## 7/28/1978

# OREGON ENVIRONMENTAL QUALITY COMMISSION MEETING MATERIALS



State of Oregon Department of Environmental Quality

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### (Tentative Agenda)

ENVIRONMENTAL QUALITY COMMISSION MEETING July 28, 1978 LaGrande Community Center 808 Adams Avenue LaGrande, Oregon

9:00 am A. Minutes of the June 30, 1978 meeting.

- B. Monthly Activity Report for June 1978.
- C. Tax Credit Applications
  - PUBLIC FORUM Opportunity for any citizen to give a brief oral or written presentation on any environmental topic of concern. If appropriate, the Department will respond to issues in writing or at a subsequent meeting. The Commission reserves the right to discontinue this forum after a reasonable time if an unduly large number of speakers wish to appear.
- D. 1979-81 Budget Discussion of preliminary proposals for DEQ's 1979-81 biennial budget.
- E. Eastern Region Report of Region Manager on significant on-going activities in the Eastern Region.
- F. NPDES July 1, 1977 Compliance Date Request for approval of Stipulated Consent Orders for NPDES permittees not meeting July 1, 1977 Compliance date: City of Dundee, Yamhill County.
- 10:00 am G. Conflict of Interest Rules - Public hearing to receive testimony and consider adoption of amendments to the Oregon Clean Air Act Implementation Plan to include rules pertaining to conflict of interest by State Boards, required by Section 125 of the Clean Air Act.
  - H. Subsurface Sewage Rules Proposed adoption of rules governing the fees charged by Clackamas County for subsurface or alternative sewage disposal system permits, OAR 340-72-010(4)(b).
  - 1. Medford AQMA Rules Authorization for public hearing to consider proposed amendment of Oregon Clean Air Act Implementation Plan to include Offset Rule for new or modified emission sources.
  - J. Sulfur in Fuel Oil Status Report on availability of clean fuels (Clean Fuels Policy).
  - K, "208" Plans Areawide designation and certification. Also, involved citizens are invited to comment on the emerging draft portions of Oregon's Statewide Water Quality Management Plan (according to Section 208, Federal Clean Water Act).

L. Emergency Response Plan - Report on Emergency Response Plan 

( ause of uncertain time spans involved, the Commission reserves the right to deal with any item at any time in the meeting, except item G. 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 am) and lunch at the Smokehouse Restaurant, 2208 E. Adams, LaGrande.

Patterson

### MINUTES OF THE NINETY-NINTH MEETING OF THE OREGON ENVIRONMENTAL QUALITY COMMISSION

### JULY 28, 1978

On Friday, July 28, 1978, the ninety-ninth meeting of the Oregon Environmental Quality Commission convened in the LaGrande Community Center, 808 Adams Avenue, LaGrande, Oregon.

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

Chairman Richards informed those in attendance that the Commission received the staff reports a week in advance of the meeting and were familiar with the material. Therefore, he said it might appear the Commission was making hasty decisions when they actually were not.

### AGENDA ITEM A - MINUTES OF THE JUNE 30, 1978 MEETING

It was <u>MOVED</u> by Commissioner Somers, seconded by Commissioner Phinney, and carried unanimously that the Minutes of the June 30, 1978 meeting be approved.

### AGENDA ITEM B - MONTHLY ACTIVITY REPORT FOR JUNE 1978

It was <u>MOVED</u> by Commissioner Somers, seconded by Commissioner Phinney, and carried unanimously that the Monthly Activity Report for June 1978 be approved.

### AGENDA ITEM C - TAX CREDIT APPLICATIONS

<u>Mr. Michael J. Downs</u>, Administrator of the Department's Management Services Division, said that the Attorney General's Office had some problems with application T-975, Menasha Corporation. The problem, he said, was that although the Department had no record of receiving a request for preliminary certification, the Company did show the Department a copy of a transmittal letter and an application for preliminary certification from the Company's files. Based on that, Mr. Downs said, the staff believed the Company did submit an application eventhough the Department had no record of it. Mr. Downs said that Mr. Robert Haskins, Department of Justice felt that the burden was on the Company to be sure the Department received the application. <u>Mr. Robert Haskins</u>, Department of Justice, said that it was a simple matter to prove that an application for preliminary certification was received, and that it would best serve the purpose of the statute to require such actual receipt.

Commissioner Somers said he was satisfied, based on staff belief, that preliminary certification had been requested before construction. Commissioner Phinney asked what assurance the Department had that a Company would not just put a letter in their files, after the fact, and not submit the application. Commissioner Somers said that the Department had the Company's statement to that effect and believed the Company to be truthful.

In response to Chairman Richards, Mr. Haskins said that in order for the Commission to grant this tax credit, they would have to find that the application was sent and received.

It was <u>MOVED</u> by Commissioner Somers, seconded by Commissioner Phinney and carried unanimously that the wording in application T-975's review report be changed as follows:

"Menasha apparently submitted and there was apparently received a Notice of Intent to Construct and a Request for Preliminary Certification for Tax Credit on January 26, 1977."

and that applications T-975, T-1008 and T-1011 be approved.

#### PUBLIC FORUM

<u>Mr. Steven Gardels</u>, Department's Eastern Region Manager, presented a petition on behalf of approximately 50 citizens in the Hermiston area dealing with odors from rotten potatoes being used for cattle feed in an area near their residences. Mr. Gardels said that he was presented the petition because none of the petitioners were able to appear, and he was acting for those petitioners. This petition is made a part of the Commission's record on this matter. Mr. Gardels said that the smell from the rotting potatoes and the flies and other pests that go along with them, was indescribable.

Mr. Gardels said that rural cattle feedlots were currently exempt from the air quality rules. Under normal circumstances where cattle were fed grain materials accepted odors did occur, he said. Because of the large potato production in the area, Mr. Gardels continued, more and more cattle raisers were using waste potatoes as feed, and this was not the only feedlot with odor problems. Commissioner Somers asked why the owners of this property were not cited for lack of a solid waste disposal permit. Mr. Gardels replied that they did not need a solid waste permit because they were actually feeding cattle. The problem was, he said that more potatoes were dumped in the area than the cattle could eat. Mr. Gardels said he met with the owners of the feedlot and they informed him they intended to bring in more potatoes because they were good feed. He said the owners said they would try to get the potatoes spread out to where the cattle could eat them faster. Mr. Gardels said he could only deal with this problem through the water quality rules because the Department did not have air quality rules to deal with the odors from feedlots and they did not need a solid waste permit because the potaotes were being used as feed. Commissioner Somers suggested that this might come under the solid waste rules as a salvage site.

Chairman Richards asked why they were buying more than the cattle could eat. Mr. Gardels replied that because they were already harvesting potatoes in the area, last year's storage was being cleaned out. He said the owners indicated they were going to bring in more cattle to consume the potatoes. Even if that happened, he said, there would still be a gross amount of odors.

Mr. Gardels requested guidance from the Commission on this matter. He said it was a legitimate use of a waste product, but it was developing into a large environment concern in the area. He said he did not think it was a salvage operation.

Chairman Richards said that one remedy would be for the petitioners to hire an attorney to test this. He said that the Commission was not in a position to make a decision on this matter at this time. Chairman Richards asked that Mr. Gardels check with Headquarters staff and legal counsel to see if this matter fell within the Department's regulations. He said that Mr. Gardels might have to advise the petitioners that they may have recourse through the courts. Commissioner Phinney suggested that the petitioners may want to call this to the attention of their Legislators.

<u>Mr. Stanley G. Wallucis</u>, appeared on behalf of the City of Prairie City, which was under a moratorium on sewer construction. He requested that grant assistance be set aside for the City as part of a Step I grant for the correction of existing infiltration inflow. He said that a recent questionnaire survey indicated that 110 out of 132 persons questioned would vote for a bond issue for improvements to the sewer system. Mr. Wallucis presented a letter from Ms. Zelma Woods, City Records, which was made a part of the record of this meeting.

<u>Mr. Jack Baisden</u>, City Manager, City of Irrigon, read a statement regarding their belief that the area was a health hazard and in need of funding for a sewer system. He said they had appeared at the Department's public hearing in July regarding the Sewerage Works Construction Grants Priority List, in an effort to get them raised on the priority list. Mr. Baisden submitted additional material which was made a part of the record of this meeting and forwarded to the Hearing Officer in connection with the July public hearing on this matter. Commissioner Somers said he had been very concerned about this problem and had requested a survey be conducted. None of the concerns expressed by Mr. Baisden, he said, showed up as a result of the survey. He said his concern was that this was one of the most rapidly growing areas in the Northwest. He asked if a pressure line had been explored to transport the sewage to an existing treatment plant. Mr. Baisden replied that the pipeline would have to be at least six to seven miles through primarily agricultural land and could cost several million dollars. He said Umatilla had indicated they didn't want to be involved. The next closest town was Boardman, he said, ten miles away.

<u>Mr. Harold Sawyer</u>, Administrator of the Department's Water Quality Division, said that this material had been submitted at the Department's public hearing and the staff was analyzing all testimony from that hearing in terms of what types of additions, changes and modifications would be necessary to the proposed list. He said this matter was being looked at and the final proposed priority list would be submitted to the Commission for adoption at its next meeting.

Chairman Richards said that the material presented by Mr. Baisden at this meeting would be evaluated by the staff in their review and finalization of the priority list.

<u>Mr. Vernon Stewart</u>, Mayor of the City of Irrigon, also requested that the City be given consideration on their position on the priority list.

<u>Mr. John W. Beck</u>, Blue Mountain Intergovernmental Council, requested to be allowed to submit written testimony regarding septic tanks and the water quality "208" plans. Chairman Richards granted his request and asked that staff send copies of the testimony to the Commission as soon as received so that they would have an opportunity to look at it.

<u>Mr. Gene Butler</u>, appeared on behalf of the County of Wallowa, concerning the denial of septic tank permits in the county. He requested permission to submit additional written testimony because he had inadequate time to prepare for this meeting. It appeared, he said, that these denials were not being made equitably and he requested review of this matter.

Chairman Richards replied that the Commission was aware of the problem and informed the public that the Director and members of Department staff would be in Wallowa County in August to do personal inspections of sites where permits had been denied. He continued that it was unfortunate that there was not sufficient staff until recently to do adequate inspections and the Department was the first to admit that there were a number of permits that had been issued which probably should not have been because they did not meet the requirements of the regulations. Chairman Richards said they realized that as a result there was a lot of dissatisfaction but wanted to assure the audience that the Department was receptive to this problem. <u>Mr. Roland W. Johnson</u>, appeared on behalf of property owners in the Lostine River area of Wallowa County. He said that in the past few months almost all applications for septic tank permits in the county had been denied. Mr. Johnson was also concerned that the issuance of septic tank permits had been inconsistent, and that the regulations had not been applied evenly. He asked the Commission to investigate the application of the regulations in this area so that septic tank permits could be issued for all feasible sites.

Commissioner Somers gave Mr. Johnson a copy of the Subsurface Regulations and requested that he look them over and if he saw areas that modifications could be made to inform the Department. Commissioner Somers said that one of the problems staff had when investigating possible sites was the concern that a septic tank not be placed in an area where it could contaminate an aquifer. Commissioner Somers said that most people, if they understand the problems, really don't want to build a bad system.

Chairman Richards said he appreciated Mr. Johnson's comments and assured him that this problem was a high priority item. He reiterated that Department staff would be in the area in August and he hoped that some solutions would come out of that visit.

<u>Mr. Mark Platt</u>, Wallowa County Planning Commission pointed out that the mottling of rocks which indicated water had been in an area at some time, could be from the old system of flood irrigation which had now been changed to a sprinkler system. Therefore, he said, there was no longer the underground flow of water in the area. He suggested that the Department take this into consideration.

# AGENDA ITEM E - REPORT OF EASTERN REGIONAL MANAGER ON SIGNIFICANT

<u>Mr. Steven Gardels</u>, Eastern Region Manager, explained some of the significant activities of his region. He emphasized that a large amount of their work was in the subsurface area and a lot of support work for the subsurface program was being done by the county planning department staff.

Mr. Gardels said that in 1974 the Energy Facility Siting Council restricted coal plants from the Grand Ronde, Baker and Snake River airsheds based on DEQ's recommendations. He said that there was growing concern in those areas that the State had put undue restrictions on the airsheds and thus prevented the construction of coal plants.

Mr. Gardels continued by highlighting some of the activities contained in the staff report on this matter, and answered inquiries from Commission members. AGENDA ITEM G - CONFLICT OF INTEREST RULES - PUBLIC HEARING TO RECEIVE TESTIMONY AND CONSIDER ADOPTION OF AMENDMENTS TO THE OREGON CLEAN AIR ACT IMPLEMENTATION PLAN TO INCLUDE RULES PERTAINING TO CONFLICT OF INTEREST BY STATE BOARDS, REQUIRED BY SECTION 125 OF THE CLEAN AIR ACT

It was MOVED by Commissioner Somers, seconded by Commissioner Phinney and carried unanimously that the public hearing be continued and action on this matter be deferred to the Commission's August 1978 meeting. The record notes that no one was present at this meeting to testify.

AGENDA ITEM I - MEDFORD AQMA RULES - AUTHORIZATION FOR PUBLIC HEARING TO CONSIDER PROPOSED AMENDMENT OF OREGON CLEAN AIR ACT IMPLEMENTATION PLAN TO INCLUDE OFFSET RULE FOR NEW OR MODIFIED EMISSION SOURCES

AGENDA ITEM J - SULFUR IN FUEL OIL - STATUS REPORT ON AVAILABILITY OF CLEAN FUELS (CLEAN FUELS POLICY)

It was <u>MOVED</u> by Commissioner Somers, seconded by Commissioner Phinney and carried unanimously that:

- -- the Director's Recommendation to authorize a public hearing to consider proposed amendment of Oregon Clean Air Act Implementation Plan to include Offset Rule for new or modified emission sources be approved; and
- -- the Status Report on the availability of clean fuels (Clean Fuels Policy) be accepted.

### AGENDA ITEM K - "208" PLANS - AREAWIDE DESIGNATION AND CERTIFICATION

By unanimous consent the Commission commended the Department and the Water Quality Advisory Committee for their efforts in this matter.

### AGENDA ITEM L - EMERGENCY RESPONSE PLAN - REPORT ON EMERGENCY RESPONSE PLAN

AGENDA ITEM F - NPDES JULY 1, 1977 COMPLIANCE DATE - REQUEST FOR APBROVAL OF STIPULATED CONSENT ORDERS FOR NPDES PERMITTEES NOT MEETING JULY 1, 1977 COMPLIANCE DATE

#### AUTO EMISSION TESTING RULES

It was MOVED by Commissioner Somers, seconded by Commissioner Phinney and carried unanimously that:

- -- the staff be commended for their work on the report on the Emergency Response Plan and that the report be accepted;
- -- Final Order amending Stipulation and Final Order No. WQ-SNCR-77-261, DEQ v. City of Dundee, Yamhill County, Oregon, be approved; and
- -- A public hearing be authorized for the Commission's September 1978 meeting to deal with an amendment to the Auto Emission Testing Rules.

### AGENDA ITEM H - SUBSURFACE SEWAGE RULES - PROPOSED ADOPTION OF RULES GOVERNING THE FEES CHARGED BY CLACKAMAS COUNTY FOR SUBSURFACE OR ALTERNATIVE SEWAGE DISPOSAL SYSTEM PERMITS, OAR 340-72-010(4)(b)

It was <u>MOVED</u> by Commissioner Somers, seconded by Commissioner Phinney and carried unanimously that amendments be adopted to Oregon Administrative Rules governing Subsurface and Alternative Sewage Disposal, OAR 340-72-010(4)(b).

Commissioner Somers stated for the record that in all these matters findings were being made per the agenda packet. Chairman Richards said that in all rule adoption matters the Director's Recommendation should make reference that the facts were true as set forth in the staff report.

AGENDA ITEM D - 1979-81 BUDGET - DISCUSSION OF PRELIMINARY PROPOSALS FOR DEQ'S 1979-81 BIENNIAL BUDGET

Commission members and Department staff discussed preliminary proposals for DEQ's 1979-81 biennial budget,

There being no further business, the meeting was adjourned.

Respectfully submitted,

Carol A. Splettstaszer Recording Secretary



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

### MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item B, July 28, 1978, EQC Meeting

June Program Activity Report

Discussion

Attached is the June Program Activity Report.

ORS 468.325 provides for Commission approval or disapproval of plans and specifications for construction of air contaminant sources.

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.

OAR 340-62-020 provides for Commission approval prior to disposal of environmentally hazardous wastes in Oregon, which are generated outside of the State.

The purposes of this report are:

- To provide information to the Commission regarding the status of reported program activities and an historical record of project plan and permit actions;
- 2) To obtain confirming approval from the Commission on actions taken by the Department relative to air contamination source plans and specifications.
- 3) To obtain Commission approval for disposal of specific environmentally hazardous wastes at Arlington, Oregon, which were generated outside of the State of Oregon; and
- 4) To provide a log on the status of DEQ contested cases.

### Recommendation

It is the Director's recommendation that the Commission take notice of the reported program activities and contested cases, give confirming approval to the air contamination source plans and specifications listed on page 2 of the report, and approval for disposal of environmentally hazardous wastes listed on page 21 of the report.



M. Downs:dh 229-6485 07-21-78

WILLIAM H. YOUNG

### Monthly Activity Report

### June 1978

### Month

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### Hearings Section

DEQ Contested	Çase	Log	•	٠	•	•	٠	٠	٠	•	•	•	•	•,	•	٠	•	•	•	•	٠	٠	22	2
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## MONTHLY ACTIVITY REPORT

Air, Water, and Solid Waste Divisions

(Reporting Unit)

July 1978

(Month and Year)

### SUMMARY OF PLAN ACTIONS

Air	Plans Received <u>Month Fis.Yr</u> .	Pla Appr <u>Month</u>	nns coved <u>Fis.Yr</u> .	Pla Disapp Month	ans proved <u>Fis.Yr</u> .	Plans Pending 27
Direct Sources	12 207			<del></del>	 ,	
Total	12 207	19	197		1	37
<u>Water</u> Municipal Industrial Total	133 1448 18 120 151 1568	119 5 124	1457 98 1555	- <u></u>		79 21 100
Solid Waste General Refuse Demolition Industrial Sludge Total	$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	3 3 3 1 10	<u>38</u> <u>6</u> <u>20</u> <u>6</u> 70		·	<u>4</u> <u>2</u> <u>4</u> 10
Hazardous Wastes						

GRAND TOTAL	167	1852	153	1822	·····	<u> </u>	147

### MONTHLY ACTIVITY REPORT

	Air Quality Division	June 1978 (Month and Yea	ar) .	
	PLAN ACTIONS COMPLET	<u>red</u> - 19		-
County	Name of Source/Project/Site and Type of Same	Date of Action	Action	• _
Direct Stati	onary <u>Sources</u> (19)			
Linn (NC1062)	Teledyne Wah Chang of Albany Scrubber for Z <sub>r</sub> 0 <sub>2</sub> Kiln	4/3/78	Approved	
Portable (NC1084)	Columbia West Materials Rock crusher	5/25/78	Approved	
Multnomah (NC1113)	Owens Illinois Cyclone on paper shredder	5/24/78	Approved	
Polk (NC1114)	Towmotor Corp. Spray paint booth	5/16/78	Approved	
Morrow (NC1132)	Cominco America Inc. Fertilizer blending plant	4/26/78	Approved	
Multnomah (NC1145)	Continental Can Catalytic fume burner	5/25/78	Approved	
Linn (NC1156)	Duraflake Baghouse on cyclones #501 & 7	5/17/78	Approved	
Multnomah (NCl161)	Crown Zellerbach Corp. Flexographic press	5/25/78	Approved	
Jackson (NC1164)	Payless Drug Stores Incinerator modification	6/14/78	Approved	-
Lane (NC1167)	Waterbed Factory Sawdust cyclone and filter	6/12/78	Approved	
Portable (NC1168)	Babler Bros. Inc. Asphalt plant baghouse	5/30/78	Approved	
Linn (NCl171)	Northrup King Co. Seed cleaning plant	6/6/78	Approved	
Linn (NC1176)	Boise Cascade Corp. Wood furnace and veneer dryer	6/8/78	Approved	
Union (NC1177)	Boise Cascade Corp. Three bagbouses	5/26/78	Approved	

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### MONTHLY ACTIVITY REPORT

	Air Quality Division (Reporting Unit)	June 197 (Month and Ye	8 ar)
	PLAN ACTIONS COMPLETE	ED - 19 cont	•
County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Stati	onary Sources (cont.)	1, I	
Portable (NC1179)	Deschutes Ready Mix New scrubber on old asphalt plant	6/20/78	Approved
Portable (NC1180)	R. L. Coats Construction New asphalt plant and old baghouse	6/16/78	Approved
Clackamas (NC1181)	E. C. Gravel Rock crusher	6/20/78	Approved
Douglas (NCl183)	Woolley Enterprizes New fan for burley scrubber	6/8/78	Approved
Josephine (NCl184)	Miller Redwood Veneer dryer w/Burley scrubber	6/19/78	Approved

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### MONTHLY ACTIVITY REPORT

Air Quality Division	 June 1978
(Reporting Unit)	(Month and Year)

### SUMMARY OF AIR PERMIT ACTIONS

	Permit Actions Received		Permit A Comple	Actions	Permit Actions	Sources under	Sources Reqr'g	
	Month	<u>Fis.Yr</u> .	Month	<u>Fis.Yr</u> .	Pending	Permits	Permits	
Direct Sources	,							
New	4	60	9	40	20	1		
Existing	5	106	16	77	- 29			
Renewals	21	130	· 2		75			
Modifications	7	880	12	861	19			
Total	37	1,176	39	1,033	143	1,831	1,880	
. *								
Indirect Sources	•							
New	2		7*	31	14			
Existing			·	<u> </u>				
Renewals				, ,	- •			
Modifications	1 .		0 ·	7	]			
Total	3	40	6	37	15	85	• •	

\*Includes the withdrawal of the Beaverton Commercial Center.

GRAND TOTALS	40 1,216 45 1,070 158 1,916
Number of Pending Permits	Comments
25 15 31 1 0 13 <u>2</u> 87	To be drafted by Northwest Region Office To be drafted by Willamette Valley Region Office To be drafted by Southwest Region Office To be drafted by Central Region Office To be drafted by Eastern Region Office To be drafted by Program Operations To be drafted by Program Planning & Development
29 21 <u>6</u> 56	Permits awaiting next public notice Permits being typed Permits awaiting end of 30-day public notice period Permits pending

### MONTHLY ACTIVITY REPORT

# Air Quality DivisionJune 1978(Reporting Unit)(Month and Year)

## PERMIT ACTIONS COMPLETED - 45

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Statio	nary Sources (39)		
Baker	Ellingson Lumber 01-0004, New	6/20/78	Permit issued
Clackamas	Riverside School 03-2588, Boiler, Modification	6/7/78	Permit issued
Crook	American Forest Products 07-0002, Modification	5/26/78	Permit issued
Deschutes	Williamette Industries 09-0002, Modification	5/24/78	Addendum issued
Deschutes	Bend Aggregate & Paving 09-0026, Renewal	6/20/78	Permit issued
Deschutes	Sisters Shake Co. 09-0063, Existing	5/26/78	Permit issued
Deschutes	Central Oregon Pavers 09-0064, New	5/26/78	Permit issued
Douglas	Umpqua Excavating & Paving 10-0006, Renewal	5/26/78	Permit issued
Douglas	Trend Veneer Co. 10-0035, Modification	5/26/78	Permit issued
Douglas	Deer Creek Pellet Mill 10-0040, Modification	5/26/78	Permit issued
Douglas	Douglas County Nursing Home 10-0119, New	6/20/78	Permit issued
Hood River	Pyramid Metals 14-0022, New	5/26/78	Permit issued
Jackson	J. C. Penney 15-0107, Existing	5/26/78	Permit issued
Jackson	Vella Cheese Co. 15-0108. Existing	5/26/78	Permit issued

### MONTHLY ACTIVITY REPORT

## <u>Air Quality Division</u><u>June 1978</u> (Reporting Unit) (Month and Year)

## PERMIT ACTIONS COMPLETED - 45 cont.

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Statio	nary Sources (cont.)		
Jackson	Sabroso Co. 15-0109, Existing	5/26/78	Permit issued
Jackson	Rogue Valley Manor 15-0111, Existing	6/20/78	Permit issued
Josephine	Menasha Corp. 17-0058, Existing	5/26/78	Permit issued
Klamath	Chiloquin Forest Products 18-0016, Modification	5/26/78	Permit issued
Linn ,	Brady's Albany Planing Mill 22-0013, New	5/26/78	Permit issued
Linn	Willamette Industries 22-5194, Modification	6/5/78	Addendum issued
Malheur.	Ontario Asphalt Paving 23-0027, New	6/20/78	Permit issued
Multnomah	W. R. Grace & Co. 26-2530, Modification	6/20/78	Permit issued
Multnomah	Army Corps of Engineers 26-2953, Existing	6/20/78	Permit issued
Multnomah	Reynolds School District #7 26-2987, New	5/26/78	Permit issued
Multnomah	Portland Air National Guard 26-2989, Existing	Base 6/20/78	Permit issued
Tillamook	Gold Medal Cedar Products 29-0017, Modification	6/20/78	Permit issued
Tillamook	Centennial Forest Products 29-0055, Modification	6/20/78	Permit issued
Umatilla	Exterior Wood 30-0034, Existing	5/26/78	Permit issued

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### MONTHLY ACTIVITY REPORT

# Air Quality Division (Reporting Unit)

# June 1978 (Month and Year)

## PERMIT ACTIONS COMPLETED - 45 cont.

. County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Direct Statio	pary Sources (cont.)		
	nary sources (cont.)		•
Umatilla	Pendleton Grain Growers 30-0070, Existing	5/26/78	Permit issued
Umatilla	Pendleton Grain Growers 30-0085, Existing	5/26/78	Permit issued
Umatilla	Pendleton Grain Growers 30-0090, Existing	5/26/78	Permit issued
Washington	Stearns Rock Crushing 34-2615, Modification	6/20/78	Permit issued
Yamhill	McMinnville Rock Products 36-0027, Modification	6/20/78	Pemit issued
Portable Plan	<u>ts</u>		
Portable	Nu-Mix Concrete 37-0194, Existing	6/20/78	Permit issued
Portable	Quality Asphalt Paving 37-0195, New	6/20/78	Permit issued
Portable	McClean Logging & Construction 37-0196, Existing	6/20/78	Permit issued
Portable	Houck-McCall Corp. 37-0199, New	5/26/78	Permit issued
Portable	Konen Rock Supply 37-0200, Existing	6/20/78	Permit issued
Portable	D Mc D Corp. 37-0203, Existing	6/20/78	Permit issued

## MONTHLY ACTIVITY REPORT

# Air Quality DivisionJune 1978(Reporting Unit)(Month and Year)

## PERMIT ACTIONS COMPLETED - 45 cont.

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Indirect Sourc	 <u>es</u> (6)		
Washington	Tektronix Beaverton Campus 3,160 spaces File No. 34-8005	6/23/78	Final permit issued
Washington	Floating Point Systems (Murray at Millikan Way) l,200 spaces File No. 34-8007	6/20/78	Final permit issued
Clackamas	Tektronix Wilsonville Campus 2,153 spaces File No. 03-8011	6/15/78	Final permit issued
Washington	Koll Business Center 446 spaces File No. 34-8014	6/13/78	Final permit issued
Multnomah	Oregon Trail Center Ph. 11 783 spaces File No. 26-8017	6/13/78	Final permit issued
Multnomah	Freightliner Corp. Headquarters expansion, 721 spaces File No. 26-7020	6/2/78	Final permit issued

