Issued
Linn	Teledyne Wah Chang 22-0547, Renewal	11/17/77	Permit Issued
Malheur	Amalgamated Sugar Company 23-0002, Modification	10/14/77	Permit Issued
Polk	Boise Cascade Corporation 27-4078, Modification	10/27/77	Addendum Issued
Polk	Boise Cascade Corporation 27-7002, Modification	10/27/77	Addendum Issued
Tillamook	Wilson River Sand and Gravel 29-0064, Existing	10/11/77	Permit Issued

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Air Quality
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (508 - cont.)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
<u>Direct Stationary Sources (continued)</u>			
Tillamook	Sandlake Cedar Shake Products 29-0065, Existing	10/11/77	Permit Issued
Portable	Harney Rock and Paving 37-0059, Modification	10/31/77	Permit Issued
Portable	Tuss Crushing 37-0176, New	10/11/77	Permit Issued
Portable	Stukel Rock and Paving 37-0178, Existing	10/11/77	Permit Issued
Portable	David S. Schwartz 37-0184, Existing	10/31/77	Permit Issued
<u>Indirect Sources (2)</u>			
Washington	Washington Square Shopping Center, 1,000 space temporary parking lot. File No. 34-6022	11/21/77	Modification issued.
Multnomah	East Fremont Bridge Ramps, interchange expansion. File No. 26-6028		No permit needed for alternative selected.

DEPARTMENT OF ENVIRONMENTAL QUALITY
 TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division
 (Reporting Unit)

November 1977
 (Month and Year)

PLAN ACTIONS COMPLETED (4)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Lane	Fred Smith Landfill Existing Site Operational Plan	11/1/77	Conditional approval
Marion	MacLaren School Existing Site Operational Plan Amendment	11/1/77	Conditional approval
Clackamas	LaVelle - King Road Existing Site Construction Plan	11/3/77	Conditional approval
Harney	Burns-Hines Landfill Existing Site Operational Plan	11/4/77	Conditional approval

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

November 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.			
<u>General Refuse</u>							
New	2	6		4	5		
Existing		3		5	19	(*)	
Renewals	2	21	9	15	14		
Modifications		4		5	2		
Total	4	34	9	29	40	182	187
<u>Demolition</u>							
New				1			
Existing				1			
Renewals							
Modifications							
Total	0	0	0	2	0	17	17
<u>Industrial</u>							
New		2	2	7	1		
Existing				2	5	(*3)	
Renewals		3	2	5	3		
Modifications	1	1		1	1		
Total	1	6	4	15	10	96	99
<u>Sludge Disposal</u>							
New							
Existing							
Renewals		1	1	2			
Modifications							
Total	0	1	1	2	0	5	5
<u>Hazardous Waste</u>							
New							
Authorizations	18	69	20	90	7		
Renewals							
Modifications							
Total	18	69	20	90	7	1	1
<u>GRAND TOTALS</u>	<u>23</u>	<u>110</u>	<u>34</u>	<u>138</u>	<u>57</u>	<u>301</u>	<u>309</u>

*Sites operating under temporary permits until regular permits are issued - total 22.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (34)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
<u>General Refuse (Garbage) Facilities (9)</u>			
Clatsop	Astoria Landfill Existing facility	11/16/77	Permit issued (renewal)
Clatsop	Cannon Beach Landfill Existing facility	11/16/77	Permit issued (renewal)
Clatsop	Elsie Disposal Site Existing facility	11/16/77	Permit issued (renewal)
Clatsop	Seaside Disposal Site Existing facility	11/16/77	Permit issued (renewal)
Lincoln	Logsdon Disposal Site Existing facility	11/16/77	Permit issued (renewal)
Union	Elgin Disposal Site Existing facility	11/16/77	Permit issued (renewal)
Union	North Powder Disposal Site Existing facility	11/16/77	Permit issued (renewal)
Union	Union Disposal Site Existing facility	11/16/77	Permit issued (renewal)
Benton	Monroe Transfer Station Existing facility	11/30/77	Permit issued (renewal)
<u>Demolition Waste Facilities - none</u>			
<u>Sludge Disposal Facilities (1)</u>			
Coos	Hempstead Sludge Lagoon Existing facility	11/21/77	Permit issued (renewal)
<u>Industrial Waste Facilities (4)</u>			
Umatilla	Jones Normel Foods New facility	11/3/77	Letter authoriza- tion issued.

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

November 1977
(Month and Year)

PERMIT ACTIONS COMPLETED (continued)

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Lake	Louisiana-Pacific, Lakeview New facility	11/17/77	Permit issued.
Linn	Old Timber Pond Existing facility	11/29/77	Permit issued (renewal)
Linn	Fred Smith Landfill Existing facility	11/30/77	Permit issued (renewal)
<u>Hazardous Waste Facilities</u> (20)			
Gilliam	Chem-Nuclear	11/3/77	Disposal authoriza- tion approved (arsenic-contaminated waste).
"	"	11/4/77	Eleven (11) verbal authorizations con- firmed in writing (small quantities of various hazardous wastes).
"	"	11/7/77	Disposal authoriza- tion approved (2,4,5T).
"	"	11/8/77	Disposal authoriza- tion amended (pesticide manufac- turing waste).
"	"	11/10/77	Disposal authoriza- tion amended (plat- ing sludge, acid solutions, etc.).
"	"	11/15/77	Disposal authoriza- tion (spent sulfuric acid).

DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROGRAMS

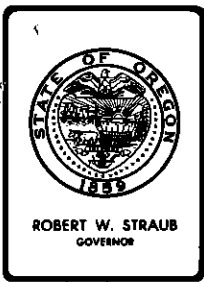
MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

November 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	11/16/77	Disposal authoriza- tion approved (pesticides).
"	"	11/17/77	Disposal authoriza- tion amended (waste water).
"	"	11/25/77	Two (2) disposal authorizations approved (paint sludge, wood treating waste).



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 No. C, December 16, 1977, EQC Meeting
Tax Credit Applications

Attached are 19 requests for tax credit action. Review reports and 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 Pollution Control Facility Certificates for 16 applications: T-839R, T-922, T-929, T-932, T-933, T-936, T-937, T-939, T-940, T-941, T-942, T-945, T-946, T-947, T-948, T-950.
2. Reissue Tax Credit Certificate No. 612 to Cascade Aggregates, Inc. purchaser of facilities previously owned and certified to Glacier Sand and Gravel (review report and authorizing letter attached).
3. Revoke Tax Credit Certificate No. 740 issued to Teledyne Wah Chang Albany because of innocent misrepresentation (see review report and authorizing letter attached).
4. Revoke Tax Credit Certificate No. 695 issued to Georgia-Pacific Corporation because the facilities certified are no longer in use (see review report and authorizing letter attached).

Michael Downs
for
William H. Young

MJDowns:cs
229-6485
12/8/77

Attachments

1. Tax Credit Summary
2. Tax Credit Application Table
3. 19 review reports



Contains
Recycled

Attachment 1

Proposed December 1977 Totals

Air Quality	\$ 2,196,185
Water Quality	745,079
Solid Waste	<u>572,293</u>
	\$ 3,513,557

Calendar Year Totals to Date
(Excluding December 1977 Totals)

Air Quality	\$ 6,343,874
Water Quality	4,054,806
Solid Waste	<u>5,648,882</u>
	\$ 16,047,562

Total Certificates Awarded (Monetary Values)
Since Beginning of Program (Excluding
December 1977 Totals):

Air Quality	\$109,990,930
Water Quality	79,560,673
Solid Waste	<u>14,056,336</u>
	\$204,607,939

TAX CREDIT APPLICATIONS SUMMARY

Applicant/ Plant Location	Appl. No.	Facility	Claimed Cost	% Allocable To Pollution Control	Director's Recommendation
Teledyne Wah Chang Albany Albany	T-839R	12,000 scfm packed tower scrubber system	\$ 193,747.00	80% or more	Issue Certificate
Donald L. Goe Hood River	T-922	Orchard fans	4,000.00	80% or more	Issue Certificate
Hilton Fuel Central Point	T-929	Waste bark utilization facility	144,673.28	100%	Issue Certificate
Champion International Gold Beach	T-932	Wood waste reclamation system	427,620.00	100%	Issue Certificate
Champion International Dee	T-933	Waste treatment plant	174,159.00	80% or more	Issue Certificate
Pacific Resin & Chemical, Inc Eugene	T-936	Waste water treatment system	348,650.00	80% or more	Issue Certificate
Columbia Steel Casting Co. Portland	T-937	Baghouse and associated equipment	140,130.73	80% or more	Issue Certificate
Publishers Paper Company Tillamook	T-939	Wet scrubber and associated equipment	133,682.00	80% or more	Issue Certificate
Publishers Paper Company Newberg	T-940	40,000 gallon surge tank	76,034.00	80% or more	Issue Certificate
Publishers Paper Company Oregon City	T-941	Extension of existing filter plant discuarge culvert	47,935.00	80% or more	Issue Certificate
Publishers Paper Company Oregon City	T-942	Addition of three aerators to secondary lagoon	90,301.00	80% or more	Issue Certificate
Weyerhaeuser Company Springfield	T-945	Electrostatic precipitator system	1,508,099.00	80% or more	Issue Certificate
Boise Cascade Corporation Independence	T-946	Baghouse to control sander dust	36,634.34	80% or more	Issue Certificate

TAX CREDIT APPLICATIONS SUMMARY

Applicant/ Plant Location	Appl. No.	Facility	Claimed Cost	% Allocable To Pollution Control	Director's Recommendation
Boise Cascade Corp. Millersburg	T-947	Baghouse to control emissions from plywood sander	\$ 20,726.22	80% or more	Issue Certificate
Boise Cascade Corp. Sweet Home	T-948	Baghouse to control emissions from three cyclones	25,998.45	80% or more	Issue Certificate
Weyerhaeuser Co. Cottage Grove	T-950	Control system for veneer dryer emissions	133,169.00	80% or more	Issue Certificate

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

1. Applicant

Teledyne Industries, Inc.
Teledyne Wah Chang Albany
P. O. Box 460
Albany, Oregon 97321

The applicant owns and operates a zirconium, hafnium, tantalum and niobium production plant at 1600 N. E. Old Salem Road in Albany.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a 12,000 scfm packed tower scrubber system originally installed to treat emissions from the last sand chlorination addition. This facility known as the 36" diameter scrubber now treats the emissions from all sand chlorinators operating at any time. (Normal operation involves six to eight chlorinators of the twelve total being on line.) The facility consists of a caustic scrubber, water scrubber, two 50 hp fans, a 20 hp pump, and miscellaneous materials and equipment.

According to Dave St. Louis, Mid-Willamette Valley Air Pollution Authority approved construction of the claimed facility by letter in 1974. The exact date of the approval letter is unknown. Neither Mid-Willamette Valley Air Pollution Authority nor Midwest Region Office can find a copy of the approval letter. Preliminary Certification for Tax Credit not required.

Construction was initiated on the claimed facility in May 1974, completed in December 1974, and the facility was placed into operation in December 1974.

Facility Cost: \$193,747 (Accountant's Certification was provided).

3. Evaluation of Application

A source test has demonstrated that the sand chlorinator exhaust, which is cleaned by the claimed facility, is in compliance with Departmental regulations and permit conditions.

4. Summation

- A. Facility was constructed after receiving approval to construct issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.

- D. The facility was required by Mid-Willamette Valley Air Pollution Authority and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. There is no income derived from the claimed facility. The total annual operating expense including depreciation is estimated to be \$19,450. The sole purpose of the claimed facility is control of air pollution.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$193,747 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-839R.

F. A. Skirvin:sw
(503) 229-6414
November 29, 1977

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

1. Applicant

Donald L. Goe
Route 1, Box 312
Hood River, Oregon 97031

The applicant owns and operates a fruit orchard at Hood River, Oregon.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is two home made orchard fans used for frost protection.

Request for Preliminary Certification for Tax Credit was made on February 18, 1977, and approved on April 27, 1977.

Construction was initiated on the claimed facility on February 28, 1977, completed on March 17, 1977, and the facility was placed into operation on March 17, 1977.

Facility Cost: \$4,000.00 (Accountant's Certification was provided).

3. Evaluation of Application

There is no law limiting the use of fuel oil fired heaters to control frost damage to fruit trees even though the heaters can cause a significant smoke and soot air pollution problem in the City of Hood River. The orchard farmers desire a secure, long range solution to frost control that includes the reduction or elimination of the smoke and soot nuisance caused by the use of heaters. The orchard fans, which together serve 10 acres, reduces the number of heaters required for frost protection from 340 heaters to 100 perimeter heaters, a 70% reduction.

An orchard fan blows warmer air from above an inversion level down into the trees. They have proven effective for frost control in the Pine Grove area of Hood River where frost control is needed on an average of 30 hours per year.

4. Summation

A. Facility was constructed after filing for approval to construct and was issued preliminary certification pursuant to ORS 468.175.

- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. Each orchard fan is home made from a used helicopter rotor blade and is powered by the temporary use of a tractor power-take-off. This results in a relatively low capital investment.

The operating cost savings in heater fuel oil is \$1,764 per year. However, there is also now an operating cost of \$360 per year rental for the tractors, at \$6.00 per hour, for a net savings of \$1,404 per year. At 10 years straight line depreciation and 9% interest on the average undepreciated balance, this results in a 20.2% return on investment before taxes.

Other similar sized commercial orchard fan systems have previously received the maximum benefits of 80% or more allocation to pollution control. The return on investment before taxes for these previously considered systems ranged from 1 to 3% primarily because the capital costs (approximately \$10,000) were greater than the "home made" system being considered in this report.

Because of the amount of time and effort put into this facility by the applicant, the facility is considered eligible for the minimum allocation of costs to pollution control even though the return on investment is normally considered at the upper limit for being eligible.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$4,000.00 with less than 20% allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-922.

F.A.Skirvin:lb
229-6414
12/2/77

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

1. Applicant

Hilton Fuel
8087 Blackwell Road
Central Point, Oregon 97502

The applicant owns and operates a decorative bark processing facility at Central Point, Oregon.

Application was made for tax credit for a solid waste pollution control facility.

2. Description of Claimed Facility

The facility described in this application utilizes waste bark from two local sawmills. Waste bark is hogged, sized, sorted, cleaned, stored and sold for landscaping purposes. The installed cost of the system includes the following:

1. Building cost	\$ 27,488.93
2. Bark processing equipment	44,684.35
3. 1972 Terex Loader, 1970 International Truck and Box, 1970 Peerless Trailer and 1966 International truck	<u>72,500.00</u>
TOTAL	\$144,673.28

Request for Preliminary Certification for Tax Credit was made May 15, 1976, and approved September 29, 1976. Construction was initiated on the claimed facility June 15, 1976, completed February 15, 1977, and the facility was placed into operation February 1977.

Facility cost: \$144,673.28 (accountant's certification was provided).

3. Evaluation of Application

The claimed facility is a complete waste bark processing storage and transporting system. Waste bark is processed into salable decorative landscape bark of different grades and quality. The off-fall materials from the cleaning belts are reprocessed and salvaged. The plant is utilizing approximately 12,500 units of waste bark annually.

T-929
Page 2
10/28/77

4. Summation

- A. Facility was constructed after receiving preliminary certification issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1973, as required by ORS 468.165(1)(c).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing solid waste.
- D. The facility satisfies the intents and purposes of ORS Chapter 459 and the rules adopted under that chapter.
- E. Facility qualifies for 100 percent of actual cost as stipulated in ORS 468.165(2).

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$144,673.28 with 100 percent allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-929.

William Dana/kz
229-5913
11/2/77

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

1. Applicant

Champion International Corporation
Champion Building Products
P. O. Box 10228
Eugene, Oregon 97401

The applicant owns and operates a plywood mill at Gold Beach, Oregon.

Application was made for tax credit for a solid waste pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a new wood waste reclamation system. Wood waste that was previously burned in a wigwam burner is now utilized for the generation of steam and the making of paper.

The system includes a new hammer hog, a new and reconditioned veneer chipper, a new rechipper and new pneumatic and mechanical conveyence equipment.

Request for Preliminary Certification for Tax Credit was made October 6, 1976, and approved June 2, 1977.

Construction was initiated on the claimed facility May 1, 1976, completed June 15, 1976, and the facility was placed into operation June 15, 1976.

Facility cost: \$427,620 (accountant's certification was provided).

3. Evaluation of Application

The system was installed to salvage wood waste which was being burned in a wigwam waste burner. The plant had a shortage of hogfuel for its boiler and the wigwam waste burner was troublesome. As a result of the new system, the wigwam burner is no longer in continuous operation. Bark and wood slabs are hogged and along with sawdust are used for fuel in the boiler. Scrap veneer and overs are chipped and sold for paper production. Approximately 100 tons per day of wood waste is being utilized.

Income is from the sale of chips and from savings in the purchase of hog fuel for the boiler and oil for the wigwam waste burner.

4. Summation

- A. Facility was constructed after receiving approval to construct and preliminary certification issued pursuant to ORS 468.175.
- B. Facility was under construction on or after January 1, 1973, as required by ORS 468.165(1)(c).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing solid waste.
- D. Facility satisfies the intents and purposes of ORS, Chapter 459 and the rules adopted under that chapter.
- E. Facility qualifies for 100 percent of actual cost as stipulated in ORS 468.165(2).

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate of \$427,620.00 with 100 percent allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-932.

WHDana/kz
6266
11/30/77

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

1. Applicant

Champion International Corporation
Champion Building Products Division
P. O. Box 10228
Eugene, OR 97401

Dee Hardboard Plant

The applicant owns and operates a hardboard plant at Dee, Oregon.

Application was made for tax credit for water pollution control facility.

2. Description of Claimed Facility

The claimed facility consists of the following:

- A. Enlargement of existing ponds and construction of one additional treatment pond.
- B. Oil separation storage tanks (2).
- C. Fiber removal screen system.
- D. Installation of 2 MSA aerators (total 70 hp).
- E. Miscellaneous waste streams collection system.
- F. Necessary piping, valves, pumps, equipment, instrumentation and electrical.

Notice of Intent to Construct and Preliminary Certification for Tax Credit was not required.

Construction was initiated on the claimed facility in 9/15/69, completed 3/31/70, and placed into operation 4/1/70.

Facility cost \$174,159 (Certified Public Accountant's statement was provided)

3. Evaluation

The claimed facility implemented recommendations put forth in DEQ letter dated August 17, 1971. A waste discharge permit had been drafted which included more stringent limits for BOD and solids. The application claims that with the facility, BOD had been reduced by 75 to 85% and solids had been reduced 1,100 pounds per day. The facility's only function is for pollution control. Applicant claims no usable or saleable products are recovered.

4. Summation

- A. Facility was not required to have prior approval to construct or preliminary certification.
- B. Facility was constructed on or after January 1, 1967, as required by ORS Chapter 468.165 (1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing water pollution.
- D. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. Applicant claims 80% or more of facility costs are allocable to pollution control and that there is no return on investment, increased production, improved product quality, fuel savings or byproduct resulting from the installation of this facility.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in Application T-933, such Certificate to be the actual cost of \$174,159, with 80% or more of the cost applicable to Pollution Control.

William D. Leshner/em
229-5318
December 7, 1977

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

1. Applicant

Pacific Resin & Chemical, Inc.
1743 Thorne Road
Tacoma, Washington 98421

Eugene, Oregon Plant

The applicant owns and operates a plant in the Eugene area which manufactures urea and phenol formaldehyde resins used in plywood, hardboard, particle board, wood-laminating, paper and related products.

Application was made for tax credit for water pollution control facility.

2. Description of Claimed Facility

The claimed facility is Phase I of the total waste water treatment system and consists of the following:

- A. Waste water collection system, recycling a portion for reuse and transferring the remainder for treatment.
- B. Aerated biopond (1.3 million gallon) with 3 mechanical aerators.
- C. Quiescent pond (1/3 million gallon) with sludge return line.
- D. Land disposal system. (3.5A)
- E. Also involved excavation, holding tanks, pump, piping, electrical and instrumentation.

Notice of Intent to Construct and Preliminary Certification for Tax Credit was not required.

Construction was initiated on the claimed facility in September 1973 completed and placed into operation in April 1974.

Facility Cost \$348,650. (Certified Public Account's statement was provided)

3. Evaluation

The claimed facility was required by the DEQ Permit 1303, Condition 2, dated October 13, 1972. Plans for the waste treatment plant for additional waste waters due to plant expansion were approved by DEQ letter of September 28, 1973. The facility performed essentially as designed. Some difficulty was experienced with recycling treated water so that Pacific Resins requested winter discharge to public waters. Approval was granted, with limitations, by NPDES Permit 2229-J,

dated June 26, 1975. Phase II Facility which is not part of this application, was necessary to comply with NPDES Permit 2229-J.

4. Summation

- A. Facility was not required to have prior approval to construct or preliminary certification.
- B. Facility was constructed on or after January 1, 1967, as required by ORS Chapter 468.165 (1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing water pollution.
- D. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. Applicant claims 100% of facility costs are allocable to pollution control and that there is no return on investment, increased production, improved product quality, fuel savings or byproduct resulting from the installation of this facility.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in Application T-936, such certificate to bear the actual cost of \$348,650 with 80% or more of the cost applicable to Pollution Control.

William D. Leshner:em
229-5318
December 7, 1977

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

1. Applicant

Columbia Steel Casting Co., Inc.
P. O. Box 03095
Portland, Oregon 97203

The applicant owns and operates an alloy steel castings facility at 10425 North Bloss Avenue, Portland.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application consists of a Fuller Co. 6 zone Model 96-6-6000 plenum pulse baghouse, a Garden City Model 445BF blower, ducting, a Mars Mineral Series No. 20 agglomerator and miscellaneous materials. Exhibit C of Tax Credit Application No. T-937 gives a detailed breakdown of the claimed facility and Exhibit D itemizes the cost.

Request for Preliminary Certification for Tax Credit was made on September 23, 1975, and approved on October 22, 1975.

Construction was initiated on the claimed facility on November 18, 1975, completed on March 14, 1976, and the facility was placed into operation on March 15, 1976.

Facility Cost: \$140,130.73 (Accountant's Certification was provided).

3. Evaluation of Application

The previous dust control system was inadequate to control air pollution and the collected dust was not wetted prior to disposal which allowed reentrainment into the atmosphere. Department personnel have found that the claimed facility has satisfactorily eliminated dust into the air and has also eliminated reentrainment of dust into the air during the disposal operation.

4. Summation

- A. Facility was constructed after receiving approval to construct and preliminary certification issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.

- D. The facility was required by the Department and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. The sole purpose of the claimed facility is to control air pollution. No income is derived from the claimed facility.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$140,130.73 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-937.

F. A. Skirvin:sw
(503) 229-6414
November 28, 1977

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

1. Applicant

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

The applicant owns and operates a sawmill at Tillamook, Oregon.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a Bumstead-Woolford wet scrubber and associated equipment.

Request for Preliminary Certification for Tax Credit was made on December 2, 1976, and approved on December 20, 1976.

Construction was initiated on the claimed facility on March 1, 1977, completed on July 11, 1977, and the facility was placed into operation on July 11, 1977.

Facility Cost: \$133,682 (Accountant's Certification was provided).

3. Evaluation of Application

Source test data indicates that the scrubber controls particulate emissions and opacity to well below allowed limits.

4. Summation

- A. Facility was constructed after receiving approval to construct and preliminary certification issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility was required by the Department and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. The only purpose of this facility is air pollution control and there is no economic benefit to the applicant.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$133,682 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-939.

F. A. Skirvin:sw
(503) 229-6414
November 28, 1977

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

1. Applicant

Publishers Paper Company
419 Main Street
Oregon City, OR 97045

Newberg Mill

The applicant owns and operates a pulp and newsprint mill at Newberg, Oregon.

Applicant was made for tax credit for water pollution control facility.

2. Description of Claimed Facility

The claimed facility consists of a 40,000 gallon surge tank to supply a steady feed of filter back wash effluent to water treatment settling ponds. Installation of the surge tank also involved a structural steel tank foundation, filter plant backwash manifold and discharge piping (8 and 10 inch), and a 10 inch pipe line to the settling pond.

Request for Preliminary Certification for Tax Credit was made 3/23/77 and approved 4/20/77. Construction was initiated on the claimed facility 6/77, completed and placed into operation 7/5/77.

Facility Cost: \$76,034 (Certified Public Account's statement was provided)

3. Evaluation

Prior to installation, the water treatment plant backwash effluent was discharged directly to the river without treatment. NPDES permit limits, effective 7/1/77, required that the facility be included in the waste water treatment works at the mill. Discharge of water treatment plant filter backwash to the river has been eliminated.

4. Summation

- A. Facility was constructed after receiving approval to construct and Preliminary Certification issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing controlling or reducing water pollution.

Appl. T-940
December 7, 1977
Page 2

D. The facility was required by the Department of Environmental Quality and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate ^{be} issued for the facility claimed in Application T-940, such Certificate to bear the actual cost of \$76,034 with 80% or more allocable to pollution control.

William D. Leshner/em
229-5318
December 7, 1977

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

1. Applicant

Publishers Paper Company
419 Main Street
Oregon City, Oregon 97045

Oregon City Mill

The applicant owns and operates a newsprint manufacturing mill on the Willamette River in Oregon City.

Application was made for tax credit for water pollution control facility.

2. Description of Claimed Facility

The claimed facility consists of an extension of the existing filter plant discharge culvert 50 feet from bank. It is an additional 191 feet of 18 inch PVC to a depth of 52 to 72 feet. Sandbed, riprap and concrete are present for anchoring pipe.

Request for Preliminary Certification for Tax Credit was made 12/27/76 and approved 1/19/77. Construction was initiated on the claimed facility 7/1/77, completed and placed into operation 7/15/77.

Facility Cost: \$47,935. (Certified Public Accountant's statement was provided.)

3. Evaluation

Claimed facility was required by NPDES Permit 2661-J, Compliance Schedule 3. The goal was to discharge into the main channel of the river. Prior to the construction, noticeable local turbidity existed. The problem no longer exists since the outfall was extended. Staff verifies the facility is operating as intended. The only benefits to be derived from this project are in pollution control.

4. Summation

- A. Facility was constructed after receiving approval to construct and Preliminary Certification issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing water pollution.

Appl. T-941
December 7, 1977
Page 2

- D. The facility was required by the Department of Environmental Quality and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. Applicant claims 100% of costs allocable to pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in Application T-941, such Certificate to bear the actual cost of \$47,935, with 80% or more allocable to pollution control.

William D. Leshner/em
229-5318
December 7, 1977

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

1. Applicant

Publishers Paper Company
419 Main Street
Oregon City, OR 97045

Oregon City Mill

The applicant owns and operates a Newsprint Manufacturing Mill on the Willamette River in Oregon City, Oregon.

Application was made for tax credit for water pollution control

2. Description of Claimed Facility

The claimed facility consists of the addition of three aerators (100 Hp) to the secondary lagoon with electrical control center wiring, floatation equipment, steel piling, cable, construction materials and labor.

Request for Preliminary Certification for Tax Credit was made 3/30/77 and approved 5/11/77. Construction was initiated on the claimed facility in 4/77, completed and placed into operation 7/27/77.

Facility Cost: \$98,301. (Certified Public Accountant's statement was provided)

3. Evaluation

Facility was required to meet permit levels of BOD. Oxygen demand of waste waters was not being satisfied by aeration which existed before facility installation. BOD discharges have been well within permit limitations and the dissolved oxygen concentration within the lagoon has increased. Staff verifies this.

The only benefits derived from installation of the claimed facility are in pollution control.

4. Summation

- A. Facility was constructed after receiving approval to construct and Preliminary Certification issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing water pollution.

Appl. T-942
December 7, 1977
Page 2

D. The facility was required by the Department of Environmental Quality and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.

E. Applicant claims 100% of costs allocable to pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in Application T-942, such Certificate to bear the actual cost of \$98,301 with 80% or more allocable to pollution control.

William D. Leshner/em
229-5314
December 7, 1977

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

1. Applicant

Weyerhaeuser Company
Willamette Region
Paperboard Manufacturing
Tacoma, Washington 98401

The applicant owns and operates an unbleached kraft pulp and paper mill at Springfield, Oregon.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is an electrostatic precipitator system which controls the particulate emissions of three lime kilns. The facility cost consists of the following:

a. Precipitator	\$565,000
b. Installation	563,099
c. Foundation	35,000
d. Duct Work	190,000
e. Dust Slurry Handling System	71,000
f. Power Transformer and Controls	84,000

Notice of Intent to Construct was made on March 25, 1974, and approved on April 16, 1974. Preliminary Certification for Tax Credit not required.

Construction was initiated on the claimed facility on May 5, 1975, completed on December 1, 1975, and the facility was placed into operation on November 12, 1975.

Facility Cost: \$1,508,099 (Accountant's Certification was provided).

3. Evaluation of Application

The claimed facility replaced two scrubbers which were unable to control particulate emissions adequately.

The facility has been inspected by the Department and is operating satisfactorily. It has reduced particulate emissions by 2,300 pounds per day.

The value of the additional material collected by this facility is much less than the additional operating expenses of the facility. Therefore, it is concluded that the facility was installed solely for air pollution control.

4. Summation

A. Facility was constructed after receiving approval to construct issued pursuant to ORS 468.175.

- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility was required by the Department and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. The Department has concluded that 100% of the cost of this facility is allocable to air pollution control since the facility was installed solely for air pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$1,508,099 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-945.

F. A. Skirvin:sw
(503) 229-6414
December 1, 1977

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

1. Applicant

Boise Cascade Corporation
P. O. Box 127
Independence, Oregon 97351

The applicant owns and operates a plywood plant at Independence.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a baghouse to control sander emissions.

Notice of Intent to Construct and Preliminary Certification for Tax Credit not required.

Construction was initiated on the claimed facility in November 1972, completed in February 1973, and the facility was placed into operation in February 1973.

Facility Cost: \$36,634.34 (Accountant's Certification was provided).

3. Evaluation of Application

The applicant has installed a baghouse to control emissions from the sander and patch line. Emissions can be routed to two existing cyclones in case of failure of the baghouse. Baghouses are accepted as the best controls for sanderdust. This source is operating in compliance with Department regulations.

4. Summation

- A. Facility was not required to have prior approval to construct or preliminary certification.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility was required by Mid-Willamette Valley Air Pollution Authority and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. There is no economic benefit to the operator of this baghouse. The sole purpose is pollution control and therefore 100% of the cost is allocable to pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$36,634.34 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-946.

F. A. Skirvin:sw
(503) 229-6414
November 28, 1977

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

1. Applicant

Boise Cascade Corporation
P. O. Box 127
Independence, Oregon 97351

The applicant owns and operates a plywood plant at Millersburg.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a baghouse to control emissions from a plywood sander.

Notice of Intent to Construct and Preliminary Certification for Tax Credit not required.

Construction was initiated on the claimed facility in November 1972, completed in February 1973, and the facility was placed into operation in February 1973.

Facility Cost: \$20,726.22 (Accountant's Certification was provided).

3. Evaluation of Application

The applicant has installed a Carter Day 72-RJ-96 baghouse to control emissions from a plywood sander. Should the baghouse fail, emissions can be routed to an existing cyclone to minimize emissions to the atmosphere during the upset. Baghouses are accepted as the best available control equipment for sanderdust. This source is in compliance with Department regulations.

4. Summation

- A. Facility was not required to have prior approval to construct or preliminary certification.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility was required by Mid-Willamette Valley Air Pollution Authority and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. This facility provides no economic benefit to the operator. The sole purpose is air pollution control and 100% of the cost is allocable to pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$20,726.22 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-947.

F. A. Skirvin:sw
(503) 229-6414
November 28, 1977

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

1. Applicant

Boise Cascade Corporation
P. O. Box 127
Independence, Oregon 97351

The applicant owns and operates a plywood plant at Sweet Home.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a baghouse to control emissions from three cyclones.

Notice of Intent to Construct and Preliminary Certification for Tax Credit not required.

Construction was initiated on the claimed facility in May 1971, completed in June 1971, and the facility was placed into operation in June 1971.

Facility Cost: \$25,998.45 (Accountant's Certification was provided).

3. Evaluation of Application

The applicant has installed a baghouse to control emissions from two sanderdust cyclones and a relay cyclone. Baghouses are the best available control equipment for sanderdust emissions.

4. Summation

- A. Facility was not required to have prior approval to construct or preliminary certification.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility was required by Mid-Willamette Valley Air Pollution Authority and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. This baghouse does not provide any economic benefit to the operator. The sole purpose is air pollution control and 100% is allocable to pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$25,998.45 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-948.

F. A. Skirvin:sw
(503) 229-6414
November 28, 1977

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

1. Applicant

Weyerhaeuser Company
Willamette Region
Wood Products Manufacturing Division
P. O. Box 247
Springfield, Oregon 97477

The applicant owns and operates a plywood plant at Cottage Grove.

Application was made for tax credit for an air pollution control facility.

2. Description of Claimed Facility

The facility described in this application is a control system for veneer dryer emissions.

Notice of Intent to Construct was made on August 5, 1974, and approved on August 7, 1974. Preliminary Certification for Tax Credit not required.

Construction was initiated on the claimed facility in August 1974, completed in February 1975, and the facility was placed into operation in February 1975.

Facility Cost: \$133,169 (Accountant's Certification was provided).

3. Evaluation of Application

The applicant has ducted the exhaust from the veneer dryers to the hogged fuel boiler. The organic emissions are incinerated in the boiler. The boiler and veneer dryers are in compliance with all regulations of the Lane Regional Air Pollution Authority.

4. Summation

- A. Facility was constructed after receiving approval to construct issued pursuant to ORS 468.175.
- B. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- C. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling or reducing air pollution.
- D. The facility was required by Lane Regional Air Pollution Authority and is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- E. The only purpose of this installation is air pollution control. There is no economic benefit to the operator. Therefore, 100% of the cost is allocable to pollution control.

5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of \$133,169 with 80% or more allocated to pollution control be issued for the facility claimed in Tax Credit Application No. T-950.

F. A. Skirvin:sw

(503) 229-6414

December 1, 1977

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

REISSUANCE OF POLLUTION CONTROL FACILITY CERTIFICATE

1. Applicant

Cascade Aggregates, Inc.
P. O. Box 4267
Portland, Oregon 97208

The pollution control certificate was issued for a water pollution control facility.

2. Discussion

On October 21, 1977, the Environmental Quality Commission took action to revoke Pollution Control Facility Certificate No. 612 issued to Glacier Sand and Gravel because the facilities for which the Certificate was issued had been sold.

On October 14, 1977, Arthur Young & Company, on behalf of Cascade Aggregates, Inc., requested that Certificate No. 612 be reissued to Cascade Aggregates, Inc., because they had purchased the certified facilities from Glacier Sand and Gravel (see attached letter).

3. Summation

Pursuant to ORS 307.405(4) and ORS 468.170, Cascade Aggregates, Inc. has applied for reissuance of Pollution Control Facility Certificate No. 612. (See Application, attached.)

4. Director's Recommendation

Reissue Certificate No. 612, formerly issued to Glacier Sand and Gravel, to Cascade Aggregates, Inc.

MJDowns:cs
12/12/77
Attachments

ARTHUR YOUNG & COMPANY

900 SOUTHWEST FIFTH AVENUE
PORTLAND, OREGON 97204

October 14, 1977

Ms. Carol Splettztaszer
Program Planning Division
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205

Dear Ms. Splettztaszer:

Re: Request of Reissuance of Pollution Control
Certificate for Santosh Plant

Cascade Aggregates, Inc. purchased on August 16, 1977
the Santosh Plant in Scappoose, Oregon from Glacier Sand & Gravel
Company.

Included in the purchase of the Santosh Plant and equip-
ment was a gravel washing system subject to Pollution Control
Facility Certificate #612 issued to Glacier Sand & Gravel.

Cascade Aggregates, Inc. hereby applies for the reissu-
ance of a new certificate.

All correspondence with Cascade Aggregates, Inc. should
be sent to:

Mr. Jon Morris
c/o Cascade Construction Company
P.O. Box 4267
Portland, Oregon 97208

Thank you for your help. If you have any questions,
please call me at 225-1684.

Very truly yours,

ARTHUR YOUNG & COMPANY

Douglas E. Damon

By Douglas E. Damon

cc Jon Morris
Cascade Construction Company

Technical Programs Office
Dept. of Environmental Quality
RECEIVED
OCT 17 1977

IMPORTANT

- 1) READ APPLICATION INSTRUCTIONS CAREFULLY,
- 2) SUBMIT TWO (2) COPIES OF APPLICATION AND EXHIBITS TO:

DEPARTMENT OF ENVIRONMENTAL QUALITY
PROGRAM MANAGEMENT DIVISION
 1234 S.W. Morrison Street
 PORTLAND, OREGON 97205

For DEQ Use Only
Date Rec'd _____
Application No. _____

**APPLICATION FOR CERTIFICATION OF A POLLUTION CONTROL FACILITY FOR
 TAX RELIEF PURPOSES PURSUANT TO ORS 468.155 et. seq.**

SECTION I IDENTIFICATION OF APPLICANT	(1) Indicate the Type of Facility by Placing Check (✓) in Appropriate Box. <input type="checkbox"/> AIR <input type="checkbox"/> NOISE <input checked="" type="checkbox"/> WATER <input type="checkbox"/> SOLID WASTE	
	(2) Official Name of Applicant (if corporation, exact name as specified in charter; if partnership or joint venture the names of all partners or principals). <u>Cascade Aggregates, Inc.</u> <small style="margin-left: 100px;">official name</small> <u>(A wholly owned subsidiary of Conway Investment Corp.)</u> <small style="margin-left: 100px;">division identification</small> _____ <small style="margin-left: 100px;">names of general partners or principals</small> _____ <small style="margin-left: 100px;">address</small> _____ <small style="margin-left: 100px;">city, state, zip code</small>	(3) Status of Applicant _____ Lessee _____ <input checked="" type="checkbox"/> Owner _____ Individual _____ Partnership _____ <input checked="" type="checkbox"/> Corporation
	(4) Person Authorized to Receive Certification <u>C.E. Idlewine</u> <small style="margin-left: 100px;">name</small> <u>President</u> <small style="margin-left: 100px;">title</small> <u>P.O. Box 4267</u> <small style="margin-left: 100px;">address</small> <u>Portland 97208 222-6421</u> <small style="margin-left: 100px;">city zip phone no.</small>	(5) Person to Contact for Additional Details <u>Jon E. Morris</u> <small style="margin-left: 100px;">name</small> <u>Treasurer</u> <small style="margin-left: 100px;">title</small> <u>P.O. Box 4267</u> <small style="margin-left: 100px;">address</small> <u>Portland 97208 222-6421</u> <small style="margin-left: 100px;">city zip phone no.</small>
	(6) Location of Claimed Facility <u>Approx. 1 mile past Airport on</u> <u>Dike Rd.</u> <small style="margin-left: 100px;">address</small> <u>Scappoose, OR</u> <small style="margin-left: 100px;">city</small> <u>Columbia</u> <small style="margin-left: 100px;">county</small>	(7) Access Directions: <p style="text-align: center;">U.S. Route 30 and Scappoose Bay - Scappoose, Oregon</p>
	(8) Applicant's IRS Employer Identification Number <u>93-0690266</u>	(9) Applicant's Tax Year <u>incorporated Aug. '77 12-31-77</u> <small style="margin-left: 100px;">beginning date ending date</small>
SECTION II DESCRIPTION OF OPERATION	(1) Briefly describe the nature of the industrial or commercial process conducted at the plant, and the end product produced. <p style="text-align: center;">Commercial rock crushing - crushed rock, concrete round rock and concrete sand is produced.</p>	

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

REVOCATION OF POLLUTION CONTROL FACILITY CERTIFICATE

1. Certificate Issued to:

Glacier Sand and Gravel
Santosh Plant
300 Lakeside Drive
Oakland, California 94604

The Pollution Control Facility Certificate was issued for a water pollution control facility.

2. Discussion

On September 26, 1975, the Environmental Quality Commission issued Pollution Control Facility Certificate No. 612 to Glacier Sand and Gravel for their Santosh Plant in Scappoose, Oregon. The Certificate was in the amount of \$298,942, and was issued for a gravel washing system.

On September 7, 1977, the Company notified the Department that the facilities certified in Pollution Control Facility Certificate No. 612 had been sold to Cascade Aggregates, Inc. (see authorizing letter, attached).

3. Summation

Pursuant to ORS 307.420(4), certificate no. 612 should be revoked because of change of ownership of the certified pollution control facilities.


4. Director's Recommendation

Revoke Certificate No. 612 issued to Glacier Sand and Gravel in the amount of \$298,942.

Attachments (2)

CASplettstaszer
229-6484
10/12/77

(A) RJN

**GLACIER SAND & GRAVEL COMPANY**
300 LAKESIDE DRIVE OAKLAND, CALIFORNIA 94604

September 7, 1977

R E C E I V E D
SEP 9 1977

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

Water Quality Division
Dept. of Environmental Quality

Re: Certificate #612
Issued 9/26/75
Santosh Plant, Scappoose, Oregon
Columbia County

Gentlemen:

As prescribed by law we are advising the recent sale of our Santosh plant and equipment, including the gravel washing system covered by Pollution Control Facility Certificate #612, to:

Cascade Aggregates, Inc.
c/o Conway Investment Corporation
Foot of S. W. Abernathy Street
Portland, Oregon 97201

We understand you will revoke certificate #612 and that Cascade Aggregates may apply for a new certificate for the remaining term of the property tax exemption available.

Yours very truly,

GLACIER SAND & GRAVEL COMPANY

A. E. Steffe

A. E. Steffe
Director, Corporate Taxes

DDE/jd

cc: Cascade Aggregates, Inc.
Santosh TF (2)

Certificate No. 612Date of Issue 09-26-75State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITYApplication No. T-684**POLLUTION CONTROL FACILITY CERTIFICATE**

Issued To: Ass Lessee Glacier Sand & Gravel Company Pacific Building Materials Santosh Plant - Dike Road 3510 S. W. Bond Avenue Portland, Oregon 97201	Location of Pollution Control Facility: US Route 30 and Scappoose Bay Scappoose, Oregon Columbia County
Description of Pollution Control Facility: Steel sump pump; Denver pump with rubber discharge hose; liquid cyclone separators; booster pump; dewatering screw; conveyor and conveyor structure; turbine pump; relocation of Denver pump; and ancillary piping, pipe fittings & valves for collection and recycling for reuse of all waste water (gravel washings).	
Date Pollution Control Facility was completed and placed in operations: 04-10-73; 04-10-73	
Actual Cost of Pollution Control Facility: \$ 298,942.00	
Percent of actual cost properly allocable to pollution controls: <p style="text-align: center;">Eighty percent (80%) or more</p>	

In accordance with the provisions of ORS 449.605 et seq., it is hereby certified that the facility described herein and in the application referenced above is a "pollution control facility" within the definition of ORS 449.605 and that the facility was erected, constructed, or installed on or after January 1, 1967, and on or before December 31, 1976, and is designed for, and is being operated or will operate to a substantial extent for the purpose of preventing, controlling or reducing air or water pollution, and that the facility is necessary to satisfy the intents and purposes of ORS Chapter 449 and regulations thereunder.

Therefore, this Pollution Control Facility Certificate is issued this date subject to compliance with the statutes of the State of Oregon, the regulations of the Department of Environmental Quality and the following special conditions:

1. The facility shall be continuously operated at maximum efficiency for the designed purpose of preventing, controlling, and reducing water pollution.
2. The Department of Environmental Quality shall be immediately notified of any proposed change in use or method of operation of the facility and if, for any reason, the facility ceases to operate for its intended pollution control purpose.
3. Any reports or monitoring data requested by the Department of Environmental Quality shall be promptly provided.

Signed _____

Title Joe B. Richards, Chairman

Approved by the Environmental Quality Commission

on the 26th day of September 1975

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

REVOCATION OF POLLUTION CONTROL FACILITY CERTIFICATE

1. Certificate Issued to:

Georgia-Pacific Corporation
900 S. W. Fifth Avenue
Portland, Oregon 97204

The Pollution Control Facility Certificate was issued for a water pollution control facility.

2. Discussion

On August 27, 1976, the Environmental Quality Commission issued Pollution Control Facility Certificate No. 695 to Georgia-Pacific Corporation for their Toledo, Oregon plant. The Certificate was in the amount of \$92,003, and was issued for a lamella thickener.

On November 28, 1977, the Company notified the Department that the facilities certified in Pollution Control Facility Certificate No. 695 were removed from service on July 13, 1977 (see attached letter).

3. Summation

Pursuant to ORS 317.072(10), Certificate No. 695 should be revoked because the certified facilities are no longer in use.

4. Director's Recommendation

Revoke Pollution Control Facility Certificate No. 695 issued to Georgia-Pacific Corporation in the amount of \$92,003 effective July 13, 1977.

MJDowns:cs
12/12/77
Attachments



Georgia-Pacific Corporation

900 S.W. Fifth Avenue
Portland, Oregon 97204
Telephone (503) 222-5561

November 28, 1977

Ms. Carol A. Splettstaszer
Technical Programs Coordination
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, OR 97205

Dear Ms. Splettstaszer:

Mr. Darrell McLaughlin, Environmental Supervisor at our Toledo Division, has notified us that a lamella thickener covered by tax credit certificate number 695 was removed from service and the plant site on July 13, 1977. The unit is temporarily being held at our Tigard, Oregon location awaiting sale. At the time it is sold we will notify the new owner of his right to pick up any remaining tax credit.

Sincerely,

Rebecca M. Crockford
Senior Accountant

RMC/jlm

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

Certificate No. 695

Date of Issue 8/27/76

Application No. T-787

POLLUTION CONTROL FACILITY CERTIFICATE

Issued To: Georgia Pacific Corp. Toledo Division 900 S.W. Fifth Portland, Oregon Attn: Roger Sherwood	Location of Pollution Control Facility: Paper mill site Toledo, Oregon Lincoln County
As: <input type="checkbox"/> Lessee <input checked="" type="checkbox"/> Owner	
Description of Pollution Control Facility: Consists of 2 systems: 1) a Lamella Thickener LT-141 and associated piping and controls, and 2) a collection sump, transfer pump and pipeline.	
Type of Pollution Control Facility: <input type="checkbox"/> Air <input checked="" type="checkbox"/> Water <input type="checkbox"/> Solid Waste	
Date Pollution Control Facility was completed: <u>April 1974</u>	Placed into operation: <u>April 1974</u>
Actual Cost of Pollution Control Facility: <u>\$ 92,003</u>	
Percent of actual cost properly allocable to pollution control: <u>60% or more but less than 80%</u>	

In accordance with the provisions of ORS 468.155 et seq., it is hereby certified that the facility described herein and in the application referenced above is a "Pollution Control Facility" within the definition of ORS 468.155 and that the air and water or solid waste facility was erected, constructed or installed on or after January 1, 1967, or January 1, 1973 respectively, and on or before December 31, 1980, and is designed for, and is being operated or will operate to a substantial extent for the purpose of preventing, controlling or reducing air, water or solid waste pollution, and that the facility is necessary to satisfy the intents and purposes of ORS Chapters 459, 468 and the regulations thereunder.

Therefore, this Pollution Control facility Certificate is issued this date subject to compliance with the statutes of the State of Oregon, the regulations of the Department of Environmental Quality and the following special conditions:

1. The facility shall be continuously operated at maximum efficiency for the designed purpose of preventing, controlling, and reducing the type of pollution as indicated above.
2. The Department of Environmental Quality shall be immediately notified of any proposed change in use or method of operation of the facility and if, for any reason, the facility ceases to operate for its intended pollution control purpose.
3. Any reports or monitoring data requested by the Department of Environmental Quality shall be promptly provided.

Signed _____

Title _____

J. B. Richard
Chairman

Approved by the Environmental Quality Commission on

the 27th day of August, 19 76

State of Oregon
Department of Environmental Quality

REVOCATION OF POLLUTION CONTROL FACILITY CERTIFICATE

1. Certificate Issued to:

Teledyne Wah Chang Albany
P. O. Box 460
Albany, Oregon 97321

The Pollution Control Facility Certificate was issued for a water pollution control facility.

2. Discussion

On November 19, 1976, Teledyne Wah Chang Albany was issued Pollution Control Facility Certificate No. 740 in the amount of \$29,507. However, \$24,890 of the cost of this same facility had previously been issued tax credit on Certificate No. 305. Therefore, only the remaining amount of \$4,617 should have been applied for.

The Department has determined that this error was due to innocent misrepresentation and that Pollution Control Facility Certificate No. 740 should be revoked with no prejudice to Teledyne Wah Chang Albany applying for tax credit for the \$4,617. Teledyne Wah Chang Albany has waived their right to a hearing on this revocation (see attached letter).

3. Summation

Pursuant to ORS 468.185, Pollution Control Facility Certificate No. 740 should be revoked.

4. Director's Recommendation

Revoke Pollution Control Facility Certificate No. 740, issued to Teledyne Wah Chang Albany in the amount of \$29,507, without prejudice to the Company applying for tax credit for the amount of \$4,617 for the same facility.

MJDowns:cs
12/12/77
Attachments

 **TELEDYNE
WAH CHANG ALBANY**

P.O. BOX 460

ALBANY, OREGON 97321

(503) 926-4211 TWX (510) 595-0973

November 9, 1977

Mr. Michael J. Downs, Administrator
Program Management Division
Department of Environmental Quality
1234 S. W. Morrison Street
Portland, OR 97205

RE: Tax Credit Certificates
305 & 740

Dear Mr. Downs:

Due to innocent misrepresentation Teledyne Wah Chang Albany made application for tax credit (T-828) and was issued Tax Certificate #740 in the amount of \$29,507. However, \$24,890 of the cost of this same facility had previously been issued tax credit on Tax Certificate #305. In actuality, only the remaining amount of \$4,617 should have been applied for.