### DEPARTMENT OF ENVIRONMENTAL QUALITY TECHNICA: PROGRAMS

## Water Quality Division

June, 1978

### PLAN ACTIONS COMPLETED - 124

<u> </u>							
<u>u</u>				. •	Date of		Complete
ē	≥	Name of Source/	Project/Site and Type of Same	Réc Id	Action	Action	Action
	<b>5</b>					1.01101	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
. 50	, <u>1</u>	N	110				
<b>بي</b> د .		municipal Sourc	es - 7 (7				······································
	20	SPRINGFIELD	6TH ADD TO RAMBLING AC	K051978	053078	PROV APP	11
	34	USA-FOR#ST GR	MORRIS HINES	K060178	060178	PROV APP	00 -
	18	KLAMATH FALLS	TRUNK LINE RECONSTRUCTION	J052678	060678	PROV APP	11
64	24	SALEM	BRECKENRIDGE HTS NO 1	052578	060678		11
-27	27	SALEM	BRUSH COLLEGE ESTATES	1051678	060678	DROV APP	21
	2.4	CALEM	CHNDHDCT CHDA	0.51670	050010		4L
44	17	CALLEN DARE	00000X 445105	1051070	000070	PROV APP	21
40		GRANIS PASS	ORFGON AVENUE	J051678	060678	PROV APP	21
	24	AUMSVILLE	LINCOLN ST	J051678	060678	PROV APP	21
	ΙB	KLAMTH FALLS	LYNNEWOOD	J051678	060678	PROV APP	21
	34	USA	WAVERLY MEADOWS	K052678	060678	PROV APP.	11
	34	USA	SHTLO SEWER	K052678	060678	PROV APP	11
	15	JACKSON CO	WTI I OW I AKE	W021378	060678	PROVIAPP	112
1. A	15	IACKSON CO	HOWARD DRAIDTE PAKE DADE	V021378	060678		112
54	00	REDMOND	DUDITE WORKS DIDE	V050079	060070	DROW APP	<u> </u>
2 P	1 0		CHER OUTELL REPLICE	V050710	0000/0	ROV APP	20
50	- U - A - 7	WINCHESTER SD	EMEN UUIHALL REMAIKS	A021918	000678	PROV APP	18
- 22	0.9	SANDY	TICKLE CREEK ESTATES	<u> J051878</u>	060678	PROV APP	19
52	26	GRESHAM	THE VINEYARD	J051878	060.678	PROV. APP	19
	26	GRESHAM	NE SAN RAFAEL	J051878	-060678-	PROV APP	19
27	-24	SALEM WILLOW	SPRINGTIME PARK	J051778	060678	PROVAPP	20
71	36	NEWBERG	WYNOOSKI ST TO HESS CR INT	J051278	060678	PROV APP	25
	26	MULTNOM CO	ARGENT SURD	1060578	060678		
	34	HSA-TIGARD	GARDEN DARK DIACE - DURHAM	K060570	060678		01 01
	10	TRI-CITH CD	TRE-WIEW ADADTHENTE	K060576	060676	PROV APP	<u></u>
. 0.0	1.4	CRANTS PARE	INITVIEW APARIMENIS	KUD13/0	- 000030	PRUY- APP	17
70	1/	GRANIS PASS	HAWTHORNE SUBD	KU516/8	000878	PROVAPP	23
60	29	NETARTS SD.	TERRASEA SUBD	K052578	060878	PROV APP	14
	26	WILSONVILLE	WILLAMETTE VILLAGE PH D	K052278	060878	PROV APP	11
	26	OAK LODEF SD	ILONA PARK	J052278	060878	PROV APP	12
- 40	08	PORT ORFORD	SANITARY SEWER IMPROVEMENTS	J052278	060878	PROV APP	12
	34	HTLL SBOPD	SPARTAN ACRES	1051078	060978	PROV APP	20
12	24	411 1 69000	DI VIDIC DADY	1051070	000010	DOOL ADO	
	94	HILLSBORD	ULTHE IC PARK	9021319	000818	PRUV APP	40
·	- 74	MILLSBURU	MAY FIELD	<u>JU51978</u>	060878	PROV APP	
47	20	PORILANN	SW 491H & PRIVALE PROPERTY	3050578	060878	PROV APP	34
02	24	SALFM WILLOW	SMOKETREE	J051778	060878	PROV APP	22
	34	HILLSBOPO	CORNUTTOS MEMORY LANE	J051978	060878	PROV APP	20
	34	HILLSBORD	WITCH HAZEL RD	J051978	060878	PROVAPP	20
	5	CLATSKANIE -	E COLUMBIA RIVER-LID 78-1	050978 ل	060878	PROV APP	- 29
	3	CCSD	HANNEMAN HILLS	J051278	061278	PROV APP	25
	14	HOOD RIVER	SLUDE LAGOONS	V051878	06147B	PROV APP	.27
	22	LEBANON	KART ADDITION	K051778	061478	DROV ADD	79
	2 -	ONTARIO	DEALY SUBD	K050579	061478		20
. <u> </u>		STANFTEIN		KUJUJIO.	001470	CRUV APP	
: 1 <sub>1</sub>	20	ONTART CLU	CALLY CHONE OF STREET	NU4U3/8	0014(0)	RUVAPP	24
·	-45	UNTAKIO	DEALT SUBDALA	KU53078	061478	PROV APP	1.5
72	υZ	CORVALLIS	FIMHERHILL 4TH ADDITION ME	KD51978	061478	PROVAPP	26
	- ġ.	REND	CONTRACT NO. 2	K050578	061478	PROV APP	109
82	24	SALEM	FIELDCREST	J060578	061678	PROV APP	11
14	34	USA	KENNEY-ST EXTENSION	J060978	061678	PROV APP	07
		ESTACAN		- 10 KT 272	061478	DDAV. ADD	<u>. 01</u>
79	1.22	FUTACADA FERMIAN		2001310	001010	DDDU APP	0.2
· • • • •		LIDANUN	JUE GILBERT - SEVER EXT	- KU 3 30 78	052018	PROV APP	- 20
	- 22	ALBANY	EAST SIDE SUBD	K053078	062078	PROV APP	21
	6	COUS BAY	WESTGATE SUBD	J052678	062178	PROV APP	26
11	10	ROSEBURG	JOF STMAS	J052278	062178	PROV APP	30
	34	USA-ROCK CR	MORFORD ADDITION 172	H060178	062178	PROV APP	20
	26	PORTLAND	NE STAFFURD & NE 33RD	H0.50978	062178		12
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#### TECHNICAL PROGRAMS