Therefore, it is the desire of TWCA to request the Environmental Quality Commission to revoke Tax Certificate #740 and, at the same time, to waive the right to a hearing on the revocation.

Upon receipt of this letter TWCA would expect the Commission to revoke Tax Certificate #740, at which time TWCA may reapply for a new tax certificate to reflect the \$4,617.

Your cooperation in this matter is appreciated. If further questions arise, please advise.

Yours very truly,

TELEDYNE WAH CHANG ALBANY



K. W. Bird, Director
Environmental Control

JMK:dkm

Technical Programs Office
Dept. of Environmental Quality
RECEIVED
NOV 10 1977

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

Certificate No. 740

Date of Issue _____

Application No. T-828

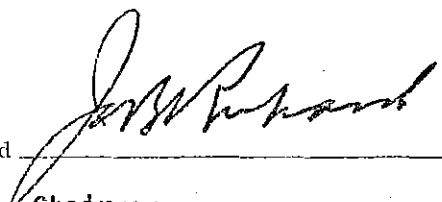
POLLUTION CONTROL FACILITY CERTIFICATE

Issued To: Teledyne Wah Chang Albany Div. of Teledyne Industries, Inc. P. O. Box 460 Albany, OR 97321	Location of Pollution Control Facility: 1600 N.E. Old Salem Road Albany, OR
As: <input type="checkbox"/> Lessee <input checked="" type="checkbox"/> Owner	
Description of Pollution Control Facility: Effluent pH adjustment facility primary station (1) Five cell concrete and wood waste neutralizing station including concrete catch basin and distributor box; (2) Five agitators and drives; (3) pH control and recording instrumentation; (4) Ancillary electrical control, power and piping.	
Type of Pollution Control Facility: <input type="checkbox"/> Air <input checked="" type="checkbox"/> Water <input type="checkbox"/> Solid Waste	
Date Pollution Control Facility was completed: August 1971 Placed into operation: August 1971	
Actual Cost of Pollution Control Facility: \$ 29,507	
Percent of actual cost properly allocable to pollution control: 100%	

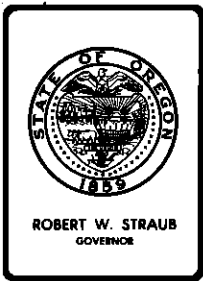
In accordance with the provisions of ORS 468.155 et seq., it is hereby certified that the facility described herein and in the application referenced above is a "Pollution Control Facility" within the definition of ORS 468.155 and that the air and water or solid waste facility was erected, constructed or installed on or after January 1, 1967, or January 1, 1973 respectively, and on or before December 31, 1980, and is designed for, and is being operated or will operate to a substantial extent for the purpose of preventing, controlling or reducing air, water or solid waste pollution, and that the facility is necessary to satisfy the intents and purposes of ORS Chapters 459, 468 and the regulations thereunder.

Therefore, this Pollution Control facility Certificate is issued this date subject to compliance with the statutes of the State of Oregon, the regulations of the Department of Environmental Quality and the following special conditions:

1. The facility shall be continuously operated at maximum efficiency for the designed purpose of preventing, controlling, and reducing the type of pollution as indicated above.
2. The Department of Environmental Quality shall be immediately notified of any proposed change in use or method of operation of the facility and if, for any reason, the facility ceases to operate for its intended pollution control purpose.
3. Any reports or monitoring data requested by the Department of Environmental Quality shall be promptly provided.

Signed 
Title Chairman

Approved by the Environmental Quality Commission on
the 19th day of November, 19 76



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 No. D, December 16, 1977, EQC Meeting

Subsurface Experimental Program--Review of Experimental
Subsurface Sewage Disposal System Installed by Mr. and
Mrs. Steven Gunn, Lane County

Background

The Experimental Review Committee on June 29, 1976 received from Mr. and Mrs. Steyen Gunn, Lane County, an application for an experimental system consisting of a composting toilet and a gray water seepage pit preceded by an above-ground trickle filter. After review on August 20, 1976, a permit in letter form was issued. This permit letter contained conditions that modified the Gunn's original proposal. The Gunn's subsequently installed a system that failed to conform to either the system permitted by the Department or to plans originally submitted by the Gunns.

An evaluation of the installed system revealed that no useful information could be gained from monitoring this installation. Since the facilities installed fail to meet the experimental permit conditions, this system is in violation of Commission rules for subsurface sewage disposal.

Evaluation

In order for the experimental systems program to attain its goal of developing new or innovative on-site sewage systems, those systems installed and monitored must provide information upon which rule modifications can be based, or information that a particular experimental system can or cannot be expected to function properly. For the information gained to be useful in the above process, the Department must be provided with all of the following:

Detailed site conditions, including soils information.
(This information was developed by the Department.)



Contains
Recycled
Materials

Accurate plans, including both facility installation and monitoring capability. (Plans were developed by the Department and provided with the permit; however, the Gunns claim they did not receive the plan.)

Assurance that construction was in accordance with approved plans. (The system installed was not constructed in accordance with approved Department plans nor was it installed in accordance with the Gunn's own plan.)

Assurance of proper construction by inspections at designated intervals. (The Gunns failed to notify the Department of construction so that proper inspections could be made.)

Assurance of cooperation and proper operation throughout test period.

Assurance that monitoring will be accomplished on schedule.

With a breakdown in the necessary steps listed above the Department concluded that no useful information can be gained from this installation.

Summation

1. The Gunn system was not installed in accordance with permit conditions and is therefore in violation.
2. The system, as installed, will not provide useful information to the experimental systems program.

Director's Proposed Action

Absent change of direction to the contrary by the Commission, the Department will proceed with enforcement.

Michael Downs
for
WILLIAM H. YOUNG
Director

Jack Osborne/jms
229-6218
December 7, 1977

Attachments: Sequence of Events, Steven Gunn Experimental Permit

STEVE GUNN EXPERIMENTAL PERMIT
Sequence of Events
November 15, 1977

Following are the facts on the Gunn Experimental permit in the order they occurred.

- ✓ 6/29/76 The Experimental Committee received an application from Steve Gunn for permit to install a Clivus Multrum compost toilet and a gray waste water seepage pit (12'x12'x6' deep) preceded by an above-ground trickle filter (See Exhibit 1).
- 7/27/76 Bob Paeth, Jun Lumapas and Mark Ronayne, Experimental Review Committee members, and Ted Deitz, Soil Scientist, Lane County Environmental Management, evaluated a test pit on the Gunn site in the presence of Mrs. Gunn. Mrs. Gunn stated she and her husband had changed their minds and desired to build the equivalent of a one bedroom home in a shop building rather than the two bedroom dwelling indicated on their permit application.
- At that time Bob Paeth informed Mrs. Gunn a 75' long disposal line would be required rather than the seepage pit featured in plans which accompanied the Gunn permit application.
- Ted Deitz informed the Committee Lane County would inspect and monitor an experimental system made up of trickle filter, 75' disposal line and composting toilet. (See Exhibit 2)
- 8/5/76 Daryl Johnson, DEQ Midwest Regional Sanitarian, Eugene, through a hand written memo from Mark Ronayne, was requested to review and comment on plans drafted by Jun Lumapas in behalf of the Gunns. The Lumapas plans showed a gray waste water system made up of a 4x5' trickle filter and a 75' disposal line (See Exhibits 3, 17 and 18).

8/6/76 Mark Ronayne sent Steve Gunn a letter and plans Jun Lumapas had drafted in Gunn's behalf which were based on the Committee's 7/27/76 evaluation of the Gunn site and concurrent conversation with Mrs. Gunn. The letter stated system plans illustrated a disposal trench sized for a one bedroom dwelling and noted the 75' trench could be doubled in length if a two bedroom dwelling was desired. The letter mentioned copies of the DEQ revised plans were directed to Ted Deitz and Daryl Johnson for their reactions.

The Gunns were requested to contact the Experimental Committee within a week if they had any comments on the plans or monitoring schedule.

Note: This request for review and comment of plans by the Committee was referred to in the Committee's August 20, 1976 permit conditions letter, Item 5, "plans previously submitted". (See Exhibits 4 & 5)

8/20/76 Steve Gunn phoned Bob Paeth to check on the status of the permit. Bob told Gunn we would issue the permit right away. We did that day in the form of an experimental permit conditions letter.

Item 5 of the permit letter specified the gray waste water system be developed according to plans previously submitted to Gunn on August 6, 1976 for his reaction (See exhibits 4 and 5).

8/24/76 Mark Ronayne forwarded plans (those drafted by Jun Lumapas) and a monitoring schedule related to Gunn's gray waste water proposal to Ted Deitz under a cover letter (See Exhibit 6).

9/6/76 (7/6/76 ?) In a phone conversation, Jun Lumapas described the gray waste water sand filter shown in plans he had revised for Gunn to Mr. Gunn. Jun also requested Gunn forward the Committee filled out and notarized easement forms to allow the Department legal access to Gunn's property to monitor his experimental system. (The conversation was recorded in Jun's personal diary.)

9/17/76 Bob Lowry, a Lane County Environmental Management sanitarian, called Jun Lumapas to report the Gunns had made application for building permit for a two bedroom dwelling rather than the one bedroom dwelling authorized in the Experimental Committee's 8/20/76 permit authorization letter (See Item 4). Mr. Lumapas suggested Lowry have Mr. Gunn call this office if he wished to have the experimental permit revised to allow a two bedroom dwelling. (See exhibits 5 and 7)

9/27/76 "Barbara", Lane County Building Department, called Jun Lumapas to report Steve Gunn submitted building plans which indicated the equivalents of a two bedroom home. (See Exhibit 8)

A few days after Mr. Lumapas' conversation with Barbara, Mark Ronayne phoned Ted Deitz. Mr. Deitz was informed Mr. Gunn would have to request the Committee amend his permit to show two 75' disposal trenches if Mr. Gunn desired a two bedroom system. The date of Mr. Ronayne's conversation with Mr. Deitz was not recorded.

10/5/76 Bob Lowry signed off on a building permit for Mr. Gunn which indicated 150 linear feet of disposal field would be required since Gunn had applied for a building permit for a two bedroom equivalent dwelling.

At an unspecified date about this time, Mr. Deitz reports he was phoned by Mr. Gunn who argued he wanted to install a 75' line required for a one bedroom home by the committee rather than the 150' disposal field listed by Bob Lowry on Lane County's building permit.

Deitz explained Gunn would have to get authorization from the Experimental Committee if a two bedroom dwelling were to be considered. (See Exhibit 16 and Ray Burns Route slip message)

6/15/77 Dave Robison, an experimental compost toilet gray water applicant from Marion County, in a phone conversation with Mark Ronayne, stated he had a letter (provided by Ron Davis, Clivus Multrum Distributor for Oregon) which indicated the Experimental Committee authorized a gray waste water seepage pit for Steve Gunn. Robison stated he understood the system had been in use for some time. (See Exhibit 9)

Shortly after Mr. Ronayne talked with Mr. Robison, he contacted Bob Lowry to determine the status on the Gunn system. Condition 7 of the Experimental Committee's permit letter required Mr. Gunn to contact Lane County Environmental Management to have his experimental gray waste water system approved before the system was approved for use. Lowry reported he would investigate. (See Exhibit 5)

6/17/77 Bob Lowry called Sherman Olson, DEQ headquarters staff, to report he had inspected the Gunn site and found the Clivus Multrum was not installed, but a cesspool like gray waste water disposal system and an earth pit privy appeared to be in use. (See Exhibit 10)

6/20/77 Mark Ronayne, on a hand written memo, requested Daryl Johnson investigate the Gunn site so a request to bring the gray waste water system into compliance with permit terms could be initiated. Since Mr. Ronayne was unable to find a copy of plans (See Exhibit 11) Mr. Lumapas prepared for the Gunns as a result of the Experimental Committee's 7/27/77 field evaluation, Mr. Ronayne in a phone conversation with Mr. Johnson on 6/20/77 requested Mr. Johnson send the Committee a copy of plans forwarded under Mr. Ronayne's 8/5/76 memo.

The Water Quality Division received and stamped the requested plan copy from Mr. Johnson 7/8/77. (See Exhibit 5; Note Plans in Exhibits 17 and 18 do not bear the Water Quality Division's 7/8/77 stamp).

Mr. Ronayne in a 10/6/77 phone call to Jun Lumapas, learned Mr. Lumapas thinks he recalls taking the original plan he drafted for Gunn with him when he left DEQ in October 1976. However, Mr. Lumapas has not been able to find the drawing.

6/21/77 Bob Lowry called Mark Ronayne to report he had discovered what he believed to be gray waste water processing pit made up of an 18" diameter culvert, standing on end, embedded in drainrock. Bob stated the surface of the pit was approximately 3.5' x 3.5'. He also mentioned the Gunns were using a two pit privy. (See Exhibit 12)

8/9/77 Daryl Johnson, in an 8/5/77 memo, informed Mark Ronayne he had inspected the Gunn system. Mr. Johnson reported his findings in memo form and attached a sketch of his observations. (See Exhibit 13)

8/16/77 Mr. Ronayne wrote Mr. and Mrs. Gunn, reporting discoveries made by Lane County and DEQ's midwest office. The letter requested the Gunns replace their unauthorized gray waste water system with the one authorized by the Experimental Committee's 8/20/76 permit authorization letter. A copy of plans received from Mr. Johnson bearing the Water Quality Division 7/8/77 stamp was included under the letter. (See Exhibit 14)

8/27/77 Barbara Gunn, in a letter to Loren Kramer, requested DEQ reconsider the requirement for trickle filter and disposal field or grant the Gunns an extension until October 30, 1977 to make changes required by the Experimental Committee's 8/20/76 permit. (See Exhibit 15)

8/31/77 Mr. Young, by letter, informed the Gunns their experimental permit construction period was extended from August 20, 1977 to October 15, 1977 so they would have the opportunity to bring their experimental system into compliance with the Experimental Committee's 8/20/76 permit terms. The October 15, 1977 deadline was established since seasonal rainfall normally increases appreciably in October. Wet soil conditions would be apt to result in disposal trench sidewall smearing after mid-October. (See Exhibit 16)

10/3/77 Roy Burns, supervising sanitarian, Lane County Environmental Management, sent Mark Ronayne photos, memo, building permit application and a copy of Gunn's 8/20/76 permit letter under cover memo.

Burns recalled a member of his staff talked with Mr. Gunn at length on the sizing of his disposal field at the time Gunn applied for building permit. (See Exhibit 17 and Burn's cover memo comments. Note the absence of the Water Quality Division's stamp on the copy of Gunn's gray waste water plans)

10/4/77 Daryl Johnson sent Mr. Ronayne a copy of the handwritten memo, attendant plans and monitoring schedule he had received from Mark Ronayne 8/10/76. (See Exhibit 18; Note the absence of the Water Quality Division's stamp on Gunn's Gray Waste Plans)

10-19-77

Mark Ronayne and Bob Paeth examined Gunn's gray waste water treatment and disposal system in the presence of Mrs. Gunn. Mrs. Gunn permitted Mr. Ronayne and Dr. Paeth to dig a 5'5" deep X 2' wide X 4' long trench immediately downslope from the Gunn's gray waste seepage pit. After trench excavation was completed, Mr. Paeth extended the digging below the base of the seepage pit. The bottom of the pit was encountered 4'4" below the pit's surface. Waste water and gravel rushed into the excavated area where the trench had undermined the seepage pit. The waste water was highly odorous.

Dr. Paeth measured the surface dimensions of the gray waste seepage pit finding them to be 5' X 10'. Before Dr. Paeth and Mr. Ronayne began excavating the trench near the pit Mrs. Gunn informed them the pit's depth was 10'.

A gray waste water trickle filter consisting of an untreated 55 gallon drum filled with drain rock to within 9" of its top was fed via a length of 4" diameter perforated polyethylene pipe extending on the gravel surface across the inside diameter of the drain. The drum was located just off a house porch. Waste water passed from the lower side of the gray water trickle filter drum downhill to the seepage pit via 4" diameter PVC conduit linked by stainless steel bandaids. Neither the pipe nor means of pipe connection meet plumbing code requirements for sewer lines.

Mrs. Gunn reported she and her husband had used their gray waste system on a limited basis since May 1977. (Note: Photos taken by Bob Lowry in late June 1977, plus Mr. Lowry's observations indicate the trickle filter drum was not present at that time nor was it present at the time of Daryl Johnson's observations, as reported in Mr. Johnson's 8-5-77 memo to Mr. Ronayne.)

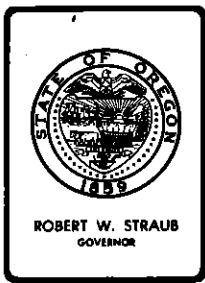
Mrs. Gunn informed Mr. Ronayne that she and her husband would be willing to undertake minor gray waste system modifications if requested by DEQ, but would object to extensive modifications and having to pay for the water meter DEQ required for measuring gray waste sewage output.

Mrs. Gunn showed Mr. Ronayne the Clivus Multrum compost toilet which she stated had been installed the previous weekend, but was not yet in use. (See exhibit 19, a gray waste illustration based on observations made by Mr. Ronayne and Dr. Paeth on 10-19-77 and photographs taken by Dr. Paeth.)

10-31-77

On the basis of observations reported by Mr. Ronayne and Dr. Paeth, Bill Young, by letter, informed the Gunn's that their present gray waste system remained in violation of experimental permit terms and provided them with the opportunity to appear before the EQC to express their viewpoints on the gray waste system issue at its November 18th meeting in Bend.

Mr. Young's letter pointed out the observed system complied with neither the system represented on the Gunn's original plan or that required by the Department. (See exhibit 19, Mr. Young's 10-31-77 letter to the Gunn's.)



Environmental Quality Commission

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

MEMORANDUM

To: Environmental Quality Commission
From: Rich Reiter, Southwest Region Manager
Subject: Agenda Item No. E, December 16, 1977, EQC Meeting

Report of Southwest Regional Manager on Significant On-going Activities in the Southwest Region (Jackson-Josephine Counties).

General

The Medford Branch Office, which is responsible for Department activities in Jackson and Josephine Counties, is currently staffed with six people with the following general assignments:

Merlyn Hough (ES-2) - AQ, WQ, SW, Noise in Jackson County.
Dennis Belsky (PHE 2) - AQ in Jackson County.
Steve Hottman (Chemist 2) - AQ in Jackson County.
Dan Frank (Senior Sanitarian) - Subsurface in Jackson & Josephine Counties.
Vacant (ES 2) - AQ, WQ, SW, Noise and SS in Josephine County.
Francine Stenerodden (CA) - Secretary.

Two of these positions (Belsky-Hottman) are recent, limited-duration transfers from Portland (Air Quality and the Laboratory, respectively) in recognition of the identified air quality problems in the Medford area.

Because of these recent staff additions, we are currently evaluating whether or not our existing office space is adequate for the long term. Furthermore, Medford is one of the locations where LCDC is proposing to open a field office. We feel there may be certain advantages for DEQ-LCDC to lease a joint office facility.

The 1977 Legislature approved \$50,000 for a "Carrying Capacity Study for Jackson County". As a result of the Emergency Board allocating these funds in September, 1977, a management team has now been selected and the project is getting underway. Bob Gay of the Director's Office has been appointed as the Department's representative to fulfill a three (3) man-month commitment of time that was added as a budget note to the Department's 1977-79 budget. Jon Deason, former Jackson County Commissioner has been appointed as local coordinator for the project. December, 1978 is the planned completion date with a report due to be submitted in January to the 1979 Legislature. At this point only very preliminary informational



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meetings have been held in Medford by the management team.

Air Quality

In March, 1977, Jackson County and the Department jointly appointed a 21 member Citizens Advisory Committee to assist the Department in developing an Air Quality Maintenance Plan (AQMP) for the Medford-Ashland Airshed (see also discussion in specific agenda item related to Particulate Control Strategy Rules for the Medford-Ashland (AQMA)). This is the first such committee appointed by the Department and partially fulfills the requirement for public involvement specified in the Clean Air Act. The first phase of the AQMP is before you today in the form of a Proposed Particulate Control Strategy and the Department is appreciative of the time, effort and support received from the AQMA advisory committee. With the anticipated adoption of a particulate control strategy, we will turn our focus to developing attainment strategies for photochemical oxidants (PO_x) and carbon monoxide (CO); two additional ambient air standards which are also being exceeded at this time. We look forward to continuing involvement from the AQMA advisory committee.

Within the last two years the Department has significantly increased the amount of ambient air monitoring taking place in the Medford area. The number of sites has increased from two (2) permanent sites (Courthouse, Ashland) to six (6) permanent sites (Courthouse, Ashland, White City, Eagle Point, Brophy Building and Bear Creek Corporation). In addition to total suspended particulate and sulfur dioxide we are also monitoring for carbon monoxide, photochemical oxidants (measured as ozone), hydrocarbons and oxides of nitrogen. As a result of this expanded monitoring network, it is now verified that both the PO_x and CO state standards are also being exceeded and that an attainment plan will have to be developed. Working with the AQMA advisory committee, those attainment plans are scheduled to be adopted in July, 1978.

From November 30 through December 6, 1977, the Department operated a voluntary Motor Vehicle Inspection Program (no fee) at the Thunderbird Shopping Center at 2230 Biddle Road in Medford. The initial request for such a voluntary program was from the AQMA advisory committee and Oregon Lung Association. The Department agreed with their request and felt that this was an appropriate effort in shifting focus from particulate emissions to PO_x and CO emissions. Strategies to control PO_x and CO are definitely going to involve the public, specifically motor vehicle related emissions.

The City of Grants Pass, in their application for a Comprehensive Land-Use Planning Extension with LCDC, included a request for \$10,500 to complete an "Airshed Carrying Capacity Study". LCDC approved the City's request and allocated the money in July, 1977. The Department has provided technical assistance to the city by helping them develop a study plan (tasks) and request for proposal (RFP).

In addition, the Department will be providing continuing assistance by reviewing the technical content of the consultant's report. The city is currently soliciting responses to their RFP. They hope the study can be completed by July, 1978. The study will look at particulate, PO_x and CO as the primary pollutants of concern.

In December, 1976, the EQC granted a variance to Down River Forest Products to operate the former Permaneer Particleboard Plant in White City. Since assuming control of the facility, Down River Forest Products has made the following progress in conforming with their variance requirements:

<u>System</u>	<u>Proposed Completion</u>	<u>Actual Completion</u>	<u>Control</u>
Dry milling	July, 1977	May, 1977	Baghouse.
Sanderdust/ relay	January, 1978	November, 1977	Baghouse.
Green milling	June, 1978	Slight delays pending receipt of vendors proposal still expected to meet June, 1978 deadline.	Baghouse or equivalent
Former/picker roll recovery system	November, 1978	On schedule	Baghouse or equivalent.
Sawtrim/ cleanup	March, 1979	November 1, 1977	Baghouse
Particleboard dryers	May, 1981	May be affected by AQMA proposed standards	?
Hog fuel boiler	?	May be affected by AQMA proposed standards.	?

It is the Department's opinion that Down River Forest Products is meeting the intent of the variance and that they are on or ahead of schedule on key aspects of the variance. In all cases to date, they are installing the highest and best particulate control systems.

Water Quality

The Rogue Valley COG (RVCOG) "208" planning program is moving toward completion. The Ashland Watershed Plan has been received from the consultant and has been adopted by the City of Ashland and the RVCOG and supported by the Forest Service and the Department. We are currently working with the city to develop an implementation schedule

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for an Accumulated Sediments Removal Plan. The city and the Forest Service, meanwhile, have signed a Memorandum of Agreement relative to a Watershed Management Plan.

A Waste Treatment Master Plan for the Bear Creek Watershed has been developed and adopted by all of the affected local parties. The plan is currently undergoing DEQ and EPA review. Once approved, the Waste Treatment Master Plan should help materially in expediting completion of identified 201 projects either ongoing or identified as needed.

The Agriculture Runoff Study is in the process of completion. The Geological Survey is preparing an interpretative report based on two years of collected data. The Agricultural Advisory Committee is preparing the Best Management Practices Plan with a proposed completion date of April, 1978.

Due to severe drought conditions during the 1976-1977 winter season, the Urban Runoff Study was delayed. Between monetary savings in other RVCOG "208" projects, additional assistance from the Geological Survey and assistance from Jackson County the study is ongoing with a proposed completion date of June 1978.

To insure the implementation of the completed, or to be completed, Management Plan, a Water Quality Review Committee, representing all local management agencies has been created under the auspices of the RVCOG. It is intended that this be an ongoing committee with one key responsibility being the periodic review and update of the Management Plans.

Two Environmental Impact Statements (EIS) were recently completed by EPA for sewerage projects in Jackson County. Both EIS's were completed concurrently with the "201" facility plan in an arrangement known as "piggybacking". These were the first two such projects in Oregon. A hearing was recently held in the City of Jacksonville on their final EIS and facility plan. The EIS and facility plan recommended connection to BCVSA's regional interceptor system with a controlled-size pipeline. Unfortunately, the EIS has not received universal support because of continuing controversy over Jacksonville's designation as a National Historic Landmark and the presumed lack of control over growth even with a controlled-size pipeline. The Department feels that the recommended solution is acceptable and has indicated its support for this alternative. A decision by RPA's Regional Administrator is pending at this time.

A second public hearing was recently held in Central Point on the final EIS and facility plan for BCVSA's Westside Trunk District interceptor system located west and south of Central Point. Following the public hearing, Jackson County filed a land-use conformance statement in May, 1977 if a controlled-size pipeline was installed to serve 9,000 persons rather than the proposed 17,400. EPA approved the project in August, 1977 with a requirement that the project be sized for 9,000 persons rather than 17,400 persons.

Following approval of an EIS for the Redwood Sanitary District project in Josephine County (southwest of Grants Pass) in late 1976, the Josephine County Commissioners decided to proceed with the project. Because of favorable weather conditions during the 1976-1977 winter season, construction proceeded promptly following approval of the EIS. That project is now nearing completing and hookups to the system will occur soon.

In February, 1977, Lost Creek Reservoir began operating on the Rogue River. Even though there were general drought conditions in the Rogue Basin last year, 151,000 acre-feet (of a possible 476,000 acre-feet) were stored during the 1976-1977 winter season which aided materially in maintaining a 1,000 cfs flow at Grants Pass this past low-flow season. The Corps of Engineers, Fish and Wildlife Department, Geological Survey and the Department are conducting various studies on the Rogue Basin to evaluate the impacts of Lost Creek Reservoir, Elk Creek Reservoir, the second of three proposed dams in the Rogue Basin, has been indefinitely postponed, due to unanswered questions on its ability to meet turbidity standards. The third reservoir, Applegate, is currently moving toward construction. Although the Carter Administration at one time questioned the economic justification of this project, it still is a funded project with a contract scheduled to be bid in January, 1978 for the main embankment. In November, 1976, a public referendum on the Applegate Reservoir in Jackson and Josephine Counties found the public in support of this project by a 3 to 2 margin. The Department has supported this project due to the anticipated low flow augmentation benefits. The Department does not anticipate significant turbidity problems nor significant problems with mercury contamination even though natural cinibar deposits occur in the watershed.

On August 1, 1977, a massive fish kill occurred on the Rogue River near Grants Pass. An estimated 238,000 fish were killed; 27,000 of which were steelhead and 15,000 chinook salmon. Based on the Department's investigation, it is our opinion that the fish kill occurred as a result of the improper application of an algicide (Magnicide H) by the Grants Pass Irrigation District (GPID). Based on the evidence gathered, the Director issued a \$10,000 civil penalty. The Fish and Wildlife Department has also filed a claim for an amount equivalent to the value of the fish killed. A hearing has been requested by the GPID on the assessment of a civil penalty. At the request of the District's legal counsel, that hearing will not be held until some time in early 1978.

Subsurface and Alternative Sewage Disposal System Program

Implementation of the standard subsurface sewage disposal program is by contract with Jackson and Josephine Counties. The Alternative and Experimental Facilities Programs are managed by the Medford Branch Office and Experimental Review Committee respectively. Some pertinent facts are as follows:

1. Standard Systems - Calendar Year, 1976

	Site Evaluations	Approved	Denied
Jackson County -----		42%	58%
Josephine County -----		81%	19%

2. Alternative Systems - Applications to date

Lagoons	Received	25
	Approved	20
	Denied	0
	Pending	5
Holding Tanks	Received	21
	Approved	21

3. Experimental Facilities - Applications to date

Systems	Approved for installation	29
	Types approved	5
	Percentage of statewide approval to date	43%

4. Variance Applications to date

	<u>Jackson County</u>	<u>Josephine County</u>
Approved	38 - 66%	13 - 36%
Denied	10 - 17%	21 - 58%
Pending	10 - 17%	2 - 6%

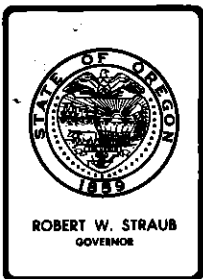
Percentage of statewide applications to date - 29%

As the figures indicate, due to very severe soil limitations for standard systems in Jackson County, there is a very high interest in alternative systems, experimental systems and the variance program. In addition, the Department has concurred with 75 proposals under the Rural Area provisions of the Subsurface Rules - 60 of which were in Jackson County. At this time the facts aren't in on the Experimental Facilities Program, however, Jackson County has assigned one person full-time to gather the monitoring data upon which to base judgments. Considering this appears to be a more normal winter season, preliminary results should be available July, 1978.

Solid Waste

Jackson and Josephine County presently rely on modified and/or sanitary landfills for disposal of solid waste. Most of the large regional landfills are privately operated. The Solid Waste Plan for Jackson-Josephine Counties envisioned landfilling as being the only viable disposal alternative through 1982 at which time it was felt a review of resource recovery opportunities was appropriate. In the meantime, some recovery of cardboard, newsprint and metal is occurring at the Grants Pass (Josephine County), South Stage (Jackson County), and Ashland (Jackson County) Landfills.

Richard P. Reiter:bw
December 7, 1977



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 No. F, December 16, 1977 EQC Meeting

Public Hearing to Consider Amendments to Oregon Clean Air Act
Implementation Plan Involving Particulate Control Strategy
Rules for the Medford-Ashland AQMA

Background

The Medford-Ashland Air Quality Maintenance Area (AQMA) consists of about 228 square miles in the Bear Creek Valley of Southwestern Oregon. The cities of Medford and Ashland are the main population centers in the AQMA. A map of the AQMA is shown in Figure 1. The majority of Jackson County's industry, which is mainly wood products oriented, is also located in this area. Mountains ranging in elevation from 3000 to 9500 feet (MSL) surround the valley floor which varies from 1300 to 2000 feet in elevation. The combination of the geographical formation and the local weather patterns cause frequent occasions of temperature inversions in the valley which tend to prevent the escape of air pollutants. National Weather Service data indicates that Southwestern Oregon is one of the two areas in the continental United States most susceptible to poor ventilation.

Total Suspended Particulate (TSP) has long been recognized as a problem within the AQMA. High volume samplers, the Federal reference method for TSP, were run at the Jackson County Courthouse in Medford as long ago as 1961. TSP concentrations measured at that site have dropped considerably over the years. The average yearly geometric mean during the 1960's was 105 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The corresponding average for the last 7 years was 80.4, including the 1976 value of 103.2 which occurred during the worst meteorological year we have had for some time (possibly 100 years). The Oregon State ambient air standard for TSP is $60 \mu\text{g}/\text{m}^3$ as a yearly geometric mean. This is also the Federal secondary standard for TSP. This level was exceeded every year, during which measurements were taken, from 1961 through 1976.

A high volume sampler site has been operated continuously at the Ashland City Hall since 1970. Concentrations recorded at that site have never exceeded the $60 \mu\text{g}/\text{m}^3$, yearly geometric mean.



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The TSP data indicates a greater problem in Medford than in Ashland. This is to be expected as the majority of population and industry is located in the northern portion of the Bear Creek Valley, much closer to Medford than to Ashland.

As mentioned before, the trend in TSP concentrations, measured at the Medford site, has been downward. This reduction can be attributed mainly to the phase out of wigwam waste burners and some control of other sources in the wood products industry. Despite the improvement, the area still was not meeting the ambient air standard and was declared an Air Quality Maintenance Area in 1974. This designation was triggered by an analysis which indicated the area could exceed TSP standards for at least the next 10 years. The designation also triggered a program to develop an air quality maintenance plan (AQMP) which would attain and maintain compliance with the TSP standard over at least the next 10 years.

The first step in the AQMP process was the awarding of a contract to a consultant to study the problem. The study began in early 1976 and was concluded in October of that year. The major tool of the study, and of much of the work done since then by the Department, was a computerized air shed dispersion model used to estimate TSP concentrations for different input conditions. The model used was the latest state-of-the-art. Input to the model includes data on pollution sources and meteorology. The consultant and the Department spent much time verifying and upgrading the emission inventory. Also, an effort was made to predict the changes in emission sources through the year 1995. The model predicted that the maximum TSP concentrations would be expected in the Medford and White City areas. Figure 2 portrays TSP air quality with all point sources in compliance with existing Department rules through the use of isopleths (lines of equal TSP concentration).

In late 1976, three high volume sampler sites were added to the network. These were at White City, North Medford and Eagle Point. Also, a cascade impactor was installed at the Jackson County Courthouse in Medford in order to obtain size distribution data on the collected particulate. Some microscopy work was also done at this time to identify the portion of the collected particulate which was greater than about 2 microns in diameter. This information has been used to identify sources contributing to the TSP problem and effectiveness of potential new control strategies.

The Medford-Ashland AQMA Advisory Committee (21 members) was formed in March 1977 by a joint approval of the Jackson County Board of Commissioners and the Department. This committee's responsibilities are to: 1) Advise the Department on control strategy selection, 2) Advise the Department on the development of emergency action plans, and 3) Provide air quality information to the public. Members of the committee represent: 1) the public-at-large, 2) industry, 3) local elected officials, 4) agriculture, 5) fire districts, 6) governmental agencies and other interested groups.

Meetings of the committee have been frequent. The first were informational in nature and attempted to give the committee a common knowledge of the problems they were to address. Included was a tour of several of the area industries. Later meetings were spent discussing the details of particular air pollution sources and possible strategies for their control. Most of the meetings have focused on the TSP problem. Industry, the Department and independents were given the opportunity to present technical information and views of Medford's TSP problem and potential solutions.

The Department provided airshed computer estimated reductions in TSP for various control strategies along with estimates of cost and energy usage for each alternative. Also provided was the necessary reduction to meet and maintain the ambient air standard. Therefore, the committee could review the available information and recommend the most acceptable combination of control strategies. Tables 1 and 2 are the information given to the committee regarding the effect of various control strategies on the Medford (Jackson County Courthouse) and White City receptors. Table 3 lists the alternative industrial strategies voted on by the committee and the results of the voting. Attached to Table 3 is a policy statement approved by the committee at the same meeting at which they voted upon the industrial control strategies. The committee recommended a strategy which would attain and maintain TSP standards through 1985.

The Department has taken the committee recommendations under advisement and has proposed the attached regulation titled "Specific Air Pollution Control Rules for the Medford-Ashland Air Quality Maintenance Area". The committee has also recommended that the criteria for slash burning in the area surrounding the AQMA be investigated to determine if it is adequate, and the Department intends to implement this recommendation. Recommendations on other area sources will be made by the Committee and the Department will respond to each. The Department attempted to follow the intent of the committee's recommendations on industrial sources and open burning in drafting the proposed regulations. However, in some cases the form of the regulation is changed from that in the recommendation although the degree of control required has not been changed.

Evaluation

The committee made recommendations, and the Department has drafted regulations, for six categories of particulate emission sources: 1) Wood Waste Boilers (including the charcoal furnace), 2) Air Conveying Systems (i.e., cyclones), 3) Veneer Dryers, 4) Wood Particle Dryers at Particleboard and Hardboard Plants, 5) Wigwam Burners, and 6) Open Burning. Following is information on the specific proposed regulation for each of these source categories and also for those sections of the proposed regulations which apply to all sources:

- 1) Wood Waste Boilers and Charcoal Furnaces - The committee recommendation was that particulate emission concentration for this source category be limited to 0.05 grains per standard cubic foot (gr/SCF). This essentially means that a low to medium pressure drop scrubber must be installed on all sources not already so equipped. Three scrubbers of this type have been installed on boilers in the AQMA to meet the existing new source limitation of 0.10 gr/SCF. The source tests on all three of these boilers showed them to be emitting at less than 0.05 gr/SCF. Industry has questioned whether scrubber performance will deteriorate with time. The Department contends that such deterioration can be offset if maintenance is adequate.

One other alternative investigated was the use of a bag filter control system. This would have been about ten times as costly and would have resulted in a 34% greater reduction in TSP. This technology is not nearly as well proven for wood combustion sources as are scrubbers.

The charcoal furnace was considered with the other wood combustion sources but is somewhat unique because its exhaust gas temperature of 1800°F is much higher than the usual 500-600°F from a boiler. This necessitates either cooling the gas stream or passing it through a waste heat boiler before control. The Department contends that either alternative is feasible.

- 2) Air Conveying Systems - The committee recommendation was that bag filters be required on all air conveying systems emitting greater than ten tons of particulate per year. This control equipment is widely used presently to control sanderdust systems. There have been some serious problems with explosions but the Department believes that adequate safety devices exist and are in widespread use to minimize such hazards. One alternative control device which might approach the high efficiency of a bag filter would be a venturi scrubber. This would eliminate the explosion hazard but would require much more power and water recycling equipment.

An alternative investigated was the requirement to have bag filters installed on all air conveying systems emitting greater than one ton per year. This would have tripled the control cost and would have resulted in a 33% increase in TSP reduction.

- 3) Veneer Dryers - The committee recommended that 45% control of veneer dryer emissions be required. This requires treatment equivalent to that required by the statewide (non AQMA) opacity rule. Low pressure drop scrubbers have demonstrated that they can meet this level of efficiency. Another alternative investigated was 85% control. This would consist of a catalytic after-burner or a scrubber followed by a mist eliminator. This higher level of control would almost double the reduction of TSP and increase the capital cost from 2 to 3.5 times, depending upon the control equipment selected, but the annualized cost per unit of TSP reduction would actually decrease.

The scrubber and mist eliminator control system has been well demonstrated, but only by one company. There have been doubts expressed by industry as to how well a mist eliminator would perform on a scrubber other than the one with which it has been used. The Department believes that there is basically no reason why a mist eliminator would not be adaptable to almost any scrubber, although this has not been demonstrated.

Equipment installed to meet the 45% control regulation will be required to have the capability of being upgraded to 85% control. This stipulation is in conformance with the committee's policy statement.

- 4) Wood Particle Dryers at Hardboard and Particleboard Plants - The committee recommended that 80% additional control of particulate emissions from this source be required. Wet electrostatic precipitators would most likely be the type of control equipment used to meet this regulation. There were no other alternatives considered other than not changing the present regulations.

This would be a technology forcing type regulation as wet electrostatic precipitators have not actually been applied to this particular type of source. However, they have been successfully applied to sources with somewhat similar particulate characteristics. The annualized cost per unit TSP reduction and the capital cost are the highest of any of the control measures recommended. The Department believes that 85% control of veneer dryer emissions would be a more practicable and cost effective strategy to adopt than this strategy. However, industry is opposed to the more restrictive veneer dryer control at this time.

- 5) Wigwam Waste Burners - The committee recommended that wigwam burners be eliminated. This would affect the only two remaining wigwam burners in the AQMA. There were no other alternatives considered other than not changing the present regulations. The Department believes that the wood waste presently being incinerated can either be utilized in a plant to produce board from the wood fiber or disposed of in a landfill.
- 6) Open Burning - The Committee recommended that air quality be included in the criteria used to determine if a fire permit should be issued. A total ban on open burning was also considered.
- 7) Compliance Schedules - The proposed regulations include dates by which each source category shall attain compliance with its specific regulation. However, if it is practicable for a source to attain compliance sooner than the deadline, then it will be required to do so. All strategies are proposed to be completed no later than January 1, 1982.

Charcoal producing plants are proposed to have the longest compliance date because it appears that a two-step process including installation of expensive heat recovery systems will be needed. It is anticipated that under the proposed Rule the Georgia Pacific charcoal plant at White City will reduce its particulate emissions from 1058 tons/yr to 340 tons/yr by July 1, 1979 and then to 170 tons/yr by January 1, 1982.

Since no controls of the type needed to meet limits proposed for charcoal plants and particleboard dryers have been demonstrated, a public hearing review date is proposed to determine the progress and feasibility of meeting the proposed limits. If emission limits are determined to be impracticable, other alternative source control strategies will have to be implemented to achieve the needed reduction of airshed particulate emissions.

- 8) Continuous Monitoring - This section of the proposed regulations gives the Department authority to require instrumentation to help ensure that pollutant levels are maintained as low as practicable. This section, and the one on source testing, implement a portion of the policy statement of the committee. This will be a great advantage in evaluating the continued compliance of sources rather than having to depend on infrequent source tests and occasional opacity readings.
- 9) Source Testing - This section of the proposed regulations establishes a minimum source testing frequency. This will enable the Department to keep more up to date on source status with regard to compliance and will also result in the generation of better input to dispersion models and other studies the Department may wish to carry out. Industry and the Advisory Committee have urged the Department to continually develop better data for future control strategy development should it be needed.

The results predicted by the computer dispersion model, assuming that the proposed regulations are attained by the required compliance dates, are illustrated in Figure 3 for the yearly geometric mean. This figure shows a significant reduction in TSP concentrations, to below the yearly ambient air standard for a period of about 3 years. The statistical relationship by which the second highest 24-hour concentration is predicted indicates that this standard will continue to be marginally violated. However, there are reasons to believe that the situation will be better than predicted and compliance will be achieved. Two recommendations have already been made which may have significant effects during adverse meteorological conditions. One is a recommendation, which has been incorporated into these proposed rules, that the local fire districts use air quality as a factor in determining whether fire permits will be issued. This would eliminate open burning during days when high TSP levels are likely to occur, thereby reducing peak TSP concentration. The other is a recommendation that the conditions for allowing slash burning near the Bear Creek Valley be studied to determine if they are sufficient to protect the valley. This may possibly result in less intrusion of slash smoke. The continuous monitoring allowed by the proposed regulations would tend to reduce the variation in source emissions and would alert plant personnel and Department inspectors immediately when problems occur. Finally, the Department's inspection force in the AQMA has been increased. This should reduce the occurrence of violations which are not noticed.

It should be noted that industry has questioned the validity of the computer dispersion model used by the Department. They have suggested as an alternative that all sources in the AQMA be brought into compliance with existing regulations and then the need for further control would be determined. However, the Department maintains that the model used is the latest state-of-the-art and is much superior to any available alternatives. The model predicts that TSP concentrations would continue to substantially violate the annual geometric mean ambient air standard even if all sources were in compliance with existing regulations and, therefore, the Department does not consider that a viable alternative to meet the requirements of the Clean Air Act.

Figure 3 indicates that the increase in TSP will be gradual throughout the period until 1995. This is encouraging as it means that the amount of further control necessary to maintain compliance throughout that period should not be extreme. More study will be carried out over the next several years by the Department, mainly on area and background sources, in order to identify new strategies which can be implemented by 1985 to maintain TSP concentrations below ambient air standard levels. The Department is hopeful that this study will result in identifying cost and energy effective control strategies.

Summation

- 1) The Medford-Ashland AQMA is violating the State daily and annual ambient air standards and the Federal secondary daily and annual ambient air standard for Total Suspended Particulate (TSP).
- 2) The Environmental Protection Agency has called for revision to Oregon's State Implementation Plan to attain and maintain ambient TSP standards in the AQMA.
- 3) The Medford-Ashland Air Quality Maintenance Area Advisory Committee has recommended several control strategies for the reduction of TSP. The Department concurs with these recommendations and has incorporated them into these proposed regulations.
- 4) The requirements in these proposed regulations are predicted to bring the AQMA into compliance with TSP standards and maintain that compliance through 1985.
- 5) Further study will be done by the Department to identify additional control strategies which will allow maintenance of standards beyond 1985. These strategies will most likely involve control of area particulate sources. However, the Department believes that the data base and analysis for the proposed control strategies are adequate and implementation of presently proposed control strategies should proceed immediately.

Director's Recommendation

It is the Director's recommendation that consideration be given to the testimony received and that:

- 1) The hearing record be kept open until December 28, 1977.
- 2) The Department evaluate the testimony received, consider such changes as are warranted, and prepare a report with recommended action relative to the proposed rules and the amendment of the Oregon Clean Air Act Implementation Plan for consideration of the Commission at the January 27, 1978 meeting.