Water	Qual	līty D	ivision

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June, 1978

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[6]	un.				Date of	Complete
Ē	ទី	Name of Source/H	Project/Site and Type of Same	Rec'd	Action Action	Action
28	34	115 4	WOODLAKE APARTMENTS 714	H061278	062178 PROV APP	<b>A</b> 0
	26	PORTLAND	NW 25TH & 26TH AVES	H061278	062178 PROV APP	- 05
	8	BROOKINGS	BIRD ISLAND SUBD	J061278	062178 PROV APP	09
2	34	USA TIGARD	TANGELA	H0'61478	062178 PROV APP	07
	34	USA TIGARD	WHITE PINE ESTATES	H061478	062178 PROV APP	07
	15	TALENT	MEADOWBROOK ESTATES	H061578	062178 PROV APP	0.6
	15	MEDFORD	STARWOOD ESTATES	H061578	062178 PROV APP	06
	3	GRESHAM	CYGNET ACRES	H061578	062178 PROV APP	06
54	34	USA	BUD ANTHONY SEWER EXT	H061678	062178 PROV APP	05
	3	GRESHAM	BULL RUN TOWNHOUSES	H061978	062178 PROV APP	02
	10	SUTHERL TN	CAPRI ESTATES	J052578	062278 PROV APP	28
	21	SALISHAN	STP EXPANSION / UPGRADING	V062278:	062278 PROV APP	00
19	24.	WOODBURN	STP AND MILL CREEK P.S.	V053078	062778 PROV APP	28
	36	MCMINNVILLE	WOODFORD MEADOWS SUBD	J052278	062778 PROV APP	30
41	18	KLAMATH FALLS	COLLEGE PARK INTERCEPTOR	J060778	062778 PROV APP	20
. 4	12	JOHN DAY	JOHN DAY SEWERAGE SYSTEM	V051778	062878 PROV APP	42
18	4	CAMP RILEA	WASTEWATER COLLECTION SYST	V052378	062878 PROV APP	36
25	03	OAK LODGE SD	WOODCOCK FSTATES	053078	062878 PROV APP	29
	22	ALBANY	WILLIAM GARRETT	J052278	062878 PROV APP	35
70	03	LAKE OSWEGO	KRUSE VIEW ESTATES	J053078	062878 PROV APP	29
	26	PORT PORTLAND	RAMSEY BLVD-N LOMBARD ST	J052478	062878 PROV APP	35
	20	FUGENE	LINCOLN CREST SURD	K060278	062878 PROV APP	26
	20	EUGENE	BOWMONT ST	K060278	052878 PROV APP	26
	20	FUGENE	SOUZA PARK FOURTH	K060278	062878 PROV APP	26
62	24	SALEM	SUMMERFIELD SOUTH	J060178	062878 PROV APP	27
-77	<u>n</u> 3	LAKE OSWEGO	MOUNTAIN PARK 5-8-3	K060578	062878 PROV APP	23
42	03	GRESHAM .	BALTZ TERRACE	J060678	062878 PROV APP	22
	15	BCVSA	ORCHARD HOME COURT AREA	J060678	062878 PROV APP	22
	20	SPRINGETELD	BRALYN FSTATES	K060778	062878 PROV APP	21
	20	SPRINGETELD	BURNELL PARK	K060778	062878 PROV APP	21
69	16	GRANTS PASS	OAK HILL ESTATES	K060878	062878 PROV APP	20
~~~	2.0-	SPRINGFIELD	THURSTON JUNIOR HIGH SCHOOL	K060978	062878 PROV APP	19
	Z 0	SPRINGETELD	BRONELL ESTATES	K061278	062878 PROV APP	16
	20	SPRINGETELD	CLIFFSIDE MANOR	K061278	062878 PROV APP	14
	20	EUGENE	CLARY PLAT IST ADD	K061278	062878 PROV APP	14
62	24	SALEM	SUNNYRIDGE HEIGHTS NO 13	J061378	062878 PROV APP	15
	20	SPRINGETELD	AMB-LJS	K061478	062878 PROV APP	14
-14	20	SALEM	TIMOTHY PARK SUBD	K061578	062878 PROV APP	13
	20	SALEM	SUNNYRIDGE ESTATES ADDENDUM	H061578	062878 PROV APP	13
	20	FUGENE	CLAREY PLAT	K061678	062878 PROV APP	12
	20	FUGENE	LEMMING AVE SHILOH ST	K061678	062878	12
-51	08	BROOKINGS	ALTA LANE-FIFTH ST	J061978	062878 PROV APP	09
93	-03	WEST LINN	HIDDEN SPRINGS RANCH #5	J062278	052878 PROV APP	06
	3	WILSONVILLE	WILLAMETTE VILLAGE	K062678	062878 PROV APP	02
	20	FUGENE	LINGLE PARK	K062678	062878 PROV APP	02
	36	MCMINNVILLE	WEST-COZINE	J062678	062878 PROV APP	02
-18	-24	SALEM	DEER HAVEN	0.626.78	062878 PROV APP	02
10	21	ALBANY	ALDERWOOD PARK	J052276	062878 PROV APP	35
10	21	ALBANY	HARDER SUBD	J052278	062878 PROV APP	35
	20	SALFM	37TH PLACE N OF D STREET	K061578	062878 PROV APP	13
31	22	LFRANON	10TH ST & WALKER RD	J060678	062978 PROV APP	23
	23	ONTARIO	VALLEY VISTA ESTATES	H060878	062978 PROV APP	21
64	24	SALFM	ROYVONNE ESTATES	J060878	062978 PROV APP	21
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### DEPARTMENT OF EN / IRONMENTAL QUALITY TECHNICAL PROGRAMS

		<u>Water</u> Quality	Division	June,	1978		
neer ty	,		PLAN ACTIONS	COMPLETED - 1	24 cont,		
Engli	Name of Sourc	e/Project/Site	and Type of S	ame Rec'd	Date of Action Act	ол	Time to Complete Action
$\frac{2}{51}$	0 EUGENE 5 ASHLAND	3RD AVE - OAK KNOLL	WALLIS SEWER	K061478 H061578	062978 PROV 062978 PROV	APP	<u>15</u> 14
2	4 ONTARIO O EUGENE	MOTEL 6 FREEDOM A	CRES	H061978 K062278	062978 PROV 062978	APP	10 07
27 2	4 SALEM 3 GOVERNMENT	LISCO EST CP MULTORPOR	ATES MEADOWS REV	062678 ISED J062878	062978 PROV 062978 PROV	APP	03 01
<u>62</u> 2 2	4 KEIZER SD 0 COTTAGE GRO	MILDRED L. VF SOUTH 7TH	ANE STREET	<u>J062678</u> K051178	062978 PROV	APP	<u>03</u> 50
2 2	O COTTAGE GRO	VE HWY 99 N VE SOUTH R S	TREET	K051178	063078 PROV	APP	50 50
4 3	O COTTAGE GRO	VE WEST HARR	ISON AVE	K051178	063078 PROV		50
72 0	2 CORVALLTS	TIMBERHIL	L SE 4TH ADD	K060178	063078 PROV		29
72 2	2 LEBANON	MTN SHADO	WS SUBD PH I	I K060778	063078 PROV	APP	23
**- <b>****</b> *****							
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## MONTHLY ACTIVITY REPORT

	Water Quality	June 1978			
	(Reporting Unit) (i	Month and Ye	ar)		
•	PLAN ACTIONS COMPLETE	<u>D</u> - 124 con	t.		
County	Name of Source/Project/Site and Type of Same	Date of Action	Action		
Industrial W	laste Sources (5)				
Linn	Teledyne Wah Chang Albany, Boring Mill Oil Recovery	6/23/78	Approved		
Clackamas	Industrial Coatings - Lake Oswego, Oil Separator	6/12/78	Approved		
Multnomah	Pennwalt Corp Portland Entrainment Separator B Set Chlorate Evaporators	6/14/78	Approved		
Polk	Sam Oberg Hog Farm - Dallas, Animal Waste	6/21/78	Approved		
Marion	Mt. Jefferson Woolens - Jefferson, Hyda-Sieve Screens and Drains	6/22/78	Approved		

### MONTHLY ACTIVITY REPORT

Water Wa	Pollution Co <u>ter Quality</u> (Reporting N	ntrol Secti <u>Division</u> Unit)	ion	(Mont	June 1978 h and Year	)	
		SUMMARY OF	WATER PEF	MIT ACTIO	NS	Ň	
	Permit Rece <u>Month</u>	Actions eived Fis.Yr.	Permit Compl <u>Month</u>	Actions eted Fis.Yr.	Permit Actions Pending	Sources Under Permits	Sources Reqr'g Permits
Municipal			.	~ [~~	- ]		- [-^
New	0 0	1 4	0 0	3 6	1 2	· .	
Existing	0 0	0 2	0 0	0 4	0 0	,	
Renewals	0_0	40 9	9 0	88 6	35 7		
Modifications	3 1	<u>15 1</u> .	2 0	17 1	4 1		
Total	3 1	56 16	11 0	108 17	40 10	243 80	244 82
-						· .	
Industrial							
New	1 3	12 14	1	7 12	7 6		
Existing	0 0	3 9	0 2	1 14	3 0	•	•
Renewals	3 3	58 18	4 2	57 15	59 9		
Modifications	0 0	12 2	1 0	20 4	7 0		
Total	4 6	85 43	6 5	85 45	74 15	399 121	409   127
		· .					
Agricultural (Ha	tcheries, Da	airies, etc	<u>:</u> .)				
New	0 1	3 6		2 3	2 3		
Existing	0 0	0 1	0 0	0 1	0 0		
Renewals	0 0	2 2	0 0	0 1	2 1	• •	
Modifications	0 0	0 0	0 0	0 0	0 0	١	
Total	0 1	5 9	<u> </u>	2 5	. 4 4	60 14	62 17

GRAND TOTALS

1/

\* NPDES Permits

\*\* State Permits

1/ Includes 3 permit cancellations

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### MONTHLY ACTIVITY REPORT

## Water Pollution Control Section

Water Quality Division		June 1 <u>978</u>
(Reporting Unit)		(Month and Year

)

#### (27) PERMIT ACTIONS COMPLETED

County	Name of Source/Project/Site and Type of Same	Date of Action	Action
Lane	City of Oakridge Sewage Disposal	6-12-78	l I NPDES Permit Renewed
Linn	Willamette Industries Inc. Foster Division	6-12-78	NPDES Permit Renewed
Lincoln	Salishan Leaseholders Sewage Disposal	6-12-78	NPDES Permit Renewed
Lane	Lane Plywood Inc. Wood Products	6-12-78	NPDES Permit Renewed
Benton	Western Pulp Products Nursery Planters	6-12-78	NPDES Permit Renewed
Clackamas	Oregon Portland Cement Cement Manufacture	6-12-78	NPDES Permit Renewed
Benton	Knoll Terrace Park Trailer Park STP	6-12-78	NPDES Permit Renewed
Klamath	City of Klamath Falls Spring St. STP	6-12-78	NPDES Permit Renewed
Klamath	City of Klamath Falls Kingsley STP	6-12 <b>-</b> 78	NPDES Permit Renewed
Columbia	City of St. Helens Sewage Disposal	6-12-78	NPDES Permit Renewed
Lane	Domsea Farms Inc. Aquaculture	6-12-78	NPDES Permit Issued
Wallowa	City of Joseph Sewage Disposal	6-12-78	NPDES Permit Renewed
Clatsop	City of Cannon Beach Sewage Disposal	6-12-78	NPDES Permit Renewed
Lane	City of Lowell Sewage Disposal	6-12-78	NPDES Permit Renewed
Douglas	Reedsport Seafood (C. Lewis) Seafood Processing	6-12-78	NPDES Permit Issued
Marion	City of Silverton Sewage Disposal	6-12-78	NPDES Permit Modified

## MONTHLY ACTIVITY REPORT

## Water Pollution Control Section

of forfullon boncion booting		
Water Quality Division	 Jun	e 1978
(Reporting Unit)	(Month	and Ye

## (Month and Year)

## PERMIT ACTIONS COMPLETED - 27 cont.

County	Name of Source/Project/Site	Date of	Action
	41		
Lincoln	Depoe Bay Fish Co. Fish Processing	6-12-78	NPDES Permit Modified
Washington	Unified Sewerage Agency-Rock Creek Sewage Disposal	6-12-78	NPDES Permit Modified
Linn	Tomco Inc. Sweet Home	6-12-78	State Permit Issued
Linn	Seabrook Foods Inc. Canning Waste	6-12-78	State Permit Renewed
Union	James R. Scott Dairy Farm	6-12-78	State Permit Issued
Coos	Knutson Towboat Co. Log Handling	6-12-78	State Permit Issued
Coos	Knutson Log Storage Log Handling	6-12-78	State Permit Issued
Yamhill	Stutzman's Slaughter House Slaughter House	6-23-78	State Permit Renewed
Multnomah	Brand S Portland Plant	6-22-78	NPDES Permit Cancelled
Lane	Parker & Sons Tire Eugene	6-22-78	NPDES Permit Cancelled
Marian	Allied Realty Western Pork Producers	6-22-78	State Permit Cancelled

## MONTHLY ACTIVITY REPORT

	Solid Waste	June	1978
(Reporting Unit)		(Mo)	nth and Year)
	PLAN ACTI	ONS PENDING (	(10)
County	Name of Source/Project/ Site and Type of Same	Date Received	Status
Malheur	McDermitt Landfill	2/3/77	Regional staff has not yet
	New site Development and Operational Plan		visited this isolated rural site. Inspection to be made as soon as possible.
Lane	Delta Sand & Gravel New site Construction and Operational Plan	3/1/77	In process. Projected com- pletion 7/78.
Jackson	Burrill Lumber New site Operational Plan	11/9/77	In process. Projected completion 7/78.
Lane	Solid Waste Resources New site Operational Plan	3/22/78	In process. Projected completion 7/78.
Hood River	Hood River Existing site Closure Plan	3/23/78	Additional information requested.
Clackamas	Rossman's Existing site Leachate Control Plan	4/3/78	In process. Projected * completion 7/78.
Clatsop	Wauna Mill Existing site Operational Plan	5/2/78	In process. Projected completion 7/78.
Hood River	Champion International Neal Creek Existing site Operational Plan	5/31/78	In process. Projected completion 7/78.
Washington	Charles Edding New site Operational Plan	6/22/78	In process. Projected compeltion 7/78.
Lane	Office of Appropriate Technology New site Operational Plan	6/30/78	In process. Projected completion 8/78.

### MONTHLY ACTIVITY REPORT

So	lid Waste			Jur	ne 1978		
(	it)		) (				
	SUMP	ARY OF S	OLID MASTE	PERMIT A	CTIONS		· · ·
	Permit A Recei Month	ctions ved Fis.Yr.	Permit A Comple <u>Month</u>	Actions eted Fis.Yr.	Permit Actions Pending	Sites Under Permits	Sites Reqr'g Permits
General Refuse							-
New Existing Renewals Modifications Total	1 1 2	10 8 33 8 59	<u>4</u> 3 <u>1</u> 8	11 <u>11</u> <u>34</u> <u>11</u> <u>67</u>	2 21* 9 1 33	185	191
Demolition		•		•			
New Existing Renewals	3	6	3	7			
Total	3	6	4	9	0	21	21
Industrial			· · · ·				
New Existing Renewals Modifications Total	2 2	6 2 15 3 26	  	$     \frac{11}{7}     10     6     34     $	1 9 2 13		102
Sludge Disposal							
New Existing Renewals Modifications	<u>1</u>	<u>1</u> 3	l	<u>3</u>			
Total	2	7		6	1	9	9
Hazardous Waste							
New Authorizations Renewals	19	187	<u>    11     </u> ,	200	8		
Modifications Total	<u>    19     </u>	187		200	8	]	1
GRAND TOTALS	39_/	285	25	310	55	316	324

\*Seventeen (17) sites operating under temporary permits until regular permits are issued.

## MONTHLY ACTIVITY REPORT

So	lid Waste		8				
(1	Reporting Unit)	(Month and Y	ear)				
PERMIT ACTIONS COMPLETED - 25							
County	Name of Source/Project/Site and Type of Same	Date of Action	Action				
. 1							
<u>General</u> <u>Refuse</u> Fa	acilities (8)						
Wasco .	Northern Wasco Co. Landfill Existing Facility	6/20/78	Permit Amended.				
Gilliam	Arlington Disposal Site Existing Facility		,				
Multnomah	Resource Recovery Byproducts Existing Processing Facility	6/22/78	Permit Renewed.				
Harney	Diamond Disposal Site New Site	6/27/78	Permit Issued.				
Harney	Drewsey Disposal Site New Site	6/27/78	Permit Issued.				
Harney	Fields Disposal Site Existing Site	6/27/78	Permit Issued.				
Harney	Frenchglen Disposal Site Existing Site	6/27/78	Permit issued.				
Lane	Creswell Landfill	6/27/78	Permit Renewed				
Demolition Waste	Facilities (4)	•	· · · ·				
Washington	Herbert Althouse New Facility	6/12/78	Letter Authoriza- tion Issued.				
Columbia	U.S. Corps of Engineers New Facility	6/19/78	Letter Authoriza- tion Issued.				
Washington	Hillsboro Landfill Existing Facility	6/22/78	Permit Renewed.				
Lane	Delta Construction Co. New Site	6/26/78	Letter Authoriza- tion Issued				

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### MONTHLY ACTIVITY REPORT

S	olid Waste	·	<u>Ju</u>	ne19	78	
	Reporting Unit	t)		(Month and Yo	ear) ,	·
	. 1	PERMIT ACTION	S COMPLET	<u>red</u> - 25 co	nt.	
County	Name of Sou and Ty	urce/Project/ /pe_of_Same	'Site	Date of Action	Action	
Industrial Waste	Facilities (1	)		ι Ι		l
Crook	Les Schwab Ti Existing Site	ire Disposal e	Site	6/2/78	Permit Amenc	ed.
Sludge Disposal	<u>Facilities</u> (	1)				·
Douglas	Douglas Co. I New Site	Public Works	Dept.	6/12/78	Letter Author tion issued	oriza-
				· · ·		

## MONTHLY ACTIVITY REPORT

	Solid Waste (Reporting Unit)		June	<u>= 19</u>	78 and Year)	<b></b>
		•	(HOI	I C II	and ical)	х х
	HAZARDOUS WASTE	DISP	OSAL REQUEST	ſS		
	CHEM-NUCLEAR SYS	TEMS	, GILLIAM CO	)		•
ļ	<u>Waste</u> De	escri	ption			•
Date	Туре	Sour	ce	Pre	<u>Quantity</u> sent	Future
REQUES	TS GRANTED (11)		• <b> </b>		· · I /	
	OREGON					
1	Pesticides		Various		Small quan.	None
5	Unwanted herbicides 2,4,D and 2,4,5,T	. (	U.S. Forest Service		2,500 gal.	Periodic
20	PCB Capacitors	I	Utility		141 Units	Periodic
20	Unwanted herbicides		County Park		6 drums	Periodic
27	Contaminated paint thinner (flammable) & polymerized vinyl adhesive (non-flammab	1e)	Vinyl Plant		100 drums	100 drums/yr.
	WASHINGTON			•		
1	PCB capacitors		Utility		29 units	Periodic
<b>1</b>	Phenolic tars		Paper Mill Chemical Pla	nt	14 drums	50 drums/yr.
5	Copper sulfate-sulfuric acid solution		Research Lab	i.	Small quan.	Periodic
5	Spent chemicals consisting of oil, solvent, sulfuric acid, & copper solution		Electronics Plant		21 drums	Periodic
30	Para-formaldehyde tank cleaning		Resin Plant		80 cu. yds.	Periodic
	BRITISH COLUMBIA					
Ţ	PCB contaminated rags, soil, etc.		PCB spill clean up		8 drums	None

NOTE:

HAZARDOUS WASTE DISPOSAL AUTHORIZATION (OUT OF STATE) WILL BE DISTRIBUTED AT THE MEETING.

	TOTALS	Last	Present	July	1978
	Settlement Action Preliminary Issues Discovery To be Scheduled To be Rescheduled Set for Hearing Briefing Decision Due Decision Out Appeal to Commission Appeal to Court Transcript Finished TOTAL	16 20 4 3 0 1 2 12 2 2 0 1 0 1 0 63	$ \begin{array}{r} 12\\ 19\\ 4\\ 0\\ 0\\ 2\\ 11\\ 3\\ 0\\ 1\\ -5\\ 64 - 5 = 59\end{array} $		
		KEY			
ACD	Air Contaminant C	)ischarge Permit			
AQ ·	Air Quality				
AQ-SNCR-76-178	A violation invol the year 1976; th	ving air quality occ ne 178th enforcement	curring in the Salem/North action in that region for	n Coast Region in 'the year.	
Cor	Cordes				
CR	Central Region				
Dec Date	The date of eithe Commission.	er a proposed decisio	on of a hearing officer ou	a decision by the	
\$	Civil Penalty Amo	ount			
ER	Eastern Region				
Fld Brn	Field Burning inc	ident			
Hrngs	The Hearings Sect	lon			
Hrng Rfrrl	The date when the schedule a hearir	a enforcement and com 19.	pliance unit requests the	e Hearings Unit to	
Hrng Rqst	The date the ager	ncy receives a reques	t for a hearing.		
Italics	Different status	or new case since la	st contested case log.	1	
LQ	Land Quality				
McS	McSwain				
MWV	The Mid-Willamett	e Valley Region	、		
NP	Noise Pollution				
NPDES	National Pollutic	on Discharge Eliminat	ion System wastewater dis	charge permit	
Р	At the beginning conditions.	of a case number thi	s means litigation over a	permit or its	
PR	Portland Region				
PNCR	Portland/North Co	bast Region			
Prtys	All parties invol	ved. ·			4
Rem Order	Remedial Action C	rder			
Resp Code	The source of the	next expected activ	ity on the case.		
SNCR	Salem/North Coast	Region (now MWVR)			
S.5.D.	Subsurface Sewage	Disposal			
SWR	Southwest Region				
T	At the beginning	of a case number thi	s means litigation over a	tax credit matter	
Trancr	Transcript being	made.			
WQ.	Water Quality				

-22-

July 1978

DEQ/EQC Contested Case Log

.

Pet/Resp Name	Hrng Rqst	Hrng Rfrrl	DEQ or Atty	Hrng Offcr	Hrng Date	Resp Code	Dec Date	Case Type δ #	Case Status
Davis et al	5/75	5/75	Atty	McS	5/76	Dept	6/78	12 SSD Permits	Settlement Action
Paulson	5/75	5/75	Atty	McS		Resp		I SSD Permit	Settlement Action
lrent Faudrox Inc	5//5	5//5	Atty	McS	11/77	Resp		I SSD Permit	Settlement Action
Johns et al	5/75	5/75	Atty	McS	31777			3 SSD Permits	Preliminary Issues
Laharty	1/76	1/76	Atty	McS	9/76	Resp	1/77	Rem Order SSD	Appeal to Comm
PGE (Harborton)	2/76	2/76	Atty	McS		Prtys		ACD Permit Denial	Preliminary Issues
Allen	3/76	4/76	DEQ	McS		Resp		SSD Permit	To be Scheduled
Taylor, R.	9/76	9/76	Atty	Lmb	12/76	Resp	12/77	\$500 LQ-MWR-76-91	Appeal to Comm
Ellsworth	10/76	10/76	Atty	MCS		Dept		\$10,000 WQ-PR-75-48 two cases P_\$C_PP_78_01	Presiminary Issues
Silbernagel	10/76	10/77	ALLY Attv	Cor		рерс Весп		A0~MW8-76-202 \$400	Discovery
Jensen	11/76	11/76	DEQ	Cor	12/77	Resp	6/78	\$1500 Fld Brn A0-SNCR-76-232	Appeal to Comm
Mignot	11/76	11/76	DEQ	McS	2/77	Resp	2/77	\$400 SW-SWR-288-76	Settlement Action
Hudspeth	12/76	12/76	Atty	McS	3/77	Prtys		\$500 WQ-CR-76-250	Settlement Action
Perry	12/76	12/76	DEQ	Cor	1/78	Hrngs		Rem Order SS-SWR-253-76	Decision Due
Jones Braves Chata at al	4///	7/7/	DEQ	Cor	6/9/78	Dept		SSD Permit SS-SWR-77-57	Briefing Besteles Due
Sundown et al	5/11	5/// 6/77	Atty Atty	vor McS	10///	Prtve		\$130 AU SNGR // -04 \$13 000 Total SS Viol SNCR	Settlement Action
Wallace	5/77	6/77	DEO	Cor	1/78	Hrnas	6/78	1 SSD Permit Denial	Decision Out
Wright	5/77	5/77	Atty	McS	.,,-	Dept		\$250 SS-MWR-77-99	Preliminary Issues
Henderson	6/77	7/77	Atty	Cor	1/77	Hrngs		Rem Order SS-CR-77-136	Decision Due
Exton	6/77	8/77	DEQ	Cor	6/12/78	Hrngs		Rem Order SS-PR-76-268	Decision Due
Lowe	7/77	7/77	DEQ	Cor	1 . /	Prtys		\$1500 SW-PR-77-103	Settlement Action
Magness Southern Pacific Trans	1///	7///	0EQ 4++14	Cor	13777	Hrngs		\$1150  OTA  \$\$~\$WK~//-142 \$500 NB_\$NCB_77_150	Decision Due
Sunida	7/77	7/77	DEO	Lmb	10/77	Resp		\$500 A0-SNCR-77-143	Decision Due
Sun Studs	8/77	9/77	DEQ	2000	,,,	Dept		\$300 WQ-SWR-77-152	Preliminary Issues
Taylor, D.	8/77	10/77	DEQ	McS	4/78	Dept		\$250 SS-PR-77-188	Settlement Action
Brookshire	9/77	9/77	Atty	McS	4/19/78	Hrngs		\$1000 AQ-SNCR-76-178 Fld Brn	Decision Due
Grants Pass Irrig	9/77	9/77	Atty	McS		Prtys		\$10,000 WQ-SWR-77-195	Discovery
Pohli Truccol et al	9///	12///	Atty	Cor	3/30/78	Resp		SSD Permit App	Briefing
russer et at Califf	3///	9/// 10/77	DEQ	Cor	4/26/78	Prtys		\$150 AU~SNUK-//~105 Rem Order SS=PR-77-225	Sottlemont Action
Mc Clincy	10/77	12/77	Attv	McS	-/ 20/ /0	Resp		SSD Permit Denial	Preliminary (ssues
Zorich	10/77	10/77	Atty	Cor		Dept		\$100 NP-SNCR-77-173	Preliminary Issues
Clay	11/77	12/77	DEQ	McS		Resp		\$200 SS-MWR-77-254	Decision Out
Jenks	11/77	12/77	DEQ	McS	6/21/78	Hrngs		\$1000 Fld Brn AQ-MWR-77-284	Decision Due
Uak Creek Farms	11/77	12/77	DEQ	McS	3/78	Hrngs		\$500 AQ-MWR-77 Fld Brn	Decision Due
Vah Chang	12/77	11///	Atty Atty	uor Mas		Prtys		STU,000 FIG BEN AQ-MWR-//-241 ACD Parmit Conditions	Preliminary Issues
Barrett & Sons, Inc.	12/77	14777	DEO	105		Dent			Preliminary Issues
,						+ + + +		Unsewered Houseboat Moorage	, reriariary 135665
Carl F. Jensen	12/77	1/78	Atty	McS		Prtys		\$18,600 AQ-MWR-77-321 Fld Brn	Discovery
Carl F. Jensen/						_		····	
Eimer Kloptenstein	12/77	12/78	Atty	McS	610170	Prtys		\$1200 AQ-SNCR-77-320 Fld Brn	Discovery
-Yen-beenweb	∠/// →∔₽≠37-		. UEQ BEA	mcs	0/9//0	Hrngs -Betwee		\$200 AQ-MWK-//2290 Fld BTN 	Hecision Due
Heaton	1/78	2/78	DEQ	McS	5/31/78	Hrnas		\$500 A0-PR-77-325 Fld Brn	Decision Out
-fowery	+/78-	2/78	-9E0			-Resp		-\$375-SNER-77-326-F1d-Brn	-Finished
Wah Chang	1/78	2/78	Atty	Cor		Dept		\$5500 WQ-MWR-77-334	Preliminary Issues
Cook-Farms	2/78-	£≠78	-BEQ			-Bept		\$200-AQ-MWR-77-330-Ftd-Brn	-Finished
uray Hawkins	3/78	3/78	DEQ Attv			Dept		\$250 \$5-PR-70-12 \$5000 \$0-PR-77-315	Settlement Action Braliminary Legues
Hawkins Timber	3/78	3/78	Atty			Dept		\$5000 AP-PR-77-314	Preliminary issues
Knight	3/78	211-	DEQ			Resp		\$500 SS-SWR-78-33	Settlement Action
Langston	3/78	3/78				Hrngs		\$1000 AQ-NWR-78-31	To be Scheduled
Avery	4/78	5/78	DEQ			Hrngs		\$500 AQ-SNCR-78-05	To Be Scheduled
	4/78- 4/78-		<del></del>			-Prtys-			- Ttntsned
Villereal			DE0			Prtve		<pre>s250 ss=WVR=78=78</pre>	Settlement Action
Wah Chang	4/78		Attv	McS		Hrnas		NPDES Permit	To be Scheduled
Abiqua	5/78		DEQ	-		Resp		P-SS-WVR-78-01	Preliminary Issues
Stimpson	5/78		DEQ			Dept		Tax Credit Cert. T-AQ-PR-78-01	Preliminary Issues
Vogt	6/78		DEQ			Dept		SSD Permit	Preliminary Issues
Нодие	7/78		DEQ			Dept		P-SS-SWR-78	Preliminary Issues

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# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

### MEMORANDUM

- To: Environmental Quality Commission
- From: Director
- Subject: Agenda Item No. C, July 28, 1978, EQC Meeting

TAX CREDIT APPLICATIONS

Attached are three 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 issue Pollution Control Facility Certificates for three (3) applications: T-975, T-1008 and T-1011.

WILLIAM H. YOUNG

MJDowns:cs 229-6485 7/20/78 Attachments



### TAX CREDIT APPLICATIONS SUMMARY

Appl. No.	Facility	<del>_</del>	Claimed Cost	% Allocable to Pollution <u>Control</u>	Director's Recommendation
T-975 (WQ)	Settling tank	\$	8,854.00	less than 20%	lssue Certificate
T-1008 (WQ)	Wastewater system	1,	,582,924.00	80% or more	lssue Certificate
T-1011 (WQ)	Supplement to aeration lagoon and polishing pon	ds	73,685.73	80% or more	lssue Certificate
		Caler (excl	ndar Year Tota Juding July 19	als to Date 78 Totals)	
-0- \$1,665,46 _0- \$1,665,46	3	Air ( Water Solid	Quality - Quality H Waste	\$ 2,052,699 4,877,208 <u>13,584,250</u> \$20,514,457	
	Appl. No. T-975 (WQ) T-1008 (WQ) T-1011 (WQ) 	Appl. No. Facility T-975 Settling tank (WQ) T-1008 Wastewater system (WQ) T-1011 Supplement to aeration (WQ) lagoon and polishing pon 	Appl. No. Facility T-975 Settling tank \$ (WQ) T-1008 Wastewater system 1 (WQ) T-1011 Supplement to aeration (WQ) lagoon and polishing ponds Caler (excl -0- Air ( \$1,665,463 Water -0- Solid	Appl. No.Claimed CostT-975 (WQ)Settling tank\$ 8,854.00T-1008 (WQ)Wastewater system1,582,924.00T-1011 (WQ)Supplement to aeration lagoon and polishing ponds73,685.73Calendar Year Tota (excluding July 19)Calendar Year Tota (excluding July 19)-0- \$1,665,463 -0- \$1,665,463Air Quality Water Quality Solid Waste	App1.Claimedto PollutionNo.FacilityCostControlT-975Settling tank\$ 8,854.00less than 20%T-1008Wastewater system1,582,924.0080% or more(WQ)T-1011Supplement to aeration lagoon and polishing ponds73,685.7380% or moreCalendar Year Totals to Date (excluding July 1978 Totals)Calendar Year Totals to Date 4,877,208 Solid Waste\$ 2,052,699 4,877,208 Solid Waste13,584,250 520,514,457

Since Beginning of Program (Excluding July 1978 Totals)

Air Quality	\$114,239,784
Water Quality	84,172,374
Solid Waste	28,012,879
	\$226,425,010
App1 T-975

Date 6/23/78

# State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

#### TAX RELIEF APPLICATION REVIEW REPORT

# 1. Applicant

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

The applicant owns and operates a neutral sulfite semi-chemical pulp and paper mill near North Bend, Oregon in Coos County.

Application was made for Tax Credit for Water Pollution Control Facility.

#### 2. Description of Claimed Facility

The facility described in this application is a settling tank to separate sand from the paper machine tertiary rejects. The system washes the rejects and reclaims about 3000 lbs/day of fiber which used to be sewered.

Menasha apparently submitted a Notice of Intent to Construct and a Request for Preliminary Certification for Tax Credit on January 26, 1977. The request must have been lost or mislaid since the Department has no record of receiving it. A copy of a letter of transmittal and the request for preliminary certification has been shown to staff by the applicant and staff believes that the request was made in a timely manner.

Construction was initiated on the claimed facility in June 1977, completed December 1977 and the facility was placed in operation in December 1977.

Facility Cost: \$8,854 (Accountant's certification was provided). Certification is claimed under the 1969 Act with 100% allocated to pollution control.

# 3. Evaluation of Application

The system is designed to reclaim about 3000 lbs/day of fiber which would otherwise discharge to the mill's waste treatment system. The facility has reduced the mill's raw discharge volume by 75,300 gpd with a corresponding reduction in BOD to the lagoon of 1700 lbs/day.

#### 4. Summation

A. The facility received preliminary certification by default pursuant to ORS 468.175.

Appl. T-975 June 23, 1978 Page 2

- 4. Summation (continued)
  - 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, con-trolling or reducing water pollution.
  - D. The cost of the claimed facility was \$8,854 with a net annual profit before taxes of \$3,215. This results in a return on investment of 36% which allows up to 20% of the facility cost allocable to tax credit.

# 5. Director's Recommendation

It is recommended that a Pollution Control Facility Certificate bearing the cost of 8,854 with less than 20% allocated to pollution control be issued for the facility claimed in Tax Credit Application Number T-975.

Charles K. Ashbaker Larry D. Patterson:em 229-5374 July 20, 1978

Appl: T-1008

Date July 5, 1978\_\_\_\_

# State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

#### TAX RELIEF APPLICATION REVIEW REPORT

# 1. Applicant

Rhodia, Inc. Agricultural Division 600 Madison Avenue New York, N.Y. 10022

Portland Plant

The applicant owns and operates a plant manufacturing agricultural chemicals (herbicides) on the Willamette River at 6200 N. W. St. Helens Road in Portland, Oregon.

#### 2. Description of Claimed Facility

The claimed facilities consist of two separate systems as follows:

- a. Process effluent containing various hydrocarbons at a low pH is collected in a 160,000 gal. acid brick lined equalization basin. For hydrocarbon removal, effluent is processed through two 8' x 35' wooden adsorbers in series containing activated carbon. This is followed by two stage neutralization with lime in 1500 gal and 5500 gal FRP vessels. Treated water is held and tested in one of the four 60,000 gal steel vessels prior to discharge to the city sewer.
- b. Area drainage is segregated from process water and collected in two 100,000 gal steel hold tanks. If contaminated it is pH adjusted and, for hydrocarbon removal, processed through two 8' x 35' wooden adsorbers in series containing activated carbon. Treated water is held and tested in one of two 25,000 gal steel tanks prior to discharge to the Willamette River.

Request for Preliminary Certification for Tax Credit was made July 26, 1976 and approved August 19, 1976. Construction was initiated on the claimed facility November 15, 1976, completed December 1, 1977, and placed into operation July 1, 1977.

Facility Cost: \$1,582,924 (Certified Public Accountant's statement was provided).

# 3. Evaluation

Installation of the claimed facility with separation of process waste water and area runoff has enabled Rhodia to meet permit limits. Flow has been reduced from 70,000 GPD to 15,000 GPM. pH fluctuations have been eliminated. TOC has been reduced from 1,200 mg/l to 100 mg/l. Suspended solids have been reduced from 500 mg/l to 50 mg/l. Phenolics and chlorinated hydrocarbons have also been greatly reduced. With reduced flow and concentration, quantity loadings in effluent to the river are even more improved. Appl. No. T-1008 July 5, 1978 Page 2

#### 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.
- 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-1008, such Certificate to bear the actual cost of \$1,582,924, with 80% or more allocable to pollution control.

C. K. Ashbaker W.D. Lesher/em 229-5318 July 5, 1978

App1 T1011

Date July 18, 1978

# State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

#### TAX RELIEF APPLICATION REVIEW REPORT

# 1. Applicant

Willamette Poultry Company, Inc. Creswell Plant P.O. Box 246 Creswell, OR 97426

The applicant owns and operates a poultry processing plant at Creswell, Oregon. Chicken fryers are dressed and packaged.

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

# 2. Description of Claimed Facility

The claimed facility described in this application supplements existing aeration lagoon and polishing ponds and consists of:

- A. Wastewater pump house and station
- B. Chlorination facility and contact chamber.
- C. A seven acre overland flow treatment and irrigation system.
- D. Sampling sump.

Request for Preliminary Certification for Tax Credit was made June 10, 1977, and approved June 20, 1977. Construction was initiated on the claimed facility in July 1977, completed and placed into operation in November 1977.

Facility Cost: \$73,685.73 (Certified Public Accountant's statement was provided.)

# 3. Evaluation

The applicant claims that the overland flow system has reduced BOD and suspended solids concentration discharged to Camas Swale Creek by 75%; and that chlorination provides the disinfection to meet limits and coliform requirements of their NPDES permit. Discharge monitoring reports and staff substantiate this.

# 4. Summation

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

App1. T1011 Date July 18, 1978 Page 2

- 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.
- 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

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It is recommended that a Pollution Control Facility Certificate be issued for the facility claimed in Application T1011, such Certificate to bear the actual cost of \$73,685.73 with 80% or more allocable to pollution control.

Charles K. Ashbaker:nrj 229-5309 July 18, 1978

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# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. D, July 28, 1978, EQC Meeting

Second EQC Briefing - 1979-81 Budget

# Background

A tabular summary of a second version of our 1979-81 budget planning is attached for your information. This version reflects the first results of our attempts to rank all budget request packages on an agency-wide basis. It represents but a "snapshot" in a succession of rapidly changing lists as we decide priorities and begin to group packages to reduce the number to be presented to the Governor and Legislature.

I realize the information may appear sketchy. It is unfortunate that the time available for our planning has been inadequate to provide you with better presentation materials. To counter that fault, I am relying upon our scheduled briefings to provide the substance to each of the sketchy des- pripriority and aid you in commenting on the relative priorities.

A few clues will aid you as you await the briefing: The second column contains a package identifier number for our tracking purposes. The digits are simply assigned in sequence but the letters in this number identify the originating Division.

> AQD - Air Quality Division WQD - Water Quality Division SWD - Solid Waste Division LAQ - Laboratory (air quality protions) LWQ - Laboratory (water quality portions) LSW - Laboratory (solid waste portions) ROD - Regional Operations Division (mixed programs) AMD - Agency Management Program N - Noise DEQ - Mixed programs (e.g., LCDC)

Whenever those letters are abbreviated further to just AQ, WQ, SW, the package contains multiple divisions.



The far right column indicates the cumulative percentage each package adds in comparison to the <u>current</u> budget, adjusted for inflation and salary increases. The APLS procedure affords some security in assuming the packages within the 85% level will be approved. Some analysis will be performed on that "comfort zone" but less rigorously than the inquiry above that level. We can assume that the future reviews of our request will attempt to limit our total request at least to the 100% level, making the decision of what falls outside that level a significant choice. Finally, we will face the question of setting the outside limits on the entire request-rayoiding the "threshold of embarrassment."

Aside from these three cutoff levels, the relative priority of one package to another is of small consequence. In summary, then, the major decisions we must make soon are which budget request packages are (1) within the 85% "RLB", (2) which are within the 100% level, and (3) which should not be on the list at all or have been omitted and should be added to the request. On that basis, we will look forward to providing you with greater explanation, a further refined list, and receiving your reviews on the materials at the scheduled briefing during the July 28, 1978 meeting.

#### Director's Recommendation

No formal action is required on this item.

Bill

WILLIAM H. YOUNG

MJDówns:cs 229-6485 7/21/78 Attachment cc: Division Administrators

· · · ·										
Rank	Number	Title	Package Dollars	Cumu lative Doliars	Percent	Comments				
· · · · /			· · · · · · · · · · · · · · · · · · ·		••••••••••••••••••••••••••••••••••••••	·····				
932	001AQD	Admin. & Support Services	613.2	613.2	2 8					
931	002AQD	Control Strategy Development	431.1	1044.3	4.8					
930	0 0 3 AQD	New Source Review	181.7	1226.0	5.6					
929	004AQD	Data Processing & Reporting	239.1	1465.1	6.7					
928	005AQD	Emission Inventory (see 20)	73.0	1538.1	7.0					
927	007AQD	Est.Source Test Capability (see 18, 135)	76.5	1614-6	7.4					
926	008AQD	Program Operation, Training	173.7	1788.3	8.2					
925	009AQD	ACDP Issuance Management	54.6	1842.9	8.4					
924	010AQD	Prog.Oper. Major Plan Review	92.5	1935.4	8.9					
923	011AQD	Inspections, enforcement, tracking	127.5	2062.9	9.4					
922	202AQD	Smoke Management (12, 30) E	287.2	2350.1	10.8					
921	014AQD	Vehicle Inspection Program	2134.1	4484.2	20.6					
920	019AQD	Air Monitoring Program Management	58.5	4542.7	20.9					
912	015AQD	Noise Control Program	112.0	4654.7	21.4					
911	016AQD	Noise Compliance and Assurance	181.7	4836.4	22.2					
910	017AQD	Noise Local Programs	210.1	5046.5	23.2					

**)** .

Rank	Number	umber Title	Package Dollars	Cumulative Doliars	Percent	Corments
<u></u>			· · · · · · · · · · · · · · · · · · ·			
909	156WQD	Program Planning and Administration	318.3	5364.8	24.6	
908	157WQD	Permits/Compliance Assurance/Enforcement	219.1	5583.9	25.7	
907	158WQD	Subsurface Evaluations/Permit/Enforcement	60.7	5644.6	25.9	
906	159WQD	Construction Grants	618.1	6262.7	28.8	
904	161WQD	Experimental OnSite Systems(See #75)	101.2	6363.9	29.2	
902	1.6.3WQD	Data Storage/Retrieval/Display	52.6	6416.5	29.5	
901	164WQD	Water Quality Problem/Progress Identification	88.i	6504.6	29.9	
803	059SWD	AdministrationSolid Waste	112.0	6616.6	30.4	
802	060SWD	Solid Waste Disposal Control	181.6	6798.2	31.2	
801	061SWD	Hazardous Waste Disposal Control	144.4	6942.6	31.9	
705	209DEQ	Apc-Sce Control Reg. (73, 73a, 73b)	1034.0	7976.6	36.7	
704	074ROD	Water Pollution source controlRegional	1252.8	9229.4	42.4	
703	075ROD	Subsurface sewage disposalPermits & Asst.	833.9	10063.3	46.3	
702	076ROD	Solid Waste Source ControlRegional Offices	469.9	10533.2	48.4	
701	210DEQ	Enforcement (77, 77a, 77b)	258.3	10791.5	49.6	
700	078ROD	Soil Investigation services	141.0	10932.5	50.3	

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Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Commen t s	
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607	123LAQ	Laboratory Administration	256.1	11188.6	51.5		
606	124LAQ	Monitoring Southwest	102.9	11291.5	51.9		
605	125LAQ	Monitoring Portland Network	317.1	11608.6	53.4		• ,
604	127LAQ	Basic MonitoringMidupper Willamette Valley	143.6	11752.2	54.1		