Bill by WHP

WILLIAM H. YOUNG

Attachments:

- Figure 1 - Map of AQMA
- Figure 2 - TSP (isopleths)
- Figure 3 - Results of Computer Dispersion Model
- Table 1, 2, 3

David M. Baker:lb (503) 229-6446
December 9, 1977

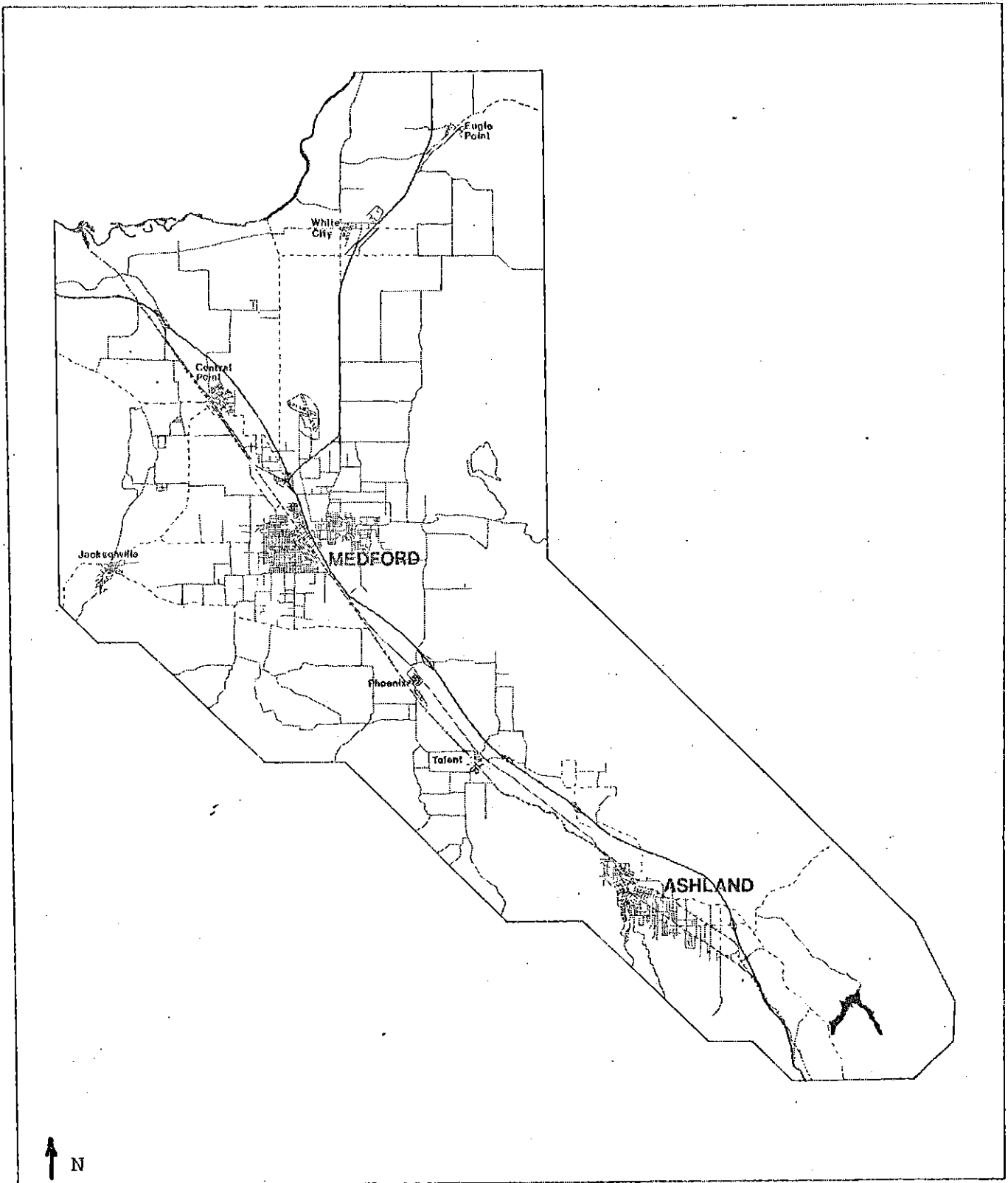


Figure 1

MEDFORD-ASHLAND AQMA

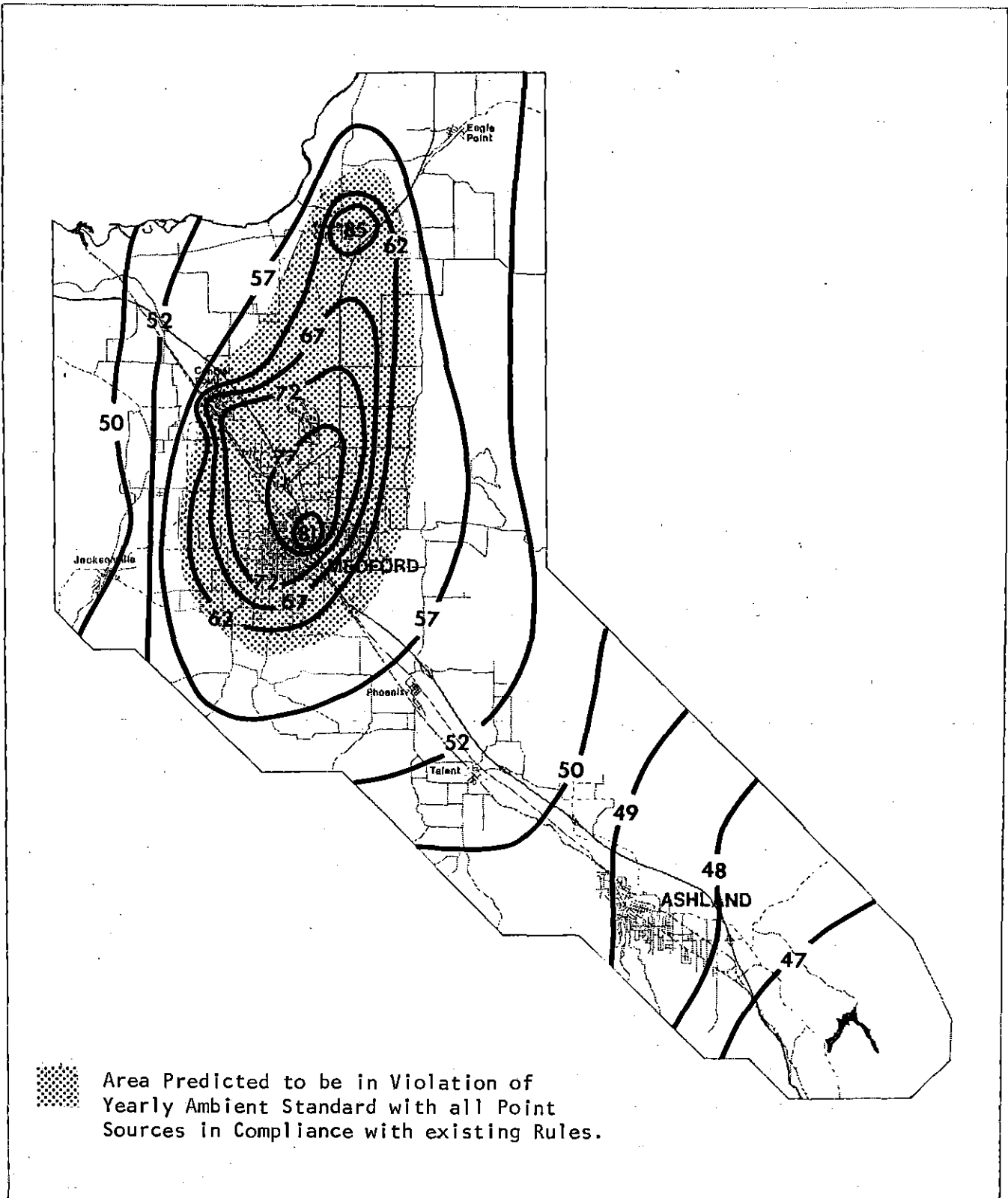


Figure 2

COMPLIANCE ISOPLETHS
 PREDICTED ANNUAL GEOMETRIC MEAN ($\mu\text{g}/\text{m}^3$)

Figure 3

Predicted Yearly Geometric Mean TSP ($\mu\text{g}/\text{m}^3$)

Medford Courthouse Receptor
(Includes Interim Charcoal Producing Plant Reduction in 1979)

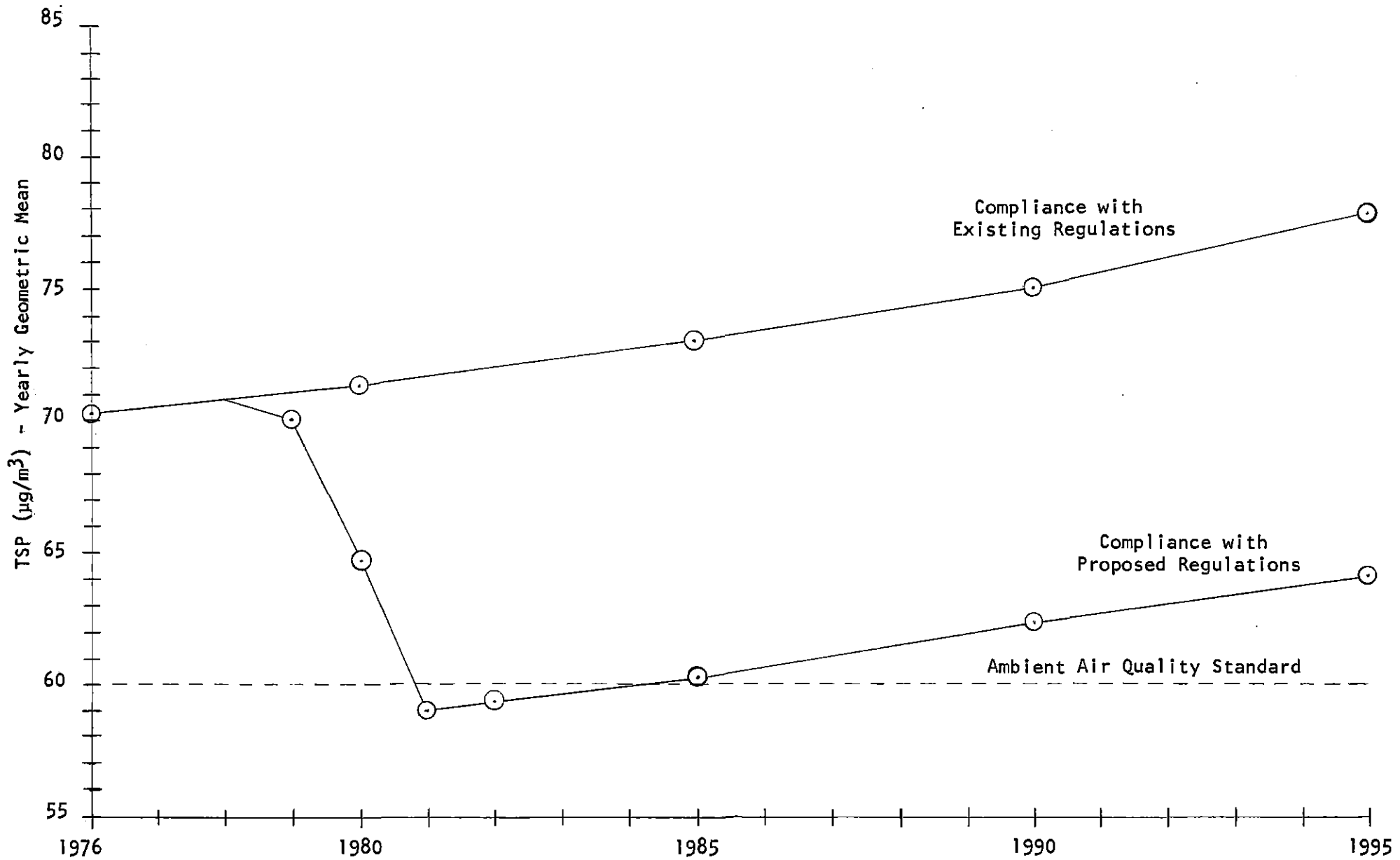


TABLE I

MEDFORD/ASHLAND AIR QUALITY MAINTENANCE AREA
 POTENTIAL PARTICULATE CONTROL STRATEGIES FOR ALL CONTROLLABLE SOURCES
 MEDFORD COURTHOUSE RECEPTOR

Strategy	$\mu\text{g}/\text{m}^3$ Reduction	Particulate Reduction (Tons/Year)	Control Equipment Capital Cost (\$)	Cost Effectiveness (A) (annualized $\$/\mu\text{g}/\text{m}^3$)	Energy Effectiveness (HP/ $\mu\text{g}/\text{m}^3$)
1. Hog Fuel Boilers					
a. limited to 0.05 gr/scf, or	5.9*	1,760	\$1,280,000	\$18,000	390
b. limited to 0.01 gr/scf	7.9	2,300	\$11,300,000	\$140,000	600
2. Cyclones					
a. baghouses for all emitting over 10 T/year each	4.9*	450	\$642,000	\$34,000	74
b. baghouses for all emitting from 1 to 10 T/year each	1.6	160	\$1,120,000	\$180,000	390
3. Veneer Dryers (B)					
a. 45% control	1.6*	219	\$1,170,000	\$250,000	180
b. 85% control	3.0	372	\$2,440,000-\$4,170,000	\$160,000-\$210,000	870-900
4. Prohibit Residential Space Heating with Wood	1.9	938	None	\$980,000	17,000
5. Particle Board Dryers (80% Additional Control)	1.9*	298	\$4,170,000	\$350,000	100
6. Prohibit Open Burning	0.3	150	Negligible	\$1,500,000	Unknown
7. Replace Oil-Fired Orchard Heaters with Propane Systems	0.2	110	\$1,610,000	\$800,000	No Increase
8. Ban Modified Wigwam Burners	0.1*	80	\$200,000	\$110,000	Negligible

Needed Reduction to Meet Annual Standard ($\mu\text{g}/\text{m}^3$)	Compliance					Footnotes
	1976	1980	1985	1990	1995	
	11.7	12.9	14.7	17.0	19.0	
Needed Reduction to Meet Daily Standard ($\mu\text{g}/\text{m}^3$)	16.8	18.0	19.9	22.1	24.2	

(A) Annualized cost is amortized capital cost plus annual operating cost.

(B) Cost could be reduced by approximately 40% if air choke off system installed.

* Strategies Implemented in Proposed Rules
 Total Reduction = 14.4 $\mu\text{g}/\text{m}^3$

TABLE 2

**MEDFORD/ASHLAND AIR QUALITY MAINTENANCE AREA
POTENTIAL PARTICULATE CONTROL STRATEGIES FOR ALL CONTROLLABLE SOURCES**

White City Receptor

Strategy	$\mu\text{g}/\text{m}^3$ Reduction at White City Receptor	Particulate Reduction (Tons/Year)	Control Equipment Capital Cost (\$)	Cost Effectiveness (A) (annualized $\$/\mu\text{g}/\text{m}^3$)	Energy Effectiveness (HP/ $\mu\text{g}/\text{m}^3$)
1. Hog Fuel Boilers					
a. limited to 0.05 gr/scf, or	9.5*	1,760	\$1,280,000	\$11,000	240
b. limited to 0.01 gr/scf	12.8	2,300	\$11,300,000	\$86,000	370
2. Cyclones					
a. baghouses for all emitting over 10 T/year each	1.7*	450	\$642,000	\$97,000	210
b. baghouses for all emitting from 1 to 10 T/year each	0.8	160	\$1,120,000	\$350,000	780
3. Veneer Dryers (B)					
a. 45% control	2.5*	219	\$1,170,000	\$160,000	120
b. 85% control	4.7	372	\$2,440,000-\$4,170,000	\$100,000-\$130,000	560-580
4. Prohibit Residential Space Heating with Wood	1.2	938	None	\$1,600,000	270
5. Particle Board Dryers (80% Additional Control)	3.0*	298	\$4,170,000	\$220,000	63
6. Prohibit Open Burning	0.2	150	Negligible	\$2,300,000	Unknown
7. Replace Oil-Fired Orchard Heaters with Propane Systems	0.1	110	\$1,610,000	\$1,600,000	No Increase
8. Ban Modified Wigwam Burners	0.3*	80	\$200,000	\$37,000	Negligible

	Compliance					Footnotes
	(1976)	1980	1985	1990	1995	
Needed Reduction to Meet Annual Standard	14.4	15.2	16.3	17.6	18.9	(A) Annualized cost is amortized capital cost plus annual operating cost.
Needed Reduction to Meet Daily Standard	16.5	17.2	18.4	19.7	20.9	

(B) Cost could be reduced by approximately 40%
if air choke off system installed.

* Strategies Implemented in Proposed Rules
Total Reduction = $17.0 \mu\text{g}/\text{m}^3$

Table 3

Results of Votes on Industrial Particulate Control Strategies
by AQMA Advisory Committee

	<u>First Vote</u>	<u>Second Vote</u>
1) Wigwam Burners		
a) Eliminate	18	-
b) No Change	1	-
c) Abstain	0	-
2) Particle Board Dryers		
a) 80% Additional Reduction	14	-
b) No Change	4	-
c) Abstain	1	-
3) Veneer Dryers		
a) 85% Control	6	4
b) 45% Control	11	11
c) Existing State Regulations	2	2
d) Abstain	0	2
4) Hog Fuel Burners		
a) Limit to less than 0.01 gr/SCF	3	2
b) Limit to less than 0.05 gr/SCF	10	11
c) No Change	6	5
d) Abstain	0	1
5) Cyclones		
a) Baghouse or equivalent on all cyclones in excess of one ton/year	5	-
b) Baghouse or equivalent on all cyclones in excess of ten tons/year	13	-
c) Baghouse or equivalent on problem sources only	1	-
d) No Change	0	-
e) Abstain	0	-

Proposed POLICY STATEMENT - Particulate Emission Control

It is the concensus of this committee that DEQ must proceed without delay to take the necessary steps to reduce the emission of particulates from industrial processes in the Medford/Ashland AQMA.

Specifically, we recommend that DEQ and industry focus immediately on the following:

- (a) intensified industry efforts to ensure that equipment generating particulate emissions is properly maintained and operated, monitoring of its own equipment, and regularly providing source data to DEQ. The program should be reinforced, as necessary, by DEQ surveillance.
- (b) attainment of a reduction of 20 micrograms per cubic meter by 1985*
- (c) install control equipment with add-on capabilities in case reduction of particulates generated by non-industrial-process sources does not fill the gap between industrial process reduction and the reduction required to meet the daily average standard in 1995.

The committee will focus on reduction of particulate pollution from other than industrial process sources in forthcoming meetings, but wishes to avoid further delay in DEQ/industry action.

(*Note that this is substantially less than the reduction needed to meet and maintain the required daily standard by 1995.)

DIVISION 30

SPECIFIC AIR POLLUTION CONTROL RULES FOR THE
MEDFORD-ASHLAND AIR QUALITY MAINTENANCE AREA

PURPOSES AND APPLICATION

340-30-005 The rules in this Division shall apply in the Medford-Ashland Air Quality Maintenance Area (AQMA). The purpose of these rules is to deal specifically with the unique air quality control needs of the Medford-Ashland AQMA. These rules shall apply in addition to all other rules of the Environmental Quality Commission. The adoption of these rules shall not, in any way, affect the applicability in the Medford-Ashland AQMA of all other rules of the Environmental Quality Commission and the latter shall remain in full force and effect, except as expressly provided otherwise. In cases of apparent duplication, the most stringent rule shall apply.

DEFINITIONS

340-30-010 As used in these rules, and unless otherwise required by context:

(1) "Medford-Ashland Air Quality Maintenance Area" is defined as beginning at a point approximately one mile NE of the town of Eagle Point, Jackson County, Oregon, at the NE corner of Section 36, T35S, R1W; thence South along the Willamette Meridian to the SE corner of Section 25, T37S, R1W; thence SE along a line to the SE corner of Section 9, T39S, R2E; thence SSE to the SE corner of Section 22, T39S, R2E; thence South to the SE corner of Section 27, T39S, R2E; thence SW to the SE corner of Section 33, T39S, R2E; thence West to the SW corner of Section 31, T39S, R2E; thence NW to the NW corner of Section 36, T39S, R1E; thence West to the SW corner of Section 26, T29S, R1E; thence NW along a line to the SE corner of Section 7, T39S, R1E; thence West to the SW corner of Section 12, T39S, R1W; thence NW along a line to the SW corner of Section 20, T39S, R1W; thence West to the SW corner of Section 24, T38S, R2W; thence NW along a line to the SW corner of Section 4, T38S, R2W; thence West to the SW corner of Section 5, T38S, R2W; thence NW along a line to the SW corner of Section 31, T37S, R2W, thence North along a line to the Rogue River, thence North and East along the Rogue River to the North boundary of Section 32, T35S, R1W; thence East along a line to the point of beginning.

- (2) "Charcoal Producing" Plant means an industrial operation which uses the destructive distillation of wood to obtain the fixed carbon in the wood.
- (3) "Air Conveying System" means an air moving device, such as a fan or blower, associated ductwork, and a cyclone or other collection device, the purpose of which is to move material from one point to another by entrainment in a moving airstream.
- (4) Particulate Matter" means any matter, except uncombined water, which exists as a liquid or solid at standard conditions.
- (5) "Standard Conditions" means a temperature of 60° Fahrenheit (15.6° Celsius) and a pressure of 14.7 pounds per square inch absolute (1.03 Kilograms per square centimeter).
- (6) "Wood Waste Boiler" means equipment which uses indirect heat transfer from the products of combustion of wood waste to provide heat or power.
- (7) "Veneer Dryer" means equipment in which veneer is dried.
- (8) "Wigwam Waste Burner" is defined in Section 340-25-005(4).
- (9) "Collection Efficiency" means the overall performance of the air cleaning device in terms of ratio of weight of material collected to total weight of input to the collector.

WOOD WASTE BOILERS

340-30-015 No person shall cause or permit the emission of particulate matter from any wood waste boiler with a heat input greater than 15 million BTU/hr in excess of 0.050 grain per standard cubic foot of exhaust gas, corrected to 12 percent carbon dioxide as an annual average or

0.10 grains per standard cubic foot of exhaust gas corrected to 12 percent carbon dioxide as a two hour average test. Control equipment shall be installed to meet a design criteria of 0.05 grains per standard cubic foot corrected to 12 percent carbon dioxide. The equipment shall demonstrate capability to meet their design level during the startup phase of operation.

VENEER DRYERS

340-30-020 No person shall cause or permit any veneer dryer to violate the rules in Section 340-25-315(1) except that, for the purposes of this Section, subsection 340-25-315(1)(c) shall become applicable on April 1, 1978. In addition, air pollution control equipment installed to meet the opacity requirements of Section 340-25-315(1) shall be designed such that the particulate collection efficiency can be practicably upgraded to approximately 85% over uncontrolled emissions.

[NOTE: Section 340-25-315(1) is the veneer dryer rule which has been in effect in areas of the state outside of special problem areas. It is attached to these proposed rules for reference.]

AIR CONVEYING SYSTEMS

340-30-025 All air conveying systems emitting greater than 10 tons per year of particulate matter to the atmosphere at the time of adoption of these rules shall, with the prior written approval of the Department, be equipped with a control system with collection efficiency equivalent to that of a bag filter.

WOOD PARTICLE DRYERS AT HARDBOARD AND PARTICLEBOARD PLANTS

340-30-030 No person shall cause or permit the emission of particulate matter from wood particle dryers to exceed 0.35 pounds per 1,000 square feet of board produced by the plant on a 3/4" basis.

WIGWAM WASTE BURNERS

340-30-035 No person shall cause or permit the operation of any wigwam burner, except for an emergency condition when operation is authorized in writing by the Director of the Department.

CHARCOAL PRODUCING PLANTS

340-30-040(1) No person shall cause or permit the emission of particulate matter from charcoal producing plant sources including, but not limited to, charcoal furnaces, heat recovery boilers and wood dryers using any portion of the charcoal furnace off-gases as a heat source, in excess of a total from all sources within the plant site of 10.0 pounds per ton of charcoal produced.

(2) Emissions from char storage, briquet making, boilers not using charcoal furnace off-gases, and fugitive sources are excluded in determining compliance with subsection (1).

(3) Charcoal producing plants as described in (1) above shall be exempt from the limitations of 340-21-030(1) and (2) and 340-21-040 which concern particulate emission concentrations and process weight.

COMPLIANCE SCHEDULES

340-30-045 The person responsible for an existing emission source subject to 340-30-015 through 340-30-040 shall proceed promptly with a program to comply as soon as practicable with these rules. A proposed program and implementation plan shall be submitted no later than April 1, 1978 for each emission source to the Department for review and written approval.

The Department shall establish a schedule of compliance, including increments of progress, for each affected emission source. Each schedule shall include the dates, as soon as practicable, by which compliance shall be achieved, but in no case shall full compliance be later than the following dates:

- (a) Wood Waste Boilers shall comply with Section 340-30-015 as soon as practicable, in accordance with approved compliance schedules, but by no later than January 1, 1980.
- (b) Veneer Dryers shall comply with Section 340-30-020 as soon as practicable, in accordance with approved compliance schedules, but by no later than January 1, 1980.
- (c) Air Conveying Systems shall comply with Section 340-30-025 as soon as practicable, in accordance with approved compliance schedules, but by no later than January 1, 1981.
- (d) Wood Particle Dryers at Hardboard and Particleboard Plants shall comply with Section 340-30-030 as soon as practicable, in accordance with approved compliance schedules, but by no later than January 1, 1981.

- (e) Wigwam Waste Burners shall comply with Section 340-30-035 as soon as practicable, in accordance with approved compliance schedules, but by no later than January 1, 1979.
- (f) Charcoal Producing Plants shall comply with Section 340-30-040 as soon as practicable, in accordance with approved compliance schedules, but by no later than January 1, 1982.

The compliance schedule for Charcoal Producing Plants and Wood Particle Dryers at Hardboard and Particleboard Plants shall contain reasonably expeditious interim dates and pilot testing programs for control to meet the emission limits in 340-30-040(1) and 340-30-030, respectively. If pilot testing and cost analysis indicates that meeting the emission limits of these rules may be impractical, a public hearing shall be held no later than July 1, 1980 for Charcoal Producing Plants and January 1, 1980 for Wood Particle Dryers at Hardboard and Particleboard Plants to consider amendments to this limit.

CONTINUOUS MONITORING

340-30-050 The Department may require the installation of instruments and recorders for measuring emissions and/or the parameters which affect the emission of air contaminants from sources covered by these rules to ensure that the sources and the air pollution control equipment are operated at all times at their full efficiency and effectiveness so that the emission of air contaminants is kept at the lowest practicable level. The instruments and recorders shall be periodically calibrated. The method and frequency of calibration shall be approved in writing by the Department. The recorded information shall be kept for a period of at least one year and shall be made available to the Department upon request.

SOURCE TESTING

340-30-055 The person responsible for the following sources of particulate emissions shall make or have made tests to determine the type, quantity, quality and duration of emissions, and/or process parameters affecting emissions, in conformance with test methods on file with the Department at the following frequencies:

<u>Source</u>	<u>Test Frequency</u>
Wood Waste Boilers	Once every year*
Veneer Dryers	Once every 3 years
Wood Particle Dryers at Hardboard and Particleboard Plants	Once every 2 years
Charcoal Producing Plants	Once every year

* If this test exceeds .05 grains/scf at 12% CO₂ then 3 additional tests shall be required at 3 month intervals with all four tests being averaged to determine compliance with the annual standard.

These source testing requirements shall remain in effect unless waived in writing by the Department because of adequate demonstration that the source is consistently operating at lowest practicable levels.

TOTAL PLANTSITE EMISSIONS

340-30-060 The Department shall have the authority to limit the total amount of particulate matter emitted from a plantsite, consistent with requirements in these rules. Such limitation will be applied, where necessary, to ensure that ambient air quality standards are not caused to be exceeded by the plantsite emissions and that plantsite emissions are kept to lowest practicable levels.

NEW SOURCES

340-30-065 New sources shall be required to comply with these rules immediately upon initiation of operation.

OPEN BURNING

340-30-070 No open burning of domestic waste shall be initiated on any day or at any time when the Department advises fire permit issuing agencies that open burning is not allowed because of adverse meteorological or air quality conditions.

Board Products Industries
(Veneer, Plywood, Particleboard, Hardboard)

Definitions

340-25-305 (1) "Department" means Department of Environmental Quality.

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

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

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

(5) "Particleboard" means 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).

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

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

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

(10) "Opacity" is defined by section 340-21-005(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 340-21-050(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.

Statutory Authority: ORS 468.295

Hist: Filed 3-31-71 as DEQ 26,
Eff. 4-25-71
Amended by DEQ 132,
Filed and Eff. 4-11-77

General Provisions

340-25-310 (1) These regulations establish minimum performance and emission standards for veneer, plywood, particleboard, and hardboard manufacturing operations.

(2) Emission limitations established herein are in addition to, and not in lieu of, general emission standards for visible emissions, fuel burning equipment, and refuse burning equipment, except as provided for in section 340-25-315.

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

Statutory Authority: ORS 468.295

Hist: Filed 3-31-71 as DEQ 26,
Eff. 4-25-71
Amended by DEQ 132,
Filed and Eff. 4-11-77

Veneer and Plywood Manufacturing Operations

340-25-315 (1) Veneer Dryers:

(a) Consistent with section 340-25-310(1) through (4), it is the objective of this section to control air contaminant emissions, including, but not limited to, condensable 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.

(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.

(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 340-25-315(1)(b)(A), (B), and (C),

(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 340-25-315(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 340-25-315(1)(b)(B) and (C).

(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 emission 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 340-25-315(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.

Statutory Authority: ORS 468.295

Hist: Filed 3-31-71 as DEQ 26,

Eff. 4-25-71

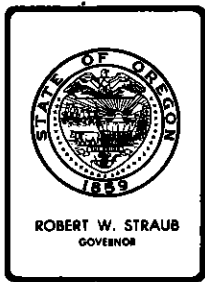
Amended 2-15-72 by DEQ 37,

Eff. 3-1-72

Amended by DEQ 43(Temp),

Filed and Eff. 5-5-72 through

9-1-72



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 No. G, December 16, 1977 EQC Meeting

Consideration of Petition on the Adequacy of Medford Corporation
Air Contaminant Discharge Permit 15-0048, and Air Contaminant
Abatement Measures in Effect to Prevent Nuisance Conditions from
the Medium Density Fiberboard Plant

Background

Medford Corporation conducts a wood products manufacturing business located on North Pacific Highway in Medford. The Air Contaminant Discharge Permit allows the discharge of exhaust gases containing air contaminants subject to conditions therein from:

- 1) Sawmill and planing mill;
- 2) Plywood manufacturing;
- 3) Hardboard plant; and
- 4) Fuel burning equipment.

Insofar as the petitioners address only the hardboard plant (referred to as Medium Density Fiberboard or MDF Plant herein), this staff report shall limit its review to this operation.

In January 1973, Medford Corporation proposed to add a Medium Density Fiberboard Plant to their sawmill and plywood plant. They submitted to the Department an application for an Air Contaminant Discharge Permit (ACDP) and a Notice of Construction, containing, in part, their proposed air pollution control program. The Department acted upon the application, holding a public hearing in March, 1973 on the proposed permit, and subsequently issued the permit April 17, 1973.

In May, 1975 construction on the Medium Density Fiberboard Plant was completed and limited operation began. A number of citizen inquiries and nuisance complaints were received by the Department coincident to the startup of the MDF Plant. Emissions of individual, small wood fibers were resulting from plant upsets associated with the startup of processes with the new plant, and the inadequacies or malfunction of pollution control equipment.



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Figure 1 shows the proximity of residences and commercial businesses to the MDF Plant. The 40-acre plantsite is roughly triangular in shape and is bounded by the Southern Pacific railroad tracks on the southwest and Hwy. 99 on the east and most of the north. Residential areas are, in general, located two or more blocks from the plantsite. Commercial property is closer, in some cases less than one block.

As required by permit, discharge points were source-tested in September, 1975 by a third party consultant. The results were evaluated by the Department in November and indicated that the MDF Plant mass emission rate exceeded by nearly double that allowed by the permit. In February, 1976 citizen concerns over fiber fallout were presented to the Department and Medford Corporation at a "Town Hall" meeting, arranged by Representative Brad Morris. The meeting was attended by 75 persons. Basic concerns voiced were that the Department and Medford Corporation were allowing a serious health hazard to exist and that a substantial, continuing nuisance was being experienced. A similar meeting was held in March, 1976.

During this time frame, the Medford Corporation was evaluating process flows and discharges in order to reduce emissions and achieve compliance. The Department was investigating problem discharge points and preparing compliance schedules and requirements to be incorporated in the renewal of the Air Contaminant Discharge Permit including conditions requiring highest and best practicable treatment and control of particulate discharges. On March 24, 1976 the Department issued a proposed permit allowing thirty days for comment from the public and the permittee. No public hearing was held as comments generated during the Town Hall meetings were considered to be representative of the residential community. The renewed permit was issued May 26, 1976..

On July 30, 1976 the Environmental Quality Commission met in Medford and was presented a status report on the MDF Plant. Richard Reiter concluded that substantial improvement in reduction of particulate fallout had been achieved by the installation of two Carothers baghouses on vacuum exhaust cyclones and re-routing of airflows which eliminated several discharge points.

Citizen complaints continued regarding fiber fallout, and another Town Hall meeting was held November 10, 1976 at the request of Medford City Councilperson, V. Vogel. A large group present (estimated at 100 persons) were concerned that the health hazard and nuisance conditions were continuing, seemingly unabated. Medford Corporation related pollution reductions achieved during 1976. Operation of the mill had reached projected capacity. Department representatives outlined the Department's plans to bring the Medford-Ashland AQMA into compliance by developing a control program for particulate matter by July 1, 1977.

In December, 1976 Medford Corporation completed installation of air pollution control equipment and improvements. In early January, 1977 a third party consultant source-tested each discharge point at the MDF Plant. The Department reviewed the source test in May, 1977 and found that the results were acceptable for compliance evaluation. Two cyclones exceeded concentration limits.

Twelve (12) other discharge points met the concentration limits. Total mass emissions were measured as 37.78 lbs./hour. The ACDP mass allowable emission in the permit is 108.0 lbs./hour. To review, the September, 1975 source-test measured mass emission discharge was 199.90 lbs./hour.

In July 1977, Department representatives inspected the raw material storage area for the MDF Plant. The Department informed Medford Corporation that total enclosure of dry material would be necessary should fugitive emissions be identified with the storage area. The two cyclones exceeding concentration limits were also discussed and it was concluded that a compliance schedule would be requested when the Medford-Ashland AQMA particulate regulations were adopted.

Citizen complaints about fiber fallout continue at this time. Most complaints are received when the MDF Plant experiences an upset condition, causing a short-term heavy discharge. The fallout problem to a lesser degree is experienced almost continually according to citizens.

Most recently, the Medford Corporation MDF Plant has been the topic of two sessions of the Medford-Ashland Air Quality Maintenance Area Advisory Committee (on November 14 and 21, 1977). At the November 21 meeting representatives of Medford Corporation were present and related past efforts in reduction of particulate emissions. Mr. James Madison, on behalf of 400 citizens, presented to the Committee their petition calling for review of the adequacy of Air Contaminant Discharge Permit and control facilities at the plant.

At the November EQC meeting, a hearing date of December 16, 1977 was authorized for consideration of the particulate regulations for the Medford-Ashland Air Quality Maintenance Area.

EVALUATION

Public Concern

1. Residents have repeatedly questioned the Department and Medford Corporation on their activities intended to alleviate a particulate fallout problem in the proximity of the Medium Density Fiberboard Plant.
2. Most recently, a group of 400 citizens and commercial businesses have submitted to the Department a petition stating that control facilities and the Air Contaminant Discharge Permit are not adequate to prevent nuisances.
3. Local residents and commercial businesses in the areas near the MDF Plant continue to be concerned about the particulate fallout problem which exists where they live and work.
4. Residents feel the particulate fallout is serious medically and for several is said to be aggravating existing health problems.
5. Residents feel the particulate fallout is creating a continual nuisance situation in and around their homes and businesses. Cleanup costs are considerable in some cases, and for the most part these costs are unrecoverable.

Medford Corporation Considerations

1. MDF Plant upset conditions increase the amount of particulate matter released to the atmosphere. These plant upsets are usually coincident to increased complaints to the Department about particulate fallout.
2. Medford Corporation is operating the MDF Plant within the allowable mass emission rate during normal operation.
3. Medford Corporation has complied with permit conditions requiring installation of pollution abatement equipment according to stipulated compliance schedules.
4. The Medium Density Fiberboard Plant is located within the boundaries of the Medford-Ashland Air Quality Maintenance Area and therefore is to be subject to the proposed rules for the Medford AQMA.

Department Activity

1. Promulgation of particulate regulations for the Medford-Ashland Air Quality Maintenance Area are expected shortly. These regulations as proposed would require several of the MDF Plant discharge points to be further controlled.
2. The original projected date for adoption of these particulate regulations of July 1, 1977 was not achieved.
3. A number of inspections of the source have been made and a Notice of Violation was issued on October 6, 1977 relative to failure to report an upset condition.
4. The Department is working in conjunction with Medford Corporation in evaluating each discharge point at the MDF Plant with regards to uncontrolled or abnormally heavy discharges during upset conditions and how these emissions may best be controlled. A plantsite housekeeping program is also requested of Medford Corporation. The preliminary evaluation report is due from Medford Corporation by December 31, 1977.

SUMMATION

1. A group of 400 citizens has submitted a petition to the Department stating that control facilities and the Air Contaminant Discharge Permit issued to the Medford Corporation Medium Density Fiberboard Plant are not adequate to prevent nuisances.
2. Particulate fallout originating primarily from the Medium Density Fiberboard Plant has a detrimental influence on the quality of life of nearby residents and commercial activity. Citizens have voiced on several occasions their concerns to the Department of the nuisance caused by the particulate fallout.

3. The particulate matter originating from the MDF Plant creates soiling around and in homes and businesses.
4. For some persons, the particulate matter causes respiratory distress or irritation of eyes, nose and/or throat.
5. Medford Corporation has been cooperative and responsive in the installation of air contaminant abatement equipment during 1976, achieving emission reduction from 200 lbs./hour to 38 lbs./hour at this time.
6. Proposed particulate regulations for the Medford-Ashland AQMA would require further reduction of particulate discharge from the MDF Plant. The new rule will require a control efficiency of 80% for both dryers. Two forming head cyclones are projected to be controlled by baghouses.
7. The Department and the Medford Corporation are evaluating upset conditions and fugitive emissions from the MDF Plant. Current regulations allow the Department to require compliance schedules and programs to control fugitive emissions and problems resulting from upset conditions. Heretofor, upset conditions and fugitive emissions have not been an identified part of the planned control strategy intended to eliminate or control the sources of particulate emissions.

DIRECTOR'S RECOMMENDATION

The Director recommends, with due consideration being given to the information received at this meeting, that:

1. The regional staff continue close surveillance of the plant site emissions.
2. Upon receipt and evaluation of the December 31, 1977 report from Medford Corporation that the Department develop a compliance schedule with increments of progress for incorporation with the Air Contamination Discharge Permit, a program for control of upset discharges and fugitive emissions.
3. Upon adoption of the special rules for particulate emissions, sources contributing to the nuisance problem be given highest priority in review and acceptance of control proposals so that these sources are controlled at the earliest practicable date.

Michael Downs
for
WILLIAM H. YOUNG

Attachment: (Figure 1, map of North Medford)
11/28/77 letter from Esther Jensen
First page of petition
11/21/77 Advisory Committee Minutes

Dennis Belsky:lb
(503)776-6010
December 8, 1977

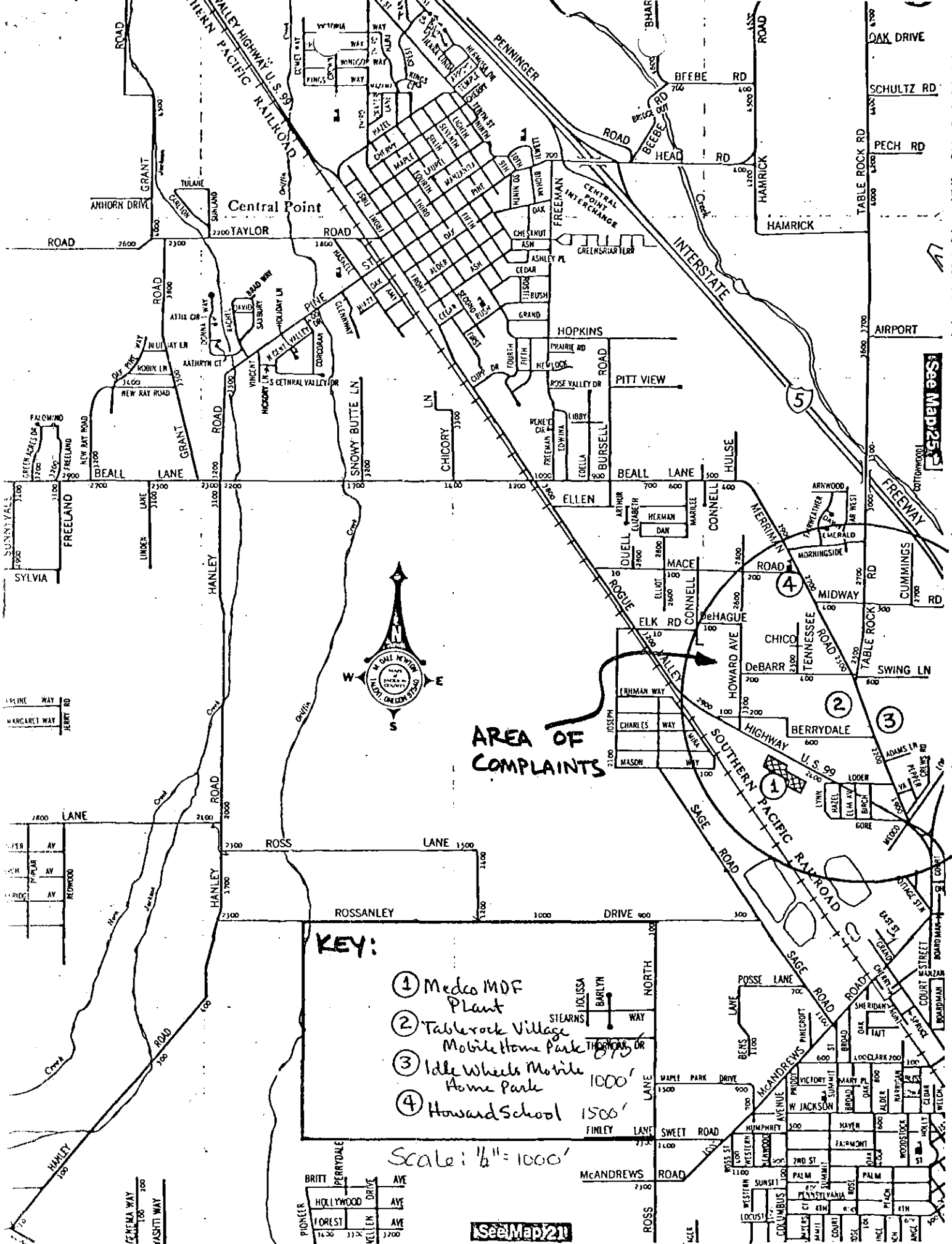


Figure One

DEPARTMENT OF PLANNING & DEVELOPMENT

November 28, 1977

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
R E C E I V E D
NOV 29 1977

OFFICE OF THE DIRECTOR

Mr. William Young, Director
Dept. of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205

Dear Mr. Young:

Enclosed are copies of the minutes of the November 21, 1977 meeting of the Medford-Ashland Air Quality Advisory Committee and the petition discussed on pp. 4 and 5 of the minutes.

The Committee agreed that the petition was a result of a legitimate long-termed, frustrating complaint of those people living in the neighborhood of the fiberboard plant. There is evidence of adverse health effects from the large amount of fibrous emissions from the plant and no question that the nuisance conditions are excessive. The petition was presented to the Committee as a court of last resort, for they have held many meetings, inquiries and appeals extending over several years with no improvement of living conditions.

It is the recommendation of the Committee that the Department of Environmental Quality consider the matter urgent and that the Committee be informed of any action concerning it. We are interested also in the cause of the recurring upsets (three in a month) at the plant.

Sincerely,



ESTHER JENSEN, CHAIRMAN
Medford-Ashland Air Quality
Area Maintenance Advisory Committee

EJ:jc

cc: Carol Doty, Jackson County Board of Commissioners
Joe B. Richards, Chairman, Environmental Quality Commission

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
R E C E I V E D
NOV 29 1977

AIR QUALITY CONTROL

NOVEMBER 16, 1977

WE, THE UNDERSIGNED, ARE CONCERNED THAT THE POLLUTION CONTROL FACILITIES AND THE PERMIT CONDITIONS FOR THE MEDOO M D F PLANT ARE NOT ADEQUATE TO PREVENT NUISANCE TO LOCAL RESIDENTS. WE REQUEST A DEPARTMENT OF ENVIRONMENTAL QUALITY HEARING ON THIS MATTER.

NAME	ADDRESS
Bette L. Cline	2786 Howard Ave, Medford
Patricia E. Peck	2786 Howard Ave, Medford
Theodore S. Peck	224 MACE RD MEDFORD
Mrs Helma Butterfield	234 Mace Rd. Medford
Mrs Steve Rietmann	251 Mace Rd. Medford
Urela A. Bradford	233 Mace Rd, Medford
J. J. Bradford	233 Mace Rd., Medford
M. H. Hall	2817 Howard ave.
Rosezella Hall	2817 Howard ave
L. Roy Lilio	1421 Euclid ave -
Reina Sartori	2772 Howard ave.
Martha Simpson	2763 Howard ave
Luvida M. Peck	2252 Table Rock Rd. Medford

**ADDITIONAL SIGNERS OF PETITIONS
ARE ON FILE WITH THE DEPARTMENT**

MEDFORD-ASHLAND AIR QUALITY MAINTENANCE AREA ADVISORY COMMITTEE

MINUTES: NOVEMBER 21, 1977

P.1

Members Present: Esther Jensen; Eleanor Bradley; Gary Grimes; Patricia Kuhn; James Dunn; Bruce Shaw; Doug Roach; Debie McFadden; Robert DeLong, alternate for Richard Howsley; Kerry Lay; Bob Bowlus, alternate for Kay Alsing; Lou Hannum; Julius Courtney, alternate for Bob Lichlyter.

Members Absent: Charlene Mitchell; Don Moody; Roger Wilkerson; Richard Howsley; Hugh Jennings; Dean Phelps; Kay Alsing; Eberhard Engelmann; Bob Lichlyter.

Guests: Patricia Peck; Bette Cline; LuNida Reck; J.E. Hansen; Lynn Newbry, Medford Corporation; Carole Madison; James Madison; William Maude; Stan Hobbs; Earl Clough; Ellsworth McCamman; Diane Meyer, Sierra Club; Lynn Ryder, Medford Mail Tribune; H.E. Jacquor; Gary Shaffer; Don Foate; Helen Foate; Celia Welch, KMED; Larry Gill, Medford Corporation; Dennis Belsky, DEQ; Carol Doty, County Commissioner; John Forsyth; Delbert Preslar; George Archer; Martin Craine, SOTIA; David McFadden; Virginia Vogel, City Councilwoman; Beatrice Hanlon; K.G. Borchgrevink; Doug Baxter; John Manwaring, Jackson County Health Dept.; Eve Borchgrevink; Bud Hanlon; Brad Prior, Jackson County Dept. of Planning and Development; Merlyn Hough, DEQ.

The Medford-Ashland Air Quality Maintenance Area Advisory Committee met on Monday, November 21, 1977 at 7:00 p.m. in the Jackson County Courthouse Annex, Conference Room A.

Esther Jensen called the meeting to order.

Esther Jensen asked each of the Committee members to identify themselves and whom they represent. As the Committee members received the minutes of the November 7, 1977 meeting at this time, Esther Jensen suggested they be reviewed during the break time and she would call for a vote on their acceptance at the beginning of the second hour. Gary Grimes moved to suspend the rules and have the minutes presented during the second hour for Committee approval. The motion was seconded. Esther Jensen called for the vote. The motion carried.

Esther Jensen called the Committee members' attention to the fact that on December 16, 1977 a public hearing was scheduled to be held

in Medford before the Environmental Quality Commission regarding proposed air quality regulations and the recommendations of the Committee to the DEQ. She indicated it was to be held in the City Council Chambers at 9:30 a.m.

As the guests scheduled to speak at the next Committee meeting on December 5, 1977 would not be available that date, Esther Jensen asked for a motion to either have a meeting on the 5th or not to have the next meeting until the 12th, the first opportunity the speakers would be available. Doug Roach moved to suspend the meeting until the 12th of December; Gary Grimes seconded the motion. Esther Jensen called for the vote. The motion carried.

As there was no further business to be discussed, Esther Jensen introduced the two guests from Medford Corporation, Lynn Newbry and Jack Hansen. Mr. Newbry identified their responsibilities for Medford Corporation for the guests and Committee members. He thanked the Committee for their invitation to come to the meeting and called for any questions the Committee members or guests may have. Esther Jensen asked Merlyn Hough to clarify for the guests the particular phase of the Medford Corporation operation that they were concerned with. Merlyn Hough explained that of Medford Corporation's three plants, the concerns expressed had been with the Medium Density Fiberboard Plant. In response to a question from Esther Jensen, Merlyn Hough explained that the air contaminant discharge permit under which Medford Corporation operates was issued by the Department of Environmental Quality. Esther Jensen briefly provided some background information into Medford Corporation's procedure for obtaining zoning clearance for the MDF Plant and the subsequent permit from DEQ. Lou Hannum gave some background information on issuance and contents of the zone change and building permit issued to Medford Corporation. He read a section from a 1972 DEQ memo reviewing the proposed Fiberboard Plant: "No adverse effects on the environment are expected since the facility will have no wastewater discharges except to the sanitary sewer. All air emission points will be controlled using highest and best technology. No solid waste problem will be created since all reject board will be recycled back through the process." Merlyn provided some information regarding the emission control devices which are used at the MDF Plant and the permissible emissions allowed under permit conditions. With that, Esther Jensen opened the meeting for discussion and questions by Committee members.

Eleanor Bradley asked what goes wrong with the operation. Mr. Newbry explained that many factors may contribute to an upset condition occurring, among them being inexperience with process, detecting equipment, and cyclone malfunctions. A question was raised as to differential rates of production on shifts. Mr. Newbry indicated that production rates are not altered for particular shifts.

He further provided some background information into the material utilized at the plant and the operational process, and that it is environmentally beneficial to run the plant on a 24-hour basis as there is less chance of complications than if it were shutdown and re-started. He also offered that during and before construction of the MDF Plant, it was reviewed by Medford Corporation and DEQ and determined by both entities to be environmentally sound and that since initial start up of the MDF Plant, the air handling equipment has been re-designed. Particulate emissions have been reduced from 131 pounds per hour to 37.78 pounds per hour. In response to a question raised by Dr. Dunn, both Newbry and Hansen indicated that Medco is involved in self-monitoring processes through a third party. Mr. Hansen further stated that a test was just being completed. Esther Jensen asked why, in light of Medford Corporation's efforts to control visible emissions, the problem seems to be more substantial at the present time. Lynn Newbry responded that it was hard for Medco to understand too as the high volume sampler installed at a nearby location indicated no reduction in emissions, yet two separate, well-qualified testers have shown that these sources have had a dramatic change in their emission levels. Dr. Dunn asked how often Medford Corporation initiates a self-monitoring program, and Jack Hansen responded that Medford Corporation is not required to provide this service at all and is undertaken purely for their own information. In response to a request by Gary Grimes, Jack Hansen elaborated on the automatic malfunction indicating equipment installed at the MDF Plant. Bruce Shaw inquired about what Medford Corporation's projections were for eliminating or at least alleviating the amounts of visible emissions currently expelled directly into the air at the MDF Plant. Mr. Hansen responded that the Company is working on the problem right now, but nothing could guarantee that upsets would be totally eliminated no matter what solution was reached. Patricia Kuhn asked the DEQ if, under known existing conditions, that permit would be granted today. Merlyn Hough responded that upsets by their nature are unpredictable and therefore upset frequency could not be accurately forecasted. Bruce Shaw opined that standby equipment (cyclone and/or baghouse) should be made available to contain upset emissions. In response to a concern expressed by Lou Hannum regarding information gained and any methods of eliminating the problem learned from these upsets, both representatives of Medco indicated that information derived from past experience has been beneficial in determining future process controls, both through incidents incurred at Medford Corporation and other similar operations. Pat Kuhn and Debra McFadden asked how hours of plant operation and rate of production have changed since startup and during source testing. Lynn Newbry indicated that the plant was operating at full production rate during source testing but not at the same number of shifts per week.

(In October, 1975 when the plant was tested at 131 pounds per hour, the plant was operating about 9 shifts per week [3 days]; in January, 1977 when the plant was tested at 38 pounds per hour the plant was operating about 15 shifts per week [5 days]; recently, the plant has been operating 20 shifts per week [almost 7 days]). Bob Bowlus related his experience in the chemical industry that graveyard shifts normally have more operational problems than other shifts. Dr. Dunn suggested that Medco invite outside consultants to advise them on emission control problems. Hansen and Grimes felt that they currently have the best people working on the problem.

Who?
Edu?

Esther Jensen then opened up the meeting for any comments or questions that the audience might have, asking them to identify themselves as they did so. Carole Madison asked DEQ how a permit was granted to locate inside the city limits with a populace like that of Medford, in light of known potential problems with industrial sources. Merlyn Hough responded that at the time the plans of the plant were reviewed, it was thought that the control equipment on the plant would prevent an environmental problem. She further inquired as to with the knowledge now available, could such a permit be issued to another industrial source today. Merlyn Hough indicated that such a request probably would not be approved in the original state and would require much more stringent controls. He added that Medford Corporation itself has been subjected to more stringent controls and have installed on several points the best pollution control devices available for this type of particulate matter (baghouses and scrubbers). Lynn Newbry added that one of the considerations in developing this plant was to alleviate a severe ongoing solid waste disposal problem, which had developed as the wigwam burners were phased out.

James Madison presented a petition signed by 386 people regarding the emission problem created by Medford Corporation. The petition reads as follows: "We, the undersigned, are concerned that the pollution control facility and the permit conditions for the Medco, MDF Plant are not adequate to prevent nuisance to local residents. We request a Department of Environmental Quality hearing on this matter." Mr. Madison requested that the petition be presented to the Committee for their followup with the DEQ. Esther Jensen accepted the petition for the Committee.

Bill Maude directed a question to Medford Corporation officials concerning implementation of the method of mixing with the wet particles; was it developed prior to late 1976. Jack Hansen indicated that it was prior to that. Mr. Maude asked what happened about last Thursday or Friday, as he noticed a reduction in particulate fallout in his residential area. Jack Hansen indicated that nothing had been changed.

Virginia Vogel, City Councilwoman, stated that she had many calls come in to her from people experiencing problems with the particulate fallout from the Medford Corporation MDF Plant and expressed her desire to see the Committee take a serious look at the problem and keep on top of progress made by Medford Corporation to deal with it.