603	128LAQ	MonitoringEastern Region	56.8	11809.0	54.3		
602	129LAQ*	MonitoringMedford (Also 205)	71.7	11880.7	54.6		
601	130LAQ	Other Special SamplingPortland	71.0	11951.7	55.0		
600	131LAQ	Ground level MeteroroligcalPortland	175.1	12126.8	55.8		
509	0.9.5LWQ	Laboratory Administration	256.1	12382.9	57.0		
508	096LWQ	STORET (also 109, 163, 172)	12.5	12395.4	57.0		
507	097LWQ	Surface Water Monitoring	304.8	12700.2	58.4		`
506	098LWQ	Water Supply Analyses	25.4	12725.6	58.5		
505	099LWQ	Biology (Resolve Question)	146.2	12871.8	59.2		
504	100LWQ	Estuaries Water Analyses	71.0	12942.8	59.5		
503	FOILWQ	Point Source	147.7	13090.5	60.2		
502	102LWQ	Subsurface	29.0	13+19.5	60.3		

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Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
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501	103LWQ	Repair and Maintenance	14.2	13133.7	60.4	
406	112LSW	Laboratory Administration	56.9	13190.6	60.7	
405	113LSW	Repair and Maintenance/Laboratory	10.9	13201.5	. 60.7	
404	114LSW	Section Administration/Laboratory	8.5	13210.0	60.8	
403	HIGLSW	Landfill leachates	55.5	13265.5	61.0	
402	117£SW	Chem Nuclear	22.1	13287.6	61.1	
401	118L.SW	Alkali Lake	31.5	13319.1	61.3	
400	119L.SW	Special Projects/Laboratories	25.6	13344.7	61.4	
306	036AMD	Director's Office	171.0	13515.7	62.2	
305	037AMD	Public Affairs Officer	86.2	13601.9	62.6	
304	207AMD	Acctg. & Purch. (39, 46)	577.2	14179.1	65.2	
304	038AMD	Administrator, Management Services Div., EQC	145.8	14324.9	65.9	
. 302	040AMD	Budgeting	176.5	14501.4	66.7	
301	04 I AMD	Personnel Unit Retention	130.7	14632.1	67.3	
300	043AMD	Hearings Office	127.5	14759.6	67.9	
268	206 AMD	Support Services (42, 42a)	1314.5	16074.1	74.0	

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments			
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251	134LAQ	Plume evaluation trainingRegional Offices	32.2	16106.3	74.1				
250	167WQD	Subsurface Variance Program	58.3	16164.6	74.4				
248	0 I 8AQD	Est. Source Test & Data Capability (see 7,135)	46.2	16210.8	74.6				
247	135LAQ	Source Test Analysis (see 7, 18)	19.5	16230.3	74.7				
246	020AQD	Emission Inventory (see 7)	73.0	16303.3	75.0				
245	198DEQ	LCDC Current Effort (51)	0 - 0	16303.3	75.0				
230	204 AQD	SAMWG (132, 151)	116.9	16420.2	75.5				
229	17 IWQD	Restore Planning Capability (add pp.p.)	154.1	16574.3	76.3				
229	069SWD	Pub. Part. SW (Restore) (Comb.w 162)	48.8	16623.1	76.5				
229	062SWD	Solid Waste Plan. and Imple. (comb.w/69)	270.8	16893.9	77.7				
229	044AMD	Information Services	87.7	16981.6	78.1				
227	083ROD	Eastern Region Environmental Engineer	61.5	17043.1	78.4				
225	166WQD	Water Quality Management Plan Dev.& Update	136.6	17179.7	79.0				
222	006AQD	Meteorology	80.4	17260.1	79.4				
221	2.0.5AQD	Special MonitMed/GP (149, 133) E	75.0	17335.1	79.8				
221	16.5WQD	Special Water Quality Studies	78.8	17413.9	80.1				

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Rank	Number	Title		Cumulative Dollars	Percent	Comments	
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221	104LWQ	Special StudiesLaboratory	37.3	17451.2	80.3		
219	08 IROD	Noise Control (Restore)	138.6	17589.8	80.9		
219	063SWD	Operation of Recycling Information	157.7	17747.5	81.7		
219	029AQD	Increase Development of Local Programs	87.4	17834.9	82.1		
217	079ROD	SW Planning and Subsurface (Restore)	406.4	18241.3	83.9		
208	105LWQ	Groundwater	9.0	18250.3	84.0		
207	021AQD	Prevention of Significant Deterioration Prgm.	59.3	18309.6	84.2		
205	09 IROD	SW Region PHE 2 (AIR)	60.5	18370.1	84.5		
204	172WQĐ	Improve Data Storage & Retrieval	61.4	18431.5	84.8		
204	080ROD	Restore Field Monitoring (Effluent Samples)	264.3	18695.8	86.0		
204	066SWD	Hazardous Waste Manifest System	59.2	18755.0	86.3		
202	025AQD	Noise Vehicle Enforcement Effort (see 29)	73.8	18828.8	\$6.6		
201	055AMD	Training, Affirmative Action and Safety	58.8	18887.6	86.9		
200	052AMD	Graphic Artist	45.3	18932.9	87.1		
200	045AMD	Intergovernmental Coordination NO LCDC	69.4	19002.3	87.4		
199	109LWQ	(See 96,170,168) Data Base, eval. & reporting	33.1	19035.4	87.6		

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Rank	Number	Title ·	Package Dollars	Cumulative Dollars	Percent	Comments
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197	022AQD -	Data Base Imprv.Pdx/Will.(see 139 205)	30.0	19065.4	87.7	
196	169WQD	Plan Review (Relates to # 84)	157.8	19223.2	88.5	
189	170WQD	Subsurface Licensing	18.7	19241.9	88.5	
189	08 5ROD	SanitarianEastern Region	47.0	19288.9	88.8	
189	047AMD	Program Planning Coordination	49.9	19338.8	89.0	
186	200DEQ	LCDC Tech. Asst. (51)	216.0	19554.8	90.0	
186	179WQD	Increase Planning Capability (delete p.p.)	219.4	19774.2	91.0	
185	199DEQ	LCDC Local Plan Review (51)	256.0	20030.2	92.2	
184	203AQD	Field Burning R&D (13,140,24,28)	1167.7	21197.9	97.5	
184	054AMD	Accounting System	12.3	21210.2	97.6	
183	208DEQ	GC/MS (106, 154, 122)	221.6	21431.8	98.6	
182	056AMD	Additional Hearing Officer	55.6	21487.4	98.9	
180	087ROÐ	Will. Valley Region Inspections	55.5	21542.9	99.1	
179	050AMD	Contract Administration & Space Management	57.4	21600.3	99.4	
177	143LAQ	Quality Assurance of Industrial Emission Anal.	7.4	21607.7	99.4	
175	137LAQ	Meterological data Quality Assurance	44.5	21652.2	99.6	

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Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
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173	107LWQ	Workload Increase/Biotogy	110.5	21762.7	100.1	
171	120LSW	Resource Recovery	16.6	21779.3	100.2	
170	067 SWD	RCRA Hazardous Waste Mgt.	106.0	21885.3	100.7	
169	14 I LAQ	Millersburg Special Monitoring	16.8	21902.1	100.8	
168	068 SWD	Solid Waste Data Base Development (Restore)	34.5	21936.6	100.9	
166	178WQD	Relates to (164,165) Detailed Problem Studies	206.3	22142.9	101.9	
165	138LAQ	Pollution standards Index software	26.1	22169.0	102.0	
158	092ROD	Will. Valley Office Support	12.5	22181.5	102.1	
158	065SWD	Restore/Increase Recycling Information	50.6	22232.1	102.3	
158	048AMD	Economic Analysis	58.8	22290.9	102.6	
158	026AQD	Eugene Air Strategy	69.3	22360.2	102.9	
157	139LAQ	Low Vol. part. size seg. (see 22, 205)	153.4	22513.6	103.6	
156	121LSW	Increased Landfill Leachate Monitoring	35.1	22548.7	103.8	
156	064 SWD	Open Dump Inventory Under RCRA	56.5	22605.2	104.0	
155	089ROD	Management of Spill Response	68.8	22674.0	104.3	
151	136LAQ	Microscopic Analysis	22.2	22696.2	104.4	

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Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Corments
			<u> </u>	,		
146	146LAQ	SF 6 Tracer Studies	12.3	22708.5	104.5	
146	I44LAQ	Quality Assurance, Software DAS	55.1	22763.6	104.7	
146	142LAQ	Upper Air Sounding Met. system	37.7	22801.3	104.9	
142	084ROD	Sewer Insp. (see 169) (redo w. WQD)	220.0	23021.3	105.9	
141	053AMD	Policy Analysis	70.0	23091.3	106.3	
140	07 I SWD	RCRA Procurement & SW Reduction Program	45.5	23136.8	106.5	
139	072SWD	Pesticide Container Control Prog.	28.3	23165.1	106.6	
137	HOLWQ	Extended Estuaries	40.3	23205.4	106.8	
137	090ROD	SW Region Sanitarian	47.0	23252.4	107.0	
130	182WQD	Grant Management for Small Communities	122.7	23375.1	107.6	
127	032AQD	Indirect Source Permit Program	64.6	23439.7	107.9	
121	191WQD	"Fast Tracks" Contract Management	122.7	23562.4	108.4	
118	108LWQ	Intralaboratory Quality Assurance	74.4	23636.8	108.8	
100	197AMD	Buy Out Word Processing Leases	0.0	23636.8	108.8	
094	031AQD	Airshed StudyThe Dalles	201.6	23838.4	109.7	
081	201DEQ	LCDC "everything else" (51)	233.0	24071.4	110.8	
080	0.58AMD	Tax Credit Program	183.4	24254.8	111.6	×

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	IN NEW DACI		750 (N ( )	
PACKAGES THAT WERE DELETED AND INCLUDED PARTIALLY OR WHOLE	IN NEW PAC	VAGES AS INDICA		
July 18, 1978				
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Rank Number Title	Package Dollars	Cumulative Dollars	Percent	Comments
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303 -039ANDАссочатінд-(207)	514.0	13884	-63+	
268 -042AMDSupport-Services-(85%)-(206)		1 5 4 3 6	-74	
262 -046AMDPurchasing-and-Property-Clerk-(207)	66+2		-74-3	
202 -051AMDLCDC-(ALL-DEQ)-(198,-199,-200,-201)	705.9	19963 . 5	-91.9	
212 -42aAMDSupport-Services-{15%}{206}	197.2		-86+3	
922 - 012AQDSmoke-Management-(202)	277.5	2340-4	-10.7	
249 -013AQDField-Burning-Research-(203)	778+6	16371.3	-75,3	
181 -024AQDField-Burning-Monitoring-Program-(203)	31.0	24637	-99.6	-
	28.0		102-8	_
149 - 030AOQSueke-Management-Data-Clerk (202)			105-3	_
220 1201 4() - CMMC Due :	<b>/////</b> /		19919	-
270 - 132EVAS	/2.8		- /6+4	

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#### PACKAGES THAT WERE INCLUDED IN NEW PACKAGES (Continued)

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Rank	Number	Title	Package Dollars	Cumu lative Doilars	Percent	Comments	
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199	-133LAQ*Special-MonitoringGrants-Pass(205)	17+2	20228	93.1	
186	-140LAQFB-surveillancey-monitoring-network-(203)	330.1	24538+4	99vi	
221	-149LAQOther-Special-MonitoringMedford-(205)	153.9	+ 7 7 4 4 + 6	84.6	
092	-151LAQSAMWG-Requirements,-EPA(204)	484+6	24613.9		
145	-154LAQOrganic-Identification-by-GC/MS-(208)	44.3	23078.6	406 . 2	
187	-122LSWOrganic-Identification-by-G.C./M.S(208)	121.9	20939.8	96.4	
194	-106LWQOrganie-identification-by-GC/MS-(208)		20570	94*7	
705	-073RODAir-Pollution-Source-Control-(76%)-(209)	770.0	7623.6	35	
701	-077RODAdministrationDEQ's-formal-Enforcements-(21	0)-236.6	10416-8	47 * 9	
237	-73aROD14%-0f-#73ROD-(209)	154.0	16538	76+1	
224	-73bR0D+0%-++73R0D-(209)				
238	-77aROD(14%-of-#77Enforce-Air)-(210)	42,7	16384	75+4	
219	-776ROD(10%-of-#77Enforce-Air)-(210)	9+0	17753.6		

# PACKAGES DELETED BEGINNING 7/17/78

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Rank Number Title	Package Dollars	Cumulative Dollars	Percent	Comments	

-23AQDClean-Air-Aet-Subprogram
-27AQDData-Processing
-33AQDProgram-OperationsMajor-Plan
- 34AQD Noise- Gontrol-band-Use-Plan
-35AQDLCDC-Goordination
-82RODCoordinationLGDG
-93ROD-Southwest-Region-Ghemist
-115L5#Repair- and -Maintenance/Laboratory
-160#QDComplaints/Spills
-162%-QDW-ater-Quality-Monitoring
-168WQDPlanning-Contract-Administration
-173WQDMonitor-Groundwator
- 174W-QD R-estore- Subsurface - Technical

# PACKAGES DELETED BEGINNING 7/17/78

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Rank Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments		
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-175WQDRestore-Gempliance-Assurance
-176WQDIncrease-Eastern-Region-Technical
-177#QDDevelop-Texies-Analysis-Capability
-180WQDProvide-Gapability-for-Source
-183WQDLCDC-Goordination-(See-Agency-Mgt.)
-184WQDExpand-Estuary-Monitoring
-185WQDEstablish-Construction-Inspection
-186#QDExpand-Staff-SubsurfaceERO
-187WQDExpand-Staff-WillValley-Region
-188W-QD-Increase-Soils-Staff
-189#QDProvide-Spill-Coordination
-190WQD-Expand-Roceburg-Subsurface-staff
-195WQDTax-Gredits
-196W-QDRostore-Water-Supply-Analysis

# PACKAGES DELETED ON 7/18/78

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
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215 -086RODOffice-Support-Eastern -Region	
147 -094R-ODS#Region-ET3-Medford	45.722929.2105.5
134 -145LAQParticle-Fallout-Network	4-423534-4108-3
134 -088RODSoil-Invostigation-services	
134 - 049AMD Central - Stores	35,223624,8108,7
124 -181W-QDAssume-Federal-Facility-Permit-Issuance	61.423873.5109.9
120 - 148LAQ Special - Analysis/AQ - Laboratory	15.724011.9110.5
115 -155LAQConsulting-Service-&-Analysis-AQ	
114 -057AMDModular-Furniture	
111 - 152LAQ Rotractible - Booms - KRTV - Tower - site	36.324150.9111.
104 - 153LAQData Handling-Pkg- for-Lab-Analysis	22.224173.1111.2
104 -0705W-DImproving-Solid-Waste-Control	
099 -147LAQAnalysis-for-sulfur-in-oil	1.124230.7111.5
085 -150LAQPollen-Sampling- and -analysis	34.624648.5113.4
085 - HHE #Q Water -Supply - Analyses	
083 - 194W-QD Step-1H- Grant-Delegation	



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

To:	Environmental	Quality	Commission

From: Steven F. Gardels, Eastern Region Manager

Subject: Agenda Item No. E, July 28, 1978, EQC Meeting

Report of Eastern Regional Manager on significant Items of the Region (Gilliam, Wheeler, Morrow, Umatilla, Grant, Union, Wallowa, Baker and Malheur Counties).

# Staff

The Subsurface Program is operated directly by the Eastern Regional Office in all but Malheur County. The sanitarian staff is as follows:

Larry Lemkau (Supervising Sanitarian), Baker County Ken Birkbeck (Senior Sanitarian), Umatilla County Charles Chuang (Senior Sanitarian), Union and Wallowa Counties Bart Barlow (Sanitarian Trainee), Morrow and Grant Counties

Note: Gilliam and Wheeler Counties are covered on a case by case basis between Sanitarians.

Charlene White (Clerical Assistant (CETA)

I must emphasize that the planning department staff in these Counties do a tremendous amount of support work for the subsurface program. They meet the applicants, explain the forms and the program, take the fees and help coordinate the work with the sanitarians and our office secretaries. Without this help, our Subsurface Sewage Disposal Program would be very difficult to run from Pendleton. In Umatilla County, most of the applicants go directly to the Eastern Regional Office.

All other programs are conducted by:

Steve Gardels - EM-1 Regional Manager Larry Jack - EE Bruce Hammon - ET-3 (new position as of August 1,1978) Judy Jones - Secretary Merle Sherman - ES-1 (CETA)



# Special Topics

All Counties except Gilliam and Wheeler are experiencing a high growth rate which has strained the Subsurface Program to its limits (1975 to present activity charts attached).

Grant County soils are either shallow or high in clay content. Several experimental systems have been installed. Large areas of Union, Wallowa and Baker Counties have high water tables and coarse grained material which results in a high denial rate. There has not been any experimental systems proposed for these problem areas. The public in Union and Wallowa Counties are expressing growing concern over the Subsurface Sewage Disposal Programs.

In 1974, the energy facility siting council restricted coal plants from the Grand Ronde, Baker and Snake River air sheds based on the Department's recommendations. There is growing concern in these Counties that the State has put undue restrictions on these air sheds. Local economic development committees, chambers and elected officials are not satisfied that the restrictions are needed or valid.

The following items by program will be briefly discussed.

#### Air Quality

1. The Kinzua Mill in Wheeler County has closed and has moved its operation to the Kinzua Mill in Heppner.

2. The PGE coal plant is now 34% complete.

3. Alumax has decided not to build the aluminum plant near Umatilla in the near future.

4. The Hudspeth Sawmill in John Day has operated well within limits and has not caused complaints since compliance was gained.

5. The Grand Ronde air shed ambient AQ monitoring station showed high TSP levels for 1977. Better source control and the elimination of the burning dumps should relieve violations.

6. Boise Cascade, Elgin, Amalgamated Sugar, Nyssa and OPC Lime are some of the major air sources that will be on delayed compliance schedules.

7. Ellingson in Baker plans to build an ELCO Board Plant which will use wood waste.

8. During the Summer of 1977, this office was plagued by dust complaints from construction sites. Some cities have now passed construction dust ordinances tied into the building permits to reduce the local nuisance problems.

# Water Quality

1. The high growth area from Boardman through Stanfield has resulted in treatment plant overloads. Boardman STP upgrade is in progress. Umatilla is designing and locally funding their upgrade. Hermiston is nearly through design. Stanfield is still in Step I. Stanfield could be a problem.

2. The interceptors for the John Day project are in construction with the STP modifications to begin soon.

3. Prairie City is still in Step I. Step II should begin this fall. The City may present material on their progress.

4. Plans and specs have been completed for the La Grande project. A consent order should be signed and presented at this meeting.

5. Animal waste complaints have come from Morrow, Umatilla, Union, Baker and Malheur Counties. We have worked mainly on Indian Head Cattle Company near Ontario extensively as well as ones near Milton-Freewater and Boardman. Many complaints are still unresolved.

6. Bush Ready Mix Sand and Gravel operation near Milton-Freewater is still causing ground water problems. We are monitoring groundwater for documentation so that a permanent solution can be implemented.

7. Sludge disposal at the Ontario Ore-Ida Plant has been a long term odor problem. Ore-Ida is designing a \$1.5 million dollar system of sludge thickening and land disposal system. The system will be put in operation this fall.

8. Mining activity is increasing, especially in Baker and Grant Counties. Two cyanide leaching operations are starting in Grant County.

#### Solid Waste

1. All of the major sites except a county site in Malheur County are in substantial compliance.

2. Small sites in Wheeler, Grant, Baker and Malheur Counties range from minimal operations to open burning dumps. It is these sites that have been difficult to obtain alternatives and financing.

3. The Union County plan is the most recent to be put in operation. The processed material may be used as fuel in the local Boise Cascade Sawmill. Tests are still being conducted. Some operational problems still need to be worked out. Markets for recyclables are being sought.

4. The County Solid Waste Management plans have not been completed for Baker and Malheur Counties. The small, remote sites are the sites that have made these

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County-wide management plans difficult to accept and work out.

5. The EHW site west of Arlington (Chem-Nuclear) is monitored by the Solid Waste Division. Some complaints of odors have been received but have not been attributed to poor operation. Transport of odorous materials may be the problem. More evaluation is needed.

Steven F. Gardels, Regional Manager Pendleton 276-4063 July 18, 1978

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75-78(MARCH) --190% increase 75-78 (MARCH Binous 75-78 (MARCH) STRE SULTAERINES ERO 1975-1978 FIRDT QUANTER ₹ 222 2 include DERMITS KGPAIR 00 S, permits on nerving. 10 20 20 20 20 20 40 828 à 10 Q, 19710 p15 6 4 r1975 11.15 ISTA - 61 ſ " ï i 1.4. 1.



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item F, July 28, 1978, 1978 Environmental Quality Commission Meeting.

> NPDES July 1, 1977 Compliance Date - Request for Approval of Stipulated Consent Order Addendum for City of Dundee.

# Background

The City of Dundee was unable to comply with Condition A.l.a. of Stipulation and Final Order No. WQ-SNCR-77-261 (Attachment 1) and has requested a time extension by letter dated June 7, 1978 (Attachment 2).

# Summation

- Stipulation and Final Order WQ-SNCR-77-261, Condition A.1.a., required the City of Dundee to submit final engineering plans and design specifications and a Step III grant application by May 2, 1978.
- 2. The City was unable to complete the plans and specifications by that date because:
  - a. The City has not acquired the land necessary for the proposed sewage treatment facility improvements.
  - b. The siting of the proposed facilities has changed since the Step I facility plan report was prepared and certified.
  - c. Subsequently, the Environmental Protection Agency, Oregon Operations Office, has directed the City to revise the environmental assessment statement and hold a new environmental hearing.



DEQ-1

- 3. A public hearing to discuss the environmental and economic impacts of the proposed sewage treatment facility will be held on August 7, 1978.
- 4. The City expects to submit engineering plans and design specifications by November 1, 1978.

# Director's Recommendation

1

The Commission should approve the Final Order (Attachment 3) amending Stipulation and Final Order No. WQ-SNCR-77-261, DEQ vs. City of Dundee, Yamhill County, Oregon.

Bill

# WILLIAM H. YOUNG

John E. Borden:wjr 378-8240 July 13, 1978

Attachments: (3) 1. Stipulation and Final Order No. WQ-SNCR-77-261. 2. City of Dundee letter dated June 7, 1978. 3. Final Order (Addendum).

1	BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
2	OF THE STATE OF OREGON
3	DEPARTMENT OF ENVIRONMENTAL QUALITY, ) STIPULATION AND
4	of the STATE OF OREGON, ) FINAL ORDER ) WQ-SNCR-77-261
5	Department, ) YAMHILL COUNTY v.
6	CITY OF DUNDEE,
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(to as assigned upon issuance of the Permit) to CITY OF DUNDEE
12	("Respondent") pursuant to Oregon Revised Statutes ("ORS") 468.740 and the Federal
13	Water Pollution Control Act Amendments of 1972, P.L. 92-500. The Permit authorizes
14	the Respondent to construct, install, modify or operate waste water treatment,
15	control and disposal facilities and discharge adequately treated waste waters into
16	waters of the State in conformance with the requirements, limitations and conditions
17	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:
20	Effluent Loadings Average Effluent Monthly Weekly Daily
21	Concentrations Average Average Maximum Baramatar Monthly Veckly ka(day (16/day) ka (16/day) ka (16/day)
22	Jun 1 - Oct 31: NO DISCHARGE TO PUBLIC WATERS PERMITTED
23	Nov I - May 31: ROD $30ma(1)$ $hEma(1) = 2h$ (75) 51 (113) 68 (150)
24	TSS $50 \text{ mg/l} = 57 (125) = 91 (200) = 114 (250)$
25	3. Respondent proposes to comply with all the above effluent limitations of its
.26	Permit by constructing and operating a new or modified waste water treatment facility
Pag	e 1 - STIPULATION AND FINAL ORDER

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Respondent has not completed construction and has not commended operation thereof. 1 2 4. Respondent presently is capable of meeting the following limitations: During the period June 1 to October 31, discharge to public 3 a. waters is prohibited. 4 During the period November 1 to May 31: 5 Ь. (1)Effluent shall not exceed an average effluent 6 concentration of 200 fecal coliform bacteria 7 per 100 ml as a monthly average and/or 400 per 8 ml as a weekly average. 9 (2) Operate all waste water treatment facilities as 10 efficiently as possible to minimize the effluent 11 concentrations and amounts of biochemical oxygen 12 demand (BOD) and total suspended solids (TSS) 13 discharged to public waters. 14 The Department and Respondent recognize and admit that: 5. 15 Until the proposed new or modified waste water treatment 16 a. facility is completed and put into full operation, 17 Respondent will violate the effluent limitations set 18 forth in Paragraph 2 above the vast majority, if not 19 all, of the time any effluent is discharged. 20 Respondent has committed violations of its NPDES Waste 21 Ь. 22 Discharge Permit No. 2466-J and related statutes and 23 regulations. 24 Effluent violations have been disclosed in Respondent's 1) 25 waste discharge monitoring reports to the Department,

covering the period from August 30, 1976 through the

Page 2 - STIDULATION AND EINAL ODED
date which the order below is issued by the Environmental Quality Commission.

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 Respondent did not submit final engineering plans and specifications by March 1, 1977 and begin construction by June 1, 1977, as required by Condition 1.

6. The Department and Respondent also recognize that the Environmental
Quality Commission has the power to impose a civil penalty and to issue an
abatement order for any such violation. Therefore, pursuant to ORS 183.415(4),
the Department and Respondent wish to resolve those violations in advance by
stipulated final order requiring certain action and waiving certain legal rights
to notices, answers, hearings and judicial review on these matters.

13 7. The Department and Respondent intend to limit the violations which this 14 stipulated final order will settle to all those violations specified in Paragraph 15 5 above, occurring through (a) the date that compliance with all effluent limita-16 tions is required, as specified in Paragraph A(1) below, or (b) the date upon 17 which the Permit is presently scheduled to expire, whichever first occurs.

8. This stipulated final order is not intended to settle any violation of any effluent limitations set forth in Paragraph 4 above. Furthermore, this stipulated final order is not intended to limit, in any way, the Department's right to proceed against Respondent in any forum for any past or future violation not expressly settled herein.

NOW THEREFORE, it is stipulated and agreed that:
A. The Environmental Quality Commission shall issue a final order:
(1) Requiring Respondent to comply with the following schedule:
a. Submit complete and biddable final plans and
Page 3 - STIPULATION AND FINAL ORDER





1		specifications and a proper and complete Step III
2		grant application within six (6) months of Step 11
3		grant offer.
4	b.	Start construction within four (4) months of Step 111
5		grant offer.
6	с.	Submit a progress report within nine (9) months of
7	ι,	Step III grant offer.
8	d.	Complete construction within fourteen (14) months of
9		Step III grant offer.
10	e.	Demonstrate compliance with the final effluent limita-
11		tions specified in Schedule A of the Permit within
12		sixty (60) days of completing construction.
13	(2) Re	quiring Respondent to meet the interim requirements set forth in
14	Paragraph 4	above until the date set in the schedule in Paragraph A(1) above
15	for achievin	g compliance with the final effluent limitations.
16	(3) Re	equiring Respondent to comply with all the terms, schedules and
17	conditions c	of the Permit, except those modified by Paragraphs A(1) and (2) above.
18	B. Reg	arding the violations set forth in Paragraph 5 above, which are
19	expressly se	ttled herein, the parties hereby waive any and all of their rights
20	under United	l States and Oregon Constitutions, statutes and administrative rules
21	and regulati	ons to any and all notices, hearings, judicial review, and to service
22	of a copy of	the final order herein.
23	C. Res	pondent acknowledges that it has actual notice of the contents and
24	requirements	of this stipulated and final order and that failure to fulfill any
25	of the requi	rements hereof would constitute a violation of this stipulated final
26	order. The	efore, should Respondent commit any violation of this stipulated final

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Page 4 - STIDILATION AND FINAL OPDER

1 order, Respondent hereby waives any rights it might then have to any and all ORS 468.125(1) advance notices prior to the assessment of civil penalties for any and 2 all such violations. However, Respondent does not waive its rights to any and all 3 ORS 468.135(1) notices of assessemnt of civil penalty for any and all violations 4 5 of this stipulated final order. DEPARTMENT OF ENVIRONMENTAL QUALITY 6 7 APR 1,7 1978 Date: 8 Βv YOUNG WILLIAM H. Director 9 RESPONDENT 10 11 1.27 By Date: 12 Name Title 13 14 FINAL ORDER 15 IT IS SO ORDERED: 16 ENVIRONMENTAL QUALITY COMMISSION 17 JUN 5 1978 -18 1. 1. 1. 1. 1. Date: WILLIAM H. YOUNG, Director 19 Department of Environmental Quality Pursuant to OAR 340-11-136(1) 20 21 22 23 24 25 -26

Page 5 - STIPULATION AND FINAL ORDER

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Westech Engineering, Inc.

CONSULTING ENGINEERS AND PLANNERS

PRINCIPALS C. H. STEKETEE, P.E. H. C. FERRIS, P.E. R. W. FAUST, P.E.

June 7, 1978

3421 - 25th St. S.E. SALEM, OREGON 97302

Telephone 585-2474

Department of Enviornmental Quality Salem-North Coast Region 796 Winter Street NE Salem, OR 97310

Re: City of Dundee, Sewer System Improvements JO 507

ATTENTION: Mary Halliburton, Regional Engineer

Dear Ms. Halliburton:

The City of Dundee has requested that I write you concerning the consent order executed by the City of Dundee last fall. We were recently notified that the consent order required the plans and specifications for the treatment plant improvements be completed within 6 months after receipt of the Step 11 EPA financing. The City received notice that Step 11 financing was available on November 14, 1977. Thus, the plans and specification should be complete at this time.

Two matters have delayed and will continue to delay the preparation of these plans. First, the City has been unable to arrive at a suitable agreement with the land owner adjacent to the present facilities so that land for the proposed improvements can be obtained. Final appraisals and the initiation of condemnation procedures is now under way. The City has been very reluctant to begin the final plans and specifications until the land matter has been resolved. If the plans had been complete and then the City was forced to take another site, most of the design work would have been wasted, and would need to have been done over again at additional expense.

Secondly, the City, after negotiating with the land owner, has changed the siting of the proposed facilities somewhat. Enclosed you will find a letter from the Portland EPA office which directs the City to revise the enviornmental assessment statement and hold new enviornmental hearings because of this relatively minor change in project siting. The preparation of the enviornmental assessment and the hearings of course, will further delay the project.

WATER SUPPLY AND DISTRIBUTION . FLOOD CONTROL . IRRIGATION . DAMS AND RESERVOIRS . WASTE WATER DISPOSAL SUBDIVISIONS AND UTILITIES . STREETS AND ROADS . STRUCTURAL . SURVEYING

City of Dundee, Sewer System Improvements JO 507 Mart Halliburton, Regional Engineer June 7, 1978

The City hearby requests that an extention be granted to allow the completion of plans and specifications for the project by November 1, 1978. This firm during the past few days, was given direction to begin on the plans despite the fact that the enviornmental hearing of the revised site, and the acquisition of the plant site are not yet complete. We, of behalf of the City, ask your consideration of this matter.

Very truly yours,

WESTECH ENGINEERING, INC.

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dt enc. Citv of Dundee cc:

UNITED STEES ENVIRONMENTAL PROTECTION AGENCY

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ATIONS OFFICE

2 N D

AND, OREGON 97204

FLOOR



REPLY TO 10000

· JUN 1 1978

Honorable Kenneth Hough City of Dundee P.O. Box 201 Dundee, Oregon 97115

Re: City of Dundee C-410626

Dear Hayor Hough:

We received from your consulting engineer a request for grant increase due to change in scope of the project. During our review of the changein-scope, we noted in the report entitled "Wastewater Treatment Plant Expansion Alternatives and Costs" dated July 1977, that it did not address the environmental impacts of the proposed damming of the ravine for summer holding. It was further noted, the only public hearing held on the proposed project was on July 7, 1976, and apparently did not include the proposed effluent storage.

During my visit on May 25, 1978, I noted the ravine is covered with dense vegetation and some trees. I also understand the depth of the stored effluent will be a bout 30 feet. It is obvious major portions of the densely vegetated area will be under water.

In view of this it is necessary that an amendment to the environmental assessment of the alternatives and the proposed project be prepared, and the required public hearing be held. Written comments from the following agencies be solicited:

- 1. Oregon Department of Fish and Wildlife
- 2. Gregon Department of Water Resources
- 3. State Soil and Water Conservation Commission
- 4. Oregon Department of Environmental Quality
- 5. Other government and private agencies who may have concerns or interest on the proposed project.



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

## MEMORANDUM

- TO: Environmental Quality Commission
- FROM: Director
- SUBJECT: Agenda Item G, July 28, 1978, Environmental Quality Commission Meeting

Conflict of Interest Rule - Public Hearing:

Consideration of the Adoption of Proposed Amendments to Oregon Clean Air Act Implementation Plan to Include Rules Pertaining to Conflict of Interest by State Boards

## Background

In August 1977 Congress passed Clean Air Act Amendments. Section 128 of these Amendments requires state boards which adopt rules, approve permits and enforcement orders, to meet certain requirements. As provided in Section 128, these requirements must be included in State Implementation Plans by August 7, 1978.

The requirements state that a majority of board members 1) represent the public interest, and 2) not derive any significant portion of their income from persons subject to the rules, permits and orders. The requirements also apply to heads of agencies which have similar authority.

The Department is proposing rules which would be in the best interest of the public and, at the same time, satisfy requirements of Section 128 of the Amended Act. These proposed rules are consistent with state policy, as stated in ORS 244.010 and 244.040, regarding conflicts of interest of public officials.

The proposed rule was drafted with the assistance of the State Attorney General's office using guidance supplied by the Environmental Protection Agency. They were assessed by that agency as being satisfactory to meet at least the minimum requirements of the Amendments.

## Statement of Need for Rule Making

1. Legal authority relied upon: ORS 468.020 and Section 128 of the Clean Air Act as amended 1977 (42 USCA Section 7428). The proposed rule is consistent with state policy, as stated in ORS 244.010 and 244.040.



Agenda Item G Page Two

- 2. The 1977 Clean Air Act Amendments require state boards which adopt rules and approve permits and enforcement orders to meet certain requirements. These requirements are met in the form of the proposed rule.
- 3. Documents relied upon in developing the rule are:
  - 1) Section 128 of the 1977 Clean Air Act Amendments;
    - 2) EPA guidance memorandum, dated March 2, 1978;
    - 3) ORS 244.010 and 244.040.

## Evaluation

Approval of the proposed rule would ensure that the State would be in compliance with federal law and that the EQC represents the public interest.

Failure to amend the State of Oregon Implementation Plan with such a rule may result in the Environmental Protection Agency acting on Section 128 in place of the State. There is also the possibility that enforcement actions, permits and rules acted on by a non-complying state board such as the EQC, may be subject to legal challenge.

As of this writing, no testimony has been received on the proposed rule.

Summation

Congress passed Clean Air Act Amendments in 1977 which, among other things, require state boards to represent the public interest.

The proposed rule, consistent with State policy, was assessed by the Environmental Protection Agency as being satisfactory to meet the Clean Air Act Amendments requirements.

Failure to include such a rule in the State Implementation Plan by August 7, 1978, may result in the EPA promulgating such a rule for the State and for possible legal challenge of actions by a non-complying state board.

## Director's Recommendation

Unless specific testimony is received at this public hearing which would warrant changes, it is the Director's recommendation that the proposed conflict of interest rule be adopted as submitted.

Bell

William H. Young Director

Attachments:

1 - Proposed Conflict of Interest Rules, OAR 340-20-200 through 20-215 2 - Section 128 of the Clean Air Act

MEZ:as 7-12-78