Don Foate and his wife Helen who reside at 2252 Table Rock Road commented on the fact that Mrs. Foate experiences aggravated coughing when the particulate fallout is heavy and that they know of several other people who had left the area because of respiratory difficulties experienced in direct association with the particulate problem. Mr. Foate felt that something should be done to preserve the health of those persons living in that area.

Douglas Baxter also expressed concern that the problem be resolved to alleviate aggravated symptoms of persons who have respiratory difficulties (his son has asthma). These comments concluded that testimony offered by the audience.

In response to a question from Bob Bowlus, Jack Hansen indicated that particle sizing was part of the source testing procedure. Esther Jensen asked if the results of the most recent test could be made available to the Committee. Mr. Hansen agreed to make the information available to the Committee as soon as it was received. Lynn Newbry thanked the Committee again for their invitation to attend their meeting and reiterated Medford Corporation's constant efforts in trying to come up with a solution to the problems of the MDF Plant.

The Committee recessed for a ten minute break to read the minutes of the November 7, 1977 meeting. Upon reconvening, Esther Jensen asked if there were any additions or corrections to the minutes. Eleanor Bradley moved that they be accepted as presented; Bruce Shaw seconded the motion. Esther Jensen called for the vote. The motion carried.

Esther Jensen inquired of the Committee as to the disposition of the petition presented that evening. After some discussion among Committee members, Merlyn Hough suggested that the petition be either presented to the Board of Commissioners and/or the Director of DEQ, since they were jointly involved in appointing the Committee. He felt that it might be more appropriately submitted to the DEQ Director. Dr. Dunn suggested that the petition be submitted with a summary cover letter from the Committee. Gary Grimes suggested that the petition be sent along with a copy of the meeting's minutes. Eleanor Bradley moved that a transmittal letter from the Committee accompany the petition to DEQ that would be supportive of the petition with copies sent to the EQC members and the County Commissioners. Patricia Kuhn seconded the motion. After some discussion, the Committee decided to let Chairman Jensen develop the cover letter to accompany the petition. Chairman Jensen called for the vote on the motion before the Committee.

Three points were clarified in the ensuing discussion:

1. Merlyn Hough reviewed the steps taken in 1976 to minimize nuisance problems related to the Medco fiberboard plant (recognizing, however, that the problem was obviously continuing). Three public meetings had been held in the north Medford area. The Medco permit was modified to include three compliance schedules: one required Medco to install a scrubber on the core fiber dryer, another required Medco to control several emission points with baghouses and the third required Medco to outline their plan for controlling several other sources. Medco implemented the third compliance schedule by rerouting airstreams and eliminating emission points or connecting former emission points to the new baghouses.
2. Doug Roach asked that Medco's efforts to reduce local solid waste problems (by constructing the plant) be recognized.
3. Esther Jensen and Lou Hannum reviewed the fact that consideration by the Medford Planning Commission and Council in 1973 had been hurried, but not illegal. Lou Hannum read the letter from Medco to the City asking for expeditious review for various financial reasons.

With no further discussion, Esther Jensen again called for the vote on the motion before the Committee. The motion carried.

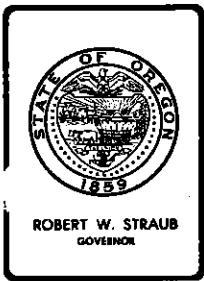
Esther Jensen brought to the Committee's attention that the proposed control strategies will not be discussed if the next meeting isn't to be until December 12, 1977 unless they encroach on the guests scheduled for that meeting. Eleanor Bradley added that with the next meeting scheduled for the 12th and the public hearing scheduled for the 16th, the next opportunity to meet and discuss the proposed control strategies would be after the first of the year. In light of this, Patricia Kuhn moved that the meeting scheduled for December 5, 1977 be reinstated to discuss the proposed rules. Dr. Dunn added that he felt the Committee was obligated to review the proposed control strategies and present their opinion of them. The motion was seconded. Esther Jensen called for the vote. The motion carried. The next meeting will be December 5, 1977 at 7:00 p.m., place yet to be determined (possibly the Courthouse Annex, Conference Room A).

With no further business to be conducted, the meeting was then adjourned.

Respectfully submitted,

Francine Stenerodden

Francine Stenerodden
Branch Secretary



Environmental Quality Commission

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

To: Environmental Quality Commission
From: Director
Subject: Addenda to Agenda Item G, EQC Meeting, December 16, 1977
Letters Regarding Medco

The attached letters have been received regarding Medco's emissions. They contain requests to be included in the Commission's record of this matter.

Receipt of these letters has been acknowledged.

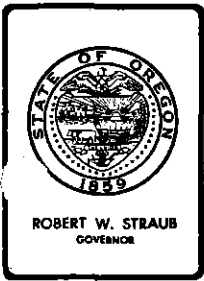
Bill

Director

cc: Southwest Region Office

F.A.Skirvin:lb 229-6414
12/12/77
Attachments: 9 Letters





Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229-6414

December 13, 1977

Ms. Patricia E. Peck
2786 Howard Avenue
Medford, Oregon 97501

Dear Ms. Peck:

This acknowledges receipt of your December 9, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

I was advised by DEQ personnel in Medford that a response to your earlier letter is on its way. The Department apologizes for the response not being more timely.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



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December 9, 1977

Dept. of Environmental Quality
1234 S.W. Morrison Street
Portland, OR 97205

Dear Director:

This letter is being written in regards to the Medco fiber board plant pollution problem in this area. I understand that you are holding a meeting here on December 16th regarding this problem.

I am requesting that this letter be entered in the minutes of this meeting.

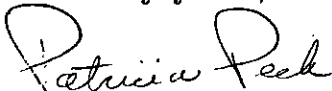
I have previously written to the local DEQ on this problem. See attached letter. I even sent them a small envelope full of particles I had scrapped off my windshield one morning. I have not as yet received an acknowledgement of my letter.

We have a continuing problem with "fallout" from their plant. It is very visable. Sometimes it looks like it is snowing outside. Practically every morning there is a coating of the light brownish fiber dust on the cars and on top of the water in our fish pond. When I wrote my original letter, Medco had apparently just experienced one of several equipment failures causing unusually high levels of this pollution. There is, however, a daily problem to a lesser degree.

There are several people in my immediate neighborhood who suffer from respiratory problems that seem to be directly related to the pollution level of the day. Anything this visable can't keep from being a health hazzard, as you know, we are all breathing in this pollution also.

There were 400 people who signed the petitions requesting a hearing on Medco's discharge permit, when only 10 were required to make this request. Is any of this going to do any good?

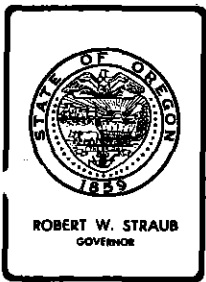
Sincerely yours,



Patricia E. Peck
2786 Howard Avenue
Medford, OR 97501

Technical Programs Office
Dept. of Environmental Quality
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DEC 12 1977



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229-6414

December 13, 1977

Mr. C. Ivan Burton
2253 Table Rock Road, Sp. 217
Medford, Oregon 97501

Dear Mr. Burton:

This acknowledges receipt of your recent letter regarding air pollution due to Medford Corporation and Timber Products which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office

To the attention of the Director of Department of Environmental Quality for the State of Oregon

Director-William Young
1234 S. W. Morrison
Portland, Oregon

Dear Sir:

I wish to have the following protest entered in the minutes of the E. Q. C. meeting at Medford, Oregon Friday December 16th.

As you know, we have laws prohibiting driving while drinking and the taking the life of another person or persons with firearms, knives or by any other means.

Although gradual in its effects, surely the pollution from Medford Corporation and Timber Products presents as great a threat to human health, life and property as drunk driving or the illegal use of firearms, yet they have never been fined for their obvious failure to meet basic health requirements.

Unquestionably human lives are not less valuable if taken slowly by pollution than those caused instantly by a drunk driver or a person using a firearm.

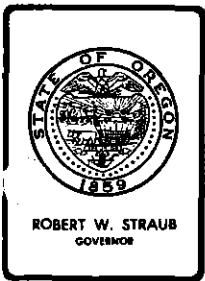
Why spend the tax payers money for the Department of Environmental Quality if the authority vested in it is not exercised?

In my opinion, the operations of the offending corporations should be closed down until these requirements are met because they certainly have had ample time to have already made these necessary corrections.

Yours very truly,

William Young

Technical Programs Office
Dept. of Environmental Quality
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DEC 12 1977



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229- 6414

December 13, 1977

Roy F. and Bernice Hewitt
295 DeBarr Avenue
Medford, Oregon 97501

Dear Mr. & Mrs. Hewitt:

This acknowledges receipt of your December 8, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



Contains
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December 8, 1977
Medford, Oregon

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

Attn: Director

Dear Sir:

We wish to have this letter entered into the minutes of the DEPARTMENT OF ENVIRONMENTAL QUALITY meeting of December 16, 1977, to be held at the Medford City Hall, in Medford, Oregon.

Living conditions in this area are menaced by the fallout. It is EXTREMELY dirty - porches, bushes, flowers and trees are covered with a heavy coating of soot, which is BLACK, fine dust and wood fibre. Also, consider the conditions as they now exist a menace to our own health, and in general the Medford Particle Board mill is a nuisance. Impossible to do any painting on ones homes. Last but not least is the noise which goes on twenty four hours of the day and night.

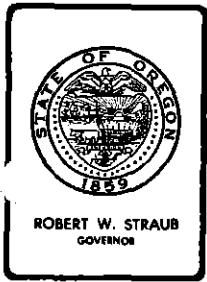
Also, drifts into the houses and we find a thin film of this dirt inside on things.

Yours very truly,

Bernie Hewitt 295 De Ball Medford
Name Address

Roy J. Hewitt 295 De Barranc Medford
Name Address

Technical Programs Office
Dept. of Environmental Quality
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DEC 12 1977



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229- 6414

December 13, 1977

Lester and Marian Wilson
220 Berrydale
Medford, Oregon 97501

Dear Mr. & Mrs Wilson:

This acknowledges receipt of your December 9, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



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Dec 9, 1977

D. F. O

1234 S. W. Morrison St
Portland, Ore 97205

Attn: Director

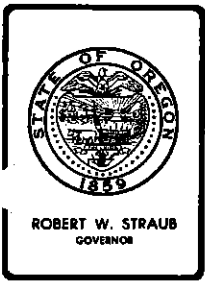
Technical Programs Office
Dept. of Environmental Quality
RECEIVED
DEC 12 1977

Dear Sir

For more than two years we have had to contend with the pollution and fall out from the Medco Particle Board mill. We want this cleaned up. Want clean air to breath, clean Porches, sidewalks, clean plants and trees and cars. We feel the pollution is a definite hazard to our health. We can't work in our yards because of the fall out and dirty condition. It's a fine black film with fiber - varies from time to time - depends on the direction of the winds, covers everything - even sifts indoors.

Having lived here more than 20 years, we never had any dirt and pollution like this until medco's new mill opened. Conditions have cleared up a trifle in last few days but is still too dirty. Can clean Porches twice a day. You carry this sooty black stuff on your feet into your homes, on your rugs & floors. Incorporate into minutes of meeting Dec 16-77.

- Lester Wilson 220 Berrydale Medford
- Mona Wilson 220 Berrydale - Medford
- Elva Morgan 219 Berrydale
- Ernest Morgan 214 Berrydale Medford



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229- 6414

December 13, 1977

Kenneth and Clara Morgan
219 Berrydale
Medford, Oregon 97501

Dear Mr. & Mrs. Morgan:

This acknowledges receipt of your December 9, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

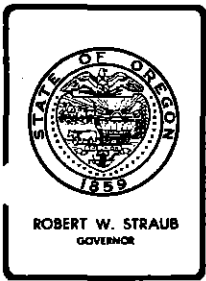
Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

William H. Young
WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229- 6414

December 13, 1977

Goldy Boyd
292 Berrydale Avenue
Medford, Oregon 97501

Dear Goldy Boyd:

This acknowledges receipt of your December 8, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

William H. Young
WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office

TECHNICAL PROGRAMS
Dept. of Environmental Quality

RECEIVED

Nov. 8 - 1977

DEC 12 1977

Dept of Environmental Quality,
12374 S.W. Morrison St.
Portland, Ore
97205

Attention Director.

Dear Sir:

We wish to have this letter entered into the minutes of the Dept. of Equality. The meeting to be Dec 16 - 77. to be held at Medford City Hall in Medford, Ore.

Living condition in this district near the Medco plywood plant. The houses trees bushes, cars, porches are covered by fall out from this plant. We feel it is detrimental to health.

It's dust sifts even into the houses. on rego-furniture

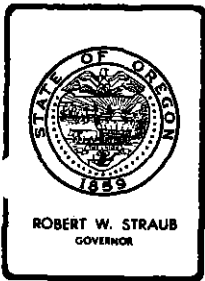
this has gone on ever
since this new plant
was put in 2 years ago.

We believe this should
be looked into.

Some times it is just
like sawdust being
blown around.

as ever.

Goldy Boyd.
292 Berrydale Ave
Medford, Ore
97501



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229-6414

December 13, 1977

Mrs. Paul Robertson
534 Berrydale Avenue
Medford, Oregon 97501

Dear Mrs. Robertson:

This acknowledges receipt of your December 9, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



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Dept. of Environmental Quality

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DEC 12 1977

534 Berrydale Ave.

Medford, Oregon

Dec. 9, 1977

Dept. of Environmental Quality

1234 S.W. Morrison St.

Portland, Oregon, 97205

Dear Sirs:

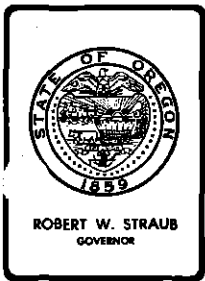
I wish to have this letter entered into the minutes of the DEQ meeting at the Medford City Hall on Dec. 16, 1977.

My concern is in regard to the air pollution coming from Medford Corporation's Particle Board Plant on N. Pacific Highway, Medford.

I have made my home here since June, 1938 and, even with the wigwam business we had back then, we never had anything to compare with the dirty black dust and fiber particles we are getting since this plant went into operation 2 1/2 yrs ago.

You are no doubt aware that Medford has been determined to be one of the worst places in the nation for potential air pollution, due to air invasions and poor air circulation. I understand you are authorized to ban open public burning when weather conditions indicate poor air quality may result. Why isn't there also a ban on the Particle Board Plant? They keep right on operating regardless of fog and air invasions. The limits set are not adequate to take care of the problem, and to permit them to continue operating under these conditions, until Jan. 1, 1981 is increasing the already existing health hazard. We need help NOW - not years from now.

Mrs Paul Robertson
534 Berrydale Ave. Medford, Or. 97501



Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229- 6414

December 13, 1977

Mr. Gerald Moore
204 Berrydale Avenue
Medford, Oregon 97501

Dear Mr. Moore:

This acknowledges receipt of your December 8, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

William H. Young
WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



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Dec 8 '77

Dept of Environmental Quality
1234 S. W. Morrison Str
Portland, Or 97205

Attn: Director:

Dear Sir:

I want this pollution from the Medco
Particle Board mill stopped. Damaging to our property in
this part of Medford. Menace to our health. Covers
plants, trees, porches, etc with a film of black soot, and
is just plain dirty.

I had to close up my NEW swimming pool
which I had built this summer, because of the pollution
problem.

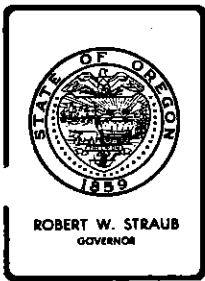
Yours truly,


Name


Address

P. S. I want this letter incorporated into the minutes of the
meeting of the D. E. Q. to be held in Medford, Oregon, at the
City Hall, on December 16, 1977, at 9:30 A. M.

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Department of Environmental Quality

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 Telephone (503) 229- 6414

December 13, 1977

Irvin and Ruth Hall
255 Barr Avenue
Medford, Oregon 97501

Dear Mr. & Mrs. Hall:

This acknowledges receipt of your December 8, 1977 letter which will be included in the Environmental Quality Commission's record as requested.

We are aware of both the daily fallout problem and those problems coincidental to upsets at Medco. Please be assured that both situations are being worked on. The solutions are not expected to occur overnight but they will occur.

Your interest in this matter is well understood and your efforts are greatly appreciated.

Sincerely,

WILLIAM H. YOUNG
Director

FAS:1b

cc: Southwest Region office
cc: Medford Branch Office



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December 8, 1977
Medford, Oregon

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

Attn: Director

Dear Sir:

We wish to have this letter entered into the minutes of the DEPARTMENT OF ENVIRONMENTAL QUALITY meeting of December 16, 1977, to be held at the Medford City Hall, in Medford, Oregon.

Living conditions in this area are harassed by the fallout. It is EXTREMELY dirty - porches, bushes, flowers and trees are covered with a heavy coating of soot, which is BLACK, fine dust and wood fibre. Also, consider the conditions as they now exist as a menace to our own health, and in general the Medford Particle Board mill is a nuisance. Impossible to do any painting on ones homes. Last but not least is the noise which goes on twenty four hours of the day and night.

Also, drifts into the houses and we find a thin film of this dirt inside on things.

Yours very truly,

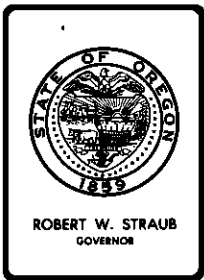
Irvin E. Hall
Name

255 De Barr
Address

Ruth E. Hall
Name

255 De Barr Ave
Address

Technical Programs Office
Dept. of Environmental Quality
RECEIVED
DEC 12 1977



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 No. H, December 16, 1977, EQC Meeting
City of Cannon Beach Extension of Time Schedule to Adopt
Facility Plan Report

Background

1. The Commission issued an Order on October 21, 1977, to the City of Cannon Beach to upgrade the sewage treatment facilities (see Attachment No. 1).
2. A draft facility plan report was prepared in March 1976 and studied three (3) conventional treatment alternatives:
 - a. Lagoon treatment and algae removal through chemical treatment.
 - b. Lagoon treatment and Phase Isolation Ponds.
 - c. Lagoon treatment with an ocean outfall.
3. Between March 1976 and May 1977, the City had been evaluating the above alternatives and formed a Sewer Advisory Committee for this task.
4. In May 1977, the City Council requested the Consulting Engineer to prepare a supplementary report incorporating the following new alternatives:
 - a. Enlarge the lagoon system to provide complete summer holding.
 - b. Construct a new biological treatment system with sand filtration for summer discharge.

After an initial review the Engineering Firm discarded the lagoon enlargement alternative and prepared a supplement report dated September 20, 1977, comparing construction of a biological treatment system with sand filtration and lagoon treatment with algae removal through chemical addition and sand filtration.



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5. On June 27, 1977, DEQ staff met with Cannon Beach to review a draft Stipulated Consent Order requiring that the facility plan report be adopted by December 31, 1977. The Mayor and City Council agreed to the compliance schedule and signed the Stipulated Consent Order on September 21, 1977.
6. An Environmental Assessment Hearing was held on September 21, 1977, in Cannon Beach to review the supplement to the facility plan report. The Sewer Advisory Committee publicly stated they did not like the conventional approach taken toward waste treatment design recommendations and wanted the City to explore the use of nonmechanical/low energy consumption systems, such as aquaculture and artificial marsh treatment.
7. On November 1, 1977, Cannon Beach enlisted the service of a new Consulting Firm to study the following nonmechanical/low energy alternatives for upgrading the existing treatment plant:
 - a. Lagoon system with intermittent sand filtration.
 - b. Lagoon system with artificial marsh treatment.
 - c. Lagoon system with aquaculture ponds and intermittent sand filtration.
 - d. Lagoon system with aquaculture ponds and artificial marsh.

Evaluation

1. The existing 3-cell lagoon system is designed for an average flow of 220,000 gallons per day and a population of 2,200 full-time residents.
2. The existing facility is loaded to design capacity during summer months and must discharge to Elk Creek on an intermittent basis during summer months.
3. The facility cannot meet the summertime discharge effluent limits of 10 mg/l for Biochemical Oxygen Demand (BOD 5-day) and Total Suspended Solids as required in the River Basin Water Quality Management Plan (OAR 340-41-215(1)(c)).
4. The existing Order requires the City to adopt and have certified a completed facility plan report and Step II Grant application by December 31, 1977.
5. The City has contracted a new Consulting Firm and is having additional nonmechanical/low energy treatment alternatives studied. The consulting firm proposes to have the final report submitted by March 7, 1978, and the Step II Grant application submitted by March 14, 1978.
6. Cannon Beach is No. 93 on the FY 1978 Grant Priority List for Step II funding. The City will probably not obtain Step II funding in this fiscal year.

Summation

1. The City of Cannon Beach is not able to comply with the first compliance date in the Order requiring certification of a completed facility plan report and submittal of Step II Grant application by December 31, 1977.
2. The City of Cannon Beach has requested a three (3) month extension to study additional nonmechanical/low energy consumptive waste treatment alternatives (see Attachment No. 2).
3. Staff considers these new alternative treatment schemes using aquaculture and artificial marsh as experimental in nature and cannot comment on their potential operating success until additional information is available.
4. Staff believes the City is sincere in trying to provide the most environmentally sound treatment alternatives for upgrading their treatment system.
5. Staff believes an extension to March 31, 1977, should be granted for submittal of a proper and complete facility plan report and Step II Grant application.

Director's Recommendation

The Director recommends that the Order signed at the October 21, 1977 EQC Meeting be revised by substituting the following language in Item A(1)(a) on page 3 of the Order: "Submit proper and complete facility plan report and Step II Grant application by March 31, 1978."

Bill

WILLIAM H. YOUNG

MMT/kz
842-6637
12/1/77

Attachments:

1. DEQ v. City of Cannon Beach Stipulation and Final Order No. WQ-SNCR-77-212.
2. Two (2) City of Cannon Beach letters dated November 16, 1977.
3. Proposed amendment to Order No. WQ-SNCR-77-212.

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

2 OF THE STATE OF OREGON

3 DEPARTMENT OF ENVIRONMENTAL QUALITY,
4 of the STATE OF OREGON,

5 Department,

6 v.

7 CITY OF CANNON BEACH,

8 Respondent.

STIPULATION AND FINAL ORDER
WQ-SNCR-77-212
CLATSOP COUNTY

9 W H E R E A S

10 1. The Department of Environmental Quality ("Department") will soon issue
11 National Pollutant Discharge Elimination System Waste Discharge Permit ("Permit")
12 Number _____ (to be assigned upon issuance of the Permit) to the CITY OF CANNON
13 BEACH ("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and the
14 Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500. The Permit
15 authorizes the Respondent to construct, install, modify or operate waste water
16 treatment, control and disposal facilities and discharge adequately treated waste
17 waters into waters of the State in conformance with the requirements, limitations
18 and conditions set forth in the Permit. The Permit expires on September 30, 1982.

19 2. Condition 1 of Schedule A of the Permit does not allow Respondent to exceed
20 the following waste discharge limitations after the Permit issuance date:

Parameter	Average Effluent Concentrations		Effluent Loadings			
	Monthly	Weekly	Monthly Average	Weekly Average	Daily Maximum	
	kg/day	kg/day	(lb/day)	(lb/day)	kg	(lbs)
May 20 - Sept 19:	No discharge without written permission from the Department					
Sept 20 - May 19:						
BOD	30 mg/l	45 mg/l	86	{184}	128	{282}
TSS	50 mg/l	80 mg/l	142	{312}	129	{282}
					170	{376}
					284	{624}

21 3. Respondent proposes to comply with all the above effluent limitations of

1 its Permit by constructing and operating a new or modified waste water treatment
2 facility. Respondent has not completed construction and has not commenced operation
3 thereof.

4 4. Respondent presently is capable of treating its effluent so as to meet
5 the following effluent limitations, measured as specified in the Permit:

6 Effluent Loadings

7	Average Effluent	Monthly	Weekly	Daily					
8	Concentrations	Average	Average	Maximum					
8	<u>Parameter</u>	<u>Monthly</u>	<u>Weekly</u>	<u>kg/day (lb/day)</u>	<u>kg/day (lb/day)</u>	<u>kg</u>	<u>(lbs)</u>		
9	May 20 - Sep 19	No discharge without written permission from the Department							
9	Sep 20 - May 19	45 mg/l	60 mg/l	128	(282)	190	(376)	256	(562)
		60 mg/l	90 mg/l	170	(376)	256	(562)	340	(752)

10

11 5. The Department and Respondent recognize and admit that:

12 a. Until the proposed new or modified waste water treatment
13 facility is completed and put into full operation,
14 Respondent will violate the effluent limitations set
15 forth in Paragraph 2 above the vast majority, if not all,
16 of the time that any effluent is discharged.

17 b. Respondent has committed violations of its NPDES Waste
18 Discharge Permit No. 1721-J and related statutes and
19 regulations. Those violations have been disclosed in
20 Respondent's waste discharge monitoring reports to the
21 Department, covering the period from August 30, 1974
22 through the date which the order below is issued by the
23 Environmental Quality Commission.

24 6. The Department and Respondent also recognize that the Environmental
25 Quality Commission has the power to impose a civil penalty and to issue an abatement
26 order for any such violation. Therefore, pursuant to ORS 183.415(4), the Department

1 and Respondent wish to resolve those violations in advance by stipulated final
2 order requiring certain action, and waiving certain legal rights to notices,
3 answers, hearings and judicial review on these matters.

4 7. The Department and Respondent intend to limit the violations which this
5 stipulated final order will settle to all those violations specified in Paragraph
6 5 above, occurring through (a) the date that compliance with all effluent limita-
7 tions is required, as specified in Paragraph A(1) below, or (b) the date upon which
8 the Permit is presently scheduled to expire, whichever first occurs.

9 8. This stipulated final order is not intended to settle any violation of
10 any effluent limitations set forth in Paragraph 4 above. Furthermore, this stipulated
11 final order is not intended to limit, in any way, the Department's right to proceed
12 against Respondent in any forum for any past or future violation not expressly
13 settled herein.

14 NOW THEREFORE, it is stipulated and agreed that:

15 A. The Environmental Quality Commission shall issue a final order:

16 (1) Requiring Respondent to comply with the following schedule:

17 (a) Submit proper and complete facility plan report and
18 Step II grant application by December 31, 1977.

19 (b) Submit complete and biddable final plans and specifi-
20 cations and a proper and complete Step III grant
21 application within ten (10) months of Step II grant
22 offer.

23 (c) Complete construction within fifteen (15) months of
24 Step III grant offer.

25 (d) Demonstrate compliance with the final effluent limita-
26 tions specified in Schedule A of the Permit within

1 30 days of completing construction.

2 (2) Requiring Respondent to meet the interim effluent limitations set forth
3 in Paragraph 4 above until the date set in the schedule in Paragraph A(1) above for
4 achieving compliance with the final effluent limitations.

5 (3) Requiring Respondent to comply with all the terms, schedules and conditions
6 of the Permit, except those modified by Paragraph A(1) and A(2)

7 B. Regarding the violations set forth in Paragraph 5 above, which are expressly
8 settled herein, the parties hereby waive any and all of their rights under United
9 States and Oregon Constitutions, statutes and administrative rules and regulations
10 to any and all notices, hearings, judicial review, and to service of a copy of the
11 final order herein.

12 C. Respondent acknowledges that it has actual notice of the contents and
13 requirements of this stipulated and final order and that failure to fulfill any o
14 the requirements hereof would constitute a violation of this stipulated final order.
15 Therefore, should Respondent commit any violation of this stipulated final order,
16 Respondent hereby waives any rights it might then have to any and all ORS 468.125(1)
17 advance notices prior to the assessment of civil penalties for any and all such
18 violations. However, Respondent does not waive its rights to any and all ORS 468.135
19 (1) notices of assessment of civil penalty for any and all violations of this stipu-
20 lated final order.

21 DEPARTMENT OF ENVIRONMENTAL QUALITY

22
23 Date: OCT 12 1977 1977

24 By William H. Young
WILLIAM H. YOUNG
Director

25 ///

26 ///

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RESPONDENT

Date: 9-21 1977.

By Bruce M. Haskel
Name
Title Mayor

F I N A L O R D E R

IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: SEP 21 1977 1977.

By William H. Young
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

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BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

AMENDMENT OF THE)
OCTOBER 21, 1977,) F I N A L O R D E R
COMMISSION ORDER NO.)
WQ-SNCR-77-212 TO THE)
CITY OF CANNON BEACH)

WHEREAS the Commission finds the facts to be as follows:

1. The City of Cannon Beach is unable to submit a facility plan report and Step II grant application by December 31, 1977.
2. The City of Cannon Beach is studying alternative sewage treatment methods and will complete the study in a relatively short time period.
3. A time extension of three months will not result in a delay in the remaining time schedule set forth in Commission Order No. WQ-SNCR-77-212 because of the City's position on the FY 1978 Grant Priority List.

NOW THEREFORE, it is hereby ordered that Paragraph A(1)(a) of Stipulation and Final Order No. WQ-SNCR-77-212 to the City of Cannon Beach is amended as follows:

- A.(1)(a) Submit proper and complete facility plan report and Step II Grant application by March 31, 1977.

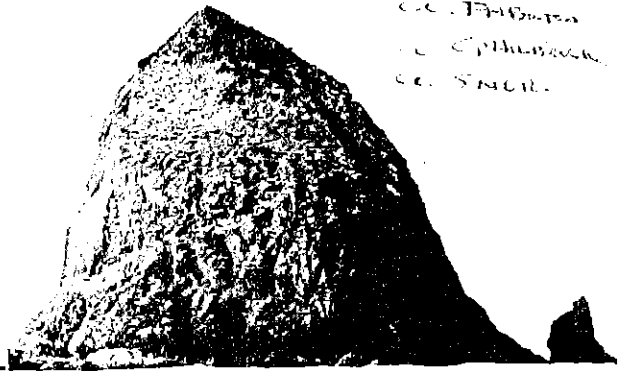
IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: _____

By _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

CITY OF CANNON BEACH



"The Beach of a Thousand Wonders"

November 16, 1977

CANNON BEACH,
OREGON 97110

Murray M. Tilson, North Coast Regional Director
Department of Environmental Quality
3600 East Third Street
Tillamook, Oregon 97141

Dear Murray:

The City of Cannon Beach, Oregon, respectfully requests an extension of the Stipulated Consent Order for Wastewater Treatment. The City upon examining the Facilities Plan Step I work completed to date, does not agree with the recommendations set forth by the engineer and has on its own chosen to research other possible alternatives. The City has executed a contract with Kramer, Chin and Mayo Environmental Associates, Corvallis Office, to conduct a study of possible non-mechanical alternatives to wastewater treatment.

The extension herein requested should reflect the time perimeter as designated in the contract with Kramer, Chin and Mayo which I have attached for your reference.

Very truly yours,

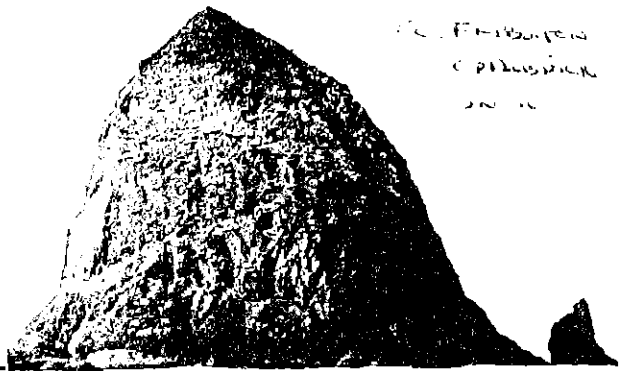
Bruce M. Haskell
by Russell Kinnison

Bruce M. Haskell
Mayor, City of Cannon Beach

BH:rd

Enclosure, (two)
Contract with KCM
Facilities Plan and Addendum CH2M Hill
copy to Al Goodman, EPA

CITY OF CANNON BEACH



"The Beach of a Thousand Wonders"

November 16, 1977

CANNON BEACH,
OREGON 97110

Murray Tilson, North Coast Regional Manager
Department of Environmental Quality
3600 East Third Street
Tillamook, Oregon 97141

Dear Murray:

The City of Cannon Beach, Oregon, has accepted the Facilities Plan as completed to date, but has not accepted the recommendations as included in the Addendum, feeling that the capital costs as well as the long range operating costs specified may well be beyond the real means of the people of Cannon Beach.

In searching for alternative solutions the City of Cannon Beach has chosen to utilize the efforts of Kramer, Chin and Mayo Environmental Associates and have entered a contract agreement with them at this time. The City in no way wishes that this action be construed to mean that the City is backing away from it's responsibilities of meeting the requirements of it's discharge permit. The City simply feels that it needs to look at what appear to be very viable alternatives to a mechanical treatment form. As you can tell from the contract we have attached to our letter requesting an extension of the time frame under our Stipulated Consent Order, the delay does not appear to be very significant. If, after examining these alternatives, we should determine that they do not meet with any acceptibility, nor acceptibility enough to be seriously considered by DEQ and/or EPA, then we would go forth as we have pledged to meet the time frame and conditions thereby to adopt formally and attempt to finance one of the Alternatives as set forth in the Facilities Plan and Addendum. Or, if feasible, to consider alteration of the Alternative chosen if some portion of KCM's work is acceptable as an intermidiate step of treatment.

The City Council of Cannon Beach is unanimous in its agreement to conduct this alternate search as are the majority of the people who have become aware of these non-mechanical alternatives. We hope that by now Kramer, Chin and Mayo have had an opportunity to explain and offer to you a more than brief detail of initial

Murray Tilson, North Coast Regional Manager
Department of Environmental Quality
3600 East Third Street
Tillamook, Oregon 97141

conversations and communications the scope of some of the non-mechanical alternatives.

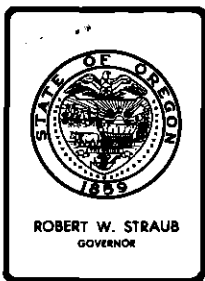
The City of Cannon Beach, or the Corvallis office of Kramer, Chin and Mayo, will continue to keep you abreast of our progress. As you can tell from our contract, again, the time frame is fairly short in nature and KCM feels very positive that they can complete their work in that time frame. The SSES work that is being done at this time is not yet complete, and we will be awaiting the results of the work to be attached to the Step I Facilities Plan work.

Any other information that we would be able to give you we will be happy to provide for you.

Sincerely,

Bruce M. Haskell,
Bruce M. Haskell *By Rosalie Himmick*
Mayor of Cannon Beach

BH:rd
Encl. (2)
KCM Contract
Facilities Plan and Addendum
copy to Al Goodman, EPA



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 No. 1, December 16, 1977 EQC Meeting

NPDES July 1, 1977 Compliance Date - Request for Approval of Stipulated Consent Orders for Permittees not meeting July 1, 1977 compliance deadline.

Background

The Department has been taking enforcement action against NPDES Permittees that are in violation of the July 1, 1977 deadline for achieving secondary treatment or implementing best practicable control technology currently available. That action has been by stipulated consent orders which impose a reasonably achievable and enforceable compliance schedule.

Summation

The Cities of Corvallis, Donald, Gold Hill, St. Paul and Winston are unable to consistently treat sewage to the required level of secondary treatment. The attached Consent Orders contain a time schedule for the orderly construction of new or modified waste treatment facilities and provide for interim treatment limitations. The Department has reached agreement with those Cities on the contents of the orders.

Director's Recommendation

I recommend that the Commission approve the following Consent Orders:

1. Department of Environmental Quality v. City of Corvallis, Stipulation and Final Order No. WQ-MWR-77-249.
2. Department of Environmental Quality v. City of Donald, Stipulation and Final Order No. WQ-SNCR-77-178.
3. Department of Environmental Quality v. City of Gold Hill, Stipulation and Final Order No. WQ-SWR-77-253.
4. Department of Environmental Quality v. City of St. Paul, Stipulation and Final Order No. WQ-SNCR-77-256.
5. Department of Environmental Quality v. City of Winston, Stipulation and Final Order No. WQ-SWR-77-252.

WILLIAM H. YOUNG *Bill*

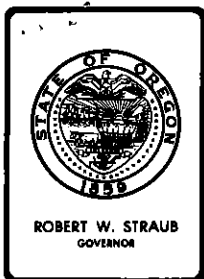


FMB:gcd

229-5372

December 6, 1977

Attachments: The above listed Stipulation and Final Orders are attached.



Environmental Quality Commission

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

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Amendment to Agenda Item No. 1, December 16, 1977.

NPDES July 1, 1977 Compliance Date - Requested for Approval
of Stipulated Consent Orders on Permittees not meeting July 1,
1977 compliance deadline.

The following consent orders were received after the Agenda Item No. 1 staff report was prepared. The Department has reached agreement with the Cities of Amity, Jefferson, and Wheeler on their consent orders. I recommended that the commission approve:

1. Department of Environmental Quality v. City of Amity, Stipulation and Final Order No. WQ-SNCR-77-266.
2. Department of Environmental Quality v. City of Jefferson, Stipulation and Final Order No. WQ-SNCR-77-267.
3. Department of Environmental Quality v. City of Wheeler, Stipulation and Final Order No. WQ-SNCR-77-244.

WILLIAM H. YOUNG

FMB/bw
229-5372
December 12, 1977

Attachments: The above listed Consent Orders.



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1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

2 OF THE STATE OF OREGON

3 DEPARTMENT OF ENVIRONMENTAL QUALITY,
4 of the STATE OF OREGON,

5 Department,

6 v.

7 CITY OF AMITY,

8 Respondent.

) STIPULATION AND
) FINAL ORDER
) WQ-SNCR-77-266
) YAMHILL COUNTY

9 WHEREAS

10 1. The Department of Environmental Quality ("Department") will soon issue
11 National Pollutant Discharge Elimination System Waste Discharge Permit ("Permit")
12 Number 2671-J (to be assigned upon issuance of the Permit) to CITY OF
13 AMITY ("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and the
14 Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500. The Permit
15 authorizes the Respondent to construct, install, modify or operate waste water
16 treatment, control and disposal facilities and discharge adequately treated waste
17 waters into waters of the State in conformance with the requirements, limitations
18 and conditions set forth in the Permit. The Permit expires on June 30, 1982.

19 2. Condition 1 of Schedule A of the Permit does not allow Respondent to exceed
20 the following waste discharge limitations after the Permit issuance date:

Parameter	Effluent Loadings				
	Average Effluent Concentrations		Monthly Average	Weekly Average	Daily Maximum
	Monthly	Weekly	kg/day (lb/day)	kg/day (lb/day)	kg (lbs)
Jun 1 - Oct 31: NO DISCHARGE TO PUBLIC WATERS PERMITTED.					
Nov 1 - May 31:					
BOD	30mg/l	45mg/l	23 (50)	34 (75)	45 (100)
TSS	50mg/l	75mg/l	38 (83)	57 (125)	76 (166)

26 State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

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1 3. Respondent proposes to comply with all the above effluent limitations of
 2 its Permit by constructing and operating a new or modified waste water treatment
 3 facility. Respondent has not completed construction and has not commenced operation
 4 thereof.

5 4. Respondent presently is capable of treating its effluent so as to meet the
 6 following effluent limitations, measured as specified in the Permit:

Parameter	Average Effluent Concentrations		Effluent Loadings			
	Monthly	Weekly	Monthly Average	Weekly Average	Daily Maximum	
	kg/day	kg/day	(lb/day)	(lb/day)	kg	(lbs)
Jun 1 - Oct 31:	NO DISCHARGE TO PUBLIC WATERS PERMITTED.					
Nov 1 - May 31:						
BOD	60mg/l	75mg/l	45 (100)	57 (125)	68	(150)
TSS	90mg/l	120mg/l	68 (150)	91 (200)	114	(250)

- 12 5. The Department and Respondent recognize and admit that:
- 13 a. Until the proposed new or modified waste water treatment facility
 - 14 is completed and put into full operation, Respondent will violate
 - 15 the effluent limitations set forth in Paragraph 2 above the vast
 - 16 majority, if not all, of the time any effluent is discharged.
 - 17 b. Respondent has committed violations of its NPDES Waste Discharge
 - 18 Permit No. 2481-J and related statutes and regulations.
 - 19 1) Effluent violations have been disclosed in Respondent's
 - 20 waste discharge monitoring reports to the Department,
 - 21 covering the period from September 20, 1976 through the
 - 22 date which the order below is issued by the Environmental
 - 23 Quality Commission.
 - 24 2) Respondent did not submit final plans by June 1, 1977, as
 - 25 required by Condition 1 of Schedule C.

26 ///

1 6. The Department and Respondent also recognize that the Environmental
2 Quality Commission has the power to impose a civil penalty and to issue an
3 abatement order for any such violation. Therefore, pursuant to ORS 183.415(4),
4 the Department and Respondent wish to resolve those violations in advance by
5 stipulated final order requiring certain action, and waiving certain legal
6 rights to notices, answers, hearings and judicial review on these matters.

7 7. The Department and Respondent intend to limit the violations which this
8 stipulated final order will settle to all those violations specified in Paragraph
9 5 above, occurring through (a) the date that compliance with all effluent limita-
10 tions is required, as specified in Paragraph A(1) below, or (b) the date upon
11 which the Permit is presently scheduled to expire, whichever first occurs.

12 8. This stipulated final order is not intended to settle any violation of
13 any effluent limitations set forth in Paragraph 4 above. Furthermore, this
14 stipulated final order is not intended to limit, in any way, the Department's right
15 to proceed against Respondent in any forum for any past or future violation not
16 expressly settled herein.

17 NOW THEREFORE, it is stipulated and agreed that:

18 A. The Environmental Quality Commission shall issue a final order:

19 (1) Requiring Respondent to comply with the following schedule:

20 a. Submit complete and biddable final plans and specifications
21 and a proper and complete Step III grant application by
22 January 31, 1978.

23 b. Begin construction within four (4) months of Step III grant
24 offer.

25 c. Complete construction within ten (10) months of Step III
26 grant offer.

1 d. Demonstrate compliance with the final effluent
2 limitations specified in Schedule A of the Permit
3 within thirty (30) days of completing construction.

4 (2) Requiring Respondent to meet the interim effluent limitations set forth
5 in Paragraph 4 above until the date set in the schedule in Paragraph A(1) above
6 for achieving compliance with the final effluent limitations.

7 (3) Requiring Respondent to comply with all the terms, schedules and conditions
8 of the Permit, except those modified by Paragraphs A(1) and (2) above.

9 B. Regarding the violations set forth in Paragraph 5 above, which are expressly
10 settled herein, the parties hereby waive any and all of their rights under United
11 States and Oregon Constitutions, statutes and administrative rules and regulations
12 to any and all notices, hearings, judicial review, and to service of a copy of the
13 final order herein.

14 C. Respondent acknowledges that it has actual notice of the contents and
15 requirements of this stipulated and final order and that failure to fulfill any of
16 the requirements hereof would constitute a violation of this stipulated final order.
17 Therefore, should Respondent commit any violation of this stipulated final order,
18 Respondent hereby waives any rights it might then have to any and all ORS 468.125(1)
19 advance notices prior to the assessment of civil penalties for any and all such vio-
20 lations. However, Respondent does not waive its rights to any and all ORS 468.135
21 (1) notices of assessment of civil penalty for any and all violations of this stipu-
22 lated final order.

23 DEPARTMENT OF ENVIRONMENTAL QUALITY

24
25 Date: _____

26 By William H. Young
WILLIAM H. YOUNG
Director

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RESPONDENT

Date: 8 Nov 77

By *William H. Young*
Name
Title

FINAL ORDER

IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: _____

By _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

2 OF THE STATE OF OREGON

3 DEPARTMENT OF ENVIRONMENTAL QUALITY,) STIPULATION AND
 of the STATE OF OREGON,) FINAL ORDER
 4) WQ-SNCR-77-267
 Department,) MARION COUNTY
 5 v.)
 6 CITY OF JEFFERSON,)
 Respondent.)

8 WHEREAS

9 1. The Department of Environmental Quality ("Department") will soon issue
 10 National Pollutant Discharge Elimination System Waste Discharge Permit ("Permit")
 11 Number _____ (to be assigned upon issuance of the Permit) to CITY OF
 12 JEFFERSON ("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and
 13 the Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500. The
 14 Permit authorizes the Respondent to construct, install, modify or operate waste
 15 water treatment, control and disposal facilities and discharge adequately treated
 16 waste waters into waters of the State in conformance with the requirements, limita-
 17 tions and conditions set forth in the Permit. The Permit expires on June 30, 1982.

18 2. Condition 1 of Schedule A of the Permit does not allow Respondent to exceed
 19 the following waste discharge limitations after the Permit issuance date:

Parameter	Average Effluent Concentrations		Monthly Average		Weekly Average		Daily Maximum	
	Monthly	Weekly	kg/day	(lb/day)	kg/day	(lb/day)	kg	(lbs)
Jun 1 - Oct 31: DISCHARGE SHALL BE MINIMIZED AS MUCH AS PRACTICABLE.								
BOD	30mg/l	45mg/l	12	(25)	17	(38)	23	(50)
TSS	50mg/l	75mg/l	19	(42)	29	(63)	38	(83)
Nov 1 - May 31:								
BOD	30mg/l	45mg/l	23	(50)	34	(75)	45	(100)
TSS	50mg/l	75mg/l	38	(83)	45	(100)	66	(146)

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1 3. Respondent proposes to comply with all the above effluent limitations of
 2 its Permit by constructing and operating a new or modified waste water treatment
 3 facility. Respondent has not completed construction and has not commenced operation
 4 thereof.

5 4. Respondent presently is capable of treating its effluent so as to meet the
 6 following effluent limitations, measured as specified in the Permit:

Parameter	Average Effluent Concentrations		Effluent Loadings					
	Monthly	Weekly	Monthly Average	Weekly Average	Daily Maximum			
	kg/day	(lb/day)	kg/day	(lb/day)	kg	(lbs)		
Jun 1 - Oct 31: DISCHARGE SHALL BE MINIMIZED AS MUCH AS PRACTICABLE.								
BOD	45 mg/l	60mg/l	17	(38)	23	(50)	28	(63)
TSS	60mg/l	90mg/l	23	(50)	34	(75)	42	(92)
Nov 1 - May 31:								
BOD	45mg/l	60mg/l	34	(75)	45	(100)	57	(125)
TSS	60mg/l	90mg/l	45	(100)	68	(150)	83	(183)

- 14 5. The Department and Respondent recognize and admit that:
- 15 a. Until the proposed new or modified waste water treatment facility
 16 is completed and put into full operation, Respondent will violate
 17 the effluent limitations set forth in Paragraph 2 above the vast
 18 majority, if not all, of the time any effluent is discharged.
- 19 b. Respondent has committed violations of its NPDES Waste Discharge
 20 Permit No. 2484-J and related statutes and regulations.
- 21 1) Effluent violations have been disclosed in Respondent's
 22 waste discharge monitoring reports to the Department,
 23 covering the period from September 20, 1976 through the
 24 date which the order below is issued by the Environmental
 25 Quality Commission.
- 26 2) Respondent did not submit final plans by March 1, 1977 and

1 start construction by June 30, 1977, as required by
2 Condition 1 of Schedule C.

3 6. The Department and Respondent also recognize that the Environmental
4 Quality Commission has the power to impose a civil penalty and to issue an
5 abatement order for any such violation. Therefore, pursuant to ORS 183.415(4),
6 the Department and Respondent wish to resolve those violations in advance by
7 stipulated final order requiring certain action, and waiving certain legal
8 rights to notices, answers, hearings and judicial review on these matters.

9 7. The Department and Respondent intend to limit the violations which this
10 stipulated final order will settle to all those violations specified in Paragraph
11 5 above, occurring through (a) the date that compliance with all effluent limita-
12 tions is required, as specified in Paragraph A(1) below, or (b) the date upon
13 which the Permit is presently scheduled to expire, whichever first occurs.

14 8. This stipulated final order is not intended to settle any violation of
15 any effluent limitations set forth in Paragraph 4 above. Furthermore, this
16 stipulated final order is not intended to limit, in any way, the Department's
17 right to proceed against Respondent in any forum for any past or future violation
18 not expressly settled herein.

19 NOW THEREFORE, it is stipulated and agreed that:

20 A. The Environmental Quality Commission shall issue a final order:

21 (1) Requiring Respondent to comply with the following schedule:

- 22 a. Submit complete and biddable final plans and specifi-
23 cations and a proper and complete Step III grant appli-
24 cation by March 31, 1978.
25 b. Start construction within four (4) months of Step III
26 grant offer.

- 1 c. Submit a progress report within ten (10) months of
2 Step III grant offer.
- 3 d. Complete construction within sixteen (16) months of
4 Step III grant offer.
- 5 e. Demonstrate compliance with the final effluent limita-
6 tions specified in Schedule A of the Permit within
7 sixty (60) days of completing construction.

8 (2) Requiring Respondent to meet the interim effluent limitations set forth
9 in Paragraph 4 above until the date set in the schedule in Paragraph A(1) above
10 for achieving compliance with the final effluent limitations.

11 (3) Requiring Respondent to comply with all the terms, schedules and conditions
12 of the Permit, except those modified by Paragraphs A(1) and (2) above.

13 B. Regarding the violations set forth in Paragraph 5 above, which are expressly
14 settled herein, the parties hereby waive any and all of their rights under United
15 States and Oregon Constitutions, statutes and administrative rules and regulations
16 to any and all notices, hearings, judicial review, and to service of a copy of the
17 final order herein.

18 C. Respondent acknowledges that it has actual notice of the contents and
19 requirements of this stipulated and final order and that failure to fulfill any of
20 the requirements hereof would constitute a violation of this stipulated final order.
21 Therefore, should Respondent commit any violation of this stipulated final order,
22 Respondent hereby waives any rights it might then have to any and all ORS 468.125(1)
23 advance notices prior to the assessment of civil penalties for any and all such
24 violations. However, Respondent does not waive its rights to any and all ORS 468.135
25 (1) notices of assessment of civil penalty for any and all violations of this stipu-
26 lated final order.