### CONFLICTS OF INTEREST

### PURPOSE.

340-20-200 The purpose of OAR 340-20-200 to 340-20-215 is to comply with the requirements of Section 128 of the federal Clean Air Act as amended August 1977 (P.L. 95-95) (hereinafter called "Clean Air Act"), regarding public interest representation by a majority of the members of the Commission and by the Director and disclosure by them of potential conflicts of interest.

## DEFINITIONS.

340-20-205 As used in OAR 340-20-200 to 340-20-215, unless otherwise required by context:

(1) "Adequately disclose" means explain in detail in a signed written statement prepared at least annually and available for public inspection at the Office of the Director.

(2) "Commission" means the Oregon Environmental Quality Commission.

(3) "Director" means the Director of the Oregon Department of Environmental Quality.

(4) "Persons subject to permits or enforcement orders under the Clean Air Act" includes any individual, corporation, partnership, or association who holds, is an applicant for, or is subject to any permit, or who is or may become subject to any enforcement order under the Clean Air Act, except that it does not include (1) an individual who is or may become subject to an enforcement order solely by reason of his or her ownership or operation of a motor vehicle, or (2) any department or agency of a state, local, or regional government.

(5) "Potential conflict of interest" includes (1) any income from persons subject to permits or enforcement orders under the Clean Air Act, and (2) any interest or relationship that would preclude the individual having the interest or relationship from being considered one who represents the public interest.

(6) "Represent the public interest" means does not own a controlling interest in, having 5 percent or more of his or her capital invested in, serve as attorney for, act as consultant for, serve as officer or director of, or hold any other official or contractual relationship with any person subject to permits or enforcement orders under the Clean Air Act or any trade or business association of which such a person is a member.

(7) "Significant portion of income" means 10 percent or more of gross personal income for a calendar year, including retirement benefits, consultant fees, and stock dividends, except that it shall mean 50 percent of gross personal income for a calendar year if the recipient is over 60 years of age and is receiving such portion pursuant to retirement, pension,

-2-

or similar arrangement. For purposes of this section, income derived from mutual-fund payments, or from other diversified investments as to which the recipient does not know the identity of the primary sources of income, shall be considered part of the recipient's gross personal income but shall not be treated as income derived from persons subject to permits or enforcement orders under the Clean Air Act.

### PUBLIC INTEREST REPRESENTATION.

340-20-210 At least three (3) members of the Commission and the Director shall represent the public interest and shall not derive any significant portion of their respective incomes from persons subject to permits or enforcement orders under the Clean Air Act.

## DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST.

340-20-215 Each member of the Commission and the Director shall adequately disclose any potential conflict of interest.

- 3-

## ATTACHMENT 2

# Excerpt from the 1977 Clean Air Act Amendments

### STATE BOARDS

SEC. 128. (a) Not later than the date one year after the date of the enactment of this section, each applicable implementation plan shall contain requirements that—

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(1) any board or body which approves permits or enforcement orders under this Act shall have at least a majority of members who represent the public interest and do not derive any significant portion of their income from persons subject to permits or enforcement orders under this Act, and

(2) any potential conflicts of interest by members of such board or body or the head of an executive agency with similar powers be adequately disclosed. A State may adopt any requirements respecting conflicts of interest for such boards or bodies or heads of executive agencies, or any other entities which are more stringent than the requirements of paragraph (1) and (2), and the Administrator shall approve any such more stringent requirements submitted as part of an implementation plan.



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

Tot	Environmental	Aug 1: +	Commission
101	Environmentai	Quartery	COMMISSION

From: Director

Subject: Agenda Item No. H, July 28, 1978, EQC Meeting

## Adoption Of Amendment To Administrative Rules Governing Subsurface And Alternative Sewage Disposal; Subsurface Fees To Be Charged By Clackamas County

## Background

At it's meeting April 28, 1978 the Commission authorized a public hearing on the question of amending Administrative Rules governing Subsurface and Alternative Sewage Disposal; specifically, fees to be charged by Clackamas County.

A public hearing was conducted in Clackamas County on June 19, 1978. There was no opposition to the proposed rule amendment establishing fees to be charged by the county. (Hearing officer's report - Attachment B.)

Statement of Need for Rule Making

a. ORS 454.625 directs the Environmental Quality Commission to adopt such rules as it considers necessary for the purpose of carrying out ORS 454.605 to 454.745.

ORS 454.745(4) allows the Commission, by rule, to require or permit subsurface sewage disposal fees which are lower than those contained in ORS 454.745 subsection (1) and (2) in a contract county, provided that county can show to the satisfaction of the Commission that with the requested lower fees it can otherwise finance the duties required of it by the contract with the Department of Environmental Quality.

- b. Clackamas County has demonstrated need to increase fees charged within the subsurface sewage program due to increased costs. Without the increased fees a reduced level of service will be necessary. The proposed fee schedule will still be less than the maximum allowed.
- c. Principal documents relied upon for this rule change: None.



MEMORANDUM Agenda Item No. , July 28, 1978, EQC Meeting Page 2

## Evaluation

Under the provisions of ORS 454.745(4) the Commission has established subsurface sewage disposal fees for Clackamas County at a level less than provided for in ORS 454.745(1). Clackamas County has determined that in order to continue to provide an adequate level of service within the subsurface sewage disposal program, an increase in fees charged is necessary. The fee schedule proposed by Clackamas County is still within the maximums established by statute.

## Summation

- 1. ORS 454.625 provides that the Commission, after public hearing, may adopt rules it considers necessary for the purpose of carrying out ORS 454.605 to 454.745.
- 2. ORS 454.745(4) provides that the Commission may by rule establish fees, within the maximums allowed under ORS 454.745(1), upon request of a contract county.
- 3. Clackamas County has requested a fee schedule rule amendment.

A public hearing has been conducted without adverse comment.

## Director's Recommendation

It is the Director's recommendation that the Commission adopt amendments to Oregon Administrative Rules governing Subsurface and Alternative Sewage Disposal, OAR 340-72-010(4)(b) as shown in attachment "A" to become effective on filing with the Secretary of State.

WILLIAM H. YOUNG

T. J. Osborne 229-6218	:aes	
6/29/78		
Attachments:	1.	Attachment "A"
		Proposed amendment to OAR 340-72-010(4)(b)

2. Attachment "B" Hearing Officer's Report

Attachment "A"

# ENVIRONMENTAL QUALITY COMMISSION

# Proposed Amendment to

## OREGON ADMINISTRATIVE RULES

# Chapter 340-72-010

Amend OAR Chapter 340-72-010(4)(b) as follows:

(b) The fees to be charged by the County of Clackamas shall be as follows:

(A)	New Construction Installation Permit (in addition evaluation ) fee)	[\$25] to report	<u>\$50</u>
(B) (C)	Alteration, Repair or Extension Permit Evaluation Report	\$2 <b>5</b>	
(†)	Applicant provides soils information obtained	1	
	engineer	\$40	
(11)	Applicant provides test holes for evaluation by county	[\$55]	\$50

[(iii)]	Test holes dug and evalua	ated by county	\$75]
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## Note:

Bracketed [ ] material to be deleted. Underlined \_\_\_\_\_ material is new.

TJ0:aes

Attachment "B"

## Public Hearing

On proposed amendment to Oregon Administrative Rules, Chapter 340, section 72-010(4)(b).

Fees to be charged by Clackamas County in administering the subsurface sewage disposal program.

# Hearing Officer's Report

The public hearing, authorized by the Commission on April 28, 1978, was convened at Clackamas Community College, Barlow Hall, Boardroom "A" June 19, 1978 at 10:00 a.m.

The only testimony received was from Mr. Richard L. Dopp, Director, Clackamas County Development Services Department. Mr. Dopp's Department is responsible for administering the subsurface sewage disposal contract between the Department and Clackamas County.

Mr. Dopp testified that the present fee structure established by Commission rule does not support the subsurface sewage program. With the additional income generated under the new proposed fee structure the program still would fall short of full monetary support. The additional revenue generated by this rule amendment is needed to continue to operate the program at an acceptable level. The program deficit would be made up from other county sources. The projected revenue for fiscal year '78-'79 with fee increase \$205,000; program expenses \$218,000; deficit \$13,000.

The proposed fee structure is still within the maximums established by ORS 454.745. Hearing adjourned at 10:30 a.m.

Submitted: bane

T. J/Osborne Hearing Officer

TJ0:aes



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

- To: Environmental Quality Commission
- From: Director
- Subject: Agenda Item I, July 28, 1979, EQC Meeting

Medford AQMA Rules - Authorization for Public Hearing to Consider Proposed Amendment of Oregon Clean Air Act Implementation Plan to Include Offset Rule for New or Modified Emission Sources

## Background

At the June 30, 1978, EQC meeting, scheduled Agenda Item L, report attached, discussed the need for an "offset" rule to address growth in the Medford AQMA. Authority to take a proposed offset rule to public hearing was deferred to allow time for the Medford-Ashland AQMA Advisory Committee and the Associated Oregon Industries (AOI) to comment on the proposed rule. The Advisory Committee and AOI have studied the rule proposed last month and have requested some changes.

Advisory Committee requested changes:

- 1. The exemption point of 50 tons per year or less for Volatile Organic Compounds (VOC) be made more stringent by lowering it to 20 tons per year.
- 2. Additional VOC limits be made at 200 pounds per day and 10 pound per hour in Table 1.

## A01 requested changes:

- 1. The exemption point of 50 tons per year or less for VOC be deleted in Table 1, leaving the current Federal exemption point of 100 tons in effect.
- 2. Emission reductions in excess of required offsets would remain with the source as "banked emissions" to be used or disposed of as the source may desire unless the "banked offsets" are "foreclosed" by the Commission.
- 3. That the definitions be expanded from 5 to 9 and other changes made for clarification.

## Evaluation

The two parties reviewing the VOC exemption or "cut-off" point recommended opposite actions. The staff recommends that the 50 tons per year exemption



point, as initially proposed by the staff, be retained in the Medford rule at least until the VOC study and control strategy for Medford is completed. Completion is scheduled by September 12, 1978. After that study is completed, the staff will give detailed consideration to the Medford Committee's suggested levels of 20 tons per year, 200 pounds per day, 10 pounds per hour.

The most significant change requested by industry was to install the right of an individual source to "bank" surplus emission reductions, over and above those required by rule or permit condition. These surplus emission reductions might accrue from a source installing controls which resulted in more emission reduction than required, by decreasing production, plant closure, etc. Industry proposes that such surpluses be retained by the individual sources to offset future expansions or to sell or give to offset emissions from other new or modified sources.

The Department's present proposed draft would allow the Department to approve limited "banking" of surplus emission reductions, but only for a specified purpose and time. In the absence of specific approvals, surplus emission reductions would be "banked" by the Department.

Neither the Advisory Committee nor the industry representatives have seen this revised draft of the proposed rules, but they will have at least 30 days notice prior to hearing for review and comment, plus opportunity to provide testimony at the public hearing.

Director's Recommendation

It is the Director's recommendation that the Commission authorize the Department to hold a hearing, in Medford, before a hearings officer, on the attached proposed revised draft offset rule.

Michael Donna WILLIAM H. YOUNG

PBBosserman/kz 229-6278 Attachments: Proposed Rule (7/27/78 Proposed Draft) EPA ruling, December 21, 1976 Memorandum, Same Subject, 7/13/78 Memorandum, Same Subject, 6/14/78

## Addition to Division 30

# Emission Offset Rule for the Medford-Ashland AQMA

OFFSETS 340-30-100

The intent of this rule is to supplement and be more stringent than the Federal Interpretive Ruling promulgated in the December 21, 1976, Federal Register on pages 55,528 through 55,530 (40 CFR, Part 51) and than existing State rules. Section 340-30-115 of this rule, and other portions, shall prevail when this rule is in conflict with the Federal Interpretive Ruling. All other provisions of the Federal Interpretive Ruling are hereby incorporated by reference.

DEFINITIONS (to be added to 340-30-010)

- (13) "Bank" or "banked" means the retention by a source, for its own use or to give, sell or otherwise dispose of, the benefit of reductions in emissions greater than that needed for required offsets that result from installation of in-plant controls, changes in process, partial or total shutdown of one or more facilities or otherwise obtained.
- (14) "Criteria Pollutants" means Particulate, Sulfur Oxides, Hydrocarbons, Nitrogen Oxides, or Carbon Monoxide, or any other criteria pollutant established by the U.S. Environmental Protection Agency.
- (15) "Facility" means an identifiable piece of process equipment. A stationary source may be comprised of one or more pollutant-emitting facilities.
- (16) "Lowest Achievable Emission Rate" or "LAER" means, for any source, that rate of emissions which is the most stringent emission limitation which is achieved in practice or can reasonably be expected to occur in practice by such class or category of source taking into consideration the pollutant which must be controlled.

This term applied to a modified source means the lowest achievable emission rate for that portion of the source which is modified. In no event shall a proposed new or modified source emit any pollutant in excess of the amount allowable under applicable new source performance standards.

- (17) "Modified Source" means any physical change in, or change in the method of, operation of a stationary source which increases the potential emission of criteria pollutants over permitted limits, including those pollutants not previously emitted and regardless of any emission reductions achieved elsewhere in the source.
- (18) "New Source" means any source not previously existing or permitted in the Medford-Ashland Air Quality Maintenance Area on the effective date of these rules.
- (19) "Offset" means the reduction of the same or similar air contaminant emissions by the source:
  - (a) Through in-plant controls, change in process, partial or total shutdown of one or more facilities or by otherwise reducing criteria pollutants;
  - (b) By securing from another source, in an irrevocable form, a reduction in emissions similar to that provided in subsection (a) of this section; or
- (20) "Source" means any structure, building, facility, equipment, installation or operation, or combination thereof, which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person, or by persons under common control.
- (21) "Volatile Organic Compound" means any organic matter which, when released into the air, becomes photochemically reactive, in a degree more than methane, ethane, methyl chloroform, and trichlorotrifluoroethane.

OFFSETS FOR NEW OR MODIFIED SOURCES OAR 340-30-110

- (1) Any new or modified source which proposes to be constructed or operated in an area of the Medford-Ashland AQMA where a state or federal ambient air quality standard is being violated, and emits at a rate greater than in Table 1, shall comply with conditions (a) through (d) of Section (3). Any new or modified source which proposes to be constructed or operated in an area of the Medford-Ashland AQMA where a state or federal ambient air standard is not being violated, and has emissions greater than in Table 1, and by modeling is projected to exceed the incremental air quality values of Table 2 in the area where the state or federal ambient air standard is being violated, shall comply with conditions (a) through (d) of Section (3).
- (2) Any new or modified source or any source that is replaced because of wearout, obsolescence or any other reason, shall comply with condition (a) of Section (3).

		Table I				
			Emissior	n Rate		
	Annı	ual_	Day	<u>/</u>	Hour	
Air Contaminant	Kilograms	s (tons)	Kilograms	<u>s (lbs)</u>	Kilograms	<u>(1bs)</u>
Particulate Matter (TSP)	4,500	(5.0)	23	(50)	4.5	(10)
Volatile Organic Compound (VOC)	45,000	(50.0)	_	-	-	-

	Table 2	
	Incremental	Value
Air Contaminant	Annual Arithmetic Mean	24 Hr Average
Particulate Matter (TSP)	.10 ug/m <sup>3</sup>	.50 ug/m <sup>3</sup>

- (3) If the Department finds that the allowable emissions from a proposed source would contribute to violation of an ambient air standard as determined by criteria of Section 2 above, approval may be granted only if all of the following conditions are met:
  - (a) The new or modified source meets an emission limitation which specifies the lowest achievable emission rate for such a source.
  - (b) The applicant provides certification that all existing sources in Oregon owned or controlled by the owner or operator of the proposed source are in compliance with all applicable rules or are in compliance with an approved schedule and timetable for compliance under state or regional rules.
  - (c) Emission reductions or offsets from existing sources in the Medford-Ashland AQMA, whether or not under the same ownership, are provided by the applicant on a greater than one for one basis.
  - (d) The emission offsets provide a positive net air quality benefit in the affected area.

BANKING OAR 340-30-115

A source may bank emission reductions for a limited time and for a specific purpose as may be specifically approved in writing by the Department, subject to the following conditions:

- (a) That the source remain in compliance with all applicable permit conditions and compliance schedules, if any;
- (b) That the banked emissions shall not include emission reductions required by rules or permit conditions in effect at the time the emission reduction is approved.
- (c) Banked emission reductions may only be used to offset increased emissions of the same or similar character and particle size.

INTERPRETATIVE RULING FOR IMPLEMENTATION OF THE REQUIREMENTS OF 40 CFR 51.18

#### I. INTRODUCTION

This notice sets forth EPA's Interpretative Ruling on the preconstruction review requirements for stationary sources of air pollution under 40 CFR 51.18. This ruling reflects EPA's judgment that the Clean Air Act allows a major new or modified source<sup>1</sup> to locate in an area that exceeds a national ambient air quality standard (NAAQS) only if stringent conditions can be met. These conditions are designed to insure that the new source's emissions will be controlled to the greatest degree possible; that more, than equivalent offsetting emission reductions ("emission offsets") will be obtained from existing sources; and that these will be progress toward achievement of the NAAQS.

#### II. INITIAL ANALYSIS AND APPLICABLE REQUIREMENTS

A. Review of all sources for emission limitation compliance. The reviewing authority must examine each proposed new source subject to the SIP preconstruction review requirements approved or promulgated pursuant to 40 CFR 51.18 to determine if such a source will meet all applicable emission requirements in the SIP. If the reviewing authority determines that the proposed new source cannot meet the applicable emission requirements, the permit to construct must be denied.

B. Review of major sources for air quality impact. In addition, for each proposed "major" new source or "major" modification, the reviewing authority must perform an air quality analysis ? to determine if the source will cause or exacerbate a violation of a NAAQS. A proposed source which would not be a "major" source may be approved without further analysis, provided such a source meets the requirement of Part II.A.

The term "major source" shall, as a minimum, cover any structure, building, facility, installation or operation (or combination thereof) for which the allowable emission rate is equal to or greater than the following:

tons	per	year
Particulate matter		100
Sulfur oxides		100
Nitrogen oxides		100
Non-methane hydrocarbons (orga	<u>n</u> - '	
ics)		100
Carbon monoxide	1	1, 000

Similarly a "major modification" shall include a modification to any structure, building, facility, installation or operation (or combination thereof) which increases the allowable emission rate by the amounts set forth above. A proposed new source with an allowable emission rate exceeding the above amounts is considered a major source under this ruling, even though such a source may replace an existing source with the result that the net additional emissions are increased by less than the above amounts.

Where a source is constructed or modified in increments which individually do not meet the above criteria and which are not a part of a program of construction or modifi-

<sup>1</sup> Hereafter the term "new source" will be used to denote both new and modified sources.

<sup>9</sup> Required only for those pollutants causing the proposed source to be defined as a "'major" source, although the reviewing authority may address other pollutants if deemed appropriate.

#### **RULES AND REGULATIONS**

cation in planned incremental phases previously approved by the reviewing authority, all such increments commenced after the date this ruling appears in the FEDERAL REG-INTER or after the latest approval issued by the reviewing authority, whichever is most recent, shall be added together for determining applicability under this ruling. Moreover, where there is a group of proposed sources which individually do not meet the above criteria, but which would be constructed in substitution for a major source, the group should be collectively reviewed as a major source.

Allowable annual emissions shall be based on the applicable New Source Performance Standard (NSPS) set forth in 40 CFR Part 60 or the applicable SIP emission limitation, whichever is less, and the maximum annual rated capacity of the source. If the source is not subject to either a NSPS or SIP emission limitation, annual emissions shall be based on (1) the maximum annual rated capacity, and (2) the emission rate agreed to by the source as a permit condition.

The following shall not, by themselves, be considered modifications under this ruling:

(1) Maintenance, repair, and replacement which the reviewing authority determines to be routine for a source category;

(2) An increase in the hours of operation, unless limited by previous permit conditions; (3) Use of an alternative fuel or raw material (unless limited by previous permit conditions), if prior to the publication of this ruling in the FEDERAL REGISTER, the source is designed to accommodate such al-

ternative use; or

(4) Change in ownership of a source.

C. Air quality impact analysis. For "stable" air pollutants (i.e., SO2, particulate matter and CO); the determination of whether a source will cause or exacerbate a violation of a NAAQS generally should be made on a case-by-case basis as of the proposed new source's operation date using the best information and analytical techniques available (i.e., atmospheric simulation modeling, unless a source will clearly impact on a receptor which exceeds a NAAQS). This determination should be independent of any general determination of nonattainment or judgment that the SIP is substantially inadequate to attain or maintain the NAAQS. This is because the area affected by a determination of SIP inadequacy usually conforms to established administrative boundaries such as Air Quality Control Regions (AQCR's) rather than a precisely-defined area where air quality problems exist. For example, a SIP revision may be required for an AQCR on the basis of a localized violation of standards in a small portion of the AQCR. If a source seeks to locate in the "clean" portion of the AQCR and would not affect the area presently exceeding standards or cause a new violation of the NAAQS, such a source may be approved. For major sources of nitrogen opides, the initial determination of whether a source would cause or exacerbate a violation of the NAAQS for NO<sub>2</sub> should be made using an atmospheric simulation model assuming all the nitrogen oxide emitted is oxidized to NO2 by the time the plume reaches ground level. The initial concentration estimates may be adjusted if adequate data are avail-able to account for the expected oxidation rate. For major sources of hydrocarbons, see the discussion entitled "Geographic Applicability of Emission Offset Requirements for Hydrocarbon Sources" in the Notice appearing in today's FEDERAL REGISTER at 41 FR 55558.

HI. SOURCES LOCATING IN "CLEAN" AREAS, BUT WOULD CAUSE A NEW VIOLATION OF A NAAQS

If the reviewing authority finds that the allowable emissions<sup>3</sup> from a proposed major source would cause a new violation of a NAAQS, but would not exacerbate an existing violation, approval may be granted only if both of the following conditions are met:

Condition 1. The new source is required to meet a more stringent emission limitation ' and/or the control of existing sources below allowable levels is required so that the source will not cause a violation of any NAAQS.

Condition 2. The new emission limitations for the new source as well as any existing sources affected must be enforceable in accordance with the mechanisms set forth in Fart V below.

#### IV. SOURCES THAT WOULD EXACERBATE AN EXIST-ING VIOLATION OF A NAAQS

A. Conditions for approval. If the reviewing authority finds that the allowable emissions<sup>3</sup> from a proposed source would exacerbate an "existing" violation (i.e., as of the source's proposed start-up date) of a NAAQS, approval may be granted only if all the following conditions are met:

Condition 1. The new source is required to meet an emission limitation which specifies the lowest achievable emission rate for such type of source.<sup>3</sup> In determining the applicable emission limitation, the reviewing authority must consider the most stringent emission limitation in any SIP and the lowest emission rate which is achieved in practice for such type of source. At a minimum, the lowest emission rate achieved in practice must be specified unless the applicant can sustain the burden of demonstrating that it cannot achieve such a rate. In no event could the specified rate exceed any applicable NSPS. Even where the applicant demonstrates that it cannot achieve the lowest

<sup>3</sup> Where a new source will result in specific and well defined indirect or secondary emissions which can be accurately quantified, the reviewing authority should consider such secondary emissions in determining whether the source would cause or exacerbate a violation of the NAAQS. However, since EPA's authority to perform indirect source review relating to parking-type facilities has been restricted by statute, consideration of parking-type indirect impacts is not required.

<sup>4</sup>If the reviewing authority determines that technological or economic limitations on the application of measurement methodology to a particular class of sources would make the imposition of an enforceable numerical emission standard infeasible, the authority may instead prescribe a design, operational or equipment standard. In such cases, the reviewing authority shall make its best estimate as to the emission rate that will be achieved and must specify that rate in the required submission to EPA (see Part V). Any permits issued without an enforceable numerical emission standard must contain enforceable conditions which assure that the design characteristics or equipment will be properly maintained (or that the operational conditions wilb be properly performed) so as to continuously achieve the assumed degree of control. Such conditions shall be enforceable as emission limitations by private parties under Section 304, Hereafter, the term "emission limitations" shall also include such design, operational, or equipment standards.

emission rate achieved in practice, this in itself would not operate to raise the required emission limitation to the applicable NSPS. The "lowest achievable emission rate" requirement must still apply, and the applicant would retain the burden of demonstrating that it cannot achieve any rate more stringent than the NSPS rate.

Condition 2. The applicant must certify that all existing sources owned or controlled by the owner or operator of the proposed source in the same AQCR as the proposed source are in compliance with all applicable SIP requirements or are in compliance with an approved schedule and timetable for compliance under a SIP or an enforcement order issued under Section 113. The reviewing authority must examine all enforcement orders for sources owned or operated by the applicant in the AQCR to determine if more expeditious compliance is practicable. Where practicable, a more expeditious compliance schedule for such sources must be required as an enforceable condition of the new source permit.

Condition 3. Emission reductions ("offsets") from existing sources in the area of the proposed source (whether or not under the same ownership) are required such that that total emissions from the existing and proposed sources are sufficiently less than the total allowable emissions from the existing sources under the SIP's prior to the request to construct or modify so as to represent reasonable progress toward attainment of the applicable NAAQS.<sup>2</sup> Only intrapollutant emission offsets will be acceptable (e.g., hydrocarbon increases may not be offset against  $SO_2$  reductions).

Condition 4. The emission offsets will provide a positive net air quality benefit in the affected area (see Part IV.D. below).<sup>2</sup>

Condition 5. For a source which would be located in an area where EPA has found that a SIP is substantially inadequate to attain a NAAQS and has formally requested a SIP revision pursuant to Section 110(a) (2) (H) (ii)... (or an area where EPA has called for a study to determine the need for such a revision), permits granted on or after January 1, 1979 • must specify that the source may not commence construction until EPA has approved or promulgated a SIP revision for the area (if the source is a major source of the pollutant subject to the call for revision or study).

B. Exemptions from certain conditions. The reviewing authority may exempt a source from Condition 1 under Part III or Conditions 3 and 4 under Part IV.A., in cases where the source must switch fuels due to lack of adequate fuel supplies or where the source is required as a result of EPA regulations (i.e., lead-in-fuel requirements) to install additional process equipment and no exception from such an EPA regulation is available to the source. Such an exemption may be granted only if: (i) the applicant demonstrates that it made its best efforts to obtain sufficient emission offsets to comply with Condition 1 under Part III or Conditions 3 and 4 under Part IV.A. and that such efforts were unsuccessful; (ii) the applicant has secured all available emission offsets; and (iii) the applicant will continue to seek the necessary emission offsets and apply them when they become available. Such an exemption may result in the need to revise the SIP to provide additional control of existing sources.

 ${}^{5}\operatorname{Subject}$  to the provisions of Part IV.C. below.

<sup>6</sup> Or, if later, the date which is six months after the deadline for submittal of the revision. C. Easeline for determining credit for emission offsets. Except as provided below, the baseline for determining credit for emission and air quality offsets will be the SIP emission limitations in effect at the time the application to construct or modify a source is filed. Thus, credit for emission offset purposes may be allowable for existing control that goes beyond that required by the SIP.

1. No applicable SIP requirement. Where the applicable SIP does not contain an emission limitation for a source or source category, the emission offset baseline involving such sources shall be the actual emissions at the time the permit request is filed (determined by source test or other appropriate means).

2. Combustion of fuels. Generally, the emissions for determining emission offset credit involving an existing fuel combustion source will be the allowable emissions under the SIP for the type of fuel being burned at the time the new source application is filed (i.e., if the existing source has switched to a different type of fuel at some earlier date, any resulting emission reduction [either actual or allowable] shall not be used for emission offset credit). If the existing source commits to switch to a cleaner fuel at some future date, emission offset-credit, based on the allowable emissions for the fuels involved, is acceptable; provided, that the permit must be conditioned to require the use of a specified alternative control measure which would achieve the same degree of emission reduction should the source switch back to a dirtier fuel at some later date. The reviewing authority should ensure that adequate longterm supplies of the new fuel are available before granting emission offset credit for fuel switches.

Where the particulate emission limit for fuel combustion exceeds the appropriate uncontrolled emission factor in "Compilation of Air Pollutant Emission Factors" (AP-42) (as when a State has a single emission limit for all fuels), emission offset credit will only be allowed for control below the appropriate uncontrolled emission factor in AP-42. (Actual emissions determined by a source test may be used in place of the uncontrolled emission factor in AP-42 in the above situation.)

3. Operating hours and source shutdown. Emission offsets generally should be made on a pounds-per-hour basis when all facilities involved in the emission offset calculations are operating at their maximum ex-pected production rate. The reviewing agency should specify other averaging periods (e.g., tons per year) in addition to the pounds-perhour basis if necessary to carry out the intent of this ruling. A source may be credited with emission reductions achieved by shutting down an existing source or permanently curtailing production or operating hours below that which existed at the time the new source application was submitted; provided, that the work force to be affected has been notified of the proposed shutdown or curtailment. Emission offsets that involve reducing operating hours or production or source shutdowns must be legally enforceable, as is the case for all emission offset situations."