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DEPARTMENT OF ENVIRONMENTAL QUALITY

Date: _____

By William H. Young
WILLIAM H. YOUNG
Director

RESPONDENT

Date: 12-5-77

By Tom Villanar
Name
Title

FINAL ORDER

IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: _____

By _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

OCT 19 1977

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

1			
2			
3	DEPARTMENT OF ENVIRONMENTAL QUALITY)	STIPULATION AND
4	of the STATE OF OREGON,)	FINAL ORDER
5	Department,)	WQ-SNCR-77-244
6	v.)	Tillamook County
7	CITY OF WHEELER)	
8	Respondent;)	
9			

WHEREAS

1. On September 3, 1976, the Department of Environmental Quality ("Department") issued the City of Wheeler ("Respondent") National Pollutant Discharge Elimination System Waste Discharge Permit Number 2469-J ("Permit"). The Permit expired on September 30, 1977. The Permit will not be renewed.
2. Respondent and Department stipulate to and find the facts to be as follows:
 - a. Respondent did not complete a sewage collection system and connect to the North Tillamook County Sanitary Authority's sewage treatment facility by July 1, 1977 as required by Condition 1 of the Permit.
 - b. Respondent's present combined sewer system receives sewage from about 60 homes and discharges by way of a single outfall to Nehalem Bay, waters of the State.

- 1 3. The Department is charged with enforcement of the laws
2 prohibiting discharges of untreated sewage into waters
3 of the State.
- 4 4. Respondent proposes to eliminate the violations specified
5 in paragraph 2 above by constructing a sewage collection
6 system and connecting it to the North Tillamook County
7 Sanitary Authority's sewage treatment facility. Respondent
8 has begun construction of that system.
- 9 5. Respondent proposes to meet the following construction
10 schedule:
- 11 (a) Submit a construction progress report by January 1,
12 1978.
- 13 (b) Complete construction and connect to North Tillamook
14 County Sanitary Authority's sewage treatment facility by
15 May 31, 1978.
- 16 6. The Department and Respondent recognize that the Environmental
17 Quality Commission ("Commission") has the power to issue an
18 abatement order under ORS 468.090 for the violations specified
19 in paragraph 2 above. Therefore, pursuant to ORS 183.415(4),
20 the Department and Respondent wish to resolve and settle those
21 violations by stipulated final order requiring certain action,
22 and waiving certain legal rights by notices, answers, hearings
23 and judicial review on the matters. Department and Respondent
24 intend to limit the violations which this stipulated final order
25 will settle to only those past known violations specified in
26 paragraph 2 above. Furthermore, this stipulated final order

1 is not intended to limit, in any way, the Department's
2 right to proceed against Respondent in any forum for any
3 past or future violation not expressly settled herein.

4 NOW THEREFORE, it is stipulated and agreed that:

- 5 A. The Environmental Quality Commission shall issue a
6 final order requiring Respondent to comply with the
7 schedule set forth in paragraph 5 above.
- 8 B. Regarding the violations expressly settled herein,
9 the parties hereby waive any and all of their rights
10 under United States and Oregon constitutions, statutes
11 and administrative rules and regulations to any and all
12 notices, answers, hearings, judicial review, and to
13 service of a copy of the final order herein.
- 14 C. Respondent acknowledges that it has actual notice of the
15 contents and requirements of this stipulated final order
16 and that failure to fulfill any of the requirements hereof
17 would constitute a violation of this stipulated final
18 order. Therefore, should Respondent commit any violation
19 of this stipulated final order, Respondent hereby waives
20 any rights it might then have to any and all ORS 468.125(1)
21 advance notices prior to the assessment of civil penalties
22 for any and all such violations of this stipulated final
23 order and for any continuation of the violations specified
24 in paragraph 2 of the stipulation portion hereof. However,
25 Respondent does not waive its rights to any and all
26 ORS 468.135(1) notices of assessment of civil penalty for

1 for any and all those violations.

2 DEPARTMENT OF ENVIRONMENTAL QUALITY

3
4 Date: _____

5 By William H. Young
WILLIAM H. YOUNG, Director

6 RESPONDENT

7
8 Date Dec. 5, 1977

9 By Virgil L. Staben
Name: Virgil L. Staben
Title: Mayor, City of Wheeler

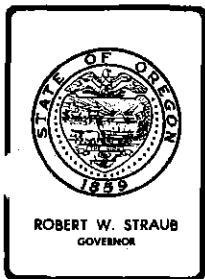
10 FINAL ORDER

11 IT IS SO ORDERED:

12 ENVIRONMENTAL QUALITY COMMISSION

13
14 Date: _____

15 By _____
WILLIAM H. YOUNG, Director
Department of Environmental
Quality
Pursuant to OAR 340-11-136(1)



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 No. 1, December 16, 1977 EQC Meeting

NPDES July 1, 1977 Compliance Date - Request for Approval of Stipulated Consent Orders for Permittees not meeting July 1, 1977 compliance deadline.

Background

The Department has been taking enforcement action against NPDES Permittees that are in violation of the July 1, 1977 deadline for achieving secondary treatment or implementing best practicable control technology currently available. That action has been by stipulated consent orders which impose a reasonably achievable and enforceable compliance schedule.

Summation

The Cities of Corvallis, Donald, Gold Hill, St. Paul and Winston are unable to consistently treat sewage to the required level of secondary treatment. The attached Consent Orders contain a time schedule for the orderly construction of new or modified waste treatment facilities and provide for interim treatment limitations. The Department has reached agreement with those Cities on the contents of the orders.

Director's Recommendation

I recommend that the Commission approve the following Consent Orders:

1. Department of Environmental Quality v. City of Corvallis, Stipulation and Final Order No. WQ-MWR-77-249.
2. Department of Environmental Quality v. City of Donald, Stipulation and Final Order No. WQ-SNCR-77-178.
3. Department of Environmental Quality v. City of Gold Hill, Stipulation and Final Order No. WQ-SWR-77-253.
4. Department of Environmental Quality v. City of St. Paul, Stipulation and Final Order No. WQ-SNCR-77-256.
5. Department of Environmental Quality v. City of Winston, Stipulation and Final Order No. WQ-SWR-77-252.

WILLIAM H. YOUNG *Bill*

FMB:gcd



229-5372

December 6, 1977

Attachments: The above listed Stipulation and Final Orders are attached.

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

2 OF THE STATE OF OREGON

3 DEPARTMENT OF ENVIRONMENTAL QUALITY,) STIPULATION AND
of the STATE OF OREGON,) FINAL ORDER
4 Department,) WQ-MWR-77-249
5 v.) BENTON COUNTY
6 CITY OF CORVALLIS,)
7 Respondent.)

8 WHEREAS

9 1. The Department of Environmental Quality ("Department") will soon issue
10 National Pollutant Discharge Elimination System Waste Discharge Permit ("Permit")
11 Number 1698-J (to be assigned upon issuance of the Permit) to CITY OF
12 CORVALLIS ("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and
13 the Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500. The Permit
14 authorizes the Respondent to construct, install, modify or operate waste water treat-
15 ment, control and disposal facilities and discharge adequately treated waste waters
16 into waters of the State in conformance with the requirements, limitations and con-
17 ditions set forth in the Permit. The Permit expires on October 31, 1982.

18 2. Condition 1 of Schedule A of the Permit does not allow Respondent to exceed
19 the following waste discharge limitations after the Permit issuance date:

Parameter	Average Effluent Concentrations		Effluent Loadings					
	Monthly	Weekly	Monthly Average	Weekly Average	Daily Maximum			
	kg/day	(lb/day)	kg/day	(lb/day)	kg	(lbs)		
Jun 1 - Oct 31:								
BOD	30mg/l	45mg/l	681	(1501)	1022	(2252)	1362	(3000)
TSS	30mg/l	45mg/l	681	(1501)	1022	(2252)	1362	(3000)
Nov 1 - May 31:								
BOD	30mg/l	45mg/l	681	(1501)	1022	(2252)	1362	(3000)
TSS	30mg/l	45mg/l	681	(1501)	1022	(2252)	1362	(3000)

1 3. Respondent proposes to comply with all the above effluent limitations of
 2 its Permit by constructing and operating a new or modified waste water treatment
 3 facility. Respondent has not completed construction and has not commenced operation
 4 thereof.

5 4. Respondent presently is capable of treating its effluent so as to meet the
 6 following effluent limitations, measured as specified in the Permit:

Parameter	Average Effluent Concentrations		Effluent Loadings			
	Monthly	Weekly	Monthly Average	Weekly Average	Daily Maximum	
Nov 1 - May 31:	kg/day	kg/day	(lb/day)	(lb/day)	kg	(lbs)
BOD and TSS	40mg/l	55mg/l	1468 (3235)	2034 (4480)	2936 (6470)	
* BOD and TSS			2120		4240	

12 *(Effluent loading limitations when the total flow entering the treatment facility
 13 exceeds 3.6×10^4 M³/day (9.7 MGD) because of excessive storm water inflow).

14 5. The Department and Respondent recognize and admit that:

15 a. Until the proposed new or modified waste water treatment facility
 16 is completed and put into full operation, Respondent will violate
 17 the effluent limitations set forth in Paragraph 2 above the vast
 18 majority, if not all, of the time that any effluent is discharged.

19 b. Respondent has committed violations of its NPDES Waste Discharge
 20 Permit No. 1698-J and related statutes and regulations.

21 1) Effluent violations have been disclosed in Respondent's
 22 waste discharge monitoring reports to the Department,
 23 covering the period from August 19, 1974 through the
 24 date which the order below is issued by the Environmental
 25 Quality Commission.

26 2) Respondent did not complete construction of waste water

1 treatment facilities capable of meeting the limitations
2 of Condition S5 and S7, as required by Condition S1.

3 6. The Department and Respondent also recognize that the Environmental
4 Quality Commission has the power to impose a civil penalty and to issue an
5 abatement order for any such violation. Therefore, pursuant to ORS 183.415(4),
6 the Department and Respondent wish to resolve those violations in advance by
7 stipulated final order requiring certain action, and waiving certain legal
8 rights to notices, answers, hearings and judicial review on these matters.

9 7. The Department and Respondent intend to limit the violations which this
10 stipulated final order will settle to all those violations specified in Paragraph
11 5 above, occurring through (2) the date that compliance with all effluent limita-
12 tions is required, as specified in Paragraph A(1) below, or (b) the date upon
13 which the Permit is presently scheduled to expire, whichever first occurs.

14 8. This stipulated final order is not intended to settle any violation of
15 any effluent limitations set forth in Paragraph 4 above. Furthermore, this
16 stipulated final order is not intended to limit, in any way, the Department's right
17 to proceed against Respondent in any forum for any past or future violation not
18 expressly settled herein.

19 NOW THEREFORE, it is stipulated and agreed that:

20 A. The Environmental Quality Commission shall issue a final order:

21 (1) Requiring Respondent to comply with the following schedule:

22 (a) Complete construction by February 1, 1978.

23 (b) Demonstrate compliance with the final effluent limitations
24 specified in Schedule A of the Permit by March 1, 1978.

25 (2) Requiring Respondent to meet the interim effluent limitations set forth in
26 Paragraph 4 above until the date set in the schedule in Paragraph A(1) above for

1 achieving compliance with the final effluent limitations.

2 (3) Requiring Respondent to comply with all the terms, schedules and conditions
3 of the Permit, except those modified by Paragraphs A(1) and (2) above.

4 B. Regarding the violations set forth in Paragraph 5 above, which are expressly
5 settled herein, the parties hereby waive any and all of their rights under United
6 States and Oregon Constitutions, statutes and administrative rules and regulations
7 to any and all notices, hearings, judicial review, and to service of a copy of the
8 final order herein.

9 C. Respondent acknowledges that it has actual notice of the contents and
10 requirements of this stipulated and final order and that failure to fulfill any of
11 the requirements hereof would constitute a violation of this stipulated final order.

12 Therefore, should Respondent commit any violation of this stipulated final order,
13 Respondent hereby waives any rights it might then have to any and all ORS 468.135

14 (1) notices of assessment of civil penalty for any and all violations of this stipulated
15 final order.

16 DEPARTMENT OF ENVIRONMENTAL QUALITY

17

18 Date: DEC - 6 1977

By William H. Young
WILLIAM H. YOUNG
Director

19

20

RESPONDENT

21

22 Date: December 1, 1977

By C. Dean Smith
Name C. Dean Smith
Title City Manager

23

24 ///

25 ///

26 ///

FINAL ORDER

IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: _____

By _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

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Handwritten notes and stamps in the top right corner, including a date stamp that appears to read "JUN 1977".

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

3	DEPARTMENT OF ENVIRONMENTAL QUALITY,)	STIPULATION AND
	of the STATE OF OREGON,)	FINAL ORDER
4)	WQ-SNCR-77-178
	Department,)	MARION COUNTY
5	v.)	
6	CITY OF DONALD,)	
7	Respondent.)	

WHEREAS

1. The City of Donald (hereinafter referred to as "City" or "Respondent") stipulates to and find the facts to be as follows:

- a. The septic tank and drainfield disposal systems serving many residences in the City are failing and present hazards to the public health and waters of the State.
- b. Sewage from various parts of the City collects in a man-hole located at the intersection of Crissell and Main Streets.
- c. Some of that sewage discharges via agricultural drain tile to an unnamed tributary of Ryan Creek, waters of the State.

2. The Department of Environmental Quality (hereinafter referred to as "Department") is charged with enforcement of the laws prohibiting unpermitted discharges into the waters of the State and the operation of septic tank and drainfield systems in a manner which causes degradation of the waters or hazards to the health of the public.

3. Respondent proposes to eliminate the above-described violations by constructing, operating and exclusively using a new waste water treatment facility.

1 Respondent has not completed construction and has not commenced operation thereof.

2 4. Respondent proposes to meet the following schedule for the planning,
3 construction and operation of a new waste water treatment facility:

4 (a) Submit proper and complete Step I grant application by

5 January 10, 1978.

6 (b) Submit proper and complete facility plan report and Step
7 II grant application within 6 months of Step I
8 grant offer.

9 (c) Submit complete and biddable final plans and specifications
10 and a proper and complete Step III grant application within
11 6 months of Step II grant offer.

12 (d) Start construction within 2 months of Step III
13 grant offer.

14 (e) Submit progress report within 6 months of Step III
15 grant offer.

16 (f) Complete construction within 18 months of Step III
17 grant offer.

18 5. The Department and Respondent recognize that the Environmental Quality
19 Commission has the power to issue an abatement order under ORS 468.090 for the
20 violations specified in paragraph 1 above. Therefore, pursuant to ORS 183.415(4),
21 the Department and Respondent wish to resolve and settle those violations by stip-
22 ulated final order requiring certain action, and waiving certain legal rights to
23 notices, answers, hearings and judicial review on the matters. The Department and
24 Respondent intend to limit the violations which this stipulated final order will
25 settle to only those past known violations specified in paragraph 1 above. Further-
26 more, this stipulated final order is not intended to limit, in any way, the

1 Department's right to proceed against Respondent in any forum for any past or
2 future violation not expressly settled herein.

3 NOW THEREFORE, it is stipulated and agreed that:

4 A. The Environmental Quality Commission shall issue a final order requiring
5 Respondent to comply with the schedule set forth in paragraph 4 above.

6 B. Regarding the violations expressly settled herein, the parties hereby
7 waive any and all of their rights under United States and Oregon constitutions,
8 statutes and administrative rules and regulations to any and all notices, answers,
9 hearings, judicial review, and to service of a copy of the final order herein.

10 C. Respondent acknowledges that it has actual notice of the contents and
11 requirements of this stipulated final order and that failure to fulfill any of the
12 requirements hereof would constitute a violation of this stipulated final order.
13 Therefore, should Respondent commit any violation of this stipulated final order,
14 Respondent hereby waives any rights it might then have to any and all ORS 468.125(1)
15 advance notices prior to the assessment of civil penalties for any and all such
16 violations of this stipulated final order and for any continuation of the violations
17 specified in paragraph 1 of the stipulation portion hereof. However, Respondent
18 does not waive its rights to any and all ORS 468.135(1) notices of assessment of
19 civil penalty for any and all those violations.

20 DEPARTMENT OF ENVIRONMENTAL QUALITY

21
22 Date: DEC - 6 1977 197 .

By William H. Young
WILLIAM H. YOUNG, Director

23
24 RESPONDENT

Harold Peterson

25
26 Date: November 16 1977.

By Ruth J. Blake
Name:

Title: Mayor
Vern Stephens - Councilman
Janice Monk - Councilman
Norman M. Donald - Councilman

FINAL ORDER

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IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: _____ 197 .

By _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

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BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY, of the STATE OF OREGON,)	STIPULATION AND
)	FINAL ORDER
)	WQ-SNCR-77-256
Department,)	Marion County
)	
v.)	
)	
CITY OF ST. PAUL,)	
)	
Respondent:)	

WHEREAS the City of St. Paul ("Respondent") and the Department of Environmental Quality ("Department") stipulate to and find the facts to be as follows:

1. The septic tank and drainfield disposal systems serving many residences in the City of St. Paul are failing and present hazards to the public health and waters of the State.

2. Respondent should proceed in an orderly, timely fashion to bring about the complete cessation of discharge of untreated or inadequately treated sewage to public waters.

3. The Department is charged with enforcement of laws prohibiting unpermitted discharges into public waters and the operation of septic tank and drainfield systems in a manner which causes degradation of the waters or hazards to the health of the public.

4. Respondent proposes to eliminate the above-described violations by constructing, operating and exclusively using a new waste water treatment facility. Respondent has not completed construction and has not commenced operation thereof.

5. Respondent proposes to meet the following construction schedule:

A. Submit a proper and complete facility plan report and Step II grant application by November 30, 1977.

1 B. Submit complete and biddable final plans and specifications within
2 six (6) months of Step II grant offer.

3 C. Submit proper and complete Step III grant application within
4 seven (7) months of Step II grant offer.

5 D. Begin construction within four (4) months of Step III grant offer.

6 E. Submit a progress report within ten (10) months of Step III grant
7 offer.

8 F. Complete construction and operate the waste water treatment facility
9 within sixteen (16) months of Step III grant offer.

10 6. The Department and Respondent recognize that the Environmental Quality
11 Commission has the power to issue an abatement order under ORS 468.090 for the
12 violations specified in paragraph 1 above. Therefore, pursuant to ORS 183.415(4),
13 the Department and Respondent wish to resolve and settle those violations by
14 stipulated final order requiring certain action, and waiving certain legal
15 rights to notices, answers, hearings and judicial review on the matters. The
16 Department and Respondent intend to limit the violations which this stipulated
17 final order will settle to only those past known violations specified in paragraph
18 1 above. Furthermore, this stipulated final order is not intended to limit, in
19 any way, the Department's right to proceed against Respondent in any forum for
20 any past or future violation not expressly settled herein.

21 NOW THEREFORE, it is stipulated and agreed that:

22 A. The Environmental Quality Commission shall issue a final order requiring
23 Respondent to comply with the schedule set forth in paragraph 5 above.

24 B. Regarding the violations expressly settled herein, the parties hereby
25 waive any and all of their rights under United States and Oregon constitutions,
26 statutes and administrative rules and regulations to any and all notices, answers,

1 hearings, judicial review, and to service of a copy of the final order herein.

2 C. Respondent acknowledges that it has actual notice of the contents and
3 requirements of this stipulated final order and that failure to fulfill any of the
4 requirements hereof would constitute a violation of this stipulated final order.
5 Therefore, should Respondent commit any violations of this stipulated final order.
6 Respondent hereby waives any rights it might then have to any and all ORS 468.125(1)
7 advance notices prior to the assessment of civil penalties for any and all such
8 violations of this stipulated final order and for any continuation of the
9 violations specified in paragraph 1 of the stipulation portion hereof. However,
10 Respondent does not waive its rights to any and all ORS 468.135(1) notices of
11 assessment of civil penalty for any and all those violations.

12 DEPARTMENT OF ENVIRONMENTAL QUALITY

13

14 Date: DEC - 6 1977

By William H. Young
WILLIAM H. YOUNG, Director

15

16

RESPONDENT

17

18 Date: _____

By [Signature]
Name: _____
Title: City of St. Paul, Oregon

19

20

21

FINAL ORDER

22 IT IS SO ORDERED:

23

ENVIRONMENTAL QUALITY COMMISSION

24

25 Date: _____

By: _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

26

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

2 OF THE STATE OF OREGON

3 DEPARTMENT OF ENVIRONMENTAL QUALITY,)
4 of the STATE OF OREGON,)
5 Department,)
6 v.)
7 CITY OF WINSTON,)
8 Respondent.)

STIPULATION AND
FINAL ORDER
WQ-SWR-77-252
DOUGLAS COUNTY

9 WHEREAS

10 1. The Department of Environmental Quality ("Department") will soon issue
11 National Pollutant Discharge Elimination System Waste Discharge Permit ("Permit")
12 Number _____ (to be assigned upon issuance of the Permit) to CITY OF WINSTON
13 ("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and the Federal
14 Water Pollution Control Act Amendments of 1972, P.L. 92-500. The Permit authorizes
15 the Respondent to construct, install, modify or operate waste water treatment, control
16 and disposal facilities and discharge adequately treated waste waters into waters of
17 the State in conformance with the requirements, limitations and conditions set forth
18 in the Permit. The Permit expires on June 30, 1982.

19 2. Condition 1 of Schedule A of the Permit does not allow Respondent to exceed
20 the following waste discharge limitations after the Permit issuance date:

Parameter	Average Effluent Concentrations		Monthly Average		Effluent Loadings		Daily Maximum	
	Monthly	Weekly	kg/day	(lb/day)	kg/day	(lb/day)	kg	(lbs)
June 1 - Oct 31:								
BOD	30mg/l	45 mg/l	51	(113)	77	(169)	103	(225)
TSS	30mg/l	45 mg/l	51	(113)	77	(169)	103	(225)
Nov 1 - May 31:								
BOD	30mg/l	45 mg/l	51	(113)	77	(169)	103	(225)
TSS	30mg/l	45 mg/l	51	(113)	77	(169)	103	(225)

1 3. Respondent proposes to comply with all the above effluent limitations of
 2 its Permit by constructing and operating a new or modified waste water treatment
 3 facility. Respondent has not completed construction and has not commenced operation
 4 thereof.

5 4. Respondent presently is capable of treating its effluent so as to meet the
 6 following effluent limitations, measured as specified in the Permit:

Parameter	Average Effluent Concentrations		Effluent Loadings			
	Monthly	Weekly	Monthly Average	Weekly Average	Daily Maximum	
	kg/day	(lb/day)	kg/day	(lb/day)	kg	(lbs)
June 1 - Oct 31:						
BOD	45mg/1	60 mg/1	77 (169)	102 (225)	153	(338)
TSS	45mg/1	60 mg/1	77 (169)	102 (225)	153	(338)
Nov 1 - May 31:						
BOD	45mg/1	60 mg/1	77 (169)	102 (225)	153	(338)
TSS	60mg/1	90 mg/1	102 (225)	153 (338)	204	(450)

13 5. The Department and Respondent recognize and admit that:

14 a. Until the proposed new or modified waste water treatment
 15 facility is completed and put into full operation, Respondent
 16 will violate the effluent limitations set forth in Paragraph
 17 2 above the vast majority, if not all, of the time any
 18 effluent is discharged.

19 b. Respondent has committed violations of its NPDES Waste Discharge
 20 Permit No. 2438-J and related statutes and regulations.

21 (1) Effluent violations have been disclosed in Respondent's
 22 waste discharge monitoring reports to the Department,
 23 covering the period from June 30, 1976 through the date
 24 which the order below is issued by the Environmental
 25 Quality Commission.

26 (2) Respondent did not submit detailed engineering plans by

1 December 1, 1976 and start construction of a new
2 sewage treatment plant by March 1, 1977, as required
3 by Condition S1.

4 6. The Department and Respondent also recognize that the Environmental
5 Quality Commission has the power to impose a civil penalty and to issue an
6 abatement order for any such violation. Therefore, pursuant to ORS 183.415 (4),
7 the Department and Respondent wish to resolve those violations in advance by
8 stipulated final order requiring certain action, and waiving certain legal
9 rights to notices, answers, hearings, and judicial review on these matters.

10 7. The Department and Respondent intend to limit the violations which this
11 stipulated final order will settle to all those violations specified in Paragraph
12 5 above, occurring through (a) the date that compliance with all effluent limita-
13 tions is required, as specified in Paragraph A (1) below, or (b) the date upon
14 which the Permit is presently scheduled to expire, whichever first occurs.

15 8. This stipulated final order is not intended to settle any violation of
16 any effluent limitations set forth in Paragraph 4 above. Furthermore, this
17 stipulated final order is not intended to limit, in any way, the Department's
18 right to proceed against Respondent in any forum for any past or future violation
19 not expressly settled herein.

20 NOW THEREFORE, it is stipulated and agreed that:

21 A. The Environmental Quality Commission shall issue a final order:

22 (1) Requiring Respondent to cooperate and coordinate with the
23 Green Sanitary District and Douglas County to connect
24 Respondent's sewerage system to the Winston-Green regional
25 treatment facility within thirty (30) days of its completion.

26 (2) Requiring Respondent to meet the interim effluent limitations set

1 forth in Paragraph 4 above until the date set in the
2 schedule in Paragraph A (1) above for achieving com-
3 pliance with the final effluent limitations.

4 (3) Requiring Respondent to comply with all the terms,
5 schedules and conditions of the Permit, except those
6 modified by Paragraphs A (1) and (2) above.

7 B. Regarding the violations set forth in Paragraph 5 above, which are expressly
8 settled herein, the parties hereby waive any and all of their rights under
9 United States and Oregon Constitutions, statutes and administrative rules
10 and regulations to any and all notices, hearings, judicial review, and to
11 service of a copy of the final order herein.

12 C. Respondent acknowledges that it has actual notice of the contents and
13 requirements of this stipulated and final order and that failure to ful-
14 fill any of the requirements hereof would constitute a violation of this
15 stipulated final order. Therefore, should Respondent commit any violation
16 of this stipulated final order, Respondent hereby waives any rights it
17 might then have to any and all ORS 468.125 (1) advance notices prior to
18 the assessment of civil penalties for any and all such violations.
19 However, Respondent does not waive its rights to any and all ORS 468.135 (1)
20 notices of assessment of civil penalty for any and all violations of this
21 stipulated final order.

DEPARTMENT OF ENVIRONMENTAL QUALITY

22
23 Date: DEC - 6 1977

By William H. Young
WILLIAM H. YOUNG
Director
RESPONDENT

24
25
26 Date: Nov-7-77

By Harley R. Means
Name
Title Mayor

FINAL ORDER

IT IS SO ORDERED:

ENVIRONMENTAL QUALITY COMMISSION

Date: _____

By WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136 (1)

1 BEFORE THE ENVIRONMENTAL QUALITY COMMISSION

2 OF THE STATE OF OREGON

3 DEPARTMENT OF ENVIRONMENTAL QUALITY,
4 of the STATE OF OREGON,

5 Department,

6 v.

7 CITY OF GOLD HILL,

8 Respondent.

) STIPULATION AND
) FINAL ORDER
) WQ-SWR-77-253
) JACKSON COUNTY

9 WHEREAS

10 1. The Department of Environmental Quality ("Department") will soon issue
11 National Pollutant Discharge Elimination System Waste Discharge Permit ("Permit")
12 Number _____ (to be assigned upon issuance of the Permit) to CITY OF
13 GOLD HILL ("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and
14 the Federal Water Pollution Control Act Amendments of 1972, P.L. 92-500. The
15 Permit authorizes the Respondent to construct, install, modify or operate waste
16 water treatment, control and disposal facilities and discharge adequately treated
17 waste waters into waters of the State in conformance with the requirements, limita-
18 tions and conditions set forth in the Permit. The Permit expires on May 31, 1982.

19 2. Condition 1 of Schedule A of the Permit does not allow Respondent to exceed
20 the following waste discharge limitations after the Permit issuance date:

Parameter	Average Effluent Concentrations		Effluent Loadings					
	Monthly	Weekly	Monthly Average		Weekly Average		Daily Maximum	
	kg/day	(lb/day)	kg/day	(lb/day)	kg/day	(lb/day)	kg	(lbs)
Jun 1 - Oct 31:								
BOD	30mg/l	45mg/l	9.7	(21.3)	14.5	(31.9)	19.3	(42.5)
TSS	30mg/l	45mg/l	9.7	(21.3)	14.5	(31.9)	19.3	(42.5)
Nov 1 - May 31:								
BOD	30mg/l	45mg/l	19.3	(42.5)	29.0	(63.8)	38.6	(85.1)
TSS	30mg/l	45mg/l	19.3	(42.5)	29.0	(63.8)	38.6	(85.1)

26 ///

1 3. Respondent proposes to comply with all the above effluent limitations of
 2 its Permit by constructing and operating a new or modified waste water treatment
 3 facility. Respondent has not completed construction and has not commenced operation
 4 thereof.

5 4. Respondent presently is capable of treating its effluent so as to meet the
 6 following effluent limitations, measured as specified in the Permit:

Parameter	Average Effluent Concentrations		Effluent Loadings				
	Monthly	Weekly	Monthly Average		Weekly Average		Daily Maximum
			kg/day (lb/day)		kg/day (lb/day)		kg (lbs)
Jun 1 - Oct 31:							
BOD	40mg/l	60mg/l	13	(28)	19	(43)	13 (56)
TSS	60mg/l	60mg/l	19	(43)	19	(43)	38 (86)
Nov 1 - May 31:							
BOD	60mg/l	60mg/l	38	(86)	38	(86)	76 (172)
TSS	60mg/l	60mg/l	38	(86)	38	(86)	76 (172)

13 5. The Department and Respondent recognize and admit that:

14 a. Until the proposed new or modified waste water treatment
 15 facility is completed and put into full operation, Respondent
 16 will violate the effluent limitations set forth in Paragraph
 17 2 above the vast majority, if not all, of the time any effluent
 18 is discharged.

19 b. Respondent has committed violations of its NPDES Waste Discharge
 20 Permit No. 1820-J and related statutes and regulations.

21 1) Effluent violations have been disclosed in Respondent's
 22 waste discharge monitoring reports to the Department,
 23 covering the period from October 30, 1975 through the
 24 date which the order below is issued by the Environmental
 25 Quality Commission.

26 2) Respondent did not submit final engineering design plans by

1 March 1, 1977 and start plant construction by June 1, 1977,
2 as required by Condition S1.

3 6. The Department and Respondent also recognize that the Environmental
4 Quality Commission has the power to impose a civil penalty and to issue an
5 abatement order for any such violation. Therefore, pursuant to ORS 183.415(4),
6 the Department and Respondent wish to resolve those violations in advance by
7 stipulated final order requiring certain action, and waiving certain legal
8 rights to notices, answers, hearings and judicial review on these matters.

9 7. The Department and Respondent intend to limit the violations which this
10 stipulated final order will settle to all those violations specified in paragraph
11 5 above, occurring through (a) the date that compliance with all effluent limita-
12 tions is required, as specified in Paragraph A(1) below, or (b) the date upon
13 which the Permit is presently scheduled to expire, whichever occurs first.

14 8. This stipulated final order is not intended to settle any violation of
15 any effluent limitations set forth in Paragraph 4 above. Furthermore, this
16 stipulated final order is not intended to limit, in any way, the Department's
17 right to proceed against Respondent in any forum for any past or future violation
18 not expressly settled herein.

19 NOW THEREFORE, it is stipulated and agreed that:

20 A. The Environmental Quality Commission shall issue a final order:

21 (1) Requiring Respondent to comply with the following schedule:

22 (a) Submit complete and biddable final plans and specifi-
23 cations by February 15, 1978.

24 (b) Submit proper and complete Step III grant
25 application by March 15, 1978.

26 (c) Start construction within four (4) months of

- 1 Step III grant offer.
- 2 (d) Submit a progress report within ten (10) months
3 of Step III grant offer.
- 4 (e) Complete construction within sixteen (16) months
5 of Step III grant offer.
- 6 (f) Demonstrate compliance with the final effluent
7 limitations specified in Schedule A of the Permit
8 within sixty (60) days of completing construction.
- 9 (2) Requiring Respondent to meet the interim effluent limitations set
10 forth in Paragraph 4 above until the date set in the schedule A(1) above for
11 achieving compliance with the final effluent limitations.
- 12 (3) Requiring Respondent to comply with all the terms, schedules and
13 conditions of the Permit, except those modified by Paragraphs A(1) and (2) above.
- 14 B. Regarding the violations set forth in Paragraph 5 above, which are ex-
15 pressly settled herein, the parties hereby waive any and all of their rights under
16 United States and Oregon Constitutions, statutes and administrative rules and
17 regulations to any and all notices, hearings, judicial review, and to service of a
18 copy of the final order herein.
- 19 C. Respondent acknowledges that it has actual notice of the contents and
20 requirements of this stipulated and final order and that failure to fulfill any of
21 the requirements hereof would constitute a violation of this stipulated final order.
22 Therefore, should Respondent commit any violation of this stipulated final order,
23 Respondent hereby waives any rights it might then have to any and all ORS 468.125(1)
24 advance notices prior to the assessment of civil penalties for any and all such
25 violations. However, Respondent does not waive its rights to any and all ORS 468.1
26 (1) notices of assessment of civil penalty for any and all violations of this stipulated

1 final order.

2

DEPARTMENT OF ENVIRONMENTAL QUALITY

3

4 Date: _____

By _____
WILLIAM H. YOUNG
Director

5

6

RESPONDENT

7

8 Date: 5 Dec 1977

By Frances D. Brown
Name Frances Brown
Title City Council President

9

10

FINAL ORDER

11 IT IS SO ORDERED:

12

ENVIRONMENTAL QUALITY COMMISSION

13

14 Date: _____

By _____
WILLIAM H. YOUNG, Director
Department of Environmental Quality
Pursuant to OAR 340-11-136(1)

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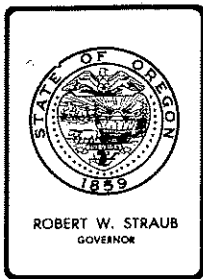
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Environmental Quality Commission

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

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. J , December 16, 1977, EQC Meeting

Public Sewerage Considerations Within Bend Urban Growth Boundary

Progress Report No. 1

Background

Staff concerns about sewage collection and disposal consideration were discussed at the Commission's November 18, 1977 meeting (Agenda Item No. F, attached). The Commission concurred with the Director's recommendation for staff to participate in a work session on November 29, 1977. Representatives from City of Bend and Deschutes County discussed possible DEQ alternatives as presented on page 6, item 4 of the November 18, 1977 staff report with Department staff.

Evaluation

A working agreement between entities did not materialize at the November 29, 1977 work session. Progress was made in airing concerns of the involved entities. Department staff is waiting on a recommendation for future action from the Deschutes County Commissioners.

Deschutes County Commissioners seem reluctant to make a time and staff resource commitment to this issue while the apparent uncertainty of success of the Bend project exists.

Director's Recommendation

1. The Director recommends that the Commission direct the staff to continue to work with Deschutes County officials and the City of Bend to obtain a written agreement outlining how DEQ, Deschutes County and City of Bend can work together to solve the problems discussed in the November 18, 1977 report.



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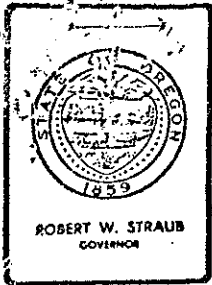
Agenda Item No.
December 16, 1977
Page 2

2. The Director recommends no Commission action at this time and that the Commission consider a staff progress report at the January meeting.

Michael Downs
for
WILLIAM H. YOUNG

Robert E. Shimek
382-6446
12-6-77

Attachment: Agenda Item No. F



Master Copy

Borden
of
Borden

Environmental Quality Commission

S-Bend

1234 S.W. MORRISON STREET, PORTLAND, OREGON 97205 PHONE (503) 229-5693

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
NOV 7 1977

BEND DISTRICT OFFICE

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. F, November 18, 1977, EQC Meeting

Public Sewerage Considerations Within Bend Urban Growth Boundary

Background

1. Since the early 1900s, central Oregonians have been disposing septic tank effluent down lava fissures and dry wells (sewage disposal wells) rather than using conventional drainfields. This practice prompted a study of disposal well practices in 1968 by FWPCA. FWPCA (predecessor to the EPA) concluded that continued discharges of septic tank wastes to disposal wells pose a potential threat to groundwater quality. Accordingly, the EQC adopted regulations on May 13, 1969 to phase out disposal wells for inadequately treated wastes. Exhibit A illustrates the general concepts.
2. The concept of the regulations was to phase out existing sewage disposal wells in rural areas by January 1, 1975, but to allow new wells in populated areas where an acceptable sewerage construction program had been approved by DEQ. The latter areas would be classed by DEQ as "permit authorized areas" within which DEQ (or a county Health Department) could issue temporary disposal well permits. After January 1, 1980, no new disposal wells would be permitted in the "authorized" areas, and existing wells at that time would be sealed and abandoned.
3. To qualify as a permit authorized area, applicants had to agree to sewerage construction thus:
 - a. Hire consulting engineer by July 1, 1969
 - b. Submit preliminary engineering report by January 1, 1971
 - c. Start construction by August 1, 1971
 - d. Complete construction by January 1, 1980
 - e. Submit annual reports to DEQ which show reasonable progress
4. Madras, Culver, Metolius, Redmond, and Bend were designated permit authorized areas. The status today of each is as follows:



Contains
Recycled
Materials

- a. Madras--city sewerage system complete in 1976--urban area sewerage planning (Step 1) in progress
- b. Metolius--system complete 1975
- c. Culver--sewerage system complete 1976
- d. Redmond--system under construction--about 40% complete
- e. Bend--Sewerage Planning (Step 1) complete within Urban Growth Boundary (UGB). Final design (Step II) underway within current city limits (Phase 1), but not within the UGB outside the city limits (Phase 2). There is no design or sewerage construction proposal pending for the Phase 2 area at this time.

5. Overall, Bend's sewerage project has been beset with delays since 1969. To date, the following sewerage planning has occurred:

- a. Report on a Preliminary Study of a Sewage Collection and Treatment Facilities--CH2M 1967 (sewage treatment plant serving about 10% of Bend constructed in 1970)
- b. Report on Cost Updating of a Proposed Sewerage System for Bend, Oregon--Clark & Groff 1972
- c. Preliminary Design and Final Plans for East Pilot Butte Interceptor Sewer--Clark & Groff and city staff 1972-1974 (not built)
- d. Study of the Feasibility of Accepting Privy Vault Wastes at the Bend Treatment Plant--Clark & Groff 1973 (built)
- e. Preliminary Report Sewerage Study (for the City of Bend)--Century West, paid for by Brooks Resources 1974
- f. Sewerage Facilities Plan, City of Bend, Oregon--Stevens, Thompson & Runyan, Inc. and Tenneson Engineering Corp. 1976--approved by DEQ and EPA
- g. Supplemental Environmental Impact Assessment Draft, 23 September 1977--BECON
- h. Step II underway for Phase I of ST&R plan

6. All the central Oregon sewerage projects have been complicated by rock excavation and local financing difficulties, but each community has overcome these obstacles. Bend overwhelmingly passed a \$9,000,000 bond issue. Bend experienced some additional time delays due to:

- a. Analysis of experimental vacuum and pressure sewer systems
- b. Excessive cost discussions before accurate cost estimates were actually pinned down.

Indeed, cost estimate inaccuracy is largely responsible for Bend's decision to return to the E-Board for more hardship funding, but that is covered under a separate Commission agenda item.

7. Because Bend's annual reports showed progress towards sewerage construction (although behind schedule) DEQ has renewed their permit authorized status for sewage disposal wells each year through present.

8. Believing sewerage construction to be in the offing, DEQ authorized several dry sewer projects with "interim" drainfield and disposal well facilities. The facilities plan addresses the entire urban area, but due to cost projections it soon became clear that an immediate project was likely only inside the city limits. Unfortunately, most current subdivision activity (and homesite construction) is actually occurring within the Urban Growth Boundary (UGB), but outside Bend city limits. The Phase 1 sewerage project will not serve construction outside the city limits.

9. DEQ recognized this dilemma as early as 1973, and began tentative negotiations with city and county officials (staffs and commissions) to jointly participate in sewerage planning and construction within the UGB. Although the city and county both endorsed the facilities plan on October 6, 1976, Deschutes County has not implemented any of its recommendations.

The facilities plan includes an adopted Urban Growth Boundary (UGB) which influenced the plan. A quotation from the facilities plan describes the relation of the City of Bend General Plan to sewerage service:

"Since 1970 rapid population growth in the Bend area has occurred mostly in Deschutes County rather than the City. Population growth within the City has occurred mainly because of annexation policies.

"Flexibility has been a major objective in establishing the plan and it has provided for alternate population densities in outlying areas to accommodate future growth trends which are difficult to anticipate at this time. The major determining factor for higher densities will be the provision for sewerage. It is important to recognize that proper land use planning should precede sewerage planning. The plan would provide a north-south center strip of industrial and commercial activities with varying types of residential activities extending from this central core. The greatest population densities would be located in the central area with lower densities toward the outer edges of the urban area."

10. Much of the growth outside the city, but inside the UGB (i.e. the Phase 2 area) actually has occurred with little or no regard for how sewerage connections would be made except as inadvertently regulated by DEQ by "indirect" planning strategies. Examples are shown in Exhibit B. The City of Bend is powerless to implement planning decisions outside their city limits.

11. By 1976, the interface conflict and Phase 2 growth without sewers was obviously serious. DEQ continued meetings with city and county officials. The city was becoming conspicuously concerned about their possible "inheritance." Thus on June 1, 1977 and July 5, 1977, DEQ was successful in conducting joint sewerage policy planning sessions among City-County-DEQ.

At the July 5, 1977 meeting, it seemed appropriate to turn initiative for further meetings over to local officials since planning is a local function. Deschutes County requested a follow-up meeting on September 12, 1977. At that meeting with the County Commission DEQ volunteered that it was unable to justify continued sewerage "concessions" in the Phase 2 area, since no sewerage implementing authority, such as a County Service District, was operational there. ~~The concept of a septic tank moratorium to halt conflicts with the sewerage plan was discussed.~~

A joint City-County urban planning commission concept was proposed (Exhibit C), but Deschutes County felt that to be a premature move. Instead, a joint committee to study differing building standards between city and county was established (Exhibit D). Intensive development continued in the Phase 2 area without sewerage services, except for Choctaw Village Sanitary District *and Juniper Utilities.*

Bend changed its annexation policy after forming a citizens' group to study subdivision standards (Exhibit E).

12. Unlike many urban growth areas, Deschutes County planning ordinances permit development at low (up to 5 acre lot sizes) as well as high densities within the UGB. This aggravates sewerage construction by permitting "leap-frogging" densities. For example, on a given radius from Bend you might encounter 1000 feet of 1/3 acre lots, then 1000 feet of 2-1/2 acre lots, then 2000 feet of 1/2 acre lots, etc. The net result is expensive ultimate sewerage service to urban densities not immediately adjacent to Bend's existing urban densities.

13. The key item lacking is local coordination such as a City Utility Board, a County Service District, or some form of equivalent control.

Evaluation

1. Sewerage construction in Bend proper (Phase 1) will not likely be complete and available at the city limits until at least 1981.
2. At least 230 sewage disposal wells exist in the Phase 2 area which are not now scheduled for phase out by a sewerage system although the facilities plan shows how that could be done.
3. There are not many alternatives for sewage disposal in the Phase 2 area other than dry or wet community sewers due to:
 - a. Unavailability of a municipal sewerage system
 - b. Disposal wells not permitted per Oregon Administrative Rules (OAR) 340-44-005 through 44-045
 - c. Shallow soils often prevent drainfield construction
 - d. Package sewage treatment plants are not viable unless they have a large number of service connections

- e. Experimental septic systems are costly, and encourage low density
- f. Alternate systems usually turn out to be big and costly drainfields

Thus, through Geographic Region Rule A which allows drainfield construction in shallower soils in central Oregon, DEQ has actually aggravated the planning and sewerage construction costs by allowing these systems which, in turn, encourage low density development.

4. DEQ has documented 28 surfacing sewage failures in the Craven Road-Cessna Drive area adjacent to Bend; which generally have no alternative for repair other than a regional sewerage system. The city is unwilling to annex because the water system does not meet city specifications, and the county has discussed an LID. But nothing has happened. DEQ attended several local meetings to develop interest in annexation, LID's or a County Service District with no success. The sewage continues to surface.

5. DEQ is pressured daily for sewage disposal well repair permits within the UGB. Short of vacation of the premises, drillhole repairs are the only immediate option (although illegal), since a regional sewerage system is not available and drainfields are usually not possible due to small lot sizes and/or shallow soils. Authorization of such repairs actually undermines support for regional sewerage construction since the problem is moved out of sight but not solved by such repairs.

6. DEQ is pressured daily to approve compromise subsurface systems within the UGB for many subdivisions. In so far as has been possible, DEQ has agreed to complex terms to facilitate sewerage planning, allow interim facilities, not aggravate densities, and to prevent high denial rates. Unfortunately, lacking regional sewerage systems, the "interim" facilities become "permanent"--they are not designed to function permanently, and usually do not.

7. Since federal construction grants were projected based on regional sewerage facilities, there is risk of losing such funding if the Phase 2 area is developed without a sewerage system.

Summation

1. The UGB was adopted by the City of Bend and the Deschutes County Commission on June 2, 1976. The facilities plan was adopted by City of Bend and Deschutes County Commission on October 6, 1976, and is the approved sewerage services component within the UGB. The Oregon Department of Land Conservation and Development has not yet adopted the UGB.

2. Since there is no implementing mechanism or authority for sewerage services within the UGB and outside the Bend city limits, DEQ has been unable to develop guidelines consistent with the facilities plan which do not aggravate sewerage construction in that area.

3. Thus a question exists as to whether DEQ and its contract agent, Deschutes County Health Department, can continue septic tank approvals in the Phase 2 area when such approvals are or may be in conflict with local plan elements. To what extent are DEQ actions controlled by planning laws is a key question.

4. Possible DEQ alternatives range as follows:

- a. No action--continue septic tank and drainfield approvals/denials without regard to local planning.
- b. Obtain a written ^{City} program from the Deschutes County Commission which shows how DEQ and the ^{County} Commission can work together to insure that Phase 2 sewerage construction occurs in accordance with the approved facilities plan and its amendments, which show proposed trunk sewer locations. The program shall diagram an implementation strategy which addresses:
 - 1) Who will plan collector sewers;
 - 2) When sewerage facilities will be constructed;
 - 3) How sewerage facilities will be financed;
 - 4) Who will implement planning, design and construction;
 - 5) How development will be handled in the interim to insure that it does not impair implementation.
- c. Restrict subsurface sewage disposal systems in the Phase 2 area until at least one of the following occurs:
 - 1) Deschutes County forms a County Service District to design and construct sewerage facilities in the Phase 2 area to accommodate any county approvals in the UGB; or
 - 2) An equivalent public body is formed to regulate these activities in accordance with regional sewerage planning.

Director's Recommendation

1. The Director recommends that the Commission direct the staff to work with the Deschutes County Commission to obtain a written agreement outlining how DEQ, and the ^{City} County Commission can work together to solve the problems discussed in this report, and further direct the staff to schedule ^{Deschutes} ~~public work~~ ^{session} ~~hearing~~ on November 29, 1977 in Bend to take testimony on the proposed working agreement ^{City} ~~between~~ DEQ, and the County and on other alternative causes of action the EQC could pursue. CAUSE 5

2. The Director recommends no further action at this time, but suggests that the Commission consider ~~findings from the November 29 hearing at~~ *work session.* its next meeting. *progress from the*

Bill

WILLIAM H. YOUNG

John E. Borden
382-6446
11/2/77

Attachments: A through F

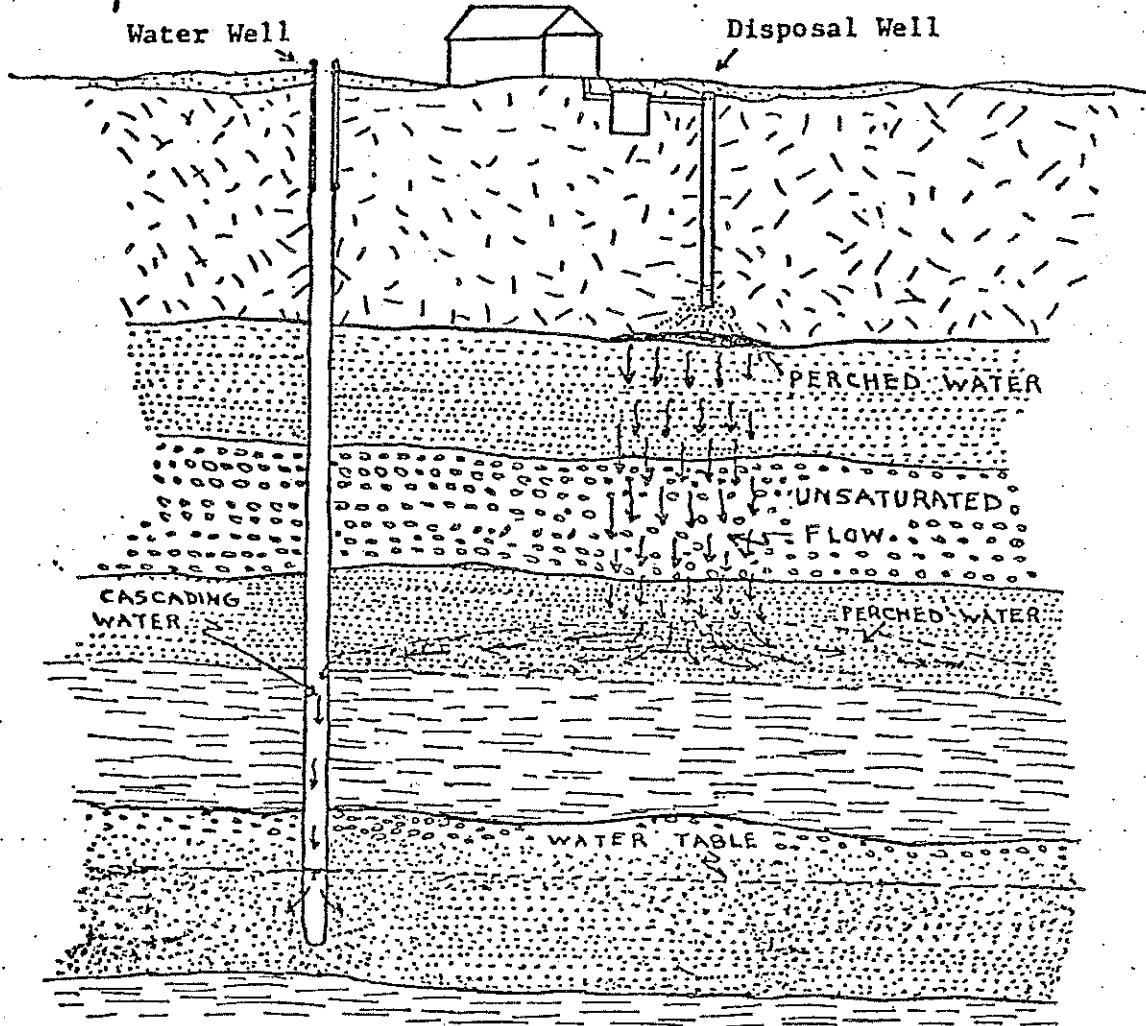


FIGURE 15. --DIAGRAM SHOWING HOW AN UNCASSED WATER WELL CAN SERVE AS A CONDUIT FOR THE MOVEMENT OF PERCHED WATER TO THE REGIONAL WATER TABLE

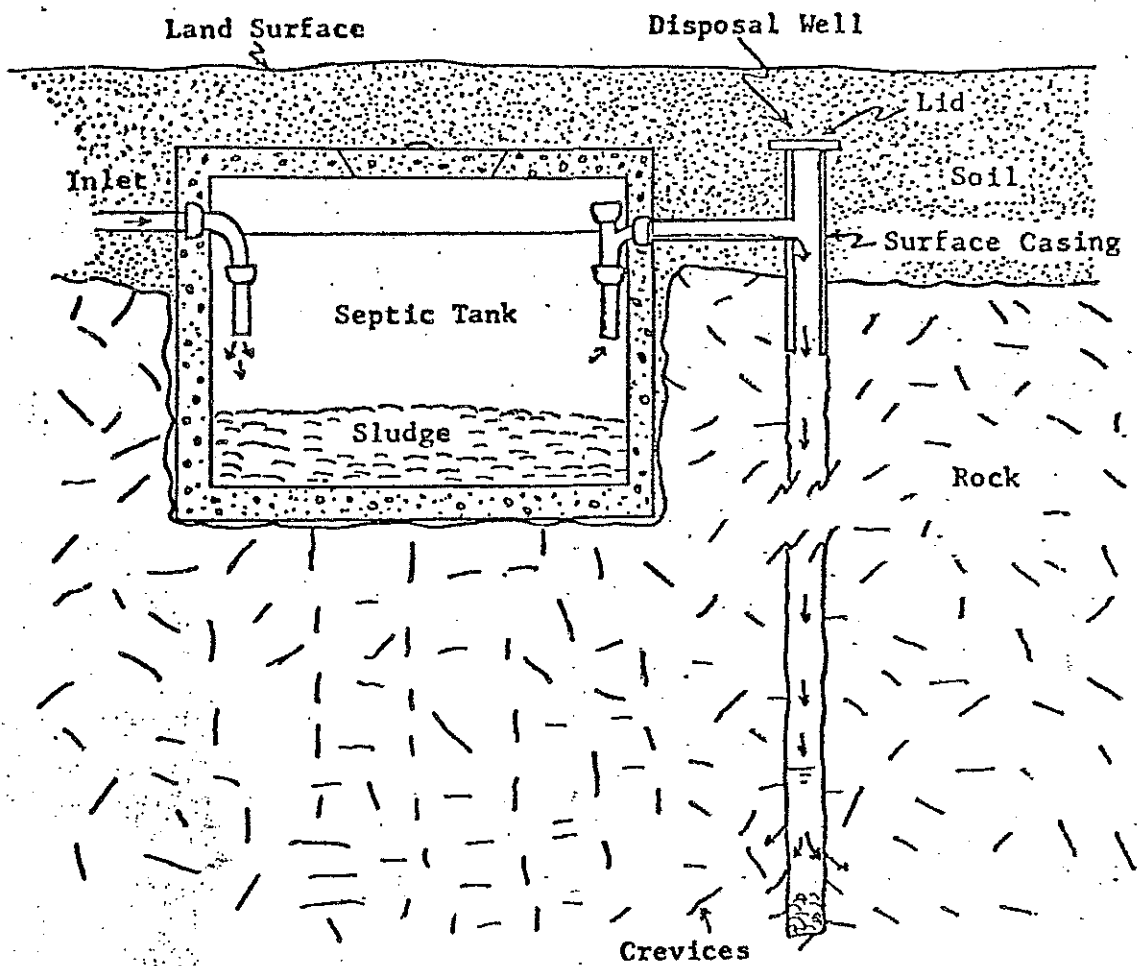
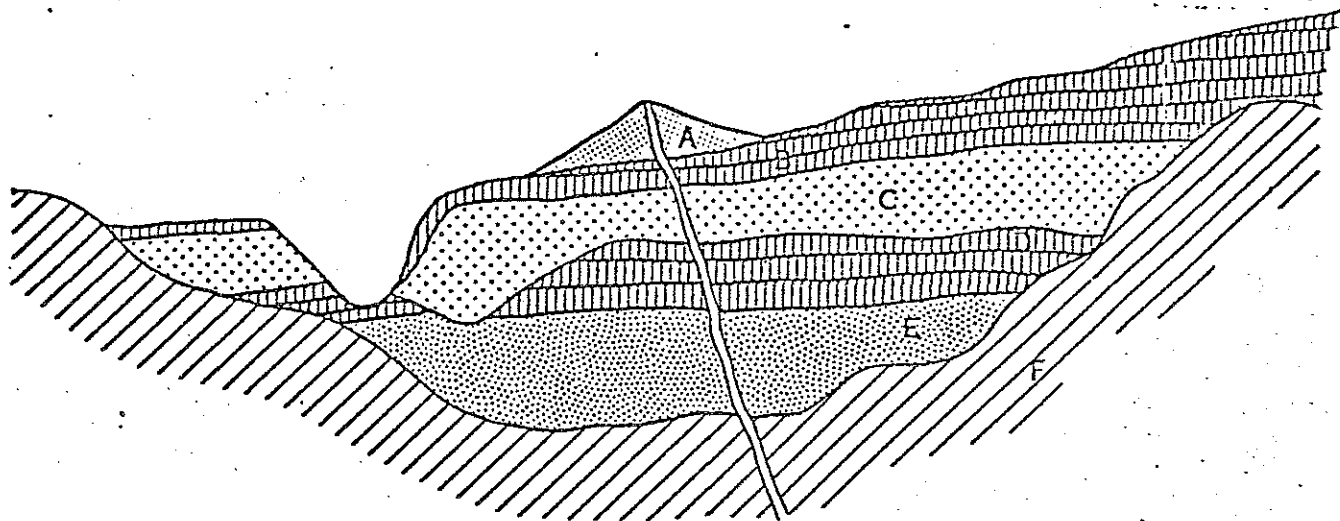


FIGURE 6. --DIAGRAM OF A TYPICAL DOMESTIC SEWAGE DISPOSAL SYSTEM IN THE MIDDLE DESCHUTES BASIN



Designation in Figure	Unit Name	Character	Water-bearing Characteristics
A	Quaternary pyroclastic deposits	Chiefly cinders associated with cinder cones.	Rocks of this unit are generally well drained and not sources of ground water. Where saturated they are capable of yielding large supplies of ground water.
B	Quaternary lavas	Chiefly basaltic lava flows associated with Newberry Crater, and volcanic eruptions in the Cascade Range.	Contains numerous porous lava flows. At most places are well drained and are unproductive. Where they are saturated, they are capable of yielding moderate to large supplies of ground water.
C	Madras formation	Chiefly stratified layers of sand, silt, ash, pumice with some gravel lenses. Contains some interbedded lava flows.	This formation is in large part fine grained and not a productive aquifer. At places it contains permeable lenses of gravel that are capable of yielding moderate supplies of ground water. Some of the interbedded volcanic rocks are permeable and are capable of yielding large supplies of ground water.
D	Columbia River basalt	Series of basaltic lava flows.	Contact zones between individual lava flows serve as aquifers. This formation is generally capable of yielding moderate to large supplies of ground water.
E	John Day formation	A sedimentary formation composed of silt, sand, and volcanic ash.	The fine grained character of this formation precludes it from being a productive source of ground water.
F	Clarno formation and older rocks undifferentiated.	Chiefly consolidated sedimentary rocks, volcanic rocks and associated pyroclastics.	All of these rocks are believed to be of low permeability and not capable of furnishing more than meager supplies of ground water.

FROM UNPUBLISHED REPORT - OREGON STATE ENGINEER

FIGURE 3. -- MAJOR ROCK UNITS IN THE DESCHUTES RIVER BASIN

SUBDIVISION ACTIVITY SINCE JULY 1, 1969

Subdivision Name	Plat Date	Number of Lots	Subdivision Acreage	Proposed or Existing Sewage Disposal Status
Awbrey Meadows	7-28-71	45		Septic tank/drainfield
Mitchell		6	2.4	Septic tank/drainfield
Sherman Park	1976			Septic tank/drainfield
BID 1	1975			Septic tank/drainfield
BID 2	1976			Septic tank/drainfield
BID 3	1977			Septic tank/drainfield
Swalley View	6-76	18	49	Septic tank/drainfield
Hunters Circle	6-77	96	43	Septic tank/drainfield
Country View Estates	5-74	13	33	Septic tank/drainfield
Sunny Acres	5-75	14	40	Septic tank/drainfield
Bee Tree	5-72	15	40	Septic tank/drainfield
Kerr Heights	9-77 Appealed	24	48	Septic tank/drainfield
Ronald Acres	9-8-72	6	29	Septic tank/drainfield
Valhalla Heights	Not final	193	100	Septic tank/drainfield -- dry sewers
Bel Air	7-77	40	20	Septic tank/drainfield -- dry sewers
Boyd Estates	Not final			Septic tank/drainfield
Chocktaw Village	6-77	85	85	City sewer under construction
Add. A.	Not final	16	5	
Valley View Estates	Not final	13	3	City sewer

Subdivision Name	Plat Date	Number of Lots	Subdivision Acreage	Proposed or Existing Sewage Disposal Status
Vintage Fare	10-77	40	28	Septic tank/drainfield
Desert Woods	4-77	81	50	Septic tank/drainfield
Paulina View Estates	4-73	61	38	Septic tank/drainfield
Nottingham Square	11-73	170	97	Private sewer system (Juniper Utilities)
Kings Forest	6-76, 3-77	90	79	Septic tank/drainfield
Trapper Club Road Estates	8-76	22	8	Septic tank/drainfield -- some disposal
Ridgeview Park	City - not final	12	4	Septic tank/drainfield
Woodriver Village	11-72	159	25	Septic tank/drainfield
Basque Tranquiles	Not final	--	--	Septic tank/drainfield
High Country	8-73	30	16	Septic tank/drainfield
Chuckanut Estates	6-77	45	17	Septic tank/drainfield
American West	Not final	56	20	Septic tank/drainfield
Timber Ridge	6-76	184	94	Private sewer system (Juniper Utilities)
Mountain High	Not final	121	71	Private sewer system (Juniper Utilities)
Mountain High - 1st Add.	Not final	24	18	Private sewer system (Juniper Utilities)
Tillicum Village	1-13-73	--	--	Juniper Utilities and disposal wells, and drainfields
Ambrosia Acres	Not final	30	20	Septic tank/drainfield
Pinebrook	8-74, 9-76, 5-77	89	57	Septic tank/drainfield
Larkwood Estates	7-77	--	--	Septic tank/drainfield

Subdivision Name	Plat Date	Number of Lots	Subdivision Acreage	Proposed or Existing Sewage Disposal Status
Holliday Park	5-74, 10-76	83	31	City sewer
Edgecliff Estates	6-76	8	16	City sewer
Williamson Park	Not final	93	100	Proposed city sewer
The Winchester:				Proposed city sewer
" " W. Arms	Not final	42	10	Proposed city sewer
" " W. Square	Not final	81	40	Proposed city sewer
Quail Ridge Park	Not final	21	70	Septic tank/drainfield.
Overturf Butte	Not final	56	18	Septic tank/disposal wells -- dry sewer
Knoll Heights	3-74, 3-76	34	14	Septic tank/disposal wells -- dry sewer
Broadway Terrace	City - not final	13	5	Septic tank/disposal wells
Prophets Den	Not final	60	29	Septic tank/drainfield
Ramsey 5th	City - not final	23	15	Septic tank/disposal wells -- dry sewer
Aero Acres	4-72, 4-73	35	16	Septic tank/drainfield
Air Park Estates	9-77	36	20	Unknown
Thomas Acres	7-76	23	14	Septic tank drainfield
Davis Additions	4-73, 4-74	82	50	Septic tank/drainfield
Reed Market Estates	9-73, 4-76, 7-70	48	19	Septic tank/drainfield
Daily Estates	7-70	29	19.5	Septic tank/drainfield

Subdivision Name	Plat Date	Number of Lots	Subdivision Acreage	Proposed or Existing Sewage Disposal Status
Romaine Village	5-74, 2-70, 11-72 6-73, 7-75, 4-76	309	130	Septic tank/drainfield (some large system)
Homestead	9-73, 5-74, 3-76	79	49	Septic tank/drainfield
Golden Mantle	5-71, 8-72, 6-74	54	27	Septic tank/drainfield
Golden Rain	6-72, 6-73, 7-74	24	15	Septic tank/drainfield
Frontier West	6-76	16	8.5	Septic tank/drainfield
St. James Square				City sewer
Shradon Estates	Not final			City sewer
Janela Court	2-77			Septic tank/drainfield
Crown Villa				Private sewer system (Juniper Utilities)
Crown Villa, 1st Add.	Site plan-- <u>not</u> subdivision		27	Private sewer system (Juniper Utilities)
Missionary First Baptist (with dormitory facilities)	1977			Septic tank/drainfield
Heritage	Not final			City sewer
Deprada Court	Not final			City sewer
Sunrise Village	Not final			Possible private sewerage system
Renwick Acres	10-14-77 Not final	16	6	Unknown
Brightenwood	Final - may be in UGB if changes approved			Septic tank/drainfield

City, county officials set joint planning session

Bend Bulletin 8-10-77

Bend City Commissioners and urban area planning commission Deschutes County Commissioners would have jurisdiction with the Bend will meet tonight at 7:30 at Bend City Urban Area, which has its boundary Hall to discuss how to plan Bend's outside the Bend city limits. growth.

The commissioners also will consider widening Neff Road between the Bend City Manager Art Johnson said the commissioners will consider city limits and St. Charles Medical Center. The section is located between Pilot Butte Junior High School and St. Charles. Such a body would replace the Bend Planning Commission, which deals with planning inside the city limits.

It also would take over some of the duties of the Deschutes County Planning Commission, which handles all planning within areas of Deschutes County not now incorporated. At the request of Deschutes County Commissioner Bob Montgomery. He said signs are becoming too numerous along county roads as well as along some city streets, and he wondered what the city's code involves.

Exhibit D

Bend Bulletin 3-11-77

Jim Swanson

City, county to appoint joint committee to study differing building standards

By Steve Boyer
Bulletin Staff Writer

Bend and Deschutes County commissioners Wednesday night took a step toward closer cooperation in controlling growth in the Bend Urban Area.

In a joint session at Bend City Hall, the commissioners set up a committee and city and county officials to determine what differences exist between city and county construction standards for developers. The study will focus on roads and water and sewer systems, the areas of the greatest differences.

At the meeting, city commissioners expressed concern that the city may become surrounded by developments which use private water and sewer systems, a number of which already exist outside the city limits. The private systems often are incompatible with the city's. If the developments were to be annexed, said city commissioners, their existing water systems would have to be replaced with ones which meet city standards.

If the city were to become com-

pletely surrounded by private water and sewer systems, it could become locked into a fixed area and tax base. Then, said commissioners, city residents would be forced to pay an increasingly higher tax rate to provide services to the expanding population living outside the city limits but coming into the city to work and shop.

"If we allow this situation to degenerate, we're all laying down on the job," said Bend Mayor Clay Shepard.

Members of the joint committee are Dave Hoerning, Deschutes County director of public works; Charles Plummer, county engineer; Pete Hansen, Bend fire chief; Gary DeBernardi, county project coordinator, and John Hossick, city planner.

When the committee has completed its study of the differences in standards, commissioners decided, it will report back to them. Then they can get together again to attempt to resolve the discrepancies.

"We all have to bend a little bit, and I think we should," said Deschutes County Commissioner Bob Montgomery. "There's no question

about it. We have to have the same standards."

In setting up the joint committee, the commissioners rejected, at least for now, Shepard's idea of creating a planning commission for the Bend urban area. Part of the urban area outlined in the Bend Urban Area Comprehensive Plan, lies outside the city limits.

The Bend Planning Commission, which has jurisdiction inside the city limits, would be dissolved, said Shepard.

An urban area planning commission would take over its functions as well as those within that part of Deschutes County located inside the urban area boundary. County planning now is handled by the Deschutes County Planning Commission.

Urban area planning commission members would be appointed, said Shepard, some by the county commission and some by the city commission.

On matters affecting areas inside the city limits, he said, the urban area commission would report to the city commission. In the rest of the urban area, it would report to the county

commission.

Shepard said the urban area commission would be able to resolve many of the differences in standards. While he won support from City Commissioner Dick Carlson, the proposal earned mostly questions from the three county commissioners.

County Commissioner Don Grubb said once a citizens' committee completes its work on zoning within the urban area, all a planning commission will be required to do is grant variances, or exceptions to the zoning requirements.

Montgomery wondered if the city still would need a planning department if the urban area commission were created. Commissioner Abe Young said two planning commissions still would be required, one for the urban area and one for the rest of the county.

"I don't think there's a dire need for one (urban area) planning commission, but I do think there's dire need for common standards," said Montgomery.

Bend Bulletin 10-6-77

Bend reverses city annexation policy in agreement with planner's suggestion

The City of Bend will begin to annex undeveloped land in a 180-degree shift from previous policy after the Bend City commission approved the change at its Wednesday night meeting.

The change had been recommended by the Bend Planning Commission following the presentation of a report by City Planner John Hossick.

The report compared the costs of annexing land before and after it is fully developed. Hossick told commissioners that regardless of which policy is pursued, the city will have to pay to improve streets, water lines and other services in areas which are annexed.

The report advocates annexing land before it is developed so the city has room to expand its area, population and tax base. The early annexations also will allow the city to gain tax revenue earlier than if it waited until after development, which is the present policy.

If the city continues its present policy, it also could become surrounded by developments with private sewer and water systems which have no wish to annex. Then the city would stagnate while residents moved to the suburbs, the report said.

Hossick and the commissioners emphasized that the report is simply a study, not a concrete proposal to annex the study area an 1,800-acre parcel of land located just north and east of the city. Hossick said the city

cannot unilaterally annex land except when residents or developers have previously agreed to annex in return for city water or sewer service.

Otherwise, said Hossick, state law requires that the city be presented with a petition signed by residents with majorities of the land, population and assessed valuation in the area. A single property owner adjacent to the city limits may also make an individual request, he said. The city can also call an election in which an area's property owners would vote on annexation.

Motel and restaurant owners in Bend's downtown area got the support of the commission in their attempts to be allowed to advertise their establishments along U.S. Highway 97. The commission authorized Mayor Clay Shepard to write a letter to the Oregon Department of Transportation supporting the request.

The commission made its decision after Delvin Plagman, owner of the Rainbow Motel in Bend, showed them a petition signed by Allan Crisler, director of the Bend Chamber of Commerce, and 24 restaurant and motel owners in town. The signs would be placed at the intersections of NE Third Street and NE Franklin Avenue and of N. Highway 97 and NE First Street.

The Department of Transportation controls what signs may be placed along Highway 97.

The commission also:

—Agreed to provide sewer ser-

vice to the proposed Winchester subdivision, located north and east of St. Charles Medical Center. The subdivision will consist of 112 single-family residences and duplexes.

—Awarded a contract to Hart Taylor Inc. of Bend for the construction of a water line from the city's second well soon to be constructed, to the city water system on the east side of the Deschutes River. The company was the low bidder for the project at \$89,914. The cost of the entire project is \$458,000. Half is being paid by the city and half by the U.S. Economic Development Agency.

For Discussion
Amendment to Comprehensive Plan
Development Alternative and Urban Service
Policies

Background

The City, on May 24, 1977, passed a \$9 million bond issue for construction of a regional sewer system. Final design is now underway. BECON, the sewer consultants, will be presenting a project delivery program report within the next several months and have indicated that construction is targeted to start early in 1978.

The City's existing sewage treatment plant has a capacity for approximately 1 million gallons per day. The disposal of effluent is to an open crevice. The amount of effluent the crevice can take is unknown. Several developments in the City and adjacent to the existing plant have been proposed. The developments could create more effluent than the plant and crevice can handle.

The City is striving to coordinate the development of a regional sewage system. It is taking steps to try to accommodate growth until the City's sewer system is enlarged. The provision of sewer service on an areawide basis will need the concurrence of the City, County and DEQ. An agreement should be reached on the regional sewerage system as the basis for future development. Steps should be taken to establish detailed engineering for Phase II areas; caution should be used in the formation of small districts that could impede the development of the regional system; and policies established that clarify when, how and under what type of jurisdiction the "interim" facilities may be permitted.

Several factors now appear to be true:

- 1) The City's sewer system is now assured.
- 2) Land available to be developed at greater densities is now greatly increased.
- 3) State law allows interim facilities in areas where a regional system is or will exist. DEQ's role is to protect the environment and under present regulations cannot deny or control small package plants without a local policy to support such action.
- 4) The development of half-acre lots is generally wasteful of land and can form a barrier to future sewer line construction due to high unit cost. A density of 10-12 people/acre is generally needed to jointly pay for sewers. This is 3 to 4 houses per acre.
- 5) The City and County do not have a definitive policy regarding sewer development within the urban area.
- 6) The history from other communities points to the need for close coordination of decisions effecting District formations, interim plants and provision of sewer services within an urban area.
- 7) There may be more development than the City's existing plant can handle without enlarging parts of the existing plant or development of temporary facilities.

Suggested Policies:

The Development Alternative specifies the need to make provision for sewer service when a financial commitment exists and the sewers will be available within 5 years. It is expected that the design definition timetable will give us a reasonable idea on those areas adjacent to the City that will be so situated.

- 1) Within the Phase II area discourage larger lot (1/2 acre +) developments that would form barriers to line extensions or make provisions for dry sewer lines to pass through such an area at the time of development or require dry line or wet line sewers and drill holes where a timetable and financial commitment exists.
- 2) Ask for Environmental Quality Commission approval of subsurface regulation for smaller lots without drainfield replacement areas or drill hole usage in areas where sewer lines are financially committed and assured within a 3-5 year period and where domestic or developed water sources would not be endangered. Also for approval of drill hole usage where the developer will complete the necessary lines to bring the development project sewage effluent to a point where it will connect to an assured system in a 3 to 5 year period provided that the lines so constructed are consistent with the overall facilities plan and meet any neighborhood drainage basin needs.

The City has made a financial commitment to a regional sewage system. The long term benefits to the community were the basis of this decision. We need to take steps that will make it attractive and practical to implement a regional system.

- 1) The County should consider formation of County Service district to provide sewer service.
- 2) Steps should be taken to implement Phase II sewer design. Aerial topographic mapping of the Phase II areas and design of drainage basin systems should be started.

JCH:ve
8/12/77

density if all community services are provided. If community water service is provided, and if the area to be developed is preplanned to the approximate higher density shown on the plan, lots of less than 2-1/2 or less than 5 acres may be developed. The following general policies are recommended for Development Alternative areas:

Urban Standard Residential Areas -

1. Within community sewer facilities planning area or areas with existing community sewer system:

6,000 - 14,000 square foot lot size

Requirement: - Community sewer and water system or
- Septic tank, drill hole, dry sewer and community water system.

2. Outside community sewer facilities planning area but within development alternative area for future community sewer system:

14,000 - 20,000 square foot lot size

Requirement: - Preplanned subdivision or land partition
- Community water system
- Septic tank and drain field

Multiple Family Areas -

1. Within community sewer facilities planning area:

1,000 - 3,000 square foot/dwelling unit

Requirement: - Install community sewer and water system

3,000 - 14,000 square foot/dwelling unit

Requirement: - Community sewer system or dry sewer and community water system

2. Outside community sewer facilities planning area, but within development alternative area for future community sewer system:

14,000 - 20,000 square foot/dwelling unit

Requirement: - Preplanned development
- Community water system
- Septic tank and drain field

The County has just begun to consider becoming involved in this problem and with good reason. Historically, there have been few problems with septic tank drainfields or drill holes in the County. Recently, changes in State regulations have virtually eliminated the use of drill holes for new development and have created an awareness and concern about future growth using drainfields.

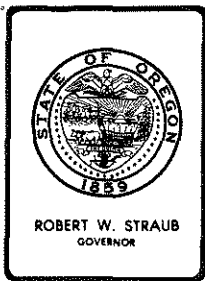
The County has many problems to consider and much to do in the process of planning and establishing sewer service in the urban growth area. As mentioned earlier, a small area east of Pilot Butte could be served now. To provide service over fairly extensive areas would require formation of a service district and several years of planning and construction. Since there is no apparent problem in the area now, it may be very difficult to get voter approval of a sewer district. The most difficult part of this entire situation is that the problems all lie in the future and there are few if any indications of them today.

However, the purpose of any plan is to look to the future and attempt to foresee and avoid problems. If the plan is to be successful, problems must be solved in a context acceptable to the people of the community today. It is not possible at this time to set forth detailed and specific guidelines for Development Alternative areas because the options for development are not clear. Will the County initiate sewer service districts? Will the State regulations eventually require sewer service? Would large parts of the area be interested in annexation to the City as a means of obtaining services? How soon will enough new growth occur to make the problems more obvious? These and many other questions may remain unanswered for several years.

There are some things we do know about the future. The rock will continue to make construction cost higher than normal. The rock will probably continue to require blasting. The Bend Area will continue to grow. Growth pressure will increase land values and reduce lot sizes. Smaller lots will not work as well for individual disposal systems. Sanitation problems will result and, eventually, sewers will be required. It is not a question of whether or not sewers will be necessary, but rather, how to minimize the cost.

The solution to services and increased housing densities must be a joint public and private effort. If services are to be provided, the city and county must participate by doing those things which individual property owners or small developers cannot do for themselves. Facility planning for systems, establishment of districts and unification of standards are examples of functions and responsibilities of local government. As the city and county proceed with these activities, development alternative standards may change for some areas as additional engineering data becomes available.

The Development Alternative symbol consists of two colors in each case. The colors correspond in meaning to those used for other residential areas on the map. The color which symbolizes the larger lot size is the recommended housing density for that area without community services. It recognizes lot sizes generally found in the area at the present time. The second color symbolizes the recommended housing



Environmental Quality Commission

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

MEMORANDUM

TO: Environmental Quality Commission

FROM: William H. Young, Director

SUBJECT: Agenda Item No. K, December 16, 1977, EQC Meeting

Water Quality Management Plan - Status report on review of
Statewide Water Quality Management Plan with local governments
and interested citizens

Background

In December 1976 Volume I of the Statewide Water Quality Management Plan, Beneficial Uses, Policies, Standards, and Treatment Criteria was adopted (with some amendments) by the Environmental Quality Commission. The contents of Volume I became administrative rules which were incorporated into Subdivision I of Division 4 of OAR Chapter 340 and replaced Sections 41-005 through 41-105 of OAR Chapter 340.

One of the amendments, added as a third paragraph to the Preface of Volume I (see OAR 340-41-001), recognized that the deadlines for adoption of the plan prevented thorough involvement by local governments in the development and review of the plan. Thus, the staff was directed to review the contents of the plan with affected local governments and to use their comments and suggestions in preparing amendments for consideration by the EQC not later than December, 1977.

In September, 1977, the staff completed a package of review materials which referred to Volumes I and II of the management plan. The review materials for Volume I consisted of a series of questions and answers addressing generally the purpose, content, and development of the Water Quality Management Plan. It also addressed specifically the major sections of the plan which included: Beneficial uses, Policies and Guidelines, Implementation Plan, Water Quality Standards, and Design Criteria for Sewage Wastes.

The review materials from Volume II included the following updated tables:

1. Inventory of sewage and industrial waste treatment facilities.
2. Fiscal Year 1978 Sewerage Works Construction Grants Priority List and the Extended Priority List for FY 79 and beyond.
3. Industrial waste treatment facilities tables showing the (a) presently identified needs and scheduled actions, and (b) potential needs and proposed actions.



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A copy of a report entitled, "Assessment of Stream Quality in Oregon Based on Evaluation of Data Collected in the 1976 Stream Sampling Program," was included in the review package. This report presents selected water quality monitoring data collected from the Department's routine monitoring program in 1976.

Meetings Explaining Purpose of Review Material

1. The staff met with the League of Oregon Cities on September 15, 1977 to discuss the adequacy of the review package and the involvement of cities relative to the Statewide Water Quality Management Plan. The League's helpful suggestions were incorporated into the finalized review package.
2. The staff attended a LCDC county coordinators' workshop on October 4, 1977, explaining the purpose and content of the review material which was sent to local governments.
3. The Director and staff members participated in a workshop at the League of Oregon Cities convention in Portland on November 4, 1977, and discussed the following:
 - a. Water Quality Management Plan and its impact on cities.
 - b. Work undertaken through the 208 Grant Project.
 - c. Features of the DEQ Construction Grants Project.

Distribution of Review Materials

Over 700 copies of the review package were distributed between September 28 and October 5 as follows:

League of Oregon Cities
Association of Oregon Counties
EQC Members
Policy Advisory Committee Members
State Representatives and Senators
Councils of Governments
Cities
Board of County Commissioners
County Health Departments
County Planning Departments
LCDC Field Representatives
LCDC County Coordinators
Port Authorities
Sanitary Districts
Irrigation Districts
Soil and Water Conservation Districts
DEQ Regional Offices

Response from Local Governments

On October 7, 1977, the Umpqua Regional Council of Governments sent a letter requesting response to questions on Water Quality Standards and Design Criteria for municipal waste treatment.

The staff responded to the questions by telephone followed by a letter of confirmation.

The Department has not received any other letters of inquiry or requests for meetings to discuss elements of the Water Quality Management Plan. Thus, at this time, the Department has no amendments or additions to propose.

Opportunities for Future Input

Additional opportunities for improving the Statewide Water Quality Management Plan through public involvement will be available from now through September 1978. People who received the review materials were advised of this. Winter and summer meetings will be scheduled across the state to discuss the 208 projects, revisions to the Water Quality Standards recommended by EPA, and other plan elements. Local governments and interested citizens who have information to add or suggestions for revising and improving the Water Quality Management Plan are urged to work with the Department on these plan elements before September 30, 1978. The comments and suggestions received from the public and private sectors can then be formulated into proposed amendments for review prior to the public hearing before the Environmental Quality Commission in November, 1978.

Summation

1. In December 1976, the EQC recognized that the deadline for adoption of the Statewide Water Quality Management Plan prevented thorough involvement by local governments in the development and review of the plan. Thus, the staff was directed to review the plan contents with affected local governments and to use their comments and suggestions in preparing amendments for consideration by the EQC not later than December 1977.
2. Materials were prepared and sent to local governments to assist them in the review of the management plan. They were requested to respond or to meet with the staff to discuss the plan elements needing change.
3. One letter of inquiry was received and the staff responded to the questions raised.

4. The Department has no amendments to propose at this time. Thus, legal notice for a rule making hearing was not issued.
5. Local governments have been advised of the future opportunities available for improving the statewide Water Quality Management Plan through the public involvement process. Proposed amendments derived from these public meetings will be presented to the EQC for consideration in November 1978.

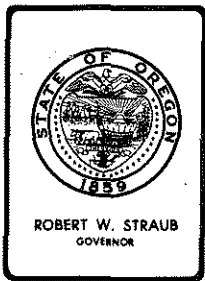
Recommendation

No action is required at this time except to receive additional testimony from the public, if any.

Bill

WILLIAM H. YOUNG

H. L. Sawyer/E. L. Quan:ak/em
229-5324/6978
December 5, 1977



Environmental Quality Commission

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

MEMORANDUM

To: Environmental Quality Commission

From: William H. Young, Director

Subject: Agenda Item No. L, December 16, 1977, EQC Meeting
City of Bend Sewerage Project - Update on Financial
Considerations of City of Bend Phase I Sewerage Project

Background

At its November 18, 1977 meeting, the EQC requested that they be informed of progress toward resolving Bend's project funding deficit. Since November 18, DEQ staff have explored several possible alternatives with City of Bend representatives.

Review of several financing options has revealed no ideal solution. Some alternatives have been screened out, but additional time will be needed to fairly evaluate the remainder.

On December 2, 1977 a meeting was held in Portland with City staff and consultants. A draft financial report prepared by Bartle-Wells & Associates was presented. The financial report strongly intimated that DEQ and the State of Oregon are expected to provide additional grant monies to erase the local funding shortage.

Our intent has been and will be to look seriously at all funding alternatives. This was made very clear at the December 2 meeting.

Immediate Concerns

Construction of the first piece of the project is scheduled to be started by late February or early March. Any delay will result in increased costs due to inflation. (According to BECON (Bend's Engineering Consultant) total project costs are inflating approximately \$12,000/day.)

The City maintains that funding for the entire project must be assured before any part of the project can proceed. EPA grant funding will hopefully be available; the problem facing the city is financing the non-grant portion of the project cost.



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Alternatives Evaluated to Fund "Shortage"

<u>Alternatives</u>	<u>Comment</u>
1. City vote to authorize sale of more bonds.	1. The City Manager and City Commission do not support this alternative. They feel the City is already paying enough for its proposed sewerage system.
2. Emergency Board obligates more grant funds.	2. An additional grant could be recommended if financial hardship exists. Our information thus far does not justify increase in state hardship grant.
3. City establish a sewer connection charge for all homes presently in existence in Bend.	3. City's financial consultant indicates that establishment of a connection charge would be different from what citizens had been told prior to bond election. However, the staff believes this alternative may be legally implementable. A \$650.00 charge/connection would make up most of the shortage. Such a charge is not unreasonable, based on every other community owned sewer system in the State of Oregon.
4. Form a Local Improvement District to assess benefited properties.	4. City's financial consultant indicates that an assessment district is different from the financing plan represented to and approved by the voters. This alternative is probably prohibited now, since voter-approved General Obligation Bonds were intended to cover City costs.
5. Adjust project estimates to match available funds - such as lowering the contingency allowance.	5. This alternative is not practicable and goes against good engineering practice. Present contingency allowances are reasonable.
6. Assume that only $\frac{1}{2}$ of citizens agree to utilize City financing plan for house sewer construction (i.e., resulting in approximately \$2 million savings).	6. Savings based solely on <u>assumptions</u> are difficult to forecast. In addition, this alternative would have to be paired with another to make up the total expected shortage.

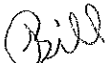
Alternatives

Comments

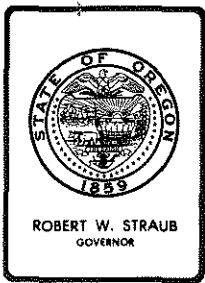
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| 7. Emergency Board allows DEQ to make "recoverable grant" to City from \$1 million to 3.5 million. | 7. This would in fact be an unsecured loan. The City's obligation would not specify <u>when</u> the "grant" must be repaid to avoid Local Budget Law restrictions (i.e., non-voter approved debt carried for more than one fiscal year). The city has indicated that interest saving realized if DEQ purchases bonds would be sufficient to repay about \$1 million. |
| 8. Have only \$2.18 million of the City's \$9 million bond issue used to fund house sewers on private property. (i.e., realize approximately \$2.7 million savings). | 8. Original project estimates included only \$2.18 million to be expended on "house sewers". These sewers are now estimated to cost approximately \$4.8 million. This alternative would have to be paired with another to make up total expected shortage. It is not clear to us whether the remaining costs could be charged to the individual homeowner either directly as by assessment. |
| 9. Agree to postpone construction contracts on effluent filtration facilities and sludge disposal facilities to determine if there will, in fact, be a shortage. Local share cost of these contracts amounts to approximately \$0.6 million. | 9. This alternative would postpone a decision that should be made as soon as possible. The local share cost saved is minimal when compared with other alternatives. In addition, the project could (in all likelihood) not proceed with EPA grant participation with these two contracts having no confirmed local funds. Effluent filtration and sludge disposal facilities will be necessary before operation of the sewage treatment plant could be permitted. |

Summation

- 1.) Alternatives 5 and 9 were screened out for the reasons noted.
- 2.) Additional time will be needed to evaluate Alternatives 1, 2, 3, 4, 6, 7 and 8. We expect to have a recommendation for the EQC at its January meeting.


WILLIAM H. YOUNG

Clarence P. Hilbrick, Jr.:aes
299-5311
12/14/77



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 No. M., December 16, 1977, EQC Meeting

Oregon CUP Award

Background

The Oregon CUP Award (Cleaning Up Pollution) Program was adopted by the Environmental Quality Commission in 1972 to recognize industry, organizations, institutions, governmental units and individuals for outstanding efforts in preventing or cleaning up pollution in Oregon.

Awards are presented on the basis of DEQ evaluation of environmental quality enhancement beyond the requirements of the standards. The industrial awards are given for a period of one year and are renewable. All other awards are presented on a one-time basis.

Evaluation

Each of the nominees is considered for an award by the Oregon CUP Award Screening Committee. The Committee is comprised of nine members appointed by the Director to represent various constituent groups of the DEQ. Members on the Committee represent the general public, environmentalists, industry and labor.

The Committee considers each nominee on the basis of information and presentations submitted to the Committee and from the DEQ evaluation. Each of the following paragraphs is a summation of that material:

American Can Company, Halsey Plant - American Can Company, Halsey, was one of the first two recipients to receive the Oregon CUP Award. American Can Company has continued to operate their pollution control facilities at a high level of efficiency. They were a leader in developing a plan and educating their employees about the plan for disposal of pulping effluent on land should the critical water levels of the Willamette River necessitate special pollution control measures. Included in the plans, should they be necessary, were making the effluent available for crop irrigation, impounding the effluent, adding pure oxygen to the effluent and spray irrigation around the plant site. The plant maintained its "model" plant image by planting some 68,000 trees for beautification on the plant



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site, taking part in community environmentally oriented programs and continuing tests on alternative uses of their pulping effluent.

Fowler Manufacturing - The Fowler Manufacturing Company is a family enterprise located in the Aloha area. The plant manufactures the "Fowler Saddle" and the Fowler "Drilling Device" used for installation of sewer service connections to live sewer laterals. When connected properly, the device and the drill provide a system of connection to existing sewer lines that provide a superior, long lasting and leak-proof connection. Environmentally, the process eliminates groundwater and rainwater infiltration into the sewer. This reduces the loads on the sewage treatment plants and provides a cleaner effluent to the State's waters. Many suburban cities, including Milwaukie and Beaverton, insist on this method of sewer connection to existing sewer lines.

Zenon F. Rozycki - Mr. Rozycki developed and patented a chemical formulation for deinking and repulping used newsprint. Last year, Publishers Paper Company in Oregon City received a CUP Award for installation of a pilot plant for this operation. The success of the pilot plant, which is producing the highest grade repulping material in the world, depends upon the chemicals used to dissolve and suspend the ink particles. Mr. Rozycki also contributed technical guidance and management direction in developing the system of barging pulp wastes to the Columbia River, development work on aerated stabilization basins, determining the nutrient levels necessary for waste water treatment, efforts to reduce fresh water consumption by in-plant re-use and the removal of the use of zinc based paper brighteners to non-polluting sodium.

Tektronix, Incorporated - Tektronix, Inc. is a locally based world-wide producer and distributor of electronic industry components and products. During 1976 the Company began an extensive reclaim-recycling effort designed to cut down on solid waste coming from the plant and to better utilize precious resources. In the first year of operation the recycling reclaim program recovered the equivalent of \$1,275,475. The recovery program accounted for the reduction in solid wastes of such metals as gold, silver, platinum, palladium, copper, aluminum, brass, steel, stainless steel, tin, iron, nickel, zinc and paper. In all, nearly one and three quarters million pounds of wastes were recovered. The program is a first for the industry. It is likely that other electronic industries will follow the lead of Tektronix.

ESCO Corporation - ESCO Corporation is a Portland based steel casting and manufacturing firm. They received their first Oregon CUP Award in 1974. Over the past year ESCO has not had the need to expand or improve on their environmental control system. They did continue a conscientious effort to maintain and prevent from deterioration their award winning control facilities. ESCO maintains one full-time maintenance person to routinely inspect and repair control equipment. Other maintenance team personnel are required to work with this man as needed, resulting in more than 3,560 hours of personnel time and using more than \$75,000 per year in materials to prevent breakdowns of the air pollution control equipment. In addition to maintenance, ESCO involves 8 engineers to a total of 2 man-years to continuously update and design new environmental controls. Total cost of the maintaining and upgrading program to ESCO is estimated to be more than \$185,000 per year.

Columbia Steel Casting Company - Columbia Steel Casting Co. celebrated its 75th anniversary in 1976. During this span of life the Company changed from a small firm supplying products to Pacific Northwest Customers to its present activity of manufacturing and marketing mining and milling replacement parts throughout the United States. The Company installed its first pollution control equipment in 1938 and has continued to upgrade its control facilities through 1976 when it received praise from the staff of the DEQ for installation of a reverse flow baghouse collector. Columbia Steel Casting has received awards and recognition from the former Columbia-Willamette Air Pollution Control Association in 1976, the "Electrified Industry" Magazine, May 1973 issue.

Summation

In summation, the Oregon CUP Award Screening Committee voted to award the Oregon CUP to:

American Can Company, Halsey, a renewal award for being a model plant for the Pulp and Paper Industry to look to with regards to environmental control and awareness;

Fowler Manufacturing for encouraging cities to use a process for tapping onto existing sewer laterals involving drilling of a core and making a soft, watertight connection, preventing groundwater and rain-water infiltration;

Zenon F. Roxycki for the development of a chemical formulation for the process of deinking and repulping used newsprint;

Tektronix, Incorporated for their extensive reclaim/recycling program to cut down on solid wastes and better utilize precious resources.

The Screening Committee also voted to award Letters of Commendation to:

ESCO Corporation for maintaining and upgrading their plants pollution control facilities in a consciencious and model manner;

Columbia Steel Casting Company for award winning and consciencious efforts to control pollution emissions from their plant.

Recommendation

It is the Director's recommendation that the Environmental Quality Commission approve the awards recommended by the Oregon CUP Award Screening Committee.

Bill

WILLIAM H. YOUNG

Dave Gemma:ks
229-6271
12/2/77

Attachments

- | | |
|--|-------------------------------|
| 1. American Can Company - Halsey Plant | 4. Tektronix, Incorporated |
| 2. Fowler Manufacturing Company | 5. ESCO Corporation |
| 3. Zenon F. Rozycki | 6. Columbia Steel Casting Co. |

1975-76 Evaluation

American Can Company's Halsey pulp mill has been from its very planning stages a model mill from an environmental standpoint. Many "first-in-industry" systems were incorporated in the mill's design and, as a result, this mill was the recipient of one of the first Oregon CUP Awards. Many innovations in pollution control, primarily in the area of Air Quality (for example the lime mud oxidation system cited in last year's award) have resulted in the awarding of the Oregon CUP each year since its inception.

The progressive attitude toward pollution control shown by American Can in the past continued during the July 1975 to July 1976 period. While no new capital projects came on line during that period, considerable time, manpower, and skill was expended in several mill projects.

One of the most recent projects has resulted, according to the latest monitoring data, in an additional 1% reduction in the BOD of the treated mill effluent. The project involved the seemingly simple raising of the liquid level in the secondary ponds to increase detention time and to provide a 93% BOD removal as compared to the previous and exemplary removal of 92%. The maintenance associated with the increased secondary pond liquid level, particularly the increased surveillance necessary to avoid accidental spills, make this system somewhat tricky to operate. The results -- about 300 pounds per day less BOD discharged -- are, however, worth the effort.

Earlier this year a pilot plant for the reclamational fiber from the mill sewer was set up and a good deal of testing done to establish the efficiency and economic advisability of full-scale installation. Tests upheld the viability of the fiber reclaim project and, at this time, funding for the purchase of equipment has been requested from the home office. A significant reduction in the loading on the wastewater treatment system is anticipated on startup of this new fiber reclamation system.

The performance monitoring of the recently (February 1975) installed lime mud oxidation system is showing that system to be most effective in total reduced sulfur (TRS - compounds of sulfur responsible for characteristic pulp mill odor) elimination. The American Can mill has been in continuous compliance with its TRS effluent limitations. The staff of the mill are presently assisting members of ITT Barton and the NCASI in the development of improved continuous TRS monitoring instruments.

Last November the American Can staff assisted the E.C. Jordan Company -- EPA Contractors -- in a study of pulp mill effluent color to be used in the development of Phase II effluent guidelines for the industry.

The mill participated in several studies conducted by the NCASI, specifically to identify sources of general process losses, brown stock washing losses, and BOD losses from the black liquor evaporating system.

American Can also participated in a comparative particulate testing program with the Department (Air Quality Group) to make an error analysis of the particulate sampling procedure.

From the foregoing, it is evident that American Can Company has displayed an aggressive and innovative attitude toward pollution abatement and control. The achievements of this company in the July 1975 to July 1976 period should be rewarded by the award of the Oregon CUP.

American Can Company - Halsey Plant

Background

American Can Company was one of the first two recipients of the Oregon CUP Award, made initially in 1972 as recognition of the technology employed in the design and construction of the company's tissue and pulp mill located at Halsey. Prior to the start of construction, there was considerable public concern expressed about the location of the mill in the Willamette River Valley because of the limited capacity of the river system to dispose of water-borne industrial effluents.

American Can Company pledged to meet every existing Oregon pollution control requirement. In its initial year of production (1970) and during 1971, the mill operation was tuned to achieve the highest degree of water waste treatment and air contaminant control available in the industry. The one pollution problem remaining in evidence concerned odors from the mill's lime kiln emissions. There was, however, an industry-wide lack of technical information on the formation of Total Reduced Sulfur (TRS) in lime kiln facilities, and a consequent lag in control strategies.

Although the company's efforts in 1974 to reduce TRS emissions resulted in its meeting 1975 prescribed limits, the odor problem remained as the CUP Award Screening Committee considered - and recommended - renewal of the Award for the current calendar year.

During the 1974-1975 award period, American Can Company strived to maintain and improve the treatment of wastes and air contaminants at its Halsey mill, with special attention to odor control at the lime kiln. As a result of the lime mud oxidation project, which moved from the trial stage to full utilization with installation of the mud oxidation tank, TRS emissions have been reduced below the 1975 limit. At the same time, monitoring reliability was investigated and secured.

DEQ review of American Can, Halsey, NPDES Waste Discharge Permit and Waste Discharge Monitoring Reports indicates no major violations occurred; the only instances where limits were exceeded were reported for three days during September, 1974, for slightly elevated BOD discharges due to increased pond loadings and reduced treatment efficiency attributable to use of some hardwoods in addition to the softwoods normally utilized. There has been no recurrence of this problem since September 1974.

The Halsey mill participated in an industry effort to analyze the significance of sulfur dioxide emissions by monitoring gaseous emissions from its Recovery Furnace. Reduced emission levels in the Recovery Furnace, reported in 1974 as a result of precipitator modifications, have continued since the report. Process control monitoring with the Lear-Siegler Transmissometer helped achieve a high level of particulate removal. A program which provides daily servicing and scheduled outages for cleaning and inspection was developed for formal precipitator preventive maintenance.

DEQ Midwest Region staff notes that American Can Company, with the cooperation of its staff, has strived to keep a clean environment on the grounds outside the plant facilities.

1976-77 Evaluation

American Can Company's Halsey Mill has continued to operate their pollution control facilities at a high level of efficiency. They have not installed any major capital improvements or made major additions to their environmental controls in the past year. They have continued to inform their employees and the public of their efforts and the need for environmental concern. They are the only Oregon CUP Award winner to use the symbol on product packaging and in public advertisements.

A major environmental effort during the past year was the extensive planning by American Can to accommodate any requests that may be necessary of the mill should the critical water shortage during Summer and Fall months hamper fish migration. The mill worked up plans by forming a mill-wide Water Use Committee and space in the Company newsletter. Some of the plans they were ready to implement, should they be needed included: making the mill's effluent available to farmers for crop irrigation; to impound digester condensate effluent until the critical period had passed; adding pure oxygen to their mill effluent to compensate for its oxygen demand in the river; using the effluent for spray land irrigation around the plant site.

As an illustration of the Company's environmental attitude and concern, the Halsey Mill was involved in a number of off-site projects. The mill planted 68,000 trees on idle land around the mill site, adding to the beautification of the area and providing a test area for using solids from their primary effluent treatment facilities as a soil conditioner. In other projects, the Company participated in the Keep America Beautiful Campaign by offering supplies and equipment; supplied litter bags to the Boy Scouts of America at a Eugene Scout Fair; supplied equipment and volunteers to assist the City of Albany clean-up program; supplied trees and park benches to a new Halsey school; made litter bags available to mill employees and made 1,000 garbage bags available to area schools as part of the keep Oregon Green and Clean anti-litter contest.