Nothing contained in this ruling is intended to alter EPA's interpretation of the Clean Air Act with regard to the use of "supplemental control systems" or "stack height increases" as set forth at 41 FR 7450 (February 18, 1976).

4. EPA has requested a SIP revision (or study). Where EPA has found that a SIP is substantially inadequate to attain a NAAQS and has formally requested a SIP revision pursuant to Section 110(a)(2)(H)(ii) (or EPA has called for a study to determine the need for such a revision) the baseline for emission offset credit involving sources of the relevant pollutant will be the emissions resulting from the application of reasonably available control measures. The intent of this requirement is to prevent sources from receiving emission offset credit against an inadequate SIP and nullifying the gains that will be achieved through the required SIP revision. In effect, States should use the anticipated SIP revision as the baseline for emission offset credit until such time as the SIP is formally revised.

5. Gredit for hydrocarbon substitution. EPA has found that almost all non-methane hydrocarbons, are photochemically reactive and that low reactivity hydrocarbons eventually form as much photochemical oxidant as the highly-reactive hydrocarbons. Therefore, no emission offset credit may be allowed for replacing one hydrocarbon compound with another of lesser reactivity. 6. No "banking" of emission offset credit.

6. No "banking" of emission offset credit. Once an emission offset has been executed for a particular new source, there can be no leftover credit to "bank" for additional new source growth in the future. This "no banking" rule would not prohibit, however, the issuance of a single permit to cover more than one phase of a phased-construction project.<sup>3</sup> Similarly, for State-initiated emission offsets (see Part V.B.), several different sources may be allowed to construct as part of a general SIP revision, so long as the planar for each source are definite and such source: are specifically identified as the recipient: of the emission effset credits in the SIP revision.

D. Geographic area of concern. In the case of emission offsets involving hydrocarbons or NOr, the offsets may be obtained from sources located anywhere in the broad vicinity of the proposed new source (within the area of nonattainment, and usually within the same air quality control region). This is because areawide oxidant and NOg levels are generally not as dependent on specific hydrocarbon or NOx source-location as they are on overall area emissions. However, since the air quality impact of SO<sub>2</sub>, particulate and carbon monoxide sources is site dependent, simple areawide mass emission offsets are not appropriate. For these pollutants, the reviewing authority should require atmospheric simulation modeling to ensure that the emission offsets provide a positive net air quality benefit. However, to avoid unnecessary consumption of limited, costly and time consuming modeling resources, in most cases it can be assumed that if the emission offsets are obtained from an existing source on the same premises or in the immediate vicinity of the new source, and the pollutants disperse from substantially the same effective stack height, the air quality test under Condition 4 in Part IV.A. above will be met. Thus, when stack emis sions are offset against a ground level source

E. Reasonable progress towards attainment. As long as the emission offset is greater than one-for-one, and the other criteria set

<sup>&</sup>lt;sup>7</sup> Source shutdowns and curtailments in production or operating hours occurring prior to the date the new source application is filed generally may not be used for emission offset oredit. However, where an applicant can establish that it shut down or curtailed production after SIP approval as a result of enforcement action providing for a new source as a replacement for the shut down or curtailment, credit for such shut down or curtailment may be applied to offset emissions from the new source.

<sup>&</sup>lt;sup>s</sup> If any phase covered by the permit is for any reason not constructed, there would be no resulting credit to "bank."

forth above are met, EPA does not intend to question a reviewing authority's judgment as to what constitutes reasonable progress towards attainment as required under Condition 3 in Part IV.A. above. Reviewing au-thorities should bear in mind, however, that the control achieved through emission offsets can significantly assist the authorities in developing legally acceptable SIP's.

#### V. ADMINISTRATIVE PROCEDURES

The necessary emission offsets may be proposed either by the owner of the proposed source or by the local community or the State. The emission reduction committed to must be enforceable by authorized State and/or local agencies and under the Clean Air Act, and must be accomplished by the new source's start-up date.

A. Source initiated emission offsets. A source may propose emission offsets which involve (1) reductions from sources controlled by the source owner (internal emission offsets); and/or (2) reductions from neighboring sources (external emission offsets). The source does not have to investigate all possible emission offsets. As long as the emission offsets obtained represent reasonable progress toward attainment, they will be acceptable. It is the reviewing authority's responsibility to assure that the emission offsets will be as effective as proposed by the source. An internal emission offset will be considered enforceable if it is made a SIP requirement by inclusion as a condition of the new source permit and the permit is forwarded to the appropriate EPA Regional Office.º An external emission offset will not be accepted unless the affected source(s) is subject to a new SIP requirement to ensure that its emissions will be reduced by a specified amount in a specified time. Thus, if the source(s) does not obtain the necessary reduction, it will be in violation of a SIP re-quirement and subject to enforcement action by EPA, the State and/or private parties. The form of the SIP revision may be a State or local regulation, operating permit condition. consent or enforcement order, or any other legally enforceable mechanism available to the State. If a SIP revision is required, the public hearing on the revision may be substituted for the normal public comment procedure required for all major sources under 40 CFR 51.18. The formal publication of the SIF revision approval in the FEDERAL REGISTER need not appear before the source may proceed with construction. To minimize uncertainty that may be caused by these procedures, EPA will, if requested by the State, propose a SIP revision for public comment in the FEDERAL REGISTER concurrently with the State public hearing process. Of course, any major change in the final permit/ SIP revision submitted by the State may require a reproposal by EPA.

B. State or community initiated emission offsets. A State or community which desires that a source locate in its area may commit to reducing emissions from existing sources to sufficiently outweigh the impact of the new source and thus open the way for the new source. As with source-initiated emission offsets, the commitment must be something more than one-for-one. This commitment must be submitted as a SIP revision by the State. The provisions of Part IV.C.4. above re-

main applicable to State or community initiated emission offsets. Therefore, where EPA, has found that a SIP is substantially inadequate to attain an NAAQS and has formally requested a SIP revision pursuant to Section 110(a)(2)(H)(ii) (or has called for a study to determine the need for such a revision). the resulting emission reduction may not be used as an emission offset.

#### VI. POLICY WITH RESPECT TO SECONDARY STANDARDS

The statutory attainment dates for the primary NAAQS have now passed or will pass very soon and cannot be administratively extended. Therefore, this ruling does not allow a new source to cause or exacerbate a primary NAAQS violation on the grounds that the SIP will eventually achieve the NAAQS (as may have been permitted in some cases before the statutory attainment dates)

The Act provides more flexibility with respect to secondary NAAQS's. Rather than setting specific deadlines, Section 110 requires secondary NAAQS's to be achieved within a "reasonable time." Under 40 CFR 51.13(b), a State may revise its SIP to provide extensions from its present secondary NAAOS deadlines. If, therefore, a State submits (and EPA approves) such a revision, a new source which would cause or exacerbate a secondary NAAQS violation may be exempt from the Conditions of Part IV.A. so long as the new source meets the applicable SIP emission limitations and will not interfere with attainment by the newly-specified date.

[FR Doc.76-37346 Filed 12-20-76;8:45 am]

#### [FRL 656-4]

#### PART 52-APPROVAL AND PROMULGA-TION OF IMPLEMENTATION PLANS

Alabama: Approval of Plan Revision

On October 7, 1976 (41 FR 44194), the Agency announced as a proposed rulemaking, an implementation plan change which the State of Alabama had adopted and submitted for EPA's approval. Copies of the materials submitted by Alabama were made available for public inspection and written comments on the proposed revision were solicited. The purpose of the present notice is to announce the Administrator's approval of this revision. An evaluation of them may be obtained by consulting the personnel of the Agency's Region IV Air Programs Branch, 345 Courtland Street, Atlanta, Georgia- 30308, or telephone 404/881-3286.

On August 20, 1975, the Administrator revised 40 CFR Part 51 by changing the emergency level for photochemical oxidants from 1200  $\mu$ g/m<sup>2</sup> to 1000  $\mu$ g/m<sup>3</sup>, one-hour average. The Alabama Air Pollution Control Commission, on March 30, 1976, amended its regulation to reflect this change. The amendment was submitted for EPA's approval on April 23, 1976.

This revised emergency level for photochemical oxidants is hereby approved. These actions are effective immediately since they serve only to notify implementation plan changes already in effect under Alabama law and impose no additional burden to anyone.

Copies of the information submitted by the State are available for public inspection during normal business hours at the following locations:

- Air Programs Branch, Air and Hazardous Materials Division, Environmental Protection Agency, Region IV, 345 Courtland Street, N.E., Atlanta, Georgia 30308. Alabama Air Pollution Control Commission,
- 645 South McDonough Street, Montgomery, Alabama 36104.

**Public Information Reference Unit, Library** Systems Branch PM-213, Environmental Protection Agency, 401 M Street, S.W., Washington, D.C. 20460.

(Section 110(a), Clean Air Act (42 U.S.C. 1857c-5(a)))

Dated: December 14, 1976.

## JOHN QUARLES.

Acting Administrator.

Part 52 of Chapter I, Title 40, Code of Federal Regulations, is amended as follows:

#### Subpart B---Alabama

Section 52.50 is amended by adding paragraph (c) (15) as follows:

§ 52.50 Identification of plan.

۰. (c) \* \* \*

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(15) Revised emergency level for photochemical oxidants (emergency episode control plan) submitted by the Alabama Air Pollution Control Commission on April 23, 1976.

[FR Doc.76-37347 Filed 12-20-76;8:45 am]

### [FRL 657-4]

#### PART 52-APPROVAL AND PROMULGA-TION OF IMPLEMENTATION PLANS

#### **Revision to the Virgin Islands** Implementation Plan

This notice announces approval by the Environmental Protection Agency (EPA) of a revision to the Virgin Islands Implementation Plan.

As requested by the Virgin Islands on August 16, 1976, the EPA has reconsidered its disapproval of the revised 12 V.I.R. & R. 9:204-26, "Sulfur Compounds Emission Control," subsections (a) (1), (a) (3), (b), (c) and (d) as they apply to the island of St. Croix. Receipt of this request was announced in the October 1, 1976 FEDERAL REGISTER at 41 FR 43421 which contains a full description of the proposed revision.

In the October 1, 1976 notice, EPA established a 30-day period for receipt of comments from the public on whether or not the proposed revision to the Virgin Islands Implementation Plan shhould be approved. No comments were received.

EPA has determined that approval of this proposed revision to the Virgin Islands Implementation Plan would not result in the contravention of any applicable ambient air quality standard. The proposed revision has been found to be consistent with current EPA policies and goals set forth by the requirements of section 110(a)(2) (A)-(H) of the Clean Air Act and EPA regulations in 40 CFR Part 51 and, therefore, is approved.

<sup>&</sup>quot;The emission offset will therefore be ena iorceable by EPA under Section 113 as an applicable SIP requirement and will be enforceable by private parties under Section 304 as an emission limitations. EPA will publish notice of such emission offsets in the FED-ERAL REGISTER.



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item I, July 28, 1978, EQC Meeting

Medford AQMA Rules - Authorization for Public Hearing to Consider Proposed Amendment of Oregon Clean Air Act Implementation Plan to Include Offset Rule for New or Modified Emission Sources

# Background

This Agenda Item was Agenda Item L at the June 30, 1978, meeting and was set over to the July 28, 1978, meeting because of the desire of Associated Oregon Industries (AOI) to have additional time to review the proposed rule and allow the Medford Advisory Committee to submit comments.

# Evaluation

A01 will meet July 17, 1978. The Department will evaluate suggested changes, evaluate the Medford Advisory Committee's comments received following their July 10, 1978, meeting and include clarifying changes received from Ray Underwood. A revised evaluation report and any recommended rule changes will be mailed to the Commission as soon as is practicable and before the July 28, 1978, meeting.

WILLIAM H. YOUNG

PBBosserman/kz 229-6278 7/13/78





# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

To: Environmental Quality Commission

From: Director

Subject: Agenda Item L, June 30, 1978, EQC Meeting

# Authorization to Hold a Hearing to Consider Adoption of an Emission Offset Rule for the Medford-Ashland Air Quality Maintenance Area

## Background

At the March 31, 1978, meeting the EQC adopted special rules to control particulate emissions in the Medford Air Quality Maintenance Area (AQMA). At that meeting the Commission acknowledged that the growth allowance built into the rules was inadequate to allow construction of all proposed new projects and they directed the Department to develop a permanent emission offset rule for the Medford AQMA as expeditiously as was practicable.

# Evaluation

The Department's air quality staff spent considerable time in April and May modeling the impact of proposed new sources in the Medford AQMA. These modeling studies have allowed the Department to determine necessary and reasonable limits for an effective "offset" rule. See the attached proposed rule draft.

The U. S. Environmental Protection Agency (EPA) requirement covering offsets in nonattainment areas such as the Medford AQMA remain in effect until states adopt a similar or more stringent one and until EPA approves the control strategy for Medford. This EPA ruling says that all new stationary sources having 100 tons per year or more of particulate emissions must acquire offsets and use lowest achievable emission rates (LAER). The current drafts of the new Federal rule may lower this exemption level to 50 tons per year. While the provisions of the EPA offset rule are generally adequate for a state rule, the emission and impact limits of the EPA requirements must be lowered due to the severity of poor ventilation in the AQMA and the numerous small new projects which collectively could cause significant contribution to nonattainment of air quality standards.

The attached proposed rule is copied in part from the EPA rule which the Department administers. The proposed Oregon rule defines exacerbation more stringently than the Federal rule.

The reason for selecting a rule applicability point of 5 tons per year for particulate matter (dust, char, fly ash, condensible hydrocarbon) is that a new cyclone in White City emitting at an estimated 5 tons per year has a modeled impact of  $.24 \text{ ug/m}^3$  on the White City Maximum Point, which is over



a quarter of the .90  $ug/m^3$  growth increment available in the current control strategy. For another proposal, a new veneer dryer, 5 tons per year of its emissions has a modeled impact of .09  $ug/m^3$  on the Medford Courthouse Station, which is over one-eighth of the .70  $ug/m^3$  growth increment available.

Since the AQMA is also nonattainment for oxidants, the Department proposes to use the EPA proposed 50 tons per year emission cut off for hydrocarbon sources. There is no justification at this time for a lower limit.

## Summation

- 1. The current particulate control strategy for the Medford-Ashland AQMA contains an inadequate growth allowance to accommodate all new and foreseeable construction.
- 2. The Commission directed the staff to develop an offset rule for the Medford AQMA as a means of allowing new construction in the airshed.
- 3. The EPA offset rule provisions are generally satisfactory for a state rule except the source size and impact level considered significant should be lowered in consideration of the abnormally poor ventilation in the AQMA.
- 4. Without an offset rule, new or modified sources could not be allowed, because there is no growth increment left in the existing control strategy.

Director's Recommendation

It is the Director's recommendation that the Commission authorize the Department to hold a hearing on an offset rule.

WILLIAM H. YOUNG Director

PBBosserman/kz 229-6278 6/14/78 Attachments: Proposed Rule Legal Statement of Need EPA Ruling, December 21, 1976 June 14, 1978, Proposed Additions to

## DEFINITIONS

340-30-010

(13) "New Source" means any new or modified source of emissions. Source means any structure, building, facility, equipment, installation or operation (or combination thereof) which is located on one or more contiguous or adjacent properties and which is owned or operated by the same person (or by persons under common control).

Modified source means any physical change in, or change in the method of, operation of a source which increases the emission rate of an air contaminant (including those pollutants not previously emitted and regardless of any emission reductions achieved elsewhere in the source).

(i) A physical change shall not include routine maintenance, repair, and replacement.

(1i) A change in the method of operation, unless limited by previous permit conditions, shall not include:

(a) An increase in the production rate, if such increase does not exceed the operating design capacity of the source;

(b) Use of an alternative fuel or raw material, if prior to December 21, 1976, the source was capable of accommodating such fuel or material; or

(d) Change in ownership or a source.

(14) "Lowest Achievable Emission Rate" means, for any source, that rate of emissions based on the following, whichever is more stringent: (i) The most stringent emission limitation which is contained in the implementation plan for any state for such class or category of source, unless the owner or operator of the proposed source demonstrates that such limitations are not achievable, or

(ii) The most stringent emission limitation which is achieved in practice or can reasonably be expected to occur in practice by such class or category of source taking into consideration the pollutant which must be controlled.

This term applies to a modification means the lowest achievable emission rate for that portion which is modified. In no event shall the application of this term permit a proposed new or modified source to emit any pollutant in excess of the amount allowable under applicable new source standards of performance.

(15) "Nonattainment Area "means a place where violations of an ambient air standard are occurring.

(16) "Attainment Area" means a place where no violations of an ambient air standard are occurring.

(17) "Volatile Organic Compounds" means any organic matter which, when released into the air, becomes photochemically reactive, in a degree more than methane ethane, methyl chloroform, and trichlorotrifluoroethane. June 14, 1978, Draft

## OAR 340-30-080 Offsets for New or Modified Sources

(1) Any new or modified source which proposes to construct in a nonattainment area and which has emissions greater than a rate in Table I shall comply with conditions A through D of Section (3).

(2) Any new or modified source which proposes to locate in an attainment area within the Medford-Ashland AQMA, having emissions greater than Table I, and by modeling is shown to exceed the incremental air quality values of Table 2 in the nonattainment area shall comply with conditions A through D of Section (3).

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	Emission Rate					
	Annua	1	Day	<u>/</u>	Hou	- -
Air Contaminant	<u>Kilograms</u>	(tons)	Kilograms	(1bs)	Kilograms	(lbs)
Particulate Matter (TSP)	4,500	(5.0)	23	(50)	4.5	(10)
Volatile Organic Compounds	45,000	(50)				

T	а	b	1	е	2
•	_	-		_	_

	Incremental Value			
Air Contaminant	Annual Arithmetic Mean	24 Hr Average		
Particulate Matter (TSP)	.10 ug/m <sup>3</sup>	.50 ug/m <sup>3</sup>		

(3) If the Department finds that the allowable emissions from a proposed source would exacerbate violation of an ambient air standard, approval may be granted only if all of the following conditions are met:

(A) The new or modified source meets an emission limitation which specifies the lowest achievable emission rate for such a source.

(B) The applicant provides certification that all existing sources in Oregon owned or controlled by the owner or operator of the proposed source are in compliance with all applicable rules or are in compliance with an approved schedule and timetable for compliance under state or local rules.

(C) Emission reductions ("offsets") from existing sources in the Medford-Ashland AQMA (whether or not under the same ownership) are provided by the applicant such that the total emissions from the existing and proposed sources are sufficiently less (more than one-for-one emission offset) than the total allowable emissions from the existing sources under state rules prior to the request to construct or modify so as to present reasonable progress toward attainment of ambient air standards.

(D) The emission offsets provide a positive net air quality benefit in the affected area.

(4) The intent of this rule is to be more stringent in the areas mentioned above than the Federal Interpretive Ruling promulgated in the December 21, 1976, <u>Federal Register</u> on pages 55528 through 55530. All other provisions of that Ruling are hereby incorporated by reference. In the Matter of the Adoption ) of an Air Pollution Offset ) Rule for the Medford-Ashland ) Air Quality Maintenance ) Area, OAR 340-30-080 )

STATEMENT OF NEED

The Environmental Quality Commission intends to adopt an Air Pollution Offset Rule (OAR 340-30-080) for the Medford-Ashland Air Quality Maintenance Area.

- a. Legal Authority: ORS 468.020 (general) and 468.295.
- b. Need for Rule: The Medford-Ashland Air Quality Maintenance Area is violating State and Federal standards for the air contaminant known scientifically as Total Suspended Particulate (TSP). The Environmental Quality Commission has adopted rules to reduce the TSP to slightly below the standard. In order to maintain that standard, and yet allow growth involving more TSP, a rule is needed to mitigate the TSP from new and modified significant sources. The Federal Environmental Protection Agency requires an offset rule in a control strategy to allow for growth if the control strategy itself does not specifically allow for projected growth. Such is the case for the Medford-Ashland AQMA.
- c. Documents Principally relied Upon:
  - Oregon Air Quality Report 1976, by State of Oregon, Department of of Environmental Quality (DEQ), Appendix 1A, pg. 7, showing the Medford area violating the 60 ug/m<sup>3</sup> annual geometric mean standard.
  - 2. DEQ File AQ 15-0015 containing reports and data from February, 1978, concerning modeling and impact of growth projects.
  - Federal Environmental Protection Agency "Interpretive Ruling for Implementation of the Requirements of 40 CFR 51.8," December 21, 1976, Federal Register, pages 55528 through 55530.
  - 4. 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," Memorandum from the DEQ, Director, William H. Young, to the Oregon Environmental Quality Commission (EQC).
  - 5. Agenda Item No. L, February 24, 1978, EQC Meeting, "Adoption of Rules to Amend Oregon's Clean Air Act Implementation Plan Involving Particulate Control Strategy for the Medford-Ashland AQMA," Memorandum for the Director of DEQ to the EQC.
  - Agenda Item No. I, March 31, 1978, EQC Meeting, same subject and addressee as 5 above.
  - 7. U. S. Environmental Protection Agency, May 5, 1978, draft, Appendix S to 40 CFR 51, "Emission Offset Interpretive Ruling."



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

# MEMORANDUM

- To: Environmental Quality Commission
- From: Director
- Subject: Agenda Item J, July 28, 1978, EQC Meeting
  - Sulfur in Fuel Oil Status Report on Availability of Clean Fuels

# Background

At the November 18, 1977, EQC meeting (Agenda Item M), a Statement of Policy was adopted regarding the sulfur content of residual fuel oils. This policy encouraged the supply and use of the cleanest fuel oils practicably available in the Portland Air Quality Maintenance Area (AQMA). It also encouraged oil suppliers to develop new supplies of cleaner fuel oils in this area in the shortest time practicable. The Department was then directed to monitor and report on a semi-annual basis the progress of oil suppliers in securing these cleaner fuels. This is the first status report.

# Discussion

Sulfur contents of fuel oils received in Oregon are reported to the Department on a quarterly basis. This data was compared with Energy Data Reports provided by the U. S. Department of Energy.

Sulfur contents of residual fuel oils received at Portland Terminals for the period 1973 through the first quarter, 1978, are shown in Figure 1. They can be compared to values shown in Figure 2 which show West Coast refinery production of residual fuel oil by sulfur level.

The following is observed:

- Residual oil sulfur contents received in Portland vary over a wide range. However, the average sulfur content has been fairly stable at about 1.50%.
- The residual oil sulfur content from West Coast refinery production has remained fairly stable over the same period.
- In the past three years there has been a slow, steady trend toward cleaner fuels. Unfortunately, residual oils from Alaskan crude oil are not adequately reflected in the data which is currently available.



- Oregon has not been receiving any of the cleanest fuels available (<0.5%S). These fuels are used mainly in California. Oregon has been receiving some of the next sulfur level fuel (0.51 to 1.00%S) as well as higher sulfur level fuels.
- Oregon has been receiving some shipments well above the 1.75% sulfur limitation during each year monitored. These have mainly occurred as a result of variances granted to Union Oil and Chevron USA.
- The latest complete data available (first quarter, 1978) is not sufficient to show a downward trend in sulfur levels. Incomplete data for second quarter, 1978, indicates somewhat higher values.

Another important consideration is the total amount of residual fuel oils which is being used in Oregon. During the period of 1972 through 1976 total residual oil sales in Oregon have steadily decreased each year. At the same time, industrial use of natural gas has decreased in almost the same proportion. This may indicate a trend toward fuel conservation or toward increased use of wood as fuel.

The trend toward less residual oil use may have been reversed during the past few months. Northwest Natural Gas Company has recently experienced a substantial loss in their industrial customers using interruptable natural gas. They attribute this to Alaskan residual oil being less expensive than natural gas. This comes at at time when they have a surplus of natural gas for interruptable customers.

### Summary

When compared to West Coast production of residual fuel oil, Oregon has historically received oils with sulfur contents roughly (but not entirely) comparable to those available after California removes the cleanest fuels. The average sulfur content has been around 1.5% sulfur since the sulfur monitoring program began. Individual values have occurred both well above and well below this average.

It is too early to determine the effect of Alaskan residual oils entering the West Coast. Their sulfur levels should be reflected in the upcoming monitoring reports. One effect of these fuel oil supplies appears to be an economic one where residual oil could be preferred to interruptable natural gas. This would appear to point to a strong potential for higher residual oil usage in the future.

WILLIAM H. YOUNG

PLHanrahan/kz 229-5204 7/18/78




Note: Oregon uses about 3% of West Coast Production of Residual Oils

WESTERN USA

REFINERY PRODUCTION

Percentage of Annual

Production by Sulfur Content



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1				FIGURE 2				
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					Note: Orea	on uses abou	t 3% of West	
				· .	Coas	t Production	of Residual	Oils



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

## MEMORANDUM

- To: Environmental Quality Commission
- From: Director
- Subject: Agenda Item No. K, July 28, 1978 EQC Meeting

Areawide 208 Plans-Designation and Certification

#### Previous 208 Material Submitted to the Commission

The 208 program first came before the Commission in April 1977 when a brief presentation was given on the various projects. Second, the designation of the Metropolitan Wastewater Management Commission (Eugene area) to construct and operate a regional sewage treatment plant in Eugene was presented as an informational item at the July 29, 1977 meeting. Third, the proposed agreement between the Department and the Oregon State Department of Forestry was presented as an informational item at the April 28, 1978 meeting. Fourth, a 208 status report was presented as an informational item at the May 26, 1978 meeting. Fifth, a proposed groundwater study covering the River Road-Santa Clara area near Eugene was presented at the June 30, 1978 breakfast meeting. The Commission approved the groundwater project.

#### Background

The four areawide 208 programs were initiated in September 1975, one year prior to the initiation of the Department's statewide 208 program. These initial programs were essentially complete in autumn 1977 and included the following agencies and geographic coverage:

Agency	<u>Geographic Coverage*</u>
Columbia Region Assocation of Governments (CRAG)	Clackamas, Multnomah and Washington counties
Lane Council of Governments (L-COG)	Lane County excluding coastal drainages
Mid-Willamette Valley Council of Governments	Marion, Polk and Yamhill counties
Rogue Valley Council of Governments	Bear Creek drainage



\*Federally owned lands excluded.

Agenda Item No. K, July 28, 1978 EQC Meeting Page 2

#### Plan Content

The areawide programs emphasized treatment and control of municipal sewage, sewage sludges, individual waste disposal, and urban runoff. The plans were regional in scope and point source oriented. Agricultural non-point waste sources were studied in the South Yamhill drainage and in Bear Creek drainage.

#### Relationship to Statewide 208 Program

The Department's statewide 208 program covers those areas of the state not covered by the areawide programs. However, the Department is responsible for all 208 planning in Oregon. For this reason, the areawide programs will be appropriately incorporated into the statewide program and will be brought to Commission for approval as a part of the Department's Water Quality Management Plan.

#### Designation of Management Agencies

The areawide plans have identified management agencies for future planning and for implementation of plan components. These management agencies have been formally designated by the Governor. The management agency designations have been forwarded to EPA for approval.

#### Plan Summaries

Summaries of each areawide 208 plan are attached for review.

#### Director's Recommendation

No action on this item is required at this time. The plans will be brought before the Commission in October 1978 for approval as a part of the Department's Water Quality Management Plan.

Hell

#### WILLIAM H. YOUNG

Thomas J. Lucas:nrj 229-5284 July 13, 1978 ROBERT W. STRAUB GOVERNOR



OFFICE OF THE GOVERNOR state capitol salem, oregon 97310 June 28, 1978

Mr. Donald P. Dubois Regional Administrator U. S. Environmental Protection Agency Region X 1200 Sixth Avenue Seattle, WA 98101

Dear Mr. Dubois:

The Department of Environmental Quality has completed the review of the Mid-Willamette Valley Council of Governments 208 Water Quality Management Plan. Based on this review and the Department's recommendations, I am hereby certifying the plan and designating management agencies for planning and implementation.

The plan emphasizes agricultural runoff in the South Yamhill Basin, individual waste disposal and control of municipal wastes. Emphasis on these waste sources is consistent with the Department's identified water quality needs in the 208 planning area.

The plan has been found to be in conformance with the Department's approved planning process. The process utilized to develop the plan was reviewed and approved by the Department prior to plan initiation.

The plan will be accepted as a detailed portion of the water quality management strategy for the state. Specifically, the plan will be approved by the Environmental Quality Commission as a part of the Department's Water Quality Management Plan. The tentative approval date is October 1978.

The plan is generally in conformance with applicable state and local regulations governing land use and protection of the environment. However, as soon as practicable, after urban growth boundaries are established and approved by the Land Conservation and Development Commission for Marion, Polk and Yamhill Counties and the cities within these counties, the plan must be reviewed. If necessary, the plan must be changed to conform with the approved urban growth boundaries. Mr. Donald D. Dubois June 28, 1978 Page 2

Management agencies for planning and implementation are identified in Attachment A, Item G, Allocation of Responsibility, for each plan element. Management agencies are further identified in the Mid-Willamette Valley Council of Governments <u>Master Sewerage Plan</u>. Pages 362 and 363 of the plan are presented as Attachment B. The designated management agencies have adequate authority to implement the plans and meet federal requirements set forth in 40 CFR 131.11(0).