The mill has engaged in an aggressive advertising campaign incorporating the Oregon CUP Award and the mill's environmental achievements. All of the consumer products that are manufactured at the Halsey mill carry the CUP Award logo. The Company states "We are proud that we can lay claim to the Award. We believe this publicity has also served to increase environmental awareness and has enhanced the intrinsic value of the Cleaning Up Pollution Award."

Fowler Manufacturing Company

In late 1975, the Department contacted the "Fowler Manufacturing Company" to become acquainted with their product.

The Fowler Manufacturing Company is a family enterprise which includes Mr. Dwight Fowler and his two sons. The manufacturing plant is located in the Aloha area. To my knowledge, this is the only manufacturer for this type of product in the State of Oregon.

The "Fowler Saddle" when used in conjunction with the "Fowler Drilling Device" is intended to install a sewer service connection to a live sewer lateral. This is accomplished with a minimum of effort and, of paramount concern, the connection is water-tight.

Please be aware that other manufacturers in the USA provide a similar product. Fowler Manufacturing Plant, which is located near Aloha, Oregon, has demonstrated a willingness to improve and modify their product as required.

Their first product was constructed of cast iron. This material limited application due to size and casting costs.

Their second and presently manufactured product was constructed of mild steel with a special protective coat of enameling. Apparently, the consumer response to this modification was limited. They are presently considering a change to a product designated "Nodgel Iron", which I am not familiar with. According to Dwight Fowler, this material incorporates the corrosion resistance of cast iron and the advantages of bending similar to mild steel.

Their third product was constructed of stainless steel, which would be the ultimate material for this particular product. Unfortunately, consumers would not pay the additional costs due to the higher costs of stainless steel and manufacturing methods. They have a surplus inventory of these superior products but do not plan on continuing with it due to lack of consumer acceptance.

Environmentally the equipment makes a superior sewage line connection that eliminates groundwater and rainwater infiltration into the sewer. This reduces the loads on the sewage treatment plants and provides a cleaner effluent to the State's waters. As stated, the high costs have prohibited the potential for widespread use of this equipment. Further modification and development could eliminate this problem.

Zenon F. Rozycki

Background

Mr. Rozycki developed and patented a chemical formulation for deinking and repulping used newsprint. A 40 ton per day pilot plant was built at the Publishers Paper - Oregon City Mill in late 1975 and has been operating since. Although other deinking/repulping plants have been built worldwide, none are producing as high grade of pulp as this plant. The success of the plant depends on the chemicals used to dissolve and suspend the ink particles so that they can be washed free from the pulp.

Advantages of this process are energy savings and pollution reduction. Less than 25% of the energy required to produce pulp from wood chips is consumed by this process. Pollution is reduced since printers ink is the only pollutant generated. No wood sugars or lignins are released into the water from this process since the raw material (used newsprint) contains none. In addition, this plant utilizes wastewater from the papermaking machines as its sole supply of process water. This factor reduces fresh water demands and allows greater efficiencies to be achieved in the mills secondary treatment systems.

Mr. Rozycki has also contributed technical guidance and management direction for the following successfully operated pollution control facilities at Publishers Oregon City Mill.

1. Barging of chemical pulping liquors from Oregon City plant to Columbia River - 1952 to 1969, to minimize pulp effluent impacts on the Willamette River.
2. Development work on aerated stabilization basin for secondary treatment of process wastewaters. Determined necessary nutrient levels for efficient biological treatment.
3. Coordinated and advanced company efforts to reduce fresh water consumption by in-plant reuse.
4. Coordinated changeover from zinc based paper brightness to non-polluting sodium base compounds.

In addition, Mr. Rozycki has been instrumental in establishing an excellent environmental group within the Company to deal with problems as they arise. He is in part responsible for the Company's positive attitude towards pollution control.

While he has worked at the Oregon City Mill, pollution has been reduced from over 200,000 pounds per day of BOD₅ to nearly 8,000 pounds per day and the use of zinc has been eliminated.

Tektronix, Incorporated

Background

Tektronix, Inc. is a locally based world-wide producer and distributor of electronic industry components and products.

In June, 1976 Tektronix began an extensive reclaim-recycling effort designed to cut down on solid waste coming from the plant and better utilization of precious resources. In the first year of operation, the recycling and reclaim program recovered the equivalent of \$1,275,475. The recovery program accounted for the reduction in solid wastes of such metals as gold, silver, platinum, palladium, copper, aluminum, brass, steel, stainless steel, tin, iron, nickel, zinc and the recovery of many other wastes. In all, nearly one and three quarters million pounds of wastes were recovered in the first year.

The Company has made a commitment to recycling and recovery of their wastes. The program is a first in the industry. The emission discharges of pollutants from Tektronix in comparison to similar industry is small and well within EPA 1977 standards. It is likely that other electronic industries will follow the lead of tektronix.

Tektronix also undertook the complete rebuilding of their industrial waste treatment plant in 1976. Work is still progressing and will continue into next year. The Company has gone a step further by taking their pollution control program back to the workshops where the pollutants are generated. They are continually modifying processes to reduce pollutants to a minimum and have sometimes even eliminated an entire process in favor of a non-polluting one. These inplant process changes are considered state of the art and are exceptional. The process changes will likely spin-off into the electroplating industry leaving Tektronix in a leadership position.

The Company is involved in the re-distilling of electroplating chemicals and solvents in-house or turning the waste over to professional reclaiming industries. With completion of the treatment plant modifications and in-house process changes, Tektronix will be in compliance with DEQ requirements and will likely also be in compliance with EPA 1983 Best Available Technology standards a full five years ahead of schedule.

ESCO Corporation

Background

ESCO Corporation, a Portland-based steel casting and manufacturing firm, received the Oregon CUP Award in August, 1974, in recognition of its responsible approach to air quality and noise pollution problems, including completion of control installations in advance of compliance dates.

The evaluation of ESCO's nomination for the CUP Award noted that it has been corporation policy to anticipate operating problems which threatened air quality, and develop designs to handle emissions rather than wait for solutions from elsewhere in the industry, or claim that the problem was insoluble. The result has been that ESCO-designed pollution control systems have been adopted in other industrial applications and in some instances have been prescribed by DEQ for certain types of problems, especially in the control of particulates.

Total cost of the particulate collection system at ESCO is in the neighborhood of \$1.5 million. Although the foundry operation is potentially one of the dirtiest and noisiest industries, and is located in a heavily-traveled and busy area of Northwest Portland's industrial district, it nevertheless operates with virtually no complaints from its neighbors.

A ventilating system related to the thermal sand reclaimer at the corporation's Yeon Avenue plant was installed at a cost of more than \$50,000. In addition, there has been development of an extensive recycling program - an environmental advance, as well as an economy move for the company.

Close surveillance of the ESCO operations at both Plant No. 1 and Plant No. 3 has been maintained by the Portland Region office, with the result that emissions have been found consistently to be in compliance with standards. During a formal inspection in April 1975, some minor deficiencies were found, but these were corrected by the time of a followup inspection. ESCO voluntarily initiated a weekly testing program of the baghouse to insure that the bags are always in good condition.

A staff report concludes that in respect to Plant No. 1, "from the standpoint of emissions, we consider this plant to be in continuous compliance."

Recurring problems at Plant No. 3 in late 1974 and early 1975, however, related to the sand handling system, persisted despite attempts to resolve them with the operating personnel. The company took several steps to eliminate the problems, including hiring a full-time control equipment maintenance man and correcting deficient equipment. When the Department observed excessive particulate emissions on July 16, 1975, apparently from improper cleaning practices and handling of fine collected dust, a "Field Notice" was issued for the violation.

The problems at Plant No. 3 were due to apparent lack of good judgment by some operating personnel. The company responded to the field notice promptly with action to correct the problems, and has pledged that these or similar actions will not happen again.

The DEQ staff report concludes: "We believe that it continues to be the corporate policy to abide by all environmental regulations and be a 'good neighbor.'"

1975-76 Evaluation

Since attaining compliance ESCO has demonstrated a continued and serious commitment to proper maintenance to insure continuous compliance. This maintenance program can be considered innovative in comparison to the less vigorous programs of many other industries.

In the past year ESCO has accomplished the following:

1. A 40,000 ACFM fabric dust collector for the powder burn booth was installed on June 15, 1976.

This is an addition to the powder burn out control system. Previously one bag filter was switched between two booths. The additional filter allows continuous operation of both booths. There is a net increase in particulate emissions due to the increased operation time in conjunction with a small increase in collection efficiency. Collected material is handled in a manner similar to other plant filter collectors, utilizing sealed plastic bags. This is a straight forward application of a fabric filter to control particulate. It uses the L.A. Manual's recommended air to cloth ratio. The Portland Region's records reveal no problems with the existing powder burn collector. The new collector possesses more capacity than the existing collector (30,000 cfm).

2. A 65,000 ACFM fabric filter for the Argon-Oxygen Decarbonization Vessel was installed in the spring of 1976.

This is a new installation. The Argon-Oxygen Decarbonization Vessel results in lower loss of alloys. Emission factors are 234 tons/yr. to the baghouse; 2.34 tons/yr. emission from the baghouse. 99% collection efficiency is a conservative estimate. A hood has been carefully designed by plant engineers to capture emissions during all phases of operation. Plan review noted that better than average engineering design considerations were employed.

Design criteria used in this installation are similar to those ESCO developed in 1972 and 1973. At that time these were innovative, but are now standard practice for similar installations.

1976-77 Evaluation

ESCO Corporation has continued to maintain its facilities to insure that all environmental systems are working properly. Although they have not done anything new or different, with respect to their program, they have continued a conscientious effort involving specific costs and man-years to prevent deterioration of their award winning control facilities.

ESCO maintains one full-time maintenance person to routinely inspect and repair environmental control equipment. In addition, other maintenance team personnel are required to work with this man providing more than 3,560 hours of personnel time and using more than \$75,000 per year in materials to prevent the air pollution control equipment from breaking down.

In addition to maintenance, ESCO involves 8 engineers to a total of 2 man-years to continuously update and design the environmental control system. Total cost to ESCO for maintaining and upgrading is estimated to be more than \$185,000 per year.

Columbia Steel Casting Company

Background

In 1976, Columbia Steel Casting Co., Inc. celebrated its 75th anniversary. This span of time has seen the Company change from a small firm supplying products to Pacific Northwest customers to its present activity of manufacturing and marketing mining and milling replacement parts throughout the United States.

This history of growth has also seen drastic physical changes in equipment and facilities, including an extensive system to collect and control pollution emissions from the company's processes.

As early as 1938, the Company installed its first two baghouse type dust collectors at the original N.W. 9th and Johnson Street location. This equipment collected dust generated by the foundry's sand processing and sand blasting processes.

In 1954, the first step in collecting metallic oxides caused by electric furnace melting was taken with the installation of a wet type dust collector.

In 1962, the Company relocated the plant to the present North Portland site. The existing collection equipment was moved to the new site and three new collectors were added to improve working conditions and control air contamination.

Further improvement to working conditions and pollution control came in 1967 when Columbia installed the largest collector at that time. The installation of this 55,000 CFM unit captured the metal oxides of torch cutting and arcing of castings. The installation was effective enough to attract the attention of "Electrified Industry" magazine which published an article in its May 1973 issue.

In 1972, the wet-type melting furnace collector was replaced with a bag-house type unit to prevent the possibility of water contamination in the Columbia slough. Another measure to improve the water quality in the plant area was the abandonment of the plant septic tank system and subsequent connection to the City of Portland Sewage Treatment plant.

The Company expanded its capacity again during 1974 and 1975 and added another new bag-house type dust collector to capture metallic oxides from the melting equipment. This collector is a 40,000 CFM, 150 horsepower unit.

Dust control was further improved on the sand preparation, shake-out and grinding processes by the 1976 addition of still another 44,000 CFM, 150 horsepower reverse flow bag-house collector. This latest dust collector's utility is currently being refined by the addition of a pelletizing system to further reduce any escape of collected dust.

In the past 38 years, Columbia Steel has worked conscientiously to improve working conditions for its employees and perform its civic responsibilities to the community. These efforts have cost approximately one

half million dollars and have required expenditures of at least one and a half million dollars to maintain and operate these systems.

Today's level of operation for all pollution control systems uses 800 horsepower and consumes 15% of the electric energy used in manufacturing the Company's products. This effective pollution control systems captures approximately 5,400 lbs. of dust per day. The electric energy cost at today's rate is approximately \$4800.00 per month.

Columbia Steel has also been recognized as a leader in pollution control by the following organizations:

1. Columbia-Willamette Air Pollution Authority "Good Citizen Award" given Columbia on May 15, 1973.
2. First runner up award July 16, 1976 from Pacific N.W. Pollution Control Association.
3. Special acknowledgment in "Electrified Industry" Magazine May 1973 issue.
4. June 30, 1976 and September 18, 1975 letters of commendation from DEQ staff people.

My wife and I are both college educated, students of ecology, and very aware of the eminent sanitation problems Oregon is facing, combined with the current population explosion and large number of marginal septic sites.. When we volunteered to participate in this revolutionary experimental program, we were excited to help the State of Oregon develop some viable alternatives to the proven ineffectual standard septic systems failing throughout the country.

The State of California Water Resource Board has published a booklet entitled Rural Wastewater Alternatives. Among other alternatives there are plans for a grey water system similar to those I have submitted, including the use of a 55 gallon drum. The State of Maine Department of Environmental Protection has also been experimenting with grey water treatment plants with dimensions close to a 55 gallon drum, but in a conical shape. These experiments have produced surprising results. Preliminary results indicate a B.O.D. count (Biological Oxygen Demand) of 40mg./liter, a substantial decrease in the present 151mg./liter now being considered as a septic leach field average.

With the initiation of Senate Bill (297) offering alternatives to conventional septic systems, my wife and I were pleased to offer our research to a comprehensive testing program. We submitted our plans with a specific site in mind, not for use by everyone in the state. Our plans best suited sloping hillsides with deep soils. An alternative suited for a number of parcels in Lane and Douglas Counties, but not suited for agriculture. A positive land planning goal.

From our first contact with D.E.Q., confusion and misunderstanding have been the rule rather than the exception. At that time Jun Lamapas was the primary applicant contact with D.E.Q.. Meaning no disrespect to the man, his mastery of English was less than desirable for conveyence of complex information over the telephone. He sent us several of his concepts of grey water systems, all of which were on 3x5 inch scratch paper with no comments or explanations on the relationship to our system. We finally, as we thought, struck an accord for a final plan. We submitted the plans and had no further correspondence from D.E.Q..

The local officials were a different matter however. The Lane County Environmental Management saw our original house plans and decided to call our one bedroom house a two bedroom house. It always was and still is a one bedroom house. Leon Pearson, our building inspector, told us that there was some confusion with our plans and that I should see Ted Dietz. I saw him that day and he told me about his seepage trench plans and about our plans being classified as a two bedroom unit. At this time I told him there was some confusion with grey water disposal plans, and he had better contact D.E.Q.. No response to date on that matter. On that same day I went back to our building inspector and he showed me how to amend my plans so they couldn't be construed as anything more than a one bedroom home. I have used, and still have the original building plans for your inspection.

Needless to say, just about every item mentioned in D.E.Q.'s sequence of events can be dsiputed. However, I am not here to belittle D.E.Q. or it's personnel. I am here to ask the Environmental

Quality Commission for an experimental trial period of our system. I have submitted a testing program and some improvements on our system. We think it would be unfortunate to leave any alternative unexplored in the country's search for adequate sewage disposal and environmental harmony. We want to keep in mind the original intent of Senate Bill 297 and not get bogged down in the customary red tape. Our site is good, our location remote, and on file is a signed and notarized document relinquishing any responsibility of the State or local governments to the failure of our system.

Item F

STATEMENT PRESENTED TO ENVIRONMENTAL QUALITY COMMISSION

I am Esther Jensen, Chairman of the Medford-Ashland Air Quality Advisory Committee. I have been asked by the Committee to express our gratitude to the Department of Environmental Quality for including the majority of our recommendations in the proposed Specific Air Pollution Control Rules.

The intent of the Committee is reflected in the proposed rules with a few exceptions and I would like to direct your attention to those exceptions at this time:

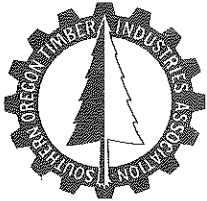
#1 - In the attachments, Table 1, 2, 3, the voting results in Table 3 were based on data from three receptors, the two included in the report and data from the North Medford receptor. Since the North Medford site showed need for a greater reduction in emissions than White City or Medford Courthouse, the Committee has asked that copies of the North Medford Table be made available to members of the Commission.

#2 - I refer you to page 5, paragraph 5 concerning Wigwam Waste Burners. The Committee did not consider alternative methods of disposing of wastes presently burned in the two remaining wigwams. It was not the intent of the Committee to stifle through time restrictions or restrictive wording, a better method which industry and the DEQ could provide. They have obviously had extensive experience in resolving this problem over the years, for there were eleven burners in 1970. .

#3. The Committee has serious doubts about the adequacy of the source testing timetable outlined on page 7 (2nd part). We do not feel that it reflects our intent to document emission reductions and to provide continuing data for subsequent analysis and study.

We recommend that the timetable for source testing be reviewed to determine whether or not the frequency is adequate. We believe that it is essential to learn more about veneer dryers and wood particle dryers at hardboard and particleboard plants. Why not annual source testing until such time that the controls are established and operating routinely?

Thank you for your consideration.



SOUTHERN OREGON

TIMBER INDUSTRIES ASSOCIATION

2680 N. PACIFIC HWY.

MEDFORD, OREGON 97501

TELEPHONE 773-5329

To: Chairman, Environmental Quality Commission
From: Martin Craine, Secretary-manager
Subject: Witnesses for public hearing, December 16, 1977

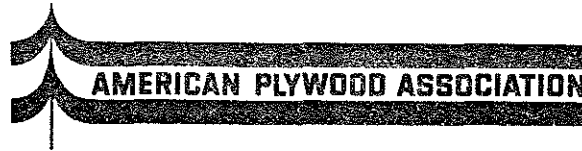
Industry representatives appreciate the opportunity to present comments to the Commission on the matter of proposed Particulate Control Strategy Rules for the Medford-Ashland Air Quality Maintenance Area.

We would be grateful for your cooperation in accepting the following list of representatives who would like to appear in the order shown.

- ✓1. Clyde Kalahan - American Plywood Association
- ✓2. Malcolm Campbell - Washington State University
- ✓3. Matt Gould - Georgia-Pacific Corporation
- ✓4. Lynn Newbry - Medford Corporation
- ✓5. David Junge - Professional Engineering Consultant - Young
- ✓6. Martin Craine - Southern Oregon Timber Industries Association
- ✓7. Wally Corey - Boise Cascade Corporation
- ✓8. Gary Grimes - SWF Plywood Company *WIAA*
- ✓9. Frank Ball - Louisiana Pacific Corporation *WIAA*
- ✓10. William Coffindaffer - Timber Products Company
- Roger Damewood* ✓11. ~~Lowell Fronek - Down River Forest Products~~
- ✓12. Clarence Casebeer - White City Dry Kiln
- ✓13. Mike Burrill - Eugene F. Burrill Lumber Company
- ✓14. J. J. McGrew - McGrew Brothers Sawmill *ASHLAND*
15. Robert Fasel - Double Dee Lumber Company
16. Summation by Matt Gould - Georgia-Pacific Corporation

Thank you,

Gene Hopkins



Bronson J. Lewis
Executive Vice President

W. J. Lewis
*Acknowledge receipt
& indicate that it
will be included in
the hearing record.*
December 7, 1977

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

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
DEC - 8 1977

Dear Mr. Young:

OFFICE OF THE DIRECTOR

We note that you have announced a public hearing to be held before the Environmental Quality Commission on December 16 to consider a regulation covering control of suspended particulate in the Medford Air Quality Maintenance Area.

In reviewing the draft of the proposed regulations attached to the staff report, we note that you and your staff have been quite responsive to many of the concerns expressed in my letter of November 7 and we appreciate very much the consideration you have given our proposed changes.

There is one major point which still seems to be at issue and that has to do with the proposed requirement that veneer dryer emission control devices meeting the state-wide opacity standard "shall be designed such that the particulate collection efficiency can be practically upgraded to approximately 85% over uncontrolled emissions."

As stated in my previous letter, the industry agrees that equipment installed should have the capacity for upgrading removal efficiency beyond 45% but we feel strongly that the inclusion of any specific number for increased collection efficiency is inappropriate and premature. Although we have felt that it was desirable for industry to support the staff recommendation before the EQC, if possible, I am afraid that in this case the industry will consider it necessary to present testimony opposing this part of the regulation.

Our reasons for opposing any specific number are:

1. As the staff report states, the technology purported to provide 85% removal efficiency will cost 2 to 3.5 times as much as the equipment to meet the opacity standard (which provides removal efficiency of at least 45%.) When you consider the magnitude of the cost in the first instance that multiple becomes quite excessive unless there is strong justification for it.

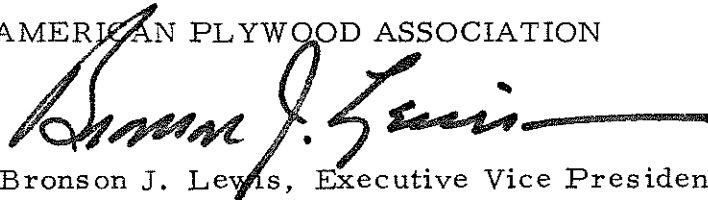
Mr. William Young
December 7, 1977
Page 2

2. It is pure speculation at this point as to what future level of removal might be required of veneer dryers based on future control strategy. Much more needs to be known about the contribution of veneer dryer to particulate problems and more reliable data is needed to verify the contribution of all sources to the emission inventory of the area.
3. Although the DEQ staff seems to be confident that the technology for 85% removal is readily available, the public hearing report in itself acknowledges the uncertainty of such a conclusion in the following language "... well demonstrated but only by one company" and "... adaptable to almost any scrubber, although this has not been demonstrated." Some very capable environmental professionals have serious doubts as to the adaptability of proposed equipment to other situations. The cost of making this determination and, if successful, demonstrating it to DEQ would be substantial and in the industry's view is not justified.
4. The public hearing report asserts that the capability of being upgraded to 85% control is a stipulation "in conformance with the (Citizen's Advisory) Committee's policy statement." However, the policy statement attached makes no such specific recommendation. The statement merely says "install control equipment with add-on capabilities in case ..." We have no objection to such a general requirement.

Industry testimony at the public hearing will request that the words "to approximately 85%" be deleted. We urge that you encourage the DEQ staff to concur in this change.

Respectfully submitted,

AMERICAN PLYWOOD ASSOCIATION



Bronson J. Lewis, Executive Vice President

Item F

Statement
of
Matthew Gould
before
Environmental Quality Commission
State of Oregon
Medford, Oregon
December 16, 1977

Mr. Chairman and Members of the Commission:

I am Matthew Gould, Corporate Director of Energy and Environment for Georgia-Pacific Corporation. I appear before you as the Chairman of the Veneer Dryer Technical Committee of the American Plywood Association. Our committee, made up of environmental professionals and concerned production managers in our industry has interfaced frequently with the DEQ staff and provides regular input to the APA Board of Trustees and its Veneer Policy Task Force chaired by Mr. Kalahan.

As Mr. Kalahan has said, we have no serious disagreement with the major thrust of the strategy proposed in this regulation. I will cover in a few minutes the two changes we wish to propose. They will not change any goals for particulate removal in the AQMA but will make the regulation considerably more workable from a practical standpoint.

Firstly, I would like to comment briefly on the implications of the Washington State University study. The concern that came through loud and clear in the findings of this report was that the agency was about

to set new regulations on very shaky ground. We are appreciative of the need to address the problems in the Medford area and we are cognizant of the deadline faced by the DEQ. However, the report concluded that the emission inventory was based on inadequate data. It told us also that the model being relied on to confirm the emission inventory was not properly calibrated. In fact, it seemed that the inventory, based on inadequate data, was used to calibrate a model which, in turn, was used to confirm the inventory. However, to get the model to verify the inventory, it was necessary to select an unrealistic mixing height of only 44 meters--that is, 143 feet--ridiculously low for any real-life airshed study.

We feel very strongly that better information is needed before irrevocable steps are taken. Much more needs to be known about the air problems in this valley and the complex chemical and meteorological relationships which cause them. And we feel that more conclusive evidence is necessary as to exactly define how much our industry really contributes to the AQMA's problems. The WSU report also makes apparent that the strategy being proposed could very likely result in little, if any, improvement in air quality. That should be of serious concern to all of us who have an interest in the economic viability of this region.

The strategy we proposed to the staff and to the Medford Citizens Advisory Committee was essentially that the first step should be to more vigorously enforce the existing statewide standards for our industry's major emission sources--the veneer dryer and the hog fuel boiler. While bringing these and other sources into compliance, both DEQ and industry should press

ahead in the search for the best information available on the true scope and nature of the problem. Within two years, we should be in a much better position to assess the effectiveness of the program and adjust it if necessary. It seems to us that this is a sound control strategy.

The regulation for veneer dryers as proposed by the staff is essentially the present standard with one proviso. That is, any control device installed will have to be designed to be upgradable to 85 percent particulate removal efficiency.

Examination of the staff's existing data will show that bringing dryers into compliance with the present standard of 10 percent average--20 percent maximum opacity will make a sizable contribution toward reducing the small amount of suspended particulate associated with veneer dryer emissions in the AQMA.

Control devices accepted by the DEQ have been shown to meet the minimum standard of 45 percent particulate removal efficiency. The average of the units evaluated by the staff was around 55 percent with the most efficient exceeding 65 percent. That in itself, would represent a significant contribution to the reduction of particulate emissions in the Medford area.

In view of the lack of information and the problems facing the AQMA, we do not object to the principle that any device approved for installation should have the capability to provide upgraded particulate collection efficiency. Until more information is developed, we must, however, vigorously object to setting a specific number as high as 85 percent for design specification.

The 85 percent efficiency is based on the performance of a single unit which has been demonstrated at one facility following a pre-scrubber which was specifically designed to operate with it. This unit is prone to plugging rendering it inoperable unless the pre-scrubbing system was specifically designed to remove insoluble components contained in the veneer dryer exhaust. Manufacturers will not guarantee the unit to perform satisfactorily following other scrubbers unless costly and extensive testing is performed on each type of scrubber in question. In fact, it is unlikely that the add-on unit will perform satisfactorily on any other type of scrubber design presently in use. Until scrubber manufacturers are willing to supply and warrant this expensive equipment to meet a DEQ proposed standard, it's premature to set a numerical performance requirement of 85 percent particulate removal.

American Plywood Association urges you to revise the proposed regulation on veneer dryers and to delete the words, "to approximately 85 percent over uncontrolled emissions." The last sentence of the section would then read, "In addition, air pollution control equipment installed to meet the opacity requirements of Section 340-25-315(1) shall be designed such that the particulate collection efficiency can be practically upgraded."

With respect to hog fuel boilers, we also feel that a logical first step would be to vigorously enforce the present state wide standard, which is .2 grains/std. cu. ft. for old boilers and .1 grains/std. cu. ft. for new boilers: bringing all boilers in the valley into compliance with this regulation would make a substantial contribution to particulate removal in the area. Actually, in our judgement, the technology will not justify going beyond the .1 grain level of removal as a routine, day in-day out operating level.

The staff was substantially responsive to our expressed concern on this point. The regulation proposed for your consideration today provides for a maximum of .1 grains/std. cu. ft. for a given test. It further requires that average emissions based on planned source testing shall not exceed .05 grains/std. cu. ft.

In practice, to operate a plant to meet a maximum of .1 grains/std. cu. ft. one has to be substantially below this level most of the time. Our objection to the section on wood waste boilers is the statement, "control equipment shall be installed to meet a design criteria of .05 grains/std. cu. ft."

To get an equipment manufacturer to guarantee his equipment will meet a design limit of .05 grains/std. cu. ft., he will have to design to less than .05 to provide a safety factor. This would mean excessively costly and conservative design with high energy penalties. The staff objective can be met by removing the design requirements and adding, "Within 90 days after start up, compliance with the average emission limit shall be demonstrated by one or more tests." We urge that you make this change before adopting this regulation.

Mr. Chairman, I realize that you and the Commission must move ahead with the DEQ staff in finding solutions for these problem areas. I am sure at the same time that you want to do whatever is possible to assure that correct and equitable decisions are made. It seems to us that there is ample evidence to show that better information is urgently needed. May we suggest that in the Commission's action on this Proposal that you accompany your decision with a statement recognizing the need for better data and a charge to the staff and industry that they jointly pursue a vigorous course of action to develop that information and that semi-annual reports of progress be jointly made to the Commission. The industry stands ready to staff a liaison committee with the best brains we have and we are ready to spend money to fund any reasonable and meaningful research effort.

Stem F

STATEMENT OF LYNN NEWBRY
BEFORE THE
ENVIRONMENTAL QUALITY COMMISSION
MEDFORD, OREGON - DECEMBER 16, 1977
ON THE MATTER OF
PROPOSED AIR QUALITY REGULATIONS FOR
THE MEDFORD-ASHLAND A.Q.M.A.

MR. CHAIRMAN & MEMBERS OF THE COMMISSION:

MY NAME IS LYNN NEWBRY, P. O. BOX 550, MEDFORD, OREGON. I AM EMPLOYED BY THE MEDFORD CORPORATION AS DIRECTOR OF GOVERNMENTAL AFFAIRS AND AM PRESENTING THIS STATEMENT ON BEHALF OF OUR COMPANY TODAY.

THE MEDFORD CORPORATION IS ENGAGED IN THE MANUFACTURE OF LUMBER, PLYWOOD, MEDIUM DENSITY FIBERBOARD, AND OPERATE A HOG FUELED STEAM GENERATING PLANT IN CONJUNCTION WITH THESE MANUFACTURING ACTIVITIES. AS A CONSEQUENCE, WE ARE DIRECTLY IMPACTED WITH THE PROPOSED RULES UNDER DISCUSSION.

OUR COMPANY IS A MEMBER OF THE AMERICAN PLYWOOD ASSOCIATION, AND I AM A MEMBER OF THE APA PLYWOOD DRYER TECHNICAL ADVISORY COMMITTEE. WE WERE INVOLVED IN THE PREPARATION OF THE TESTIMONY BEING PRESENTED BY THEM TODAY AND COMPLETELY CONCUR IN THEIR STATEMENT AND WILL OFFER NO ADDITIONAL TESTIMONY ON PLYWOOD DRYER EMISSION CONTROL.

WE ALSO HAVE NO QUARREL WITH THE PROPOSED REGULATION ON AIR CONVEYING SYSTEMS. SO, IN THE INTEREST OF TIME, WE WILL ONLY COMMENT ON THE REGULATIONS PERTAINING TO HOG FUELED BOILERS AND WOOD PARTICLE DRYERS.

THE MEDFORD CORPORATION HAS A DEEP COMMITMENT TO MAINTAIN AND IMPROVE THE ENVIRONMENT IN WHICH WE LIVE AND WORK. OUR COMPANY HAS MADE EVERY EFFORT TO COMPLY WITH AND IN MOST CASES HAS EXCEEDED BY A SUBSTANTIAL MARGIN ALL REGULATIONS GOVERNING OUR OPERATION. THIS IS NOT TO SAY WE HAVE NOT ENCOUNTERED DIFFICULTIES FROM TIME TO TIME, BUT WE ARE WELL WITHIN OUR AIR CONTAMINANT DISCHARGE PERMIT ON ALL MAJOR AIR CONTAMINANT SOURCES.

WE JOIN WITH YOU AND THE DEPARTMENT IN RECOGNIZING THAT THE AIR QUALITY IN THE MEDFORD-ASHLAND A.Q.M.A. CALLS FOR MORE STRINGENT RULES THAN IN OTHER AREAS OF OREGON. WE BELIEVE, HOWEVER, THAT THE CONTROL STRATEGIES EMPLOYED MUST BE REASONABLE AND TEMPERED BY OTHER COMPELLING INTERESTS OF IMMEDIATE NATIONAL CONCERN, PRIMARILY, ENERGY CONSERVATION.

THE REGULATIONS RELATIVE TO BOILER AND WOOD PARTICLE DRYERS SIMPLY DO NOT MEET THIS CRITERIA. ALTHOUGH THE STAFF ARGUES THAT THE DATA ON THE MEDFORD-ASHLAND A.Q.M.A. IS THE BEST THEY HAVE GATHERED IN ANY A.Q.M.A., IT IS MEAGER AT BEST AND HAS NOT MET THE TEST IN THE FACE OF CONSTRUCTIVE CRITICISM BY HIGHLY QUALIFIED SCIENTISTS. OUR MAJOR CRITICISM IS BASED UPON THE APPARENT DECISION BY THE DEPARTMENT TO ACHIEVE AIR QUALITY MAINTENANCE STANDARDS THROUGH THE REDUCTION OF

EMISSION LEVELS IN ONLY ONE INDUSTRY. THIS DECISION HAS RESULTED IN EXTRAORDINARILY STRINGENT CONTROLS, WHICH WE BELIEVE WOULD BE UNNECESSARY IF A LONG RANGE STRATEGY OF REASONABLE CONTROLS ON ALL CURRENTLY IDENTIFIED SOURCES WERE PURSUED.

WITH THESE GENERAL OBSERVATIONS, WE WOULD LIKE TO DISCUSS THE SPECIFIC REGULATIONS.

THE LANGUAGE IN THE WOOD WASTE BOILER REGULATION IS AMBIGUOUS IN THE LIMITATION TO 0.05 GRAIN PER STANDARD CUBIC FOOT OF EXHAUST GAS, ETC. DOES IT MEAN "DRY STANDARD CUBIC FOOT" OR THE ACTUAL GAS AS IT IS EXHAUSTED? THIS CAN MAKE A DIFFERENCE IN THE MEANING AND ENFORCEMENT OF THE REGULATION. THE AVERAGING LANGUAGE IN THE REGULATION IS DIFFICULT TO UNDERSTAND, AND FROM A PRACTICAL POINT OF VIEW USELESS, PARTICULARLY IN VIEW OF THE 0.05 DESIGN CRITERIA WHICH FOLLOWS.

CONTROL EQUIPMENT DESIGNED TO MEET 0.05 GR./SCF. WILL BE ENGINEERED WITH SUFFICIENT SAFETY TO MEET THE DESIGN CRITERIA UNDER ALL EXPECTED OPERATING CONDITIONS, WHICH COMPLETELY NEGATES ANY NEED FOR ANY AVERAGING OF TESTS. WE HAVE TWO BOILERS CONTROLLED BY BUMSTEAD-WOOLFORD SCRUBBERS DESIGNED TO MEET THE 0.1 GRAIN STANDARD, WHICH CONSISTENTLY TEST BELOW 0.05 GR. OTHER SIMILAR EQUIPMENT HAS DEMONSTRATED SIMILAR RESULTS.

DESIGN CRITERIA IS CRITICAL IN THIS REGULATION AND HAS MAJOR IMPACT ON ENERGY REQUIREMENTS. NEITHER PURCHASERS NOR ENGINEERS CAN RUN

THE RISK OF UNDERDESIGN. THE PURCHASER USUALLY DEMANDS A GUARANTEE AND THE ENGINEER MUST CERTIFY THE DESIGN AS BEING WITHIN ACCEPTED ENGINEERING STANDARDS AS WELL AS MEETING THE GUARANTEE. AS A RESULT, A DESIGN CRITERIA OF 0.05 GRAINS PER STANDARD CUBIC FOOT WILL REQUIRE TWICE THE ENERGY OF A SCRUBBER DESIGNED FOR 0.1 GRAINS PER STANDARD CUBIC FOOT AND UNDER NORMAL OPERATING CONDITIONS WILL REDUCE EMISSIONS WELL BELOW 0.05 GRAINS.

ENERGY DEMAND FOR THIS KIND OF EQUIPMENT IS SPECTACULAR. THE TOTAL ENERGY DEMAND TO BRING OUR THIRD BOILER INTO COMPLIANCE WITH 0.05 GRAIN IS 700 HP. THIS TRANSLATES INTO 30,000 POUNDS OF STEAM PER HOUR OR NEARLY ONE-THIRD OF THE BOILER CAPACITY. IN TERMS OF ELECTRICAL ENERGY, IT IS 5,796,000 KILOWATT HOURS PER YEAR AT A COST OF \$83,462.40, OR THE AMOUNT OF ENERGY USED IN 445 AVERAGE HOMES.

THIS PARTICULAR BOILER HAS A CURRENT ANNUAL EMISSION RATE OF 91 TONS. TO MEET COMPLIANCE WITH THIS REGULATION, WE MUST REDUCE THIS EMISSION RATE BY ABOUT 46 T./YR. ASSUMING DEPRECIATION AND MAINTENANCE COSTS AT \$35,000 PER YEAR AND THE ABOVE POWER COSTS, THE COST OF REMOVAL IS \$2,575 PER TON, VERY HIGH COST EFFECTIVENESS.

AS A FINAL COMMENT ON THE BOILER REGULATION, THE RULE DOES NOT MAKE ANY PROVISION FOR EXCEEDING THE EMISSION LIMIT FOR SOOT BLOWING, GRATE CLEANING, OR OTHER OPERATING CONDITIONS, WHICH MAY RESULT IN TEMPORARY EXCURSIONS FROM NORMAL. SOME PROVISION SHOULD BE MADE FOR THIS IN THE RULE.

RATHER THAN ADOPT NEW AND EXTRAORDINARILY ENERGY INTENSIVE RULES FOR BOILERS IN THE MEDFORD-ASHLAND A.Q.M.A., WE WOULD SUGGEST ADOPTING THE RULES FOR THE PORTLAND A.Q.M.A., WHICH SEEM TO BE FULFILLING THE NEEDS OF THAT AREA AND ARE FAR LESS ENERGY INTENSIVE FOR OLD BOILERS.

* THE REGULATION ON WOOD PARTICLE DRYERS IS TOTALLY UNACCEPTABLE AND CANNOT BE ACHIEVED WITHIN ANY ACCEPTABLE TIME FRAME.

THE METHOD OF DEVELOPING THIS CONTROL STRATEGY WAS A COMPLETE DEPARTURE FROM PAST PRACTICES AND STILL REMAINS A MYSTERY TO US. THE DEPARTMENT OFFERED THE CITIZENS ADVISORY COMMITTEE TWO ALTERNATIVES FOR ALL SOURCES IN THE MEDFORD-ASHLAND A.Q.M.A. EXCEPT FOR WOOD FIBER DRYERS AND WIGWAM BURNERS, AND IN THE LATTER CASE PERHAPS NO ALTERNATIVES EXIST. ANY NUMBER OF ALTERNATIVES, HOWEVER, WERE AVAILABLE FOR WOOD PARTICLE DRYERS. ANOTHER INTERESTING THING IS THAT THIS STRATEGY CALLED FOR AN ADDITIONAL 80% CONTROL ON WOOD FIBER DRYERS. IN ALL OTHER REGULATIONS HERE AND IN OTHER AREAS WE ARE AWARE OF, STRATEGIES HAVE BEEN BASED UPON MEETING CERTAIN REQUIREMENTS RELATIVE TO UNCONTROLLED EMISSION LEVELS. USING THIS ADDITIONAL CONTROL TECHNIQUE EQUIPMENT, EFFICIENCY REQUIREMENTS CLIMB TO UNOBTAINABLE LEVELS AS EVIDENCED BY THIS REGULATION. THE 0.35 POUNDS PER THOUSAND SQUARE FEET OF BOARD ON A 3/4" BASIS IS THE RESULT OF A SIMPLE ARITHMETICAL CALCULATION AND HAS NO RELATIONSHIP TO THE PHYSICAL PROBLEMS OR THE ABILITY OF INDUSTRY TO COMPLY. AS A MATTER OF FACT, THERE IS ONLY SPECULATION THAT AN UNTRIED PIECE OF EQUIPMENT MIGHT WORK.

THE DEPARTMENT STAFF CONSIDERS THIS REGULATION TO BE A "TECHNOLOGY FORCING" TYPE RULE AND RECOGNIZES IT TO BE THE HIGHEST COST, BOTH CAPITAL AND ANNUALIZED, OF ANY OF THE RECOMMENDATIONS MADE. THIS LEADS US TO WONDER WHY IT WAS THE ONLY RECOMMENDATION OFFERED THE CITIZEN'S COMMITTEE.

A REGULATION REQUIRING RELATIVELY SMALL COMPANIES, SUCH AS THOSE INVOLVED IN THIS A.Q.M.A., TO DEVELOP AND EXPERIMENT WITH NEW AIR CONTROL EQUIPMENT IS TOTALLY UNREASONABLE. IT WOULD REQUIRE US TO BUDGET FUNDS, BADLY NEEDED FOR OTHER ENVIRONMENTAL EXPENDITURES, AND PUT US INTO AN ACTIVITY WE ARE NOT EQUIPPED NOR HAVE THE EXPERIENCE TO PERFORM, NOT TO MENTION THE TIME DELAY IN IMPLEMENTATION.

THERE IS SERIOUS QUESTION AS TO WHETHER THIS REGULATION COULD EVEN BE ENFORCED BEYOND "BEST AVAILABLE CONTROL TECHNOLOGY."

FINALLY, MR. CHAIRMAN, IT WOULD APPEAR WE HAVE THE CART BEFORE THE HORSE IN THE WOOD PARTICLE DRYER REGULATION. THE EPA HAS CONTRACTED FOR A STUDY OF THESE DRYERS IN THE MEDFORD AREA. PAGE 2 OF THE DOCUMENT DESCRIBING THIS PROJECT STATES, "THIS STUDY IS INTENDED TO DEFINE THE PARTICULATE EMISSION AS A PREREQUISITE TO STIPULATING BACT REQUIREMENTS TO MEET MEDFORD'S AIR QUALITY NEEDS." (EMPHASIS ADDED)

SIMPLE LOGIC WOULD DICTATE THAT THIS REGULATION SHOULD NOT BE PROMULGATED UNTIL THIS STUDY IS COMPLETED OR THE CONTRACT FOR THE STUDY SHOULD BE CANCELED.

BECAUSE OUR MEDIUM DENSITY FIBERBOARD PLANT WILL BE A SPECIAL AGENDA ITEM LATER TODAY, WE WILL WITHHOLD OUR RECOMMENDATIONS UNTIL THAT TIME.

WE WANT TO THANK THE COMMISSION FOR CONDUCTING THIS HEARING IN MEDFORD AND FOR HEARING IT PERSONALLY. IF THERE ARE QUESTIONS, I WOULD BE HAPPY TO RESPOND.

Item F

PARTICULATE CONTROL STRATEGIES FOR THE MEDFORD-ASHLAND AQMA

Environmental Quality Commission Public Hearing

December 16, 1977

Medford, Oregon

TESTIMONY OF THE SOUTHERN OREGON TIMBER INDUSTRIES ASSOCIATION, MEDFORD

I am Martin Craine, secretary-manager of the Southern Oregon Timber Industries Association, 2680 North Pacific Highway, Medford, Oregon 97501. The Association represents 100% of the lumber and plywood producers in Jackson and Josephine Counties, plus a major share of the logging and log hauling operations in this area.

We feel it is important to understand that industry has and continues to do some things to reduce particulate emissions. The performance of the wood products industry is documented and acknowledged by your staff, as noted in the first two pages of the staff report before you. It is important to consider that even without the proposed regulations in consideration today, there still are compliance schedules being worked on to meet today's standards.....and there are some sources exceeding current standards for lack of approved compliance schedules which have been delayed pending results of the AQMA analysis, and not the fault of attempts by the industry. You also should understand that a great share of the industry concern, and some reluctance in this matter, stems from a lack of confidence in much of the information the staff has presented here and particularly to the Jackson County Advisory Committee. A couple of examples seem to be all there is time for....and perhaps suffice to support our point:

- a) Claims made for operation of a hog fuel boiler bag house in Shelton, Washington. Staff reported to us and the Committee that operation was

satisfactory and tested within 0.01 grains. Industry representatives visited the operation, inspected the installation and examined test results. The facts failed to support DEQ staff information and leave in mind serious questions as to the actual feasibility of a control strategy the DEQ staff has contended is reasonable.

- b) Another simple illustration of misleading information which we have contested with little apparent response concerns estimates involved in the recommendation to ban wigwam burner operation. Staff estimates cost at \$100,000 per burner. Engineers on site estimate a more realistic figure is four times that amount....\$400,000 per burner. Staff has told us that energy considerations in shutting down burners is negligible. It is more likely to take 1600 to 2000 horsepower with electric consumption equivalent to 1200 average homes.

Lack of confidence is a serious deficiency in our minds, and a problem with which we have not always had to deal.....and frustrating at best to try to cope with. Thus our serious challenge of the advisability of portions of the proposed particulate control strategy.

It is incumbent upon us to talk about energy. The DEQ staff took some stabs at estimating energy requirements in this control strategy. Throughout the analysis the staff report consistently and grossly underestimates power requirements. The wigwam burner portion is one example.

Cost, I suppose, can be shrugged off, but availability must be faced realistically. The realities are that industry is now being told that by 1980 we may not have ample power to run existing machinery. More pollution controls will make increased power demands of substantial proportions.

In the same breath that we are talking about increased demands for energy.....we are, in these proposed regulations, talking about further deterrent to increasing energy supplies by making it more costly, more difficult to utilize wood waste as an energy source. The hog fuel boiler is one of the most practical means to utilize

wood residue for energy production....as well as to cope with solid waste problems. The 0.05 grain standard proposed here today stands as a threat to the continued operation of at least four installations to my knowledge. We are obliged to question the rationality - if only from the energy utilization standpoint.

We recognize some problems exist....and agree the industry can do better....we expect to do better. Our basic contention at this point, however, is that proposed controls must be within the realm of feasibility and the costs should not be so excessive as to raise the question in the minds of some operations of whether or not the costly investment in control measures exceeds the worth of the installation, thus making the most viable compliance schedule the close down of operations on the deadline date. The proposed strategy includes some provisions which raise that question in the minds of some operators.

A couple other points I would like to make for the benefit of the record being established here today.

You, the Commission and staff.....We, the industry and citizens.....are striving to meet the requirement of Beneficent Big Brother for a federal standard of 60 micrograms per cubic meter. The background and unidentified sources, according to Department calculations, is 46 micrograms. That leaves 14 micrograms to stay within the standard. If all industrial sources are eliminated....if all orchard heating is eliminated....if all feed and grain milling is cleaned up....and so on through identifiable sources, we have 14 micrograms remaining to live within this secondary, welfare (not health) standard. We have 14 micrograms for school and hospital heating, for residential heating, for fireplace operation to conservation fossil energy sources, for automobile, truck and bus operation. Let us not kid anyone about being able to live within that arbitrary ambient air standard.

Also of interest. The Department's analysis by Seton, Johnson and Odell reports that 55% of particulate sources are background and uninventoried. Wood products operations account for 20%, according to the report. It seems a little strange to note this statement in the original draft of the Seton, Johnson and Odell report....

"Identification of the actual sources causing NAAQS violations is impossible from these results as long as the majority of the predicted concentration is composed of non-inventoried sources." The statement doesn't appear in the final draft. Why not?.... And with that disclaimer from the expert consultants who provided the basic data for this entire proposition, how is it possible to proceed with much degree of confidence?

In summary - and more directly to the instant problem of the proposed regulations - we offer some suggestions because we understand your unenviable position of having to do something even if it isn't entirely right.

Section 340-30-015....Wood Waste Boilers: We recommend adoption of the same rule as utilized in the Portland AQMA where, according to staff reports, the results have been satisfactory. The 0.1 grain loading standard is one with more likelihood of being met without excessive cost and with one-half or less energy demand than 0.05 grains.

Section 340-30-020....Veneer Dryers: Southern Oregon Timber Industries Association supports the testimony and recommendations of the American Plywood Association.

Section 340-30-030....Wood Particle Dryers: We support the testimony and suggestions of the particle board producers who have or will testify.

Section 340-30-035....Wigwam Waste Burners: We suggest the word "emergency" be deleted so the Department may consider other environmental and operational factors which may make it more desirable to permit burner operation for a limited time specified by the Department.

Section 340-30-045....Compliance Schedules: Paragraph (e) sets a deadline of January 1, 1979 for Wigwam Waste Burners which is completely unrealistic. January 1, 1980 would be more reasonable.

Finally, we respectfully request the official hearing record be held open for submission of further written testimony for a period of 15 days so you may benefit from the complete comments of as many interested people as possible.

Item F

STATEMENT
OF
BOISE CASCADE CORPORATION
before the
ENVIRONMENTAL QUALITY COMMISSION
STATE OF OREGON
MEDFORD, OREGON

DECEMBER 16, 1977

STATEMENT

December 16, 1977

Mr. Chairman, Members of the Commission: My name is Wallace Cory, Environmental Manager for Boise Cascade Corporation's Timber and Wood Products Group. We would like to concur with the testimony of both the American Plywood Association and Southern Oregon Timber Industries Association.

Boise Cascade Corporation is vitally interested in the Medford area. We are concerned that our operations here continue to be competitive and economically sound. We are also concerned that air quality in the Medford area be maintained at the highest practicable level. The record will show that we have attempted to place additional controls on our boiler stacks but, because of uncertainties regarding the rule to be promulgated inside the Air Quality Maintenance Area, our control program was not acceptable. It is our conviction, however, based upon the work done for the American Plywood Association by Washington State University, significant improvements in air quality will not result from the proposed stringent Air Quality Maintenance Area Rules. We are not convinced that the sizeable expenditures required to bring all sources into compliance with the proposed rules will result in any measurable improvement.