Particular attention should be given to the allocation of responsibility. This element presents the agreed upon division of planning responsibility and authority between the Department and the Mid-Willamette Valley Council of Governments pertinent to 208 water quality planning. This allocation of responsibility will be subject to annual review.

Attachment A endeavors to provide a brief overview of the plan. In particular the attachment gives an indication of the status of both point and non-point waste sources in the planning area. Water pollution problems are identified along with the agency committments to address the problems. The major accomplishments are summarized. Plan approval is indicated where applicable. Additional planning which should be undertaken is identified. Finally, the above mentioned allocation of responsibility both for planning and implementation is presented.

Sincerely,

Governor

RWS:aes Attachment

## MUNICIPAL WASTE TREATMENT

#### A. IDENTIFIED PROBLEM

A regional approach to municipal waste treatment has not been carried out in the MWCOG 208 planning area. Particularly critical problems included lack of uniform population, land use and waste load projections, establishment of service areas, and industrial discharges connected to treatment plants.

#### B. COMMITMENTS

Develop Master Sewerage Plan encompassing the following objectives:

- 1. Develop regional policies for sewerage system initiation and upgrading.
- 2. Define the hierarchy of sewerage conditions and recommend future action based on water quality statutes and regulations.
- Analyze existing sewerage conditions and recommend future action based on water quality statutes and regulations.
- 4. Estimate costs and timing of required future sewerage facilities.
- Develop and implement a continuing planning process.

#### C. ACCOMPLISHMENTS

- Developed and implemented urban service boundaries for 33 cities. Urban service boundaries adopted by 10 cities.
- Developed and implemented regional projections, including population, land use and waste load discharges for the counties and cities within the 208 planning area.
- Implementation of an industrial waste discharge permit system for municipally connected industries in Salem by an Industrial Waste Ordinance (SRC 71.370 and 71.380).
- 4. Implementation of an evaluation and priority ranking system to determine the prioritization of proposed sewerage needs in the planning area.
- 5. Facility planning needs and preliminary rate identified to year 2000.
- D. CERTIFICATION/ APPROVAL

Conditional

## MUNICIPAL WASTE TREATMENT

E. WORK TO BE COMPLETED

- 1. Review projections as urban growth boundaries are adopted locally and approved by LCDC.
- 2. Review service areas as urban growth boundaries are adopted locally and approved by LCDC.
- 3. Review and update the Master Plan on an annual basis through MWCOG Board Action. Revision to include new construction grant priority criteria adopted by the EQC May 1978.

## F. NEW PLANNING ELEMENTS

None currently identified.

- G. ALLOCATION OF RESPONSIBILITY
- Coordinating agency (annual certification) -MWCOG.
- Planning agencies for plan revisions and updates - Marion, Polk and Yamhill counties (see Attachment B).
- Implementing agencies each incorporated city or sewer districts (see Attachment B).
- Water quality standards, 303e planning elements, enforcement - DEQ.

SLUDGE DISPOSAL MANAGEMENT

Α.	IDENTIFIED PROBLEM	
		Sewage sludges in the MWCOG-208 planning area are disposed of on a local basis. A regional alternative has not been evaluated.
Β.	COMMITMENTS	
		Develop a regional sludge disposal alternative.
С.	ACCOMPLISHMENTS	
		Based on a cost analysis it was determined that a regional sludge disposal program is not cost-effective.
D.	CERTIFICATION/ APPROVAL	
·		Full. Future sludge disposal planning, management, and implementation can be adequately covered under 201 facilities plans.
Ε.	WORK TO BE COMPLETED	
		Need resolution of the zoning ordinance (conditional use permits) conflict in Marion County.
F.	NEW PLANNING ELEMENTS	
	١	None identified.
G.	ALLOCATION OF RESPONSIBILITY	
		Implementing agencies - each incorporated city or sewer district (see Attachment B)

		INFILTRATION/INFLOW
Α.	IDENTIFIED PROBLEM	
		Infiltration/inflow problems are covered under 201 facilities planning.
Β.	COMMITMENTS	
		Not applicable.
С.	ACCOMPLISHMENTS	
		Not applicable.
D.	CERTIFICATION/ APPROVAL	
		Full. Infiltration/inflow planning, management, and implementation covered under 201 facilities plans.
Ε.	WORK TO BE COMPLETED	
		Not applicable.
F.	NEW PLANNING ELEMENTS	
		Not applicable.
G.	ALLOCATION OF RESPONSIBILITY	

Implementing agencies - each incorporated city or sewer district (see Attachment B).

I NUT FON / END ÷

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## INDUSTRIAL WASTES

A. IDENTIFIED PROBLEM

There are no serious problems resulting from point source industrial wastes in the MWCOG planning area.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Full.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

Not applicable.

G. ALLOCATION OF RESPONSIBILITY

DEQ.

#### INDIVIDUAL WASTE DISPOSAL

#### A. IDENTIFIED PROBLEM

There are serious septic system failure problems in the MWCOG planning area. Very serious failure problems exist in Grand Ronde. The failure rate in old systems is about 80%. There are no management institutions to manage septic tank systems where annexation to an incorporated city is not possible.

## B. COMMITMENTS

- Conduct septic system surveys in Grand Ronde and determine the location and extent of failures. Conduct region wide analysis of existing surveys in the remainder of the MWCOG planning area.
- Develop management mechanisms and attempt to get member governments to agree to an implementation program.
- 3. Develop public awareness program.

#### C. ACCOMPLISHMENTS

- 1. Excellent public awareness program.
- Determined location and extent of septic system failure areas.
- 3. Recommended sewers for Grand Ronde, 201 Step I proposal now in process.
- Analyzed alternatives for septic system management, prepared model ordinance for a countywide septic tank maintenance and inspection program.

#### D. CERTIFICATION/ APPROVAL

Conditional

## E. WORK TO BE COMPLETED

#### None

## F. NEW PLANNING ELEMENTS

Assist local governments by developing funding sources for a maintenance and repair of septic systems.

#### G. ALLOCATION OF RESPONSIBILITY

Implementing agencies - counties.

## CONSTRUCTION

A. IDENTIFIED PROBLEM

Construction related pollution problems have not been identified or assessed.

B. COMMITMENTS

Not applicable.

#### C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

> DEQ should design a statewide construction management work plan by October 1978. Work to be undertaken as federal funds are available.

G. ALLOCATION OF RESPONSIBILITY

Planning and implementation - to be determined.

## URBAN RUNOFF

A. IDENTIFIED PROBLEM

> Urban runoff was a suspected pollution problem in the MWCOG 208 planning area.

## B. COMMITMENTS

Collect data and develop urban stormwater runoff control model to identify problems.

#### C. ACCOMPLISHMENTS

Through the data collection effort and the modeling, waste loads from urban runoff were estimated and projected. Based on this work, pollution from urban runoff appears to be a potential threat to water quality in the Willamette River.

## D. CERTIFICATION/ APPROVAL

#### Conditional

## E. WORK TO BE COMPLETED

None.

## F. NEW PLANNING ELEMENTS

Project proposal submitted to further identify runoff sources in the Salem urbanizing area; specify criteria to reduce or eliminate the sources, and enact ordinances to control urban runoff pollution sources. If funded, project should be initiated by about October 1978 and complete by October 1980.

#### G. ALLOCATION OF RESPONSIBILITY

Planning - MWCOG/Salem Implementation - to be determined

## EROSION AND SEDIMENT CONTROL

# A. IDENTIFIED PROBLEM

Suspected water quality degradation resulting from agricultural land runoffs. Funds now expended for agriculture implementation projects do not include water quality benefits. Data base inadequate. No defined methodology for problem identification or prioritization of projects.

#### B. COMMITMENTS

Develop methodology (modeling effort) for the South Yamhill Basin to establish erosion and sedimentation loadings. Determine areas and practices causing them. Look at management systems, other than voluntary; include a self evaluation mechanism.

#### C. ACCOMPLISHMENTS

- Intensive and successful public involvement program.
- Draft ordinance for soil erosion and sediment control.
- 3. Designed self evaluation mechanism.
- 4. Problems defined and methodology developed.
- D. CERTIFICATION/ APPROVAL

Conditional

## E. WORK TO BE COMPLETED

#### None

#### F. NEW PLANNING ELEMENTS

Project proposal submitted to carefully locate areas with various potential for stream sedimentation for the purpose of ultimately implementing control programs for these areas. Ultimate objective is the evaluation of a revitalized voluntary program. Proposed project subject to federal funding. If funded, project should begin by about October 1978 and should be complete by October 1980.

G. ALLOCATION OF RESPONSIBILITY

> Planning - MWCOG Implementation - to be determined.

## SALTWATER INTRUSION

A. IDENTIFIED PROBLEM

Not applicable. Saltwater intrusion is not a pollution source.

B. COMMITMENTS

Not applicable.

#### C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable. Saltwater intrusion is not a pollution source.

E. WORK TO BE COMPLETED

## Not applicable.

- F. NEW PLANNING ELEMENTS
- G. ALLOCATION OF RESPONSIBILITY

.

## Not applicable.

. <b>A.</b>	IDENTIFIED PROBLEM		
		Not applicable. source.	Mining is not a pollution
Β.	COMMITMENTS		
		Not applicable.	
с.	ACCOMPLISHMENTS		·
	•	Not applicable.	
D.	CERTIFICATION/ APPROVAL	•	х.
		Not applicable. source.	Mining is not a pollution
Ε.	WORK TO BE Completed		
		Not applicable.	
<b>F.</b>	NEW PLANNING ELEMENTS		
		Not applicable.	
G.	ALLOCATION OF RESPONSIBILITY		
		Not applicable.	

# MINING

## SILVICULTURE

A. IDENTIFIED PROBLEM

Not a part of the initial MWCOG 208 plan.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable.

E. WORK TO BE COMPLETED

Not applicable.

Not applicable.

F. NEW PLANNING ELEMENTS

G. ALLOCATION OF RESPONSIBILITY

- .
- 1. Planning DEQ.
- 2. Implementation
  - a. State and private forest lands OSFD.
  - b. Federal forest lands BLM, USFS.

# HYDROLOGIC MODIFICATIONS Α. IDENTIFIED PROBLEM Not applicable. Hydrologic modifications are not a pollution source. Β. COMMITMENTS Not applicable. ACCOMPLISHMENTS С. Not applicable. D. CERTIFICATION/ APPROVAL Not applicable. Hydrologic modifications are not a pollution source. WORK TO BE Ε. COMPLETED Not applicable. F, NEW PLANNING ELEMENTS Not applicable. G. ALLOCATION OF RESPONSIBILITY Not applicable.

## PUBLIC PARTICIPATION

## A. IDENTIFIED PROBLEM

Past regional planning efforts pertinent to water quality in the MWCOG area have been largely unsuccessful. The lack of success has been due, in part, to lack of adequate public participation.

#### B. COMMITMENTS

MWCOG committed to develop and implement a public participation program.

## C. ACCOMPLISHMENTS

- MWCOG disseminated information regarding the 208 program through brochures, newsletters, visual aids, press releases, newspaper and television coverage.
- MWCOG developed an extensive committee structure to solicit public input.
- MWCOG held numerous public meetings to solicit public input.
- 4. Public input was utilized in plan formulation.
- D. CERTIFICATION/ APPROVAL

Conditional

### E. WORK TO BE COMPLETED

None identified.

#### F. NEW PLANNING ELEMENTS

Public involvement should be included in all new planning elements.

G. ALLOCATION OF RESPONSIBILITY

MWCOG

ROBERT W. STRAUB



OFFICE OF THE GOVERNOR STATE CAPITOL SALEM, OREGON 97310

June 28, 1978

Mr. Donald P. Dubois
Regional Administrator
U. S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, WA 98101

Dear Mr. Dubois:

The Department of Environmental Quality has completed the review of the Rogue Valley Council of Governments 208 Water Quality Management Plan. Based on this review and the Department's recommendations, I am hereby certifying the plan and designating management agencies for planning and implementation.

The plan emphasizes control of municipal wastes; management of the Ashland watershed and the Ashland Municipal Reservoir; and control of non-point sources of waste in the Bear Creek Basin. Emphasis on these waste sources is consistent with the Department's identified water quality needs in the 208 planning area.

The plan has been found to be in conformance with the Department's approved planning process. The process utilized to develop the plan was reviewed and approved by the Department prior to plan initiation.

The plan will be accepted as a detailed portion of the water quality management strategy for the state. Specifically, the plan will be approved by the Environmental Quality Commission as a part of the Department's Water Quality Management Plan. The tentative approval date is October 1978.

The plan is generally in conformance with applicable state and local regulations governing land use and protection of the environment. However, as soon as practicable, after urban growth boundaries are established and approved by the Land Conservation and Development Commission for Jackson County and the cities within Jackson County, the plan must be reviewed. If necessary, the plan must be changed to conform with the approved urban growth boundaries. Mr. Donald P. Dubois June 28, 1978 Page 2

Management agencies for planning and implementation are identified in Attachment A, Item G, Allocation of Responsibility, for each plan element. Management agencies designated to implement the municipal waste treatment element are further identified in Chapter X1 of the Rogue Valley Council of Governments <u>Greater Bear Creek Basin Waste Treatment</u> <u>Master Plan.</u> This chapter is presented as Attachment B. The designated management agencies have adequate authority to implement the plans and meet federal requirements set forth in 40 CFR 131.11(0).

Particular attention should be given to the allocation of responsibility. This element presents the agreed upon division of planning responsibility and authority between the Department and the Rogue Valley Council of Governments pertinent to 208 water quality planning. This allocation of responsibility will be subject to annual review.

Attachment A endeavors to provide a brief overview of the plan. In particular the attachment gives an indication of the status of both point and non-point waste sources in the planning area. Water pollution problems are identified along with the agency committments to address the problems. The major accomplishments are summarized. Plan approval is indicated where applicable. Additional planning which should be undertaken is identified. Finally, the above mentioned allocation of responsibility both for planning and implementation is presented.

Sincerely,

Governor

RWS:aes Attachment

## MANAGEMENT OF REEDER RESERVOIR

#### A. IDENTIFIED PROBLEM

The severe erosion in the Ashland watershed has resulted in considerable sediment accumulation in the Ashland Municipal Reservoir. Removal of sediment by sluicing has resulted in increased sediment loadings in Ashland Creek, Bear Creek and ultimately the Rogue River. Because of the increased loadings the DEQ, through NPDES permit action, has required Ashland to explore alternatives for sediment removal.

#### B. COMMITMENTS

RVCOG has committed to the development of a reservoir management plan. This includes the development of several alternatives and recommendations.

## C. ACCOMPLISHMENTS

- A report has been prepared with specific recommendations. Major recommendations include:
  - (a) Ashland should purchase a dredge and construct a discharge pipeline.
  - (b) A grid system should be established to determine locations of sedimentaccumulation.
  - (c) Ashland should install a multiple-level water intake assembly.
  - (d) Determine feasibility of enlarging the dam opening to 48" from 24".

(e) Time discharge of sediment from dredge to minimize downstream impacts. Discharge of sediment to be between November 15 and March 31.

#### D. CERTIFICATION/ APPROVAL

#### Conditional.

E. WORK TO BE COMPLETED

- Because no realistic environmental alternative to discharging the sediment from Reeder Reservoir was prepared, EPA will develop an environmental impact assessment.
- 2. Ashland and DEQ must complete negotiations on the new NPDES permit.
- After completion of the environmental impact assessment and the NPDES permit negotiations Ashland should implement a specific reservoir management program.

## MUNICIPAL WASTE TREATMENT

#### A. IDENTIFIED PROBLEM

An agreed upon comprehensive Municipal Waste Treatment Master Plan has not been implemented in the Bear Creek Basin:

- There has been very little agreement on sewerage service areas.
- (2) A regional implementing mechanism has not been formally agreed to.

B. COMMITTMENT

- Adopt urban growth boundaries (Jackson County and cities).
- (2) Adopt urban sewerage service areas (affected jurisdictions).
- (3) Adopt implementation agreements.
- (4) Develop and adopt a Master Sewerage Plan.

## C. ACCOMPLISHMENTS

- (1) Planning boundaries identified and mapped.
- (2) Inventories complete.
- (3) Basinwide projections complete.
- (4) Sewerage service areas identified and agreed on by affected jurisdictions.
- (5) Management agencies determined and responsibilities delineated.
- (6) 201 facility planning needs identified, prioritized and projected over a five year period.
- (7) Facility plan needs identified over a 20 year period.
- (8) An intergovernmental agreement necessary to implement the Municipal Waste Treatment Master Plan signed by all affected jurisdictions.
- (9) A Water Quality Review Committee established by RVCOG Board action for annual revisions and updates.
- D. CERTIFICATION/ APPROVAL

Conditional

- E. WORK TO BE COMPLETED
- Review and adopt municipal and industrial waste load projections when urban growth boundaries are adopted.
- (2) Review and adopt service area boundaries when urban growth boundaries are adopted.
- (3) Revise and update the Master Plan on an annual basis through the Water Quality Review Committee. First report due July 1, 1979. Revision to include new construction grant priority list, utilizing criteria adopted by the EQC May 1978.
- F. NEW PLANNING ELEMENTS

None currently identified.

- G. ALLOCATION OF RESPONSIBILITY
- Designated management agencies for 201 planning and implementation - Agencies and jurisdictions identified in Waste Treatment Master Plan (see also Attachment B).
- (2) Revisions to and updates of Master Plan RVCOG.
- (3) New planning tasks pertinent to Master Plan RVCOG.
- (4) Water quality standards, 303e planning elements DEQ.

#### INDIVIDUAL WASTE DISPOSAL (SUBSURFACE)

A. IDENTIFIED PROBLEM

> The RVCOG 208 plan contained a proposal for the establishment of a county-wide program for management of on-site waste disposal. Due to poor soils for subsurface waste disposal, a 58% denial rate for permits, and a very high demand for permit, RVCOG recently applied for additional 208 funds to develop the management plan.

B. COMMITTMENT

Individual waste disposal was not included in the initial 208 work program.

C. ACCOMPLISHMENTS

A proposal for on-site waste disposal management was prepared in the initial 208 plan. The proposed project has been approved and a grant awarded on March 1, 1978 for individual waste disposal management.

D. CERTIFICATION/ APPROVAL

## Conditional

E. WORK TO BE COMPLETED

The following outputs to be completed and adopted by March 1, 1979:

- A recommended county-wide on-site small community waste disposal management program.
- (2) A draft ordinance which can be adopted and implemented by Jackson County.
- (3) An administrative framework for implementing the program.
- F. NEW PLANNING ELEMENTS

None currently identified.

- G. ALLOCATION OF RESPONSIBILITY
- (1) Planning RVCOG/Jackson County
- (2) Implementation to be determined.

## SLUDGE DISPOSAL MANAGEMENT

A. IDENTIFIED PROBLEM

There are no identified municipal and industrial sludge disposal problems in the Bear Creek Basin. Sludge disposal planning.

B. COMMITTMENTS

Not applicable.

## C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

· · · /

Full. Future sludge disposal planning management and implementation can be adequately covered under 201 facilities plans.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

Not applicable.

G. ALLOCATION OF RESPONSIBILITY

> Agencies and jurisdictions identified in Waste Treatment Master Plan are responsible for sludge disposal planning and implementation (see also Attachment B).

## ALTERNATIVE WASTE DISPOSAL SYSTEMS

A. IDENTIFIED PROBLEM

> There are sufficient subsurface disposal problems in the Bear Creek Basin to warrant the consideration of alternative systems. The determination is made on a site by site basis.

B. COMMITTMENT

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

#### D. CERTIFICATION/ APPROVAL

Full. The DEQ has adopted rules and regulations governing alternative systems.

E. WORK TO BE COMPLETED

Not applicable

F. NEW PLANNING ELEMENTS

Analysis and determination is made on a site by site basis.

G. ALLOCATION OF RESPONSIBILITY

> DEQ is responsible for alternative systems planning, management and implementation. RVCOG as a part of their on-site study will look at local options for administration of statewide alternative system regulations.

## INFILTRATION/INFLOW

Α. IDENTIFIED PROBLEM Infiltration/inflow problems are covered under 201 facilities planning. Β. COMMITTMENTS Not applicable. C. ACCOMPLISHMENTS Not Applicable. D. CERTIFICATION/ APPROVAL Full. Infiltration/inflow planning, management and implementation covered under 201 facilities plans. Ε. WORK TO BE COMPLETED Not Applicable. F. NEW PLANNING. ELEMENTS Not Applicable. G. ALLOCATION OF RESPONSIBILITY Agencies and jurisdictions identified in Waste

Agencies and jurisdictions identified in Waste Treatment Master Plan are responsible for sludge disposal planning and implementation (see also Attachment B).

- MINING
- IDENTIFIED Α. PROBLEM None. Mining is not a problem. Β. COMMITTMENTS Not applicable. Ċ. ACCOMPLISHMENTS Not applicable. CERTIFICATION/ D. APPROVAL Not applicable. Mining is not a problem. Ε. WORK TO BE COMPLETED Not Applicable. F. NEW PLANNING ELEMENTS Not Applicable. ALLOCATION OF G. RESPONSIBILITY DEQ

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## SALTWATER INTRUSION

Α.	PROBLEM	•
		None. Saltwater intrusion is not a problem.
Β.	COMMITTMENTS	
		Not Applicable.
с.	ACCOMPL I SHMENTS	
		Not Applicable.
D.	CERTIFICATION/ APPROVAL	
		Not applicable. Saltwater intrusion is not a problem.
Ε.	WORK TO BE COMPLETED	
		Not Applicable.
F.	NEW PLANNING ELEMENTS	
		Not Applicable.
G.	ALLOCATION OF RESPONSIBILITY	
		DEO

## HYDROLOGIC MODIFICATIONS

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Α.	IDENTIFIED PROBLEM	
		None (See also Reservoir Management).
Β.	COMMITTMENTS	
		Not Applicable.
c.	ACCOMPLISHMENTS	
		Not Applicable.
D.	CERTIFICATION/ APPROVAL	:
		Not applicable. Hydrologic modifications are not a problem.
Ε.	WORK TO BE Completed	
		Not Applicable.
F.	NEW PLANNING ELEMENTS	
		Not Applicable.
G.	ALLOCATION OF RESPONSIBILITY	

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DEQ

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#### CONSTRUCTION

IDENTIFIED Α. PROBLEM Construction related pollution problems have not been identified or assessed. Β. COMMITTMENTS Not Applicable. С. **ACCOMPLISHMENTS** Not Applicable. D. CERTIFICATION/ APPROVAL Conditioned. WORK TO BE Ε. COMPLETED Not Applicable. F. NEW PLANNING ELEMENTS DEQ will develop a statewide work plan by October 1978 work to be undertaken as federal funds are available: (1) Assess and evaluate construction related pollution sources. (2)Develop BMP's and/or sediemnt and erosion control act. (3)Develop implementation mechanism complete with enabling legislation. G. ALLOCATION OF RESPONSIBILITY 1. Urban runoff construction problems to be undertaken by RVCOG as a part of the Non-point source program. 2. DEQ is responsible for design of a work plan for a statewide construction management and control program. 3. Implementation - to be determined.

#### NONPOINT SOURCE RUNOFF

A. IDENTIFIED PROBLEM

> Severe water quality problems occur in Bear Creek. The monitoring and evaluation work complete to date indicates that agriculture runoff and urban stormwater runoff contribute to water quality problems in Bear Creek.

## B. COMMITTMENTS

RVCOG has committed to develop a management program to control agriculture and urban runoff sources of pollution to Bear Creek.

C. ACCOMPLISHMENTS

Basic data on irrigation return flows and more limited data on urban stormwater runoff has been collected. Preliminary BMP's are being developed through the on-farm study.

#### D. CERTIFICATION/ APPROVAL

#### Conditional.

## E. WORK TO BE COMPLETED

By July 1, 1978 RVCOG should complete the following:

- An agriculture management plan including Best Management Practices, identified management agencies, and a regulatory program.
- (2) Basic data report for on-farm study.
- (3) Draft interpretive report for monitoring program.
- (4) Basic data report for urban runoff study.

By September 30, 1978 RVCOG should complete the following:

 Preliminary urban stormwater runoff management plan including structural and non-structural alternatives, identification of management agencies and a regulatory program.

#### F. NEW PLANNING ELEMENTS

None currently identified.

### G. ALLOCATION OF RESPONSIBILITY

- 1. Designated management agencies for implementation to be determined.
- 2. Planning agency to initial plan completion RVCOG.
- New planning tasks to be determined through Statewide Water Quality Management Plan.
- 4. Reviews and updates to be determined through Statewide Water Quality Management Plan.
# WATER QUALITY MONITORING PROGRAM

A. IDENTIFIED PROBLEM

The RVCOG 208 plan indicates a need for a monitoring program to measure the success of the 208 plan and indicate where further work may be required.

B. COMMITTMENTS

Not Applicable.

C. ACCOMPLISHMENTS

Not Applicable.

D. CERTIFICATION/ APPROVAL

Not Applicable.

E. WORK TO BE COMPLETED

Not Applicable.

F. NEW PLANNING ELEMENTS

> If federal funds are available, RVCOG should submit a proposed monitoring program to DEQ and EPA. This proposal should be complete by July 1, 1979.

G. ALLOCATION OF RESPONSIBILITY

> The responsibility for carrying out a monitoring program may be a combination of federal, state, and local agencies but must be determined concurrently with submission of the monitoring proposal and work plan.

# SILVICULTURE

(excluding Ashland Watershed)

Α.	IDENTIFIED PROBLEM	
		Not a part of the initial RVCOG 208 plan.
Β.	COMMITMENTS	
		Not applicable.
с.	ACCOMPLISHMENTS	
		Not applicable.
D.	CERTIFICATION/ APPROVAL	,
		Not applicable.
Ε.	WORK TO BE Completed	
		Not applicable.
F.	NEW PLANNING ELEMENTS	
		Not applicable.
G.	ALLOCATION OF RESPONSIBILITY	
		1. Planning - DEQ.
		2. Implementation -

State and private forest lands - OSFD a.

Federal forest lands - BLM, USFS. b.

#### ASHLAND WATERSHED MANAGEMENT

#### A. IDENTIFIED PROBLEM

Since 1955, when the Forest Service enacted a multiple use concept for the Ashland Watershed, road construction, logging and skiing activities have resulted in serious erosion and resulting sediment accumulation in Reeder Reservoir. Erosion from lands and mass soil movement accounts for about 80% of the watershed erosion.

### B. COMMITTMENTS

RVCOG has committed to the development of a management plan for the watershed complete with intergovernmental agreements between the Forest Service and the City of Ashland.

#### C. ACCOMPLISHMENTS

- A report has been prepared which outlines specific management recommendations. Major recommendations include:
  - (a) Strictly limit road construction.
  - (b) Repair and revegetate all cut and fill areas.
  - (c) Eliminate mining and exploration activity.
  - (d) Tightly regulate recreational uses.
  - (e) Eliminate harvesting unless a further increase in sediment accumulation will not occur.
  - (f) Monitoring programs should be expanded.
- The Forest Service and the City of Ashland have executed an intergovernmental agreement. Major provisions are as follows:
  - (a) An earlier 1929 agreement was re-affirmed. The intent clearly is to conserve and protect Ashlands water supply through appropriate watershed management.
  - (b) The Forest Service will develop both an interim plan and a long-range comprehensive plan for watershed management.
  - (c) The Forest Service will develop a water monitoring program.
  - (d) Ashland will assist the Forest Service in plan preparation and cooperate in watershed management.

# ASHLAND WATERSHED MANAGEMENT

D. CERTIFICATION/ APPROVAL

# Conditional.

E. WORK TO BE COMPLETED

F.

- By October 1978 the Forest Service should complete the short-range (interim plan). Adoption of interim plan by December 30, 1978.
- 2. By 1981 the Forest Service should complete the long-range Comprehensive plan, including and expanded monitoring program.

None currently identified.

G. ALLOCATION OF RESPONSIBILITY

NEW PLANNING ELEMENTS

- Designated Planning Agency U. S. Forest Service with Ashland in a review capacity.
- Designated implementation agency U. S. Forest Service.

# MANAGEMENT OF REEDER RESERVOIR

F. NEW PLANNING ELEMENTS

None currently identified.

- G. ALLOCATION OF RESPONSIBILITY
- 1. Designated planning agency City of Ashland.
- Designated implementation agency City of Ashland.

### PUBLIC PARTICIPATION

# A. IDENTIFIED PROBLEM

Past planning efforts in the Bear Creek Basin, particularly Master Sewerage and related planning, have been largely unsuccessful. The lack of success has been due, in part, to lack of adequate public participation.

# B. COMMITMENTS

RVCOG committed to develop and implement a public participation program.

# C. ACCOMPLISHMENTS

 The RVCOG disseminated information regarding the 208 program through brochures, newsletters, visual aids, press releases, newspaper and television coverage.

- The RVCOG developed an extensive committee structure to solicit public input.
- The RVCOG held numerous public meetings throughout the Bear Creek Basin to solicit public input.
- 4. Public input was utilized in plan formulation.
- D. CERTIFICATION/ APPROVAL

Conditional

E. WORK TO BE COMPLETED

RVCOG should document carefully the impact of public involvement on 208 plan development and the completed 208 plan.

F. NEW PLANNING ELEMENTS

Public involvement should be included in the proposed individual waste disposal program and all new planning elements.

G. ALLOCATION OF RESPONSIBILITY

RVCOG

Attachment B

Rogue Valley Council of Governments Greater Bear Creek Basin Waste Treatment Master Plan

# PLAN IMPLEMENTATION

# AND MANAGEMENT

# CHAPTER XI

#### GENERAL STATEMENT

The Implementation portion of the plan is critical. To have any chance of success, any technical plan must rely on implementation by competent management organizations utilizing adequate financial programs.

The purpose of this section of the plan is to describe the management and institutional arrangements which will be utilized to implement the technical aspects previously outlined. The analysis begins with a discussion of the current management and institutional arrangements in effect in the study area. Next an implementation program is outlined with general responsibilities assigned for various functions grouped under the headings of "Supervision", "Implementation", and "Enforcement".

(A suggested implementation program for on-site disposal is outlined in Chapter X.)

#### INVENTORY OF MANAGEMENT AGENCIES

In 1977, centralized collection and/or treatment of waste materials was provided by ten governmental units including eight cities, one sanitary authority, and Jackson County (park facilities). The main features of the system at the present time are the regional treatment facility owned and operated by the City of Medford and the collection systems owned and operated by the Bear Creek Valley Sanitary Authority, and the Cities of Medford, Central Point, and Phoenix. In addition the City of Ashland operates waste collection and treatment facilities for that city (estimated population: 15,000) which may one day extend service to the area south of the City. Together, these systems accommodate more than 90 percent of the needs in the study area.

XI-I

Table XI-1 is an inventory of the management arrangements presently in effect in the study area. It describes the services presently provided by the various entities, how these entities are funded, and the regulatory activities of each. This table has been constructed to illustrate how the various existing management agencies currently meet the criteria for management agencies outlined in Section 208 (c)(2)(A-I) of PL 92-500. As indicated in the table, most of the management agencies currently in existance meet the criteria established by the Act.

#### REGIONAL SEWERAGE SYSTEM

On March 3, 1969, several entities entered into an agreement providing for the establishment of a regional sewage treatment plant to be owned and operated by the City of Medford. Under the provisions of the agreement, waste collection service is provided by several entities in the Valley and treated by the City of Medford at its plant on the Rogue River. The cost of operating that facility / is divided among the various entities contributing wastes to the system. As a part of the agreement, a "Regional Rate Committee" was established among the members to provide wholesale rates for this treatment service. The entities involved in this arrangement and the estimated population served by each is as follows:

City of Medford	34,900
City of Central Point	5,800
City of Phoenix	1,600
Bear Creek Valley	
Sanitary Authority	13,000
	55,300

In addition to the above, Jackson County is also a party to the agreement but does not participate on the Regional Rate Committee.

Since its inception, the Regional Rate Committee has met at least annually to establish wholesale treatment charges and to discuss other matters of common concern.

XI-2

INVENTORY OF EXISTI	NG M/	ANAGI	EMEN'	t ar	RANG	EMEN.	TS					$\geq$	
	BCVSA	Ashland	Central Point	Eagle Point	Gold Hill	Jacksonville	Medford	Phoenix	Rogue River	Shady Cove++	Talent***	Jackson Count	
Service Presently Provided						 							
Collection Inside Jurisdictional Boundary Outside Jurisdictional Boundary	X X	X X	X	X	x	x	X X	x	X				
Treatment	*X	X		Х	x	x	x		x	- - - - -			
Funding									 				
Sewer Fund Self Supporting (Operation and Maintenance)	x	Х	Х	Х		x	X	x	Х				
Types of Funding User Charges	X	Х	Х	X	X	X	x	x	x				
Based on flow/strength Volume Discounts	X	Х	X				Х	X					
Industrial Cost Recovery Connection Fees Property Taxes	X X X	X X	X X	Х	• <u>Х</u> Х	X	•	X X	X				
Assessments Bond Issues	X X	Х	Х	X X		X X	X X	X	X				
EPA Construction Grant FHA Loan Program EDA Grant Program	x			Х	X	Х		Y	X	X			
Member of Regional Rate Comm.	X		Х	 			X	X					
Regulatory													
Authority to Refuse Wastes	X	X	Х	х		x	х	x	x				
Authority to Require Pretreatment	x	Х	Х	Х		-	Х	Х					
Regulates On-Site Disposal						<b>•</b>							ł

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\*\* Scheduled to begin operation Fall of 1978
\*\*\* Waste Collection Service Provided by the Bear Creek Valley Sanitary Authority

XI-3

RESPONSIBILITIES IMPLEMENTATION