It appears, however, that we are going to be asked to make these expenditures regardless of whether any air quality improvement can be anticipated. While we strongly feel that most sources inside the Air Quality Maintenance Area should be required to be responsive only to the statewide regulations, the proposed special AQMA rules go far beyond the statewide rules and will be extremely difficult, if not virtually impossible to comply with.

I would specifically like to address two of these proposed rules:

1. The rule for control of veneer dryer emissions is essentially the same as the statewide rule with the exception of the requirement to design for eventual upgrading to 85% efficiency. We have no quarrel with the requirement to allow for upgrading provisions. What concerns us is the specification of 85%. This specification implies that we can find off-the-shelf equipment that is capable of 85% efficiency. While devices have been tested demonstrating

1. (continued)

85% reduction of particulate emissions, it would appear premature to be so definite. The particular device in question has been demonstrated effective on only one type of scrubber in one situation. We would, therefore, urge the Commission to delete the words, "to approximately 85% over uncontrolled emissions."

2. The proposed rule for restricting boiler emissions to 0.05 grains of particulate per standard cubic foot of air is even more distressing. This rule pertains, across the board, to old and new boilers alike. This is a most disconcerting precedent since Oregon boiler rules to date have taken into consideration the difficulty of retro-fit on old existing systems. In addition, no provision is made for soot blowing and grate cleaning of boilers. Three minutes per hour for this activity are allowed in those areas of the State outside of Air Quality Maintenance Areas.

In the staff report presented earlier, it was mentioned that scrubbers on existing boilers in Medford are performing better than the proposed 0.05 grain limitation. While this is true, I think it is most important to remember that these scrubbers were designed and guaranteed to meet 0.1 grains. The vendors of these devices never purported that the devices would operate as efficiently as they do. To design and guarantee operation at 0.05 grains would require that the pressure drop be increased from about 6" (as is presently used on the equipment now installed) to about 10". This would represent a fan horsepower requirement, on our boiler stacks, of 850 horsepower, or an increase of 200 horsepower above what would be required if the unit were designed to remove particulate to a level of 0.1 grains. According to the National Electric Manufacturer's Association this amounts to enough energy for 100 all-electric homes in an area presently projected to be substantially power-short in the near future. In addition, capital cost of a unit capable of reduction to 0.05 grains is significantly greater than the cost of a device capable of reducing particulate emissions to 0.1 grains.

2. (continued)

I believe the staff attempted to speak to this when they specified an opportunity for a boiler stack to occasionally exceed 0.05 grain per standard cubic foot during part of the annual testing program. Unfortunately, excursions during testing is not the issue. The issue is how the initial design and guarantee affect economics and energy consumption.

I would, therefore, ask the Commission to endorse a proposed boiler emission rule requiring the source to meet 0.1 grains instead of the presently proposed 0.05 grains. Obviously, this kind of a requirement will result in doing precisely what the proposed rules purport to achieve, that is, an actual emission rate of 0.05 grains per standard cubic foot.

Boise Cascade appreciates the opportunity to present this information and its views to the Commission.

Thank you.

TESTIMONY OF SWF PLYWOOD COMPANY

DECEMBER 16, 1977

Item F

MR. CHAIRMAN - MEMBERS OF THE COMMISSION

MY NAME IS GARY GRIMES AND I AM PRESENTING THIS TESTIMONY ON BEHALF OF SWF PLYWOOD COMPANY. I ALSO AM A MEMBER OF THE ENVIRONMENTAL AFFAIRS AND VENEER DRYER TECHNICAL COMMITTEES OF THE AMERICAN PLYWOOD ASSOCIATION (APA) AND CHAIRMAN OF THE AIR AND WATER QUALITY COMMITTEE OF THE SOUTHERN OREGON TIMBER INDUSTRIES ASSOCIATION (SOTIA). FOR THE RECORD, SWF PLYWOOD COMPANY IS IN AGREEMENT WITH AND SUPPORTS THE TESTIMONY OF APA AND SOTIA.

SWF PLYWOOD COMPANY, A SUBSIDIARY OF SOUTHWEST FOREST INDUSTRIES, IS APPRECIATIVE OF THE OPPORTUNITY YOU HAVE PROVIDED US TO TESTIFY ON THE PROPOSED RULE CHANGES TO THE OREGON CLEAN AIR ACT IMPLEMENTATION PLAN INVOLVING PARTICULATE CONTROL STRATEGY RULES FOR THE MEDFORD-ASHLAND AQMA. IT IS APPROPRIATE THAT YOU HAVE CHOSEN MEDFORD FOR THE SITE OF THIS PUBLIC HEARING SINCE THE PROPOSED RULE CHANGES UNDER CONSIDERATION WILL HAVE VERY SIGNIFICANT SOCIAL, ECONOMIC, AND ENVIRONMENTAL IMPACTS UPON THIS VALLEY IF AND WHEN THEY ARE IMPLEMENTED.

SWF PLYWOOD COMPANY HAS AN ANNUAL OREGON PLYWOOD PRODUCTION CAPACITY OF NEARLY 700 MILLION SQUARE FEET, 3/8" BASIS. IN THE MEDFORD AQMA, AT WHITE CITY, THE 1976 PLYWOOD PRODUCTION WAS 197.3 MILLION SQUARE FEET, 3/8" BASIS. SOME 130 MILLION SQUARE FEET 3/8" BASIS OF GREEN VENEER WAS PRODUCED AT OUR WHITE CITY VENEER MILL.

OUR COMBUSTION EMISSION SOURCES AT THE WHITE CITY OPERATIONS INCLUDE:

SWF PLANT #5	- VENEER MILL	ONE (1)	MODIFIED WIGWAM BURNER
SWF PLANT #5	- LAY-UP PLANT	THREE (3)	GAS FIRED VENEER DRYERS
PLANT #5-2	- INCOMPLETE PLANT	ONE (1)	GAS FIRED VENEER DRYER
SWF PLANT #6	- LAY-UP PLANT	ONE (1)	DIRECT WOOD FIRED SYSTEM ON TWO (2) VENEER DRYERS
		ONE (1)	GAS FIRED VENEER DRYER

IN ADDITION BOTH #5 AND #6 HAVE SMALL GAS FIRED BOILERS TO OPERATE THE PANEL PRESSES AND THE DRY MATERIALS HANDLING SYSTEMS HAVE BAGHOUSE CONTROLS.

THE PRESENT EMPLOYMENT AT THE WHITE CITY OPERATIONS TOTALS 803 PEOPLE WITH AN ANNUAL PAYROLL VALUE OF \$8.4 MILLION. PLANT #5 ACCOUNTED FOR 430 EMPLOYEES WITH 145 AT THE VENEER MILL AND 285 AT THE LAY-UP PLANT. THERE IS A REASON FOR SEPARATING OUT THE FIGURES AT PLANT #5. THE REASON IS THAT, THOSE FIGURES INDIVIDUALLY OR TOGETHER COULD BE A LOSS TO THE LOCAL ECONOMY GIVEN THE CLOSURE OF PLANT #5.

PLANT #5 IS ONE OF THE OLDEST VENEER AND LAY-UP PLANTS OPERATING IN THE VALLEY. THE ENTIRE COMPLEX USED TO BE DEPENDENT (A RESULT OF THE ORIGINAL DESIGN) UPON THE WIGWAM BURNER FOR SOLID WOOD RESIDUE DISPOSAL. VIRTUALLY ALL HIGH GRADE WASTE RESIDUES HAVE SINCE BEEN SCALPED FROM THE SYSTEM AS MARKETS DEVELOPED FOR THEIR USE: IE., PEELER CORES FOR STUDS, VENEER TRIM AND LILY PAD WASTES FOR CHIPS, PLY-TRIM FOR PARTICLE BOARD. WOOD WASTES NOW GOING TO THE BURNER ARE BARK, SOME OCCASIONAL BROKEN SLABS, AND SANDERDUST (PLUS OLD BOOKS AND DOCUMENTS FROM THE SCHOOL DISTRICTS AND OTHER PARTIES WITH DOCUMENT DESTRUCTION NEEDS.)

THE BARK AFTER PROCESSING HAS A VALUE AS HOG FUEL GIVEN AN AVAILABLE LOCAL MARKET. LOCALLY THAT MARKET IS WEAK AND INCREASED UTILIZATION WILL REQUIRE NEW COMBUSTION SOURCES. THE SANDERDUST, BECAUSE OF ITS DIFFICULT HANDLING CHARACTERISTICS AND RELATIVE SMALL QUANTITY, POSES A REAL PROBLEM IN SYSTEM DESIGN AND ECONOMICS IN ANY ALTERNATIVE DISPOSAL SCHEMES OTHER THAN ON-SITE COMBUSTION.

WE CANNOT BELIEVE THE STAFF ANALYSIS THAT THE "WOOD WASTES PRESENTLY BEING INCINERATED CAN BE UTILIZED IN A PLANT TO PRODUCE BOARD FROM THE WOOD FIBER OR DISPOSED OF IN A LANDFILL." DIRECTOR YOUNG HIT THE NAIL ON THE HEAD WHEN, IN A SPEECH BEFORE THE PACIFIC NORTHWEST POLLUTION CONTROL ASSOCIATION, HE STATED THAT THE ENVIRONMENTAL CONTROL HAS COME TO THE POINT WHERE WE ARE NOW "LOOKING FOR WHICH CORNER OF THE CAVE TO HIDE THE GOO IN."

SWF INFORMALLY PRESENTED DEQ STAFF A COST ESTIMATE TO ELIMINATE THE WIGWAM BURNER AT PLANT #5. THAT EARLY 1977 ESTIMATE WAS NEAR \$400,000. WE FELT THAT THE MAGNITUDE OF THE PROJECT TO CHANGE JUST THE WOOD WASTE RESIDUE HANDLING SYSTEM AT THIS OLD MILL WAS REFLECTED IN THAT DOLLAR AMOUNT. EVEN THOUGH THE INFORMATION WAS ACCURATE AND MOST CURRENT, THE \$100,000 COSTS FIGURE GIVEN THE JACKSON COUNTY AIR QUALITY CITIZENS ADVISORY COMMITTEES BY THE DEQ STAFF FOR USE IN DELIBERATION OVER COST EFFECTIVENESS WAS NOT REVISED. THOUGH IT IS NOT OUR RESPONSIBILITY TO REVISE THE ESTIMATE ON THE OTHER BURNER IN THE AQMA OWNED BY ANOTHER COMPANY, IT IS NOT UNREAL TO FORECAST A COST ALMOST IDENTICAL TO OUR \$400,000 FIGURE. AS PREVIOUSLY STATED, THE REAL BENEFITS TO BE GAINED FROM REMOVING EITHER BURNER WILL REQUIRE UTILIZATION OF MOST OF THE MATERIAL SO DIVERTED AS FUEL IN ANOTHER TYPE SYSTEM. THUS, THE COSTS GO UP DRAMATICALLY WHEN ONE ADDS ON TO THE COST OF MATERIALS HANDLING THE CAPITAL REQUIRED TO PURCHASE NEW COMBUSTION EQUIPMENT.

WE FEEL IT IS IMPORTANT TO STRESS THE NEEDS FOR NEW EMISSION SOURCES TO REPLACE THE WIGWAM BURNERS. PREVIOUSLY WE STATED THAT THE VENEER DRYERS AT THE MILL #5 LAY-UP PLANT WERE OPERATED ON NATURAL GAS. PROPANE IS THE BACK-UP DURING PERIODS OF COLD WEATHER NATURAL GAS CURTAILMENTS. NEITHER NATURAL GAS NOR PROPANE APPEAR TO HAVE ANY LONG RANGE FUTURE FOR THIS MILL OR, IN THAT MATTER, FOR THE DRYING NEEDS OF ANY PLYWOOD MANUFACTURING FACILITY. IF THIS PLANT AND OTHERS LIKE IT ARE TO CONTINUE TO OPERATE THEY MUST BE CONVERTED TO ALTERNATIVE ENERGY SOURCES. WE FEEL THAT THE WIGWAM BURNER AT THIS PLANT SHOULD NOT BE PREMATURELY SHUT DOWN BEFORE THE ALTERNATIVE USE FOR THE FUEL ON-SITE CAN BE ANALYZED AND, IF FEASIBLE, FACILITIES ENGINEERED AND CONSTRUCTED. IT WOULD BE IMPOSSIBLE TO GET SUCH A SYSTEM UP AND OPERATING BY THE JANUARY 1, 1979 PROPOSED DEADLINE IN 340-30-045 (e). 340-30-035 AS PROPOSED ALLOWS WIGWAM BURNER OPERATION FOR "EMERGENCY CONDITIONS" WITH THE DIRECTORS APPROVAL. IF THAT WORDING WERE ALTERED TO REMOVE "EMERGENCY", WE ARE CONFIDENT THAT A PROJECT TIME PERIOD ALLOWING US TO CHANGE ENERGY SOURCES AND MAINTAIN THAT MILL, AS A PART OF THE LOCAL ECONOMY, COULD BE WORKED OUT WITH DEQ STAFF. THE PROJECT WE CURRENTLY ENVISION FOR PLANT #5 IS IN EXCESS OF \$3 MILLION AND THAT MAGNITUDE OF EXPENDITURE IS HIGHER THAN THE 1974 FIXED ASSET PURCHASE PRICE OF THE PLANT AND VERY INDICATIVE OF THE PROBLEMS OF CHANGE OVER.

SWF IS A LEADER IN THIS STATE IN THE USE OF DIRECT WOOD FIRED VENEER DRYERS. WE CURRENTLY ARE WORKING WITH THE AMERICAN PLYWOOD ASSOCIATION AND DEQ STAFF TO EQUITABLY AND ENVIRONMENTALLY DEFINE THESE SYSTEMS. WE FEEL VERY UNEASY ABOUT THE 85% CONTROL UP-GRADING SYSTEMS EFFICIENCY LANGUAGE AS FOUND IN PROPOSED 340-30-020, AND THE UNKNOWN IN APPLYING THAT RULE TO THE DIRECT FIRED SYSTEM. THE CURRENT TECHNOLOGY IS SPARSE ON 85% COLLECTION EFFICIENCY

EQUIPMENT AND WE REQUEST THAT THE PROPOSED RULE NOT SPECIFY AN EXACT EFFICIENCY RANGE.

IN SUMMARY, WE WOULD ASK CONSIDERATION OF REMOVING THE WORD "EMERGENCY" IN 340-30-045 (e) AND REMOVAL OF THE SPECIFIC 85% REFERENCE TO INCREASED EFFICIENCY IN 340-30-020.

THE FACT THAT THE ATTAINMENT STRATEGY FOR THE MEDFORD AQMA, THE SUBJECT OF THIS HEARING, IS FOCUSED UPON INDUSTRIAL SOURCES, MAKES US WONDER WHERE THE NEXT REQUIRED REDUCTION WILL COME FROM. WE FEEL CONFIDENT THAT THIS PRESENT ACTION AGAINST INDUSTRY WILL NOT MAKE UP FOR THE INCREASE IN OTHER AREA SOURCES THROUGH 1985. THAT CONFIDENCE IS INCREASING AS WE NOTE THE REVISIONS BEING MADE IN LOCAL COMPREHENSIVE LAND USE PLANS AND IN FUTURE GROWTH PROJECTION INCREASES.

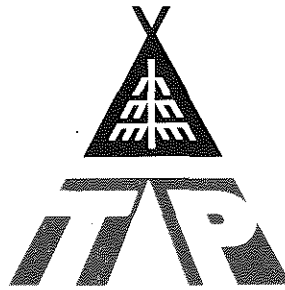
THANK YOU AGAIN FOR THE OPPORTUNITY TO PRESENT THIS TESTIMONY.

RESPECTFULLY SUBMITTED,

SWF PLYWOOD COMPANY

GARY GRIMES
COORDINATOR OF ENVIRONMENTAL PROGRAMS

TIMBER PRODUCTS CO.



POST OFFICE BOX 1669
MEDFORD, OREGON 97501
PHONE 503/773-6681

DECEMBER 16, 1977

TESTIMONY SUBMITTED BY TIMBER PRODUCTS Co.
JACKSON COUNTY COURT HOUSE - DECEMBER 16, 1977

MR. CHAIRMAN AND MEMBERS OF THE ENVIRONMENTAL QUALITY COMMISSION

MY NAME IS WILLIAM COFFINDAFFER, PLANT ENGINEER FOR TIMBER PRODUCTS Co., MEDFORD, OREGON.

I AM ADDRESSING THE COMMISSION TODAY ON SOME OF THE PROPOSED GUIDE LINES SET FORTH BY THE MEDFORD - ASHLAND AIR QUALITY MAINTENANCE COMMITTEE AND AS I SEE IT, THEY HAVE BEEN FULLY ADOPTED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY WITHOUT ANY DEVIATIONS, AND ARE HEREBY BEING SUBMITTED BY THE COMMISSION TO THE TIMBER INDUSTRY AS SPECIFIC AIR QUALITY CONTROL RULES.

AT THIS POINT I WANT TO EMPHASIZE THAT THE MEDFORD - ASHLAND AIR QUALITY COMMITTEE SHOULD BE COMMENDED ON THE LONG HOURS AND HARD WORK THAT WAS SET FORTH ON THIS PROJECT.

I ATTENDED A NUMBER OF THE MEETINGS AND FROM MY OBSERVATIONS THE DISCUSSIONS WERE DIRECTLY AIMED AT THE TIMBER INDUSTRY AND NO EMPHASIS WAS PLACED ON OTHER POLLUTION SOURCES OF WHICH THERE IS A LOT OF UNKNOWNNS THAT ENTER THIS CATAGORIE.

THERE HAS BEEN PARTICULATE SHOWING UP IN THE SAMPLER THAT CANNOT BE IDENTIFIED. IT IS ALSO BEEN PROVEN THAT SOME OF THE PARTICULATE PICKED UP IN THE SAMPLER HAS BEEN AIRBORNE WITH POINT OF ORIGIN AS FAR AWAY AS EUGENE AND ROSEBURG. HOWEVER, KNOWING THESE FACTS THE COMMITTEE HAS SET FORTH STRATAGIES FOR THE TIMBER INDUSTRIES ONLY.

I THINK IT CAN BE SAFELY STATED THAT THE TIMBER INDUSTRIES HAS PUT FORTH THE MOST EFFORT AND MONEY THAT ANY OTHER INDUSTRY FOR A SOURCE TO CONTROL AIR POLLUTION IN THE VALLEY.

TIMBER PRODUCTS Co. HAS SPENT IN THE EXCESS OF ONE MILLION DOLLARS FOR POLLUTION CONTROL EQUIPMENT, NOT TO MENTION THE COST THE OTHER COMPANIES IN THE WOOD PRODUCTS INDUSTRY HAVE INCURRED. THE TIMBER INDUSTRIES REALIZES THE FACT THAT WE DO HAVE A PROBLEM AND WITH THE BEST TECHNOLOGY AVAILABLE WE ARE TRYING TO CORRECT THIS PROBLEM.

THE TECHNOLOGY AND CONTROLS CHANGE ALMOST DAILY. AN EXAMPLE OF THIS IS SOME EQUIPMENT THAT TIMBER PRODUCTS INSTALLED ON OUR PARTICLEBOARD DRYER. WHEN THIS EQUIPMENT, WHICH IS A WET SCRUBBER, WAS INSTALLED AND APPROVED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY, THE LAST TEST THAT WAS TAKEN WE HAD A PARTICULATE EMISSION OF 9.45 LB. PER HOUR FROM BOTH DRYERS OR SCRUBBER, NOW I'M TOLD THAT THIS IS NOT IN COMPLIANCE.

THIS BRINGS UP ONE OF THE MOST QUESTIONABLE POINTS, AS FAR AS OUR PLANT IS CONCERNED, IN THE CONTROL STRATEGY AND THAT IS THE .35 LBS. EMISSION PER THOUSAND SQUARE FEET $3/4$ BASES FROM THE PARTICLEBOARD DRYERS.

THE DEPARTMENT STATES IN THE STRATEGY THAT THERE IS NO TECHNOLOGY AT THE PRESENT TIME THAT HAS BEEN PROVEN THAT BRINGS THIS FIGURE INTO A REALISTIC CATAGORIE. THE DEPARTMENT STATES THAT THEY THINK, AND LETS EMPHASIZE THE WORD THINK, THAT A ELECTROSTATIC PRECIPITATOR WOULD POSSIBLY DO THE JOB. THE ELECTROSTATIC PRECIPITATOR HAS BEEN PROVEN TO DO A GOOD JOB IN THE INDUSTRIES WITH INORGANIC EMISSION BUT NONE HAS BEEN TRIED IN A INDUSTRY THAT DISCHARGES A DRY COMBUSTIONABLE EMISSION.

SINCE RECEIVING THE COPY OF THE STRATEGY I HAVE BEEN DOING ALOT OF INQUIRING ABOUT THE ELECTROSTATIC PRECIPITATOR, HAVING TALKED WITH MICHAEL PILAT, ASSOCIATE PROFESSOR OF CIVIL ENGINEERING OF WASHINGTON UNIVERSITY WHO HAD WORKED ON THE ELECTROSTATIC PRECIPITATOR UNDER A GRANT FROM E.P.A. AND INTERNATIONAL PAPER Co. HIS FINDINGS WERE THAT HE COULD NOT ELIMINATE THE BLUE HAZE AT A REASONABLE LEVEL OF ENERGY, HE STATED THAT INTERNATIONAL PAPER HAD A PILOT MODEL MADE THAT WAS TRIED ON VENEER DRYER EMISSIONS. THEY TRIED IT FOR A SHORT LENGTH OF TIME THEN DISCONTINUED TO USE IT WITH NO FURTHER RESEARCH.

IN TALKING WITH SOME MANUFACTURERS OF THE PRECIPITATOR AND WHEN BRINGING UP THE POSSIBILITIES OF EXPLOSIONS DO TO THE FINE DRY PARTICLES EMMITTED AND THE ELECTRICITY CHARGE PLATES THAT CATCH THE PARTICLES, NONE OF THEM WILL GUARANTEE THEIR EQUIPMENT ON THE BASIS OF BRINGING OUR DRYERS INTO COMPLIANCE, UNDER THE LATEST STRATEGY, OR REMOVE IT AT NO COST. DUE TO A SAD PAST EXPERIENCE OF OURS, THAT IS THE ONLY BAIS THAT I WILL PLACE A ORDER FOR EMISSION CONTROL EQUIPMENT IN THE FUTURE.

ON THIS BASIS I DO NOT FEEL THAT THE FIGURE OF .35 IS FAIR AND SHOULD NOT BE IMPOSED UNTIL FURTHER TECHNOLOGY IS DEVELOPED TO PROVE THAT IT CAN BE MET.

IN REFERENCE TO THE FIRST PART OF THIS TESTIMONY IT IS MY FEELING THAT UNTIL THE COMMISSION CAN COME UP WITH STRATEGIES DEALING WITH ALL POLLUTION SOURCES IN THE VALLEY AND JUST NOT TIMBER INDUSTRIES, IT IS OUR STRONG BELIEF THAT THIS IS DISCRIMINATION AND MIGHT WELL BRING ABOUT A DISCRIMINATION SUIT.

I WISH TO THANK YOU FOR THE OPPORTUNITY TO EXPRESS MY VIEW OF THESE MATTERS.

VERY TRULY YOURS,
TIMBER PRODUCTS CO.



W. A. COFFINDAFFER
PLANT ENGINEER

WAC/JG

December 16, 1977

Before the Environmental Quality Commission

testimony regarding the proposed Amendments to the Oregon Clean Air Act
Implementation Plan involving particulate control strategy for the
Medford - Ashland AQMA

I am Michael E. Burrill, Vice-President and General Manager of Eugene F. Burrill Lumber Co. in White City, Oregon. I reside at 3333 Winterbrook Lane in Central Point, Oregon.

Eugene F. Burrill Lumber Co. is a small closely held lumber corporation producing approximately 75 MM board feet of 2x4 studs annually. We employ approximately 115 people and have been in business in the Rogue Valley for over 25 years.

The proposed amendments concern us because of these five points:

1. Capital Outlay - Our company, being a closely held corporation, must rely on profits (if, with today's timber values, one can be attained) to supply the growth capital to operate. We have always worked to improve the air and water quality discharges from our plant. As recently as 1976, we installed a \$40,000 multi-cone collector system on our boiler plant. We are currently installing a \$6,000 steam flow recorder that should allow us to fine tune the boiler and thus reduce our emissions to 0.100 GR/SCF. The current standard for our boiler is only 0.200 GR/SCF. As long as our expenditures have been on reasonable and proved controls, we have not hesitated to do what is required.

2. Benefits Derived - Most people do not realize the small volume of particulate we are talking about when we discuss 0.100 or 0.050 GR/SCF. All they can see is a 50% reduction in something. Our boiler plant at its last test was emitting at 0.0155 GR/SCF which is approximately three times the newly proposed standard. At that level of 0.0155 GR/SCF, you could not

see a discharge with your naked eye. In discussing this with Henry Schute, Manager of Wellon's Inc., manufacturers of wood waste fired boiler systems, he stated that the drop from 0.100 to 0.050 GR/SCF is the same as taking nothing and dividing it in half. Most people who understand, would also agree with his statement.

3. Lack of Enforcement of the Current Regulations - Within the past year we were contacted by the DEQ representatives wanting permission to bring the news media with them during an inspection of our plant. In questioning the representative as to why, he stated that our plant was a model plant and probably the cleanest in the area. As I drive around the valley and look at the emissions from other plants, I get somewhat upset. I ask myself, "Why do we do the things we do, when others are not even up to the current standards?" We are adults and we shouldn't have to play games, but that is exactly what is required. If we take the time to write letters, make lots of phone calls, and file for lots of extensions, we don't have to live up to the regulations. If we try to spend our time running our businesses, then we are forced into immediate compliance.

4. Additional Power Requirements -- The projected electrical power needed to operate all of the control equipment is staggering. PP&L has notified us that the Rogue Valley is an energy-deficient area and that we should do all we can to conserve electrical energy. While we are doing this, PP&L is trying to get more power into the area by building a new line from Wyoming. The problem is that their routing has now been blocked and it will now be a minimum of five additional years before that power is available. People with the same "Save the Earth" thoughts in mind, are now demanding that we use more power on unneeded emission control equipment. Let's get our thoughts together and consider all the alternatives and the consequences of our decision.

5. Lack of Adequate and Up-to-Date Facts and Figures in the Computer Models Used - In researching the figures used in the model, we have found that many of the discharge figures were obtained four or five years ago. We have also discovered that those figures supplied by the individual companies at that time were only an educated guess. We also found that for those companies who had not supplied the information to the DEQ, the DEQ staff took it on themselves to estimate the emissions. The statement by the DEQ staff that the computer model is the "latest state of the art" to me is not factual. If guesses and estimates are the "latest state of the art" when dealing with multi-million dollar requirements, we need to stop everything and re-analyze our position.

In summary, it is my opinion that before any additional controls be required or amendments made we:

1. Bring all sources into compliance with today's regulations,
2. Consider bringing all sources up to current standards for new sources.
3. Update inventory information so that the model is using factual current figures.
4. Provide a system whereby the members of the AQUA Advisory Committee should be people who understand business and not environmentalists, retired people, educators and the like, who have nothing to lose from a stop-industry regulation.

Thank you.



Michael E. Burrill

Vice-President



Jackson County Oregon

COUNTY COURTHOUSE / MEDFORD, OREGON 97501

Item F
BOARD OF
COUNTY COMMISSIONERS
Commissioners Office 776-7231

I am Carol Doty, a member of the Jackson County Board of Commissioners. In the early spring the County joined the DEQ in appointing the Medford-Ashland AQMA Advisory Committee. The Committee, composed of 20 members and their alternates, has met several times each month and digested highly technical information before taking positions. They have served us well.

The Committee made recommendations to the Environmental Quality Commission on six particulate emission sources. We realize the strategies affect Jackson County industries which have made positive strides in emission control. We do support the recommendations before you.

Future strategies for improving the airshed will be more difficult because they affect personal, individual values and lifestyles. We hope the DEQ and the Committee can educate our citizenry to make some of the needed changes.

Finally, the Board wishes to thank the EQC for increasing the local DEQ staff. We know the increased monitoring will give us data needed to alter present or develop future emission control measures.

Item E

PACIFIC POWER & LIGHT COMPANY

P. O. BOX 1148

MEDFORD, OREGON 97501

December 16, 1977

Environmental Quality Commission
1234 S.W. Morrison
Portland, Oregon

Dear Chairman:

Pacific Power & Light Company was asked to update you on the electric energy outlook in Southern Oregon and Northern California, the area which we serve. These areas include Roseburg, Grants Pass, Medford, Klamath Falls, Yreka, Crescent City and their surrounding areas.

During normal water conditions, Pacific has a local generating capability of 368 MW and transmission capacity to import 760 MW. As a rule of thumb, one MW will provide enough electric energy for 170 jobs or 300 typical homes.

All indications are that the combined generation and transmission capacity will be 60 MW short of anticipated electrical requirements in the winter of 1979-80, 120 MW short in 1980-81, and 180 MW in 1981-82.

Late 1982, Pacific hopes to have additional energy available to the area by the 500 KV Line.

Although the area will not be exposed to these deficits every hour of every day all winter long, import capabilities may be exceeded during peak load times of the day with the time interval and number of days exposure getting greater and greater as total electric consumption of the area grows.

PP&L is doing everything possible to avoid potential electrical shortages, however, should they occur, we are making plans to cause a minimum of inconvenience to the consumers. We sincerely hope the deficits do not occur before the import capability problem is solved.

Sincerely,



Clifford G. Russell
Assistant District Manager

CGR:ms

Item F

TABLE #4

MEDFORD/ASHLAND AIR QUALITY MAINTENANCE AREA
POTENTIAL PARTICULATE CONTROL STRATEGIES FOR ALL CONTROLLABLE SOURCES

NORTH MEDFORD RECEPTOR

Strategy	µg/m ³ Reduction at North Medford Receptor	Particulate Reduction (Tons/Year)	Control Equipment Capital Cost (\$)	Cost Effectiveness (A) (annualized \$/µg/m ³)	Energy Effectiveness (HP/µg/m ³)
1. Hog Fuel Boilers					
a. limited to 0.05 gr/scf, or	8.4*	1,760	\$1,280,000	\$13,000	270
b. limited to 0.01 gr/scf	11.2	2,300	\$11,300,000	\$98,000	420
2. Cyclones					
a. baghouses for all emitting over 10 T/year each	5.1*	450	\$642,000	\$32,000	72
b. baghouses for all emitting from 1 to 10 T/year each	3.2	160	\$1,120,000	\$88,000	190
3. Veneer Dryers (B)					
a. 45% control	2.2*	219	\$1,170,000	\$180,000	134
b. 85% control	4.1	372	\$2,440,000-\$4,170,000	\$110,000-\$150,000	640-660
4. Prohibit Residential Space Heating with Wood	1.6	938	None	\$1,200,000	20,000
5. Particle Board Dryers (80% Additional Control)	1.9*	298	\$4,170,000	\$350,000	100
6. Prohibit Open Burning	0.2	150	Negligible	\$2,300,000	Unknown
7. Replace Oil-Fired Orchard Heaters with Propane Systems	0.2	110	\$1,610,000	\$800,000	No Increase
8. Ban Modified Wigwam Burners	0.2*	80	\$200,000	\$56,000	Negligible

Needed Reduction to Meet Annual Standard (µg/m ³)	1976	1980	1985	1990	1995
Needed Reduction to Meet Annual Compliance	19.2	20.2	21.7	23.6	25.3
	(3.0) ^a	(4.0)	(5.5)	(7.4)	(9.1)
Needed Reduction to Meet Daily Standard (µg/m ³)	21.2	22.2	23.8	25.7	27.3
	(5.0)	(6.0)	(7.6)	(9.5)	(11.2)

Footnotes
 (A) Annualized cost is amortized capital cost plus annual operating cost.
 (B) Cost could be reduced by approximately 40% if air choke off system installed.

*Strategies implemented in Proposed Rules
 Total reduction = 17.8 µg/m³

a - Needed reductions in parentheses have been calibrated with sampling data.

Stem F

TESTIMONY BEFORE DEQ
ON
PROPOSED AIR QUALITY RULES

PREPARED BY
GENE HOPKINS, EXECUTIVE VICE PRESIDENT
GREATER MEDFORD CHAMBER OF COMMERCE

I am Gene Hopkins, Greater Medford Chamber of Commerce. Our organization includes nearly 600 member firms in the Greater Medford area, making us the largest organization representing business in Southern Oregon.

This Chamber was never asked to participate in the Medford-Ashland Air Quality Advisory Committee deliberations, although we have followed most of the committee's actions and activities. We feel it unfortunate that we weren't asked to represent the business sector of the valley's economy but that is, now, neither here nor there.

What we have before us today in the form of the proposed regulations designed to achieve particular air quality standards are regulations that, if adopted, will have a profound economic and social impact on this community.

There is persuasive evidence of the indirect consequences of the influence of similar regulations. Management naturally reacts by altering employment control and coordination. Over the long run these kinds of organizational changes, and the responses they call for from management, can influence corporate structures, labor-management relations, and, in some instances, the very existence of individual companies.

After reading and re-reading the Seton, Johnson, Odell report, entitled Medford-Ashland Air Quality Maintenance Area, dated October 20, 1977, and the proposed regulations, it seems clear to us that the overall control strategy is a short-range one. This introduces a very important element of uncertainty in the program. Perhaps this role of government created uncertainty is the least understood of all the influences business regulations have on the corporate economy.

Although the regulations can be changed -- and quite likely they will be -- the long term and indirect consequence of this kind of action is the

increase of the uncertainty associated with dealing with government in the first place. We need to be concerned over the image that the state possesses of business not being welcome, and that state and local governments are difficult to deal with. This is particularly important to us if by these regulations several of our mills will be forced to close, as has been reported to me. We and the state of Oregon will have to replace those jobs with less offensive industries, and the business climate must be made encouraging for those target industries.

The problem with regulations of this sort lies not in what they do to an industry, but what they do to individual competitors in the industry. Almost always some plants and companies or geographic areas experience higher cost changes than others because of regulations. Higher costs for some mean competitive advantages for others. Lack of competitive advantage, or at least equality, will influence management decisions in the future which we fear will go against us, particularly when we learn the regulations proposed for this area are 80% greater than those recommended by the Environmental Protection Agency. There seems to be a question as to whether, if EPA primary standards only were adopted for Oregon, this area would fall into the air quality maintenance area.

We would also raise the questions of the Seton, Johnson, Odell report and the data bases that are used.

There is first the question of population in which apparently each of the reference sources have taken without question data provided by the Center for Population Research at Portland State University. As you must be aware, they are projecting a population increase of 5% for Jackson County in 1977 over the 1976 figures. It is obvious that the figure for the county does not truly represent what is happening in the area the

study encompasses. For instance, in Medford the value of construction, which incidentally was up by great percentages in single family dwellings, was up 32% over 1976.

Further the question of population and how that figure was used in the report is interesting when applied to space heating. Certain conservation programs have caught on in this area, particularly in the use of wood fuel for heating and in fireplaces. According to information we have on hand it would appear that the increased use of this fuel under the guise of energy conservation rivals the annual consumption of almost three wigwam burners. Coupled with home building increase, we can foresee the time when the gain from eliminating wigwams a few years ago will have been lost to this use.

In summary, one need not enthusiastically embrace government controls to recognize that regulations are a growing and permanent reality. Thus the regulatory boom -- like any other change in the economic environment -- creates costs for some, opportunities for others, and challenges for all. We are not opposed to air quality regulations for the Medford-Ashland area, but rather we subscribe to the rationale that in the absence of functioning processes to provide essential input and guidance on which to base intelligent decisions, we can be headed for disaster. It is our conviction that controls must be planned for, just as we plan for any wise course for our future.

The Chamber is convinced that research and planning for these regulations do not reflect the professional quality and objectivity we have come to expect from our DEQ. We would urge that before adoption of any regulations of this sort, a comprehensive study of the total problem be instituted that can result in control programs that will be objective and equitable, in which the DEQ and the community can take pride.

Thank you.

Items

December 16, 1977

Environmental Quality Commission
1234 SW Morrison St.
Portland, Oregon 97205

Dear Sirs,

I would like to express my concerns over the wood fiber fall-out which is presently discharged by MEDCO Corp. at their medium density fiber board plant on North Pacific Hwy in Medford, Oregon.

My husband and I own and operate Beetle Motors, which is just across North Pacific Hwy. from this plant. We have on numerous occasions, been inundated by the wood fiber fall-out from this plant. At times the fibrous material covers our entire lot, blanketing cars, coating the pavement to the rear of our shop to the point where one can scoop up handfuls of it, and clogging the drain spouts attached to our roof. At the worst times, anyone driving onto our property with car windows open, experiences a cloud of the fibrous substance rising from the ground into the car. Unfortunately, this fall-out does not confine itself to the exterior of our shop, but actually penetrates through closed doors to coat cars, tools, equipment and furniture inside.

Our single employee, Steven Ray, has, in the past year, often complained of not being able to get any oxygen. Going outside does not seem to help. I myself experienced a continually bleeding nose and a hoarse throat all summer long. At the times when this fibrous wood material is most evident, my husband has complained of a sore throat and a tightness in his chest. Having been at our present location for eight years and never having experienced these symptoms before MEDCO located across from us, it is obvious that this fibrous fall-out is indeed responsible for these physical complaints and thus is undeniably detrimental to our health. (Please see enclosed article #1)

Our concern over this problem prompted us to attend the Nov. 21, 1977 meeting of the Medford-Ashland Air Quality Maintenance Area Advisory Committee and to present to this committee a petition typed and circulated by residents of our area. This petition called for a hearing on MEDCO's permit. At this meeting, I was stunned to learn of the history of the original approval for this permit in 1973. It became apparent, as I listened to testimony of Mr. Lynn Newbry who represented MEDCO and of Mr. Merlyn Hough who represented the DEQ, that at the time of the 1973 approval, the industry did not and in fact still does not have the technology to effectively control emissions. Mr. J. E. Hanson, also a MEDCO representative, stated that most of the adverse conditions caused by MEDCO happen in up-set situations. He stated that he could not guarantee that these up-set conditions could not occur every half hour. The obvious question here is how could a plant of such an experimental and unknown nature, fully capable of polluting the entire area, ever be granted a permit in a valley which is scientifically known to have one of the most serious air inversion problems in the nation and which already has a sizable population showing every indication of increasing? As I understood Mr. Hough's answer to this question at the meeting, he stated that with the technology available in 1973, the DEQ thought and hoped that the plant would not be a problem and on this basis did MEDCO secure their permit in Medford.

Though MEDCO quite admirably is struggling to bring the emissions of their plant under control, I recently read an article in the Medford Mail Tribune of Nov. 23, 1977 that they are now contemplating a new plant for Medford. What sort of reasoning is this? (See enclosed article #2) In this article, Mr. Russell J. Hogue, president of Medco, states in reference to the new facility, -

(2)

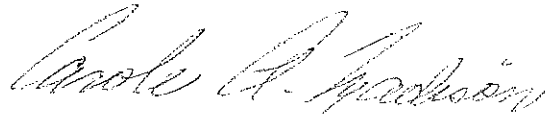
- "We (MEDCO) can't afford to spend money on something when we don't know what its effectiveness will be." Why wasn't this same reasoning applied in 1973 when the present plant was under consideration? How can MEDCO now even consider a new plant of any sort for Medford?

I appreciate the fact that MEDCO does have a sizable investment in their present plant, but I also appreciate that the private businesses and residences of this north Medford area also represent a sizable investment for a large group of people. These commercial and residential properties were established long before MEDCO sought to bring their troublesome plant to our area. Thus I feel that MEDCO is morally and legally obliged to do what-ever is necessary to stop this assault on their neighbor's health and property.

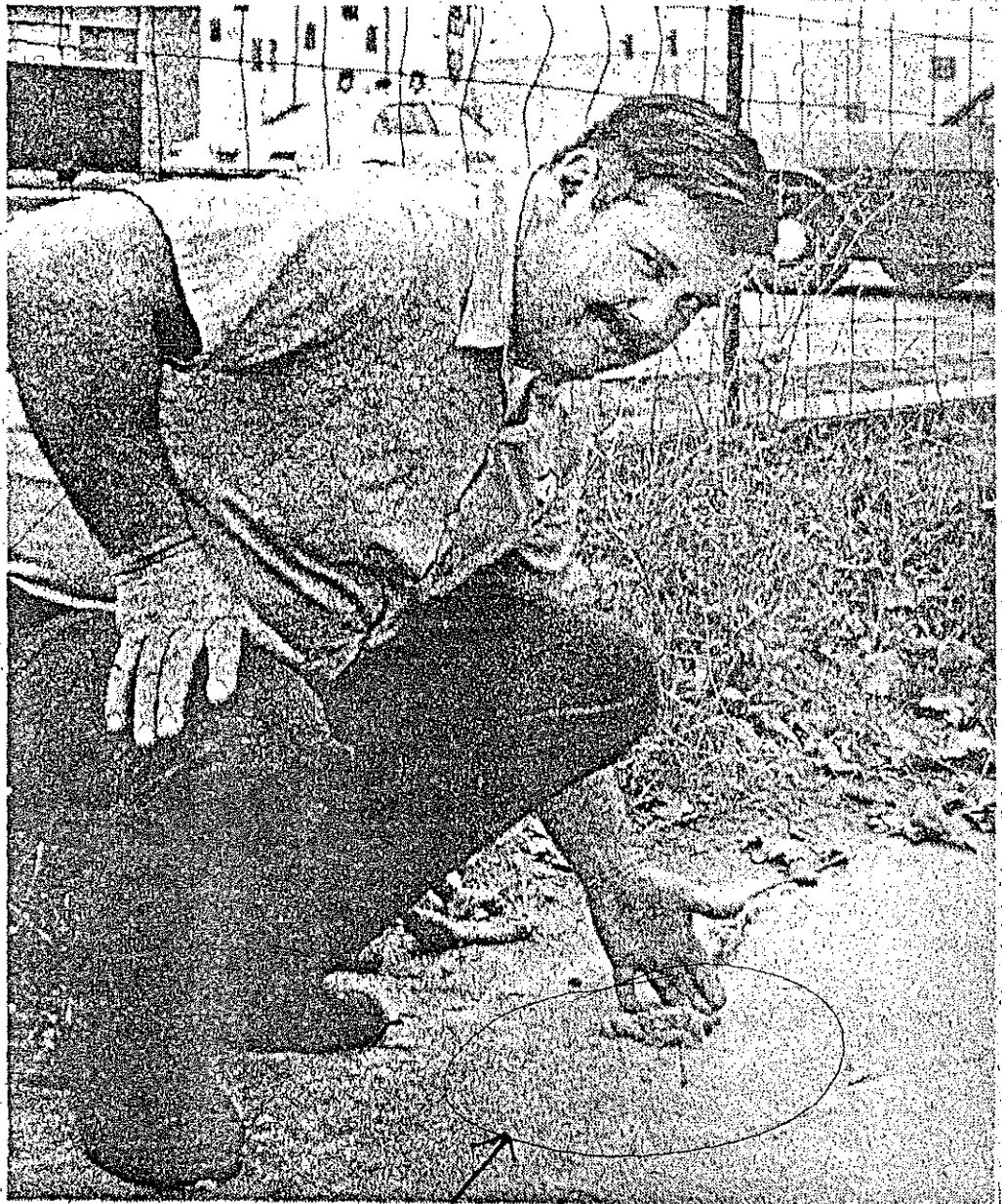
I sincerely hope that something positive can be done to resolve this problem very soon. I also wish for this letter to appear in the minutes of your Medford meeting of Dec. 16, 1977.

Thank you,

Carole A. Madison
P O box 175
Jacksonville, Oregon 97530



enclosures: 2 newspaper articles



NO SNOW, NO JOKE — James Madison scoops handful of wood fiber dust from pavement of parking lot near Medco

MT photo by Stu Watson fiberboard plant between Medford and Central Point.

Article #1

Businessman near Medco says fiber pollution is 'piling up'

Mail Tribune 11-11-77

Two equipment malfunctions this week at Medford Corporation's medium density fiberboard plant north of the city have resulted in a fallout of fibrous material which — again — has area residents fuming.

Dennis Belsky, air emissions control engineer with the Medford office of the Department of Environmental Quality, said single cyclone dust collection devices at the plant plugged on Saturday night and Monday night.

Bypass valves on the devices allowed unfiltered exhaust air carrying wood fiber to spill out of the plant for about three minutes on each occasion, Belsky said.

The blockages were cleaned and normal operation resumed. But not before fallout from the cyclones dusted the neighboring community.

"I've been breathing this (blank) for three years," said James Madison, owner of Beetle Motors, 2708 N. Pacific Highway. "I'm getting tired of it."

Madison said he had contacted the DEQ on at least six separate occasions during that period. But he said the recent fallout was worse than any other discharge.

And he said it isn't just a problem of isolated incidents; he said it occurs with disturbing regularity.

Madison said his wife Carole had helped at the shop for about three months prior to taking a position at the county assessor's office recently.

"My wife had been complaining about a bloody nose and sore throat the last two or three months," Madison said.

"It's gone away now that she's working at the assessor's office. But I've been feeling a sore throat and a constriction of my chest, too.

"This stuff just slices your lungs up."

Madison scooped a handful of the dust from the parking lot. Across the fence in the parking lot of the Oregon State Police, similar dust had collected atop cars, next to curbs and around weeds.

"I parked my pickup out back yesterday and when I went out four hours later I had to turn on the windshield wipers to clean the stuff off," said Steve Ray, an employee at Madison's shop.

Several weeks ago, Frankie Burton, a resident of the Idle Wheels Mobile Park near Table Rock Road, contacted the Mail Tribune about the same problem.

Madison was quick to note that he didn't want to see Medco employees lose their jobs. But, he said, company officials should either shut the plant down or curb the discharges, "no matter what it costs.

"They shouldn't have let the thing open in Medford until it had all the stuff on it," he said. "I'm willing to put up with some pollution, but this is asking too much."

Belsky said recent tests on the Medco plant show emissions to be within the allowable poundage-per-hour emission limit specified on the permit given the facility by the DEQ.

Medco plans large facility in region

11-23-77

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Roughly 50 percent of a \$5 million expenditure approved for the coming year by the Medford Corporation Board of Directors will go toward "a sizeable complex" somewhere in the Southern Oregon area, according to Russell J. Hogue, president of Medco.

Hogue said the new facility would consolidate various Medco divisions, including some now located in the Portland area. He said the plant would be geared toward secondary manufacture rather than primary manufacture.

"There will be four distinct product items to be manufactured," Hogue said, although he wasn't at liberty to specify what they would be.

Hogue explained that primary manufacturing involves logs and products directly related to logs. Secondary manufacture, he said, would refer more to products like panelling which are developed from log by-products.

"We're not sure which city it would be in," Hogue said. He indicated that Medford was among those cities being considered.

The balance of the \$5 million approved for capital improvements will be divided between improved production efficiency measures and environmental control

devices.

Medco has come under fire in recent weeks from residents complaining about fiber fallout from its north Medford medium density fiber-board plant.

Not addressing that issue specifically, Hogue said money has been set aside for the purchase of pollution control devices which are approved and certified by the state Department of Environmental Quality.

"A lot of plans and a lot of programs have been put together, but they aren't certified by the DEQ and some of them aren't that good," Hogue said. "We can't afford to spend money on something when we don't know what its effectiveness will be."

"We recognize certain problems. If the state of the art will develop certain machinery which the DEQ will certify, as being acceptable, then we'll put it to work."

In other action, the Medco board of directors increased the regular dividend by 25 percent. The dividend will be increased to 30 cents from 24 cents per share payable Dec. 16 to shareholders of record Nov. 30.

The board also approved the company's proposed operating budget for 1978.

Article #2

Medford Commission DEQ

Dec. 16, 1977

Stem

I was brought up in Vacaville, California, where Basic Vegetable Products Inc., has their main factory for drying, grinding and making onions and garlic salt, a fine dust-like powder. For the last 30 or 40 years, they do not lose any dust and the last few years they even catch the smell, so it doesn't pollute the neighborhood.

I visited their plant last summer and talked to Robert O. Paolini, the Plant Manager. He advised me to have anyone wanting to catch dust in any large quantity to telephone his plant engineer, Joe Grannen at 707-446-2200, Ext 26. He would tell them the name of the manufacturer of the dust catching machinery and the name of the best man for the job, who would be pleased to visit any Medford plant, free of charge and tell them what is needed to do the job right, even down to the smell.

Phone # 773-7829

George W. Archer
2385 Tabler Rd #96
Medford
Oregon 97501

Mr. & Mrs. George W. Archer
2385 Table Rock Rd., #96
Medford, Or., 97501
Dec. 14, 1977

Director of Environmental Quality
1234 S.W. Morrison St.,
Portland, Or. 97205

Dear Sir:

I wish this letter to become a part of the minutes of the Commission's meeting of December 16, 1977 at Medford City Hall.

I enclose a dust and partical sample taken from the back glass and windshield of my Colt Dodge, Nov. 8, 1977. I used a gillett razor blade as a scraper and shovel and put the polution in afolded paper which is enclosed. I parked the car in my front drive at 12:25 midnight, then took the sample at 11:00 A.M. the next morning. ~~K/I had parked the car~~ The glass was clean when I parked the car. It must be wiped every day before driving, if left standing here overnight or all day. Sometimes more , sometimes less.

The contamination on the car is not all of my worry. The pollution sifts into all parts of my house and must be cleaned continuously. My health is my worry and if it cannot be cleared up, but is allowed to continue, I must move out. I like my home here as it is. I am 72 years old, retired on a low, set income and I don't believe I should have to move out to avoid this dusty and chemically contaminated living condition. I don't believe this was the condition when I bought my mobile home and moved here over two years ago.

Sincerely yours,

George W. Archer

Mr. & Mrs. George W. Archer
2385 Table Rock Rd., #96
Medford, Or., 97501

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Item 8

Director of Environmental Quality
1234 S.W. Morrison St.,
Portland, Or., 97205