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RESPONSIBILITY	INDIVIDUALS	CITIES	COUNTY	SPECIAL DISTRICT	BODIES FORMED BY INTER-GOVERNMENTAL AGREEMENT	RVCOG	<u>STATE</u>	FEDERAL
Overall <u>SUPERVISION</u> of Water Quality	Programs							
Coordination of Water Quality			ς.		х	X (A-95)	Х	
Continuous Planning Regional Planning Facilities Planning		X	X	X X	• •	X	X	
Monitoring		Χ*		χ*		Х	Х	Х
Support of Supervision Function		X	Х	Х				Х
IMPLEMENTATION								
Construction, Operation and Maintenance of Facilities		Х	X**	Х				
Financing		X	χ**	Х			Х	х
Construction of Individual On-Site Disposal System	Х							
Individual On-Site Disposal System Inspection & Maintenance Program*	**		X	X			х	
ENFORCEMENT								
Land Use Controls		X	Х	Х				
Permits and Licenses		Х	Х	Х			Х	
Standards		Х	X	Х			Х	× X
Fiscal Policies (pricing, etc.)		X		Х	Х			
Sancitons		Х	Х	Х			Х	

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\* Sewerage System Monitoring
 \*\* Park Facilities
 \*\*\* The actual Administration and Implementation of this Element of the Plan is Tentative

- 1. The establishment of water quality standards, applicable to each segment or body of water in the basin.
- 2. Point source management provisions, including significant discharge inventories and data assembly.
- 3. Schedules of compliance or target abatement dates.
- 4. Waste load analysis in water quality segments. For each parameter in violation of standards, point source load allocations are established to assure attainment of applicable instream water quality standards.
- 5. A recognition of nonpoint sources in water quality segments.
- 6. The assessment of needs for municipal wastewater treatment facilities. This assessment is used to develop a detailed cost estimate of future needs submitted biennially to Congress through the EPA. The biennial report forms the basis for allocations to the various States of Federal construction grant assistance.

Thus, the DEQ through its Basin Plans will perform an important review function regarding water quality within the study area.

In addition, the Rogue Valley Council of Governments (RVCOG) will perform in this capacity as part of its clearinghouse responsibilities under OMB Circular A-95. Under A-95, the RVCOG is responsible for coordinating applications for federal assistance within the local area. Among other things, each grant application presented must be in conformance with local plans in effect in the area, including the proposed Waste Treatment Master Plan. Thus, the Council of Governments will be in a position to review the programs proposed which may impact water quality.

Finally, it is proposed that the Rogue Valley Council of Governments perform an additional coordination function. It is proposed that the RVCOG periodically review the status of water quality within the study area and undertake new initiatives as needed to assure continued attainment of water quality objectives. This would involve at least the following functions:

1. A periodic review of in-stream water quality data in relation to State and Federal Water Quality standards.

- 2. A periodic evaluation of the effectiveness of existing water quality programs in achieving these objectives.
- 3. The initiation of plan revisions, including special projects on particular water quality problems as appropriate.

#### CONTINUOUS PLANNING

#### REGIONAL

Regional Planning for Water Quality will be administered by two entities. Jackson County will continue to coordinate the land use aspects of water quality planning under its responsibilities under Senate Bill 100. The Rogue Valley Council of Governments will continue to administer the 208 Water Quality Management Planning Program.

#### FACILITIES PLANNING

Facilities planning for individual waste treatment facilities will continue to be administered by the implementing jurisdiction having statutory responsibility, as at present.

#### MONITORING

The monitoring of in-stream water quality will be carried out by a number of entities in the area. First, the various cities and the BCVSA will continue to monitor water quality in conjunction with their waste collection and treatment programs. Secondly, the Rogue Valley Council of Governments will monitor in-stream water quality as a part of its continuing 208 planning process. Finally, the Oregon Department of Environmental Quality and other State and Federal agencies will monitor water quality to assure that State and Federal in-stream standards are met. The coordination of these programs will be the responsibility of the Rogue Valley Council of Governments 208 Program.

XI-7

#### SUPPORT OF SUPERVISION FUNCTION

Several entities may share in the support of the functions indicated under the general heading of "Supervision". These include the cities, Jackson County, and the BCVSA which may participate in the support of such functions through in-kind participation. Finally, the Federal Environmental Protection Agency will provide matching funds from future 208 allocations.

#### IMPLEMENTATION

Until the year 2000, it is intended that the entities actually involved in the construction, operation, and maintenance of waste collection and treatment facilities will remain essentially as outlined under "Inventory of Current Arrangements" (Table XI-1). That is the regional system (consisting of treatment at the Medford Sewage Treatment Plant with collection provided by the Bear Creek Valley Sanitary Authority and the Cities of Medford, Central Point, and Phoenix) will continue to be the predominant feature of the system. In addition, it is intended that in the event that service is provided, the City of Ashland will be the entity to provide sub-regional collection and treatment services where needed, south of the BCVSA southern boundary. Finally, a number of smaller entities will continue to provide collection and treatment service for the residents of their communities. These include the Cities of Shady Cove, Eagle Point, Gold Hill, and Rogue River.\*

<sup>\*</sup> The City of Jacksonville is presently involved in a 201 Step I study which will determine the basic approach to be taken by that entity.

#### ENFORCEMENT

During the Study period, it is anticipated that the various enforcement tools and the entities which will utilize them will remain essentially unchanged. Thus, land use controls (zoning ordinances, sub-division ordinances, etc.) will continue to be exerted by the County or by the City having statutory jurisdiction. Similarly, permits, licenses, standards and sanctions will continue to be utilized by the general or special purpose unit of local government having statutory jurisdiction.

Pricing will continue to be the province of those units providing waste collection and treatment service. Specifically, the Regional Rate Committee will continue in the future to serve as the pricing vehicle for wholesale treatment rates to the member entities.

Finally, it is anticipated that the Oregon Department of Environmental Quality will continue to provide some enforcement functions through the issuance of permits and licenses, the establishment of standards, and the application of sanctions (fines, etc.) in the event of violations to any of the above.

XI-9

ROBERT W. STRAUE Governor



OFFICE OF THE GOVERNOR STATE CAPITOL SALEM, OREGON 97310

June 28, 1978

Mr. Donald P. Dubois Regional Administrator U. S. Environmental Protection Agency Region X 1200 Sixth Avenue Seattle, WA 98101

Dear Mr. Dubois:

The Department of Environmental Quality has completed the review of the Lane Council of Governments 208 Water Quality Management Plan. Based on the review and the Department's recommendations, I am hereby certifying the plan and designating management agencies for planning and implementation.

The plan emphasizes the control of municipal wastes in the Eugene-Springfield Metropolitan Area, the Lowell-Dexter Area, and Coburg; a management program for individual waste disposal; and control of urban runoff. Emphasis on these waste sources is consistent with the Department's identified water quality needs in the 208 planning area.

The plan has been found to be in conformance with the Department's approved planning process. The process utilized to develop the plan was reviewed and approved by the Department prior to plan initiation.

The plan will be accepted as a detailed portion of the water quality management strategy for the state. Specifically, the plan will be approved by the Environmental Quality Commission as a part of the Department's Water Quality Management Plan. The tentative approval date is October 1978.

The plan is generally in conformance with applicable state and local regulations governing land use and protection of the environment. However, as soon as practicable, after urban growth boundaries are established and approved by the Land Conservation and Development Commission for Lane County and the cities within Lane County, the plan must be reviewed. If necessary, the plan must be changed to conform with the approved urban growth boundaries. Mr. Donald P. Dubois June 28, 1978 Page 2

Management agencies for planning and implementation are identified in Attachment A, Item G, Allocation of Responsibility, for each plan element. Management agencies are further identified in the Lane Council of Governments <u>208 Wastewater Management Program Summary Report</u>. This summary is presented as Attachment B. The designated management agencies have adequate authority to implement the plans and meet federal requirements set forth in 40 CFR 131.11(0).

Particular attention should be given to the allocation of responsibility. This element presents the agreed upon division of planning responsibility and authority between the Department and the Lane Council of Governments pertinent to 208 water quality planning. This allocation of responsibility will be subject to annual review.

Attachment A endeavors to provide a brief overview of the plan. In particular the attachment gives an indication of the status of both point and non-point waste sources in the planning area. Water pollution problems are identified along with the agency committments to address the problems. The major accomplishments are summarized. Plan approval is indicated where applicable. Additional planning which should be undertaken is identified. Finally, the above mentioned allocation of responsibility both for planning and implementation is presented.

Sincerely,

Governor

RWS:aes Attachment

# MUNICIPAL WASTE TREATMENT (Eugene-Springfield Metro)

A. IDENTIFIED PROBLEM

> An agreed upon areawide solution to the Eugene & Springfield municipal treatment problem had not been resolved. The previous facility plans left the area ineligible for Step 1 grant authorization. No implementing mechanism was available to develop and implement a regional plan.

B. COMMITMENTS

Coordinate and staff efforts of the Metro Sewer Advisor Commission to achieve a final and areawide agreement on a waste treatment solution for Eugene and Springfield. Set up an implementation mechanism to secure a regional agreement.

#### C. ACCOMPLISHMENTS

- Completed facilities plan for Eugene-Springfield area with analysis of alternatives and financing options.
- A Joint Powers Agreement on a single regional facility and financing mechanisms. Establishment of the Metro Wastewater Management Commission (MWMC) as the appropriate implementing agency.
- 3. Step 11 design grant application made for a single regional facility. Grant awarded.
- D. CERTIFICATION/ APPROVAL
- Full
- E. WORK TO BE COMPLETED

#### None

F. NEW PLANNING ELEMENTS

# None - MWMC operating with 208 Statewide and Step II grants.

- G. ALLOCATION OF RESPONSIBILITY
- Designation of MWMC as management agency for the area (see also Attachment B).
- Water quality standards, 303e planning elements -DEQ.

#### COMPREHENSIVE SEWERAGE FACILITY REVIEW

#### A. IDENTIFIED PROBLEM

Need to assess facility planning problems and process in small and medium sized cities with reference to 201 Grant process.

#### B. COMMITMENTS

Produce facility review document. Identify status and problems in facility planning as well as future planning needs.

#### C. ACCOMPLISHMENTS

Interim Facilities Report as mid-course status report. Comprehensive Sewerage Facilities Review with recommendations for future planning needs and problem prioritization for incorporated and unincorporated areas.

#### D. CERTIFICATION/ APPROVAL

Conditional

### E. WORK TO BE COMPLETED

Investigation of regional 0 & M alternatives. Action dependent on revision of construction priorities and 1977 Water Quality Act amendments. Complete 0 & M alternative study by October 1978.

# F. NEW PLANNING ELEMENTS

- Planning efforts on identified priority areas as federal funds are available. L-COG has submitted a proposal for identified rural community priority areas. Pursuit of regional 0 & M cost effective option.
- L-COG should develop waste load projection for municipal and industrial point sources as per delineated sewerage service areas during update of plan in FY 1979.
- G. ALLOCATION OF RESPONSIBILITY
- L-COG responsible for periodic evaluation of priority list and planning progress. Revisions to include new construction grant priority list utilizing criteria adopted by the EQC May 1978. Lane County responsible for unincorporated area comprehensive planning. Other cities are management agencies within their urban areas (see Attachment B).
- Revisions to and updates of Sewerage Facility review - L-COG.
- Water quality standards, 303e planning elements -DEQ.

# MUNICIPAL WASTE TREATMENT (Lowell-Dexter Facilities Plan)

IDENTIFIED Α. PROBLEM

> Incorporated area (Lowell) under NPDES Permit to eliminate discharges to Dexter Reservoir. Nearby unincorporated community (Dexter) with serious septic system problems. Nearby park facilities in the process of preparing expansion plans.

- Β. COMMITMENTS
- Identify study area and pursue a facility 1. plan which would include analysis of regional facility options.
- Aid the City of Lowell in achieving a 2. facility planning agreement with the DEQ.
- Pursue public involvement in Dexter and reach 3. a decision on facility planning for the community.
- **ACCOMPLISHMENTS**
- 1. Facility plan completed for Lowell with plan review provisions. Agreement between Lowell and DEQ on sequence of compliance actions.
- Decision by Dexter not to pursue a facility 2. option. Request by Lane County with subsequent approval by EQC of building moratorium in the Dexter core community.
- Ð. CERTIFICATION/ APPROVAL

# Conditional

None

WORK TO BE Ε. COMPLETED

#### F. NEW PLANNING ELEMENTS

- G. ALLOCATION OF RESPONSIBILITY
- Support Lane County efforts to find a viable 1. solution to existing septic system problems in Dexter including evaluation of alternative on-site waste management options.
- Aid Lowell in evaluation of facility plan and 2. regionalization options at appropriate (5 year) intervals.
- 1. Lane County is designated management agency for Dexter Area (see Attachment B).
- City of Lowell is designated management agency 2. for their treatment plant(See attachment B). Discharge standards and water quality standards - DEQ.

С.

MUNICIPAL WASTE TREATMENT (Coburg Facilities Plan)

A. IDENTIFIED PROBLEM

> Coburg currently relies on failing septic systems and is faced with possible burden of sewerage facility construction.

B. COMMITMENTS

Prepare Facility Plan.

C. ACCOMPLISHMENTS

- 1. Facility plan completed and adopted. Selected alternative was septic tank maintenance.
- 2. City adoption of Nuisance Ordinance as option for maintenance of septic systems within urban service area.
- D. CERTIFICATION/ APPROVAL

Conditional

E. WORK TO BE COMPLETED

> Investigate with City of Coburg the possible methods for implementation of the management ordinance and produce a management plan.

- F. NEW PLANNING ELEMENTS
- 1. Support Coburg efforts to plan for implementation of management ordinance.

2. Review facility plan option at intervals for effectiveness of septic management.

G. ALLOCATION OF RESPONSIBILITY

City of Coburg designated as appropriate management agency for Nuisance Ordinance (see Attachment B).

ELEMENTS

SLUDGE DISPOSAL

A. IDENTIFIED PROBLEM

> No identified sludge disposal problems in the Metro Area independent of the Metro treatment facility planning process.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Full. To be planned under 201 facility design for Metro facility.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

Not applicable.

G. ALLOCATION OF RESPONSIBILITY

Metro Wastewater Management Commission assumed this responsibility under Joint Powers Agreement.

# INFILTRATION/INFLOW

A. IDENTIFIED PROBLEM

//I problems covered under 201 facility planning.

B. COMMITMENTS

Not applicable except in Lowell (see Lowell facility plan).

C. ACCOMPLISHMENTS

Not applicable except in Lowell (see Lowell facilities plan).

D. CERTIFICATION/ APPROVAL

Full

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

Not applicable.

G. ALLOCATION OF RESPONSIBILITY

Local governments through 201 facility planning. (See Attachment B.)

INDUSTRIAL WASTES

Α. IDENTIFIED PROBLEM

> Cumulative effect of industrial discharges not reviewed. Industrial overland flow a potential problem with no supportive information.

₿. COMMITMENTS

> Survey industrial wastes and assess point, nonpoint and sanitary discharges.

ACCOMPLISHMENTS С.

- 1. Industrial Wastes Survey Report. Identification of overland flows as most significant problem.
- 2. Identification of areas for cooperative industrial waste management planning.
- Identification of industrial overland flows an 3. important element in Urban Runoff pollution.

CERTIFICATION/ D. APPROVAL

Conditional

E. COMPLETED

- Investigation of industrial runoff impacts. 1.
- Integrate industrial runoff management into 2. Urban Runoff planning.

F. NEW PLANNING ELEMENTS

> Develop industrial storm runoff BMPs and specific management plans. Recommendations on BMPs and designated management agencies to be complete by October 1978.

G. ALLOCATION OF RESPONSIBILITY

> L-COG has Urban Runoff planning responsibility with Eugene/Springfield/Lane County cooperation and support. Industrial pretreatment is responsibility of Metro Wastewater Management Commission in Metro area. DEQ is responsible for regulation of treatment and control of point source industrial wastes.

WORK TO BE

# INDIVIDUAL WASTE DISPOSAL

#### A. IDENTIFIED PROBLEM

Many communities have identified failing septic systems problems. There are 40,000-50,000 systems, many in known poor soil areas. There is a lack of public awareness of operation and maintenance requirements.

### B. COMMITMENTS

Develop septic system management policies, guidelines and BMPs. Investigate septic system management as facility option for Coburg and Dexter. Develop public awareness program.

#### C. ACCOMPLISHMENTS

- 1. Excellent public awareness program.
- 2. Policies and BMPs recommended to the county for adoption (action now in progress).
- Developed optimal management guidelines manual prepared by county for distribution to new septic tank owners.
- 4. Coburg adopted septic system nuisance abatement ordinance.
- 5. Building moratorium adopted by Lane County and EQC for Dexter.
- D. CERTIFICATION/ APPROVAL

#### Conditional

- E. WORK TO BE COMPLETED
- 1. Complete 0 & M Manual by October 1978.
- Develop and adopt enabling ordinance for community management of septic and alternative on-site systems by October 1978.
- Develop program for groundwater investigation and protection in River Road/Santa Clara; subject to federal funding. Work to begin about October 1978 and complete by April 1980.

### F. NEW PLANNING ELEMENTS

See also reference to Comprehensive Sewerage Facility Review waste management planning for priority unincorporated communities as identified in this attachment. Planning to begin in FY 1979 if federal funding is available.

#### G. ALLOCATION OF RESPONSIBILITY

- Septic systems management planning by L-COG and Lane County.
- 2. Implementation by Lane County or DEQ.

# WATER QUALITY PROTECTION

A. IDENTIFIED PROBLEM

Need to coordinate planning for beneficial uses on major resource streams for 20 year planning period.

### B. COMMITMENTS

Develop continuing planning program to prioritize water quality protection needs and coordinate comprehensive planning with water quality management.

# C. ACCOMPLISHMENTS

Summary assessment of priority requirements, found in Water Quality Protection Program, revised draft. Recommendation for continuing work needs.

D. CERTIFICATION/ APPROVAL

# Conditional

E. WORK TO BE COMPLETED

Coordinate water quality planning with comprehensive metropolitan and suburea plans.

F. NEW PLANNING ELEMENTS

> Implement tie-in between comprehensive planning and water quality protection plans. Develop basin specific protection plans as needed.

- G. ALLOCATION OF RESPONSIBILITY
- L-COG is Areawide Water Quality Management Planning Agency. Lane County is comprehensive planning agency for unincorporated areas of the 208 area.
- 2. DEQ is responsible for water quality standards, 303e planning elements.

# NONPOINT SOURCES (Silviculture)

PROBLEM Sediment from silviculture is a major water quality concern from the extensive federal and private timberlands in this area. COMMITMENTS

Problem severity evaluation needed.

с. ACCOMPLISHMENTS

> Identification of problem is statewide priority.

D. CERTIFICATION/ APPROVAL

Not applicable.

Ε. WORK TO BE COMPLETED

None

F. NEW PLANNING ELEMENTS

None currently identified.

- ALLOCATION OF G. RESPONSIBILITY
- State Department of Forestry designated respon-1. sible management agency on state and private lands.
- 2. BLM, USFS designated management agencies on federal lands.

Β.

IDENTIFIED

Α.

# MINING

A. IDENTIFIED PROBLEM

Not applicable. Mining is not a pollution source.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable. Mining is not a pollution source.

E. WORK TO BE COMPLETED

Not applicable.

- F. NEW PLANNING ELEMENTS
- G. ALLOCATION OF RESPONSIBILITY

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Not applicable.

Not applicable.

# NONPOINT SOURCES (Agriculture

# Sediment and erosion of agricultural land stream banks is a major contributor to Water Quality problems in Willamette River basin. There is little data on the severity of the problem. Β. COMMITMENTS Problem identification and evaluation. С. ACCOMPLISHMENTS Preliminary identification of agriculture runoffs as lesser priority. D. CERTIFICATION/ APPROVAL Conditional WORK TO BE Ε. COMPLETED None F. NEW PLANNING ELEMENTS the following: 1.

L-COG has submitted a grant proposal to accomplish

- Data collection and more detailed problem survey.
- Coordination of State DEQ, SCS/SWCD, RC&D 2. and 208 roles.
- Development and implementation of BMPs for 3. agriculture lands.

Initiation of the above planning elements will be subject to availability of federal funding and DEQ implementation policy for agriculture.

ALLOCATION OF G. RESPONSIBILITY

IDENTIFIED PROGRAM

> Designations for planning and implementation to be determined.

# HYDROLOGIC MODIFICATIONS

A. IDENTIFIED PROBLEM

Not applicable. Hydrologic modifications are not a pollution source.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable. Hydrologic modifications are not a problem.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

G. ALLOCATION OF RESPONSIBILITY Not applicable.

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Not applicable.

# CONSTRUCTION

Α.	IDENTIFIED PROBLEM	
		Construction related pollution problems have not been identified or assessed separately from urban runoff.
Β.	COMMITMENTS	
		Not applicable.
с.	ACCOMPLISHMENTS	
		Not applicable.
D.	CERTIFICATION/ APPROVAL	
		Not applicable.
E.	WORK TO BE Completed	
		Not applicable.
F.	NEW PLANNING Elements	
		DEQ should design a workplan for a statewide construction management and control program by October 1978. Work to be undertaken as federal funds are available.
G.	ALLOCATION OF RESPONSIBILITY	
		<ol> <li>Urban runoff construction problems are being addressed by L-COG as part of the urban runoff program.</li> </ol>
		<ol> <li>DEQ is responsible for design of a statewide construction management program.</li> </ol>
		3 Implementation - to be determine

### URBAN RUNOFF

### A. IDENTIFIED PROBLEM

Water quality problems in millraces, storm channels and small receiving streams. Negative impacts on beneficial uses.

# B. COMMITMENTS

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Gather storm and background data to identify extent of problems. Model runoff and loadings to year 2000. Identify potential BMPs and future studies.

#### C. ACCOMPLISHMENTS

- Clearly identified urban/industrial related problems.
- 2. Waste and volume projections to year 2000.
- 3. Preliminary BMP identification.
- 4. Policy and continuing program recommendations, support for continued work.
- 5. Established urban storm runoff task force.

# D. CERTIFICATION/ APPROVAL

Conditional

E. WORK TO BE COMPLETED

L-COG should complete the following work by October 1978:

- Inventory existing and potential special problems, control options, jurisdictions and responsibilities.
- Inventory existing management practices, e.g., street cleaning.
- Develop recommended BMPs and urban runoff policies.
- 4. Agreements for designation of management agencies.

# URBAN RUNOFF

### F. NEW PLANNING ELEMENTS

L-COG has submitted an urban runoff proposal. Subject to federal funding, L-COG will begin the following work by about January 1979. Completion dates are indicated below.

- 1. Adopt BMPs for urban runoff by FY 1980.
- 2. Develop basin specific management plans by FY 1980.
- 3. Adopt special management plans for construction and industrial runoff by FY 1980.

# G. ALLOCATION OF RESPONSIBLITY

1. Planning - L-COG

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2. Implementation - to be determined.

# PUBLIC PARTICIPATION

A. IDENTIFIED PROBLEM

> Past regional planning efforts pertinent to water quality in the L-COG area have been largely unsuccessful. The lack of success has been due, in part, to lack of adequate public participation.

B. COMMITMENTS

L-COG committed to develop and implement a public participation program.

#### C. ACCOMPLISHMENTS

- L-COG disseminated information regarding the 208 program through brochures, newsletters, visual aids, press releases, newspaper and television coverage.
- L-COG developed an extensive committee process to solicit public input.
- L-COG held numerous public meetings to solicit public input.
- 4. Public input was utilized in plan formation.
- D. CERTIFICATION/ APPROVAL

Conditional

E. WORK TO BE COMPLETED

None identified.

F. NEW PLANNING ELEMENTS

Public involvement should be included in all new planning elements.

G. ALLOCATION OF RESPONSIBILITY

L-COG

ATTACHMENT B Lane Council of Governments 208 Wastewater Management Program Summary Report

#### PLAN DESCRIPTION

#### Program Management

Work activities were divided among three types of operatives; L-COG, Lane County, and private consulting firms. L-COG was to provide inhouse staff responsible for the basic program management and coordination activities, including collection of data, technical analysis, and management assessment activities. A major contract was to be made between L-COG and the Environmental Management Department - Water Pollution Control Division of Lane County to perform specified activities of nearly all work elements including technical and management staff support and laboratory facility service. Finally, major work tasks of certain elements beyond the capacity of L-COG or Lane County were to be let under separate project contracts to private consulting firms.

The program effort from July through December 1975 was expended mainly in developing a detailed control program acceptable to EPA, in the hiring of the in-house 208 Program group, and in developing scopes of work for the Lane County and consultant contract activities.

During this period, the L-COG 208 group formed a Technical Advisory Committee (TAC) and a Citizens Advisory Committee (CAC). The TAC was composed of staff personnel from local planning and public works departments, from state and federal agencies, from special service and utility agencies, and from private industry. All TAC members had technical expertise either directly related to wastewater control or in associated fields of concern, e.g., local planning, water and wildlife resources, air quality, energy, etc. The TAC established its own internal management format and the L-COG 208 group served as staff support. The TAC was in a position to advise the L-COG Board of Directors either directly or through staff, and they often did so, occasionally with positions contrary to staff recommendations.

The Citizens Advisory Committee (CAC) was created with the intent of establishing a group with a broad cross section of interests and geographical representation that would serve as a liaison and advisory body in the 208 efforts to inform and be informed by the general citizenry. The interest cross section was established and included foresters, housepersons, business people, farmers, environmentalists, and others. Obtaining a good geographical cross section from the entire planning area was not totally achieved due to large travel distances and to areaspecific impacts of many of the projects. There were many volunteers from the Eugene-Springfield area, but some positions for rural areas remained open or were intermittently filled. This problem was largely solved by developing "directed" public involvement programs for each program element that was location or group specific: In most cases this public involvement effort dealt primarily with self-organized groups not

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directly staffed or authorized by L-COG. This dispersion of public involvement activity did not limit, but rather supplemented the advice and information role of the CAC.

Initially, an executive steering committee was formed to review and monitor budgetary matters and program goals. This committee was to be comprised of agency managers and executives. It was soon decided, however, that these personnel were under severe scheduling constraints and that the overall review function was being adequately handled by the TAC and the L-COG Board and this executive committee was disbanded.

In the development of regional sewerage alternatives for the Eugene-Springfield Metropolitan area as directed by EPA and the DEQ, it became obvious that the 208 TAC was not the appropriate body to make decisions for the metro area. Previously, the three governing bodies in this planning effort (Eugene, Springfield, and Lane County) had formed the Metropolitan Sewer Advisory Commission (MSAC), and this group had been intimately associated with the metropolitan sewerage planning process for several years. The commission was recharged with this planning responsibility, and the MSAC and L-COG agreed that budgetary and staff support should be provided through the 208 project, thus satisfying both L-COG and MSAC needs and DEQ grant requirements. Considerable staff support was diverted to this effort, and in all matters relating to metro sewage treatment needs, the 208 program was under the direction of the MSAC. Since several members of the L-COG Board also were involved in the metro sewer planning, this double direction of 208 effort provided an effective coordination link in the process.

In July 1976, a major shift in 208 planning emphasis was required by EPA because of congressional pressures for the program to produce easily observable and judgeable outputs. This emphasis meant a strong shift toward the "implementation" aspect of planning, with success being measured in terms of "hard outputs" and water quality improvements actually achieved. This emphasis required a paring down of the initial program to those problems that clearly needed identification or for which plans could be implemented. This contrasted with the initial guidelines which focused more heavily on comprehensive areawide general management plans and required a redefinition of the Work Program with a greater detail of work specification, elimination of some activities which could not be completed in the two-year period, and a re-evaluation of projected work "outputs." This new direction caused few problems for the L-COG 208 project, since this process was already well underway and the work elements had already evolved into separate and independent goal-specific projects. The only significant shifts in the L-COG 208 direction involved the formal elimination of several data base, survey, and pilot study elements that would not have resulted in implementation and which were not on the "critical importance" list. The Project Control Document was revised to reflect necessary changes. A secondary result of this program shift was the abandonment of plans to draft one single comprehensive "Areawide Management Plan" document, and the decision to pursue individual, project-specific planning/implementation reports for separate regulation compliance and certification suitability review.

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In June 1977 an extension of the 208 planning period to October 31, 1977, was authorized by EPA. L-COG requested and was awarded this fourmonth extension period to complete projects then underway. This extension was important to our implementation efforts because of the vagaries of the political processes, because our public involvement programs were more involved and time consuming than anticipated, and because the persistence of drought conditions stretched our non-point problem identification activities over a longer period of time. Much of the work of holding formal public hearings and preparing draft and final plan documents was performed during this extension period.

It was found that a two and one-third year period is too short to carry projects from data gathering through planning and public involvement to adoption and implementation, except in cases where the output goals are limited and very specific in extent or unless most of the basic background data is already available in accessible form.

The management activities involved in tying this entire process into the framework of EPA regulations and requirements and DEQ statewide planning guidelines was a staff time demand that subtracted several months from the effective working period. Likewise, local coordination and compliance maintenance with local plans further reduced the direct "hard output" management time allocation. Both of these project demands were important and integral elements of the entire 208 project process, but neither is directly reflected in the discussion of specific projects nor is elsewhere covered in the overall management plan description.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- "208 Wastewater Management for the Willamette River Drainage Area of Lane County," L-COG, January 1976 (a brochure).
- "208 Wastewater Management for the Willamette River Drainage Area of Lane County - What's Happening in the Lane County 208 Project, How it Affects You and Your Neighbors, " L-COG 208 Citizens Advisory Committee Newsletter #1, January 1976.

OUTPUTS:

- Citizens involvement and public information through the 208 Citizens and Technical Advisory Committees.

#### A. Data Base Activities

Throughout the first year of the project (1975-76) a great deal of effort was directed toward the development of the background data necessary to development recommendations for specific wastewater management plan elements. Much of the data was collected from other sources, while some was generated directly through sampling programs. Although most of the data was project specific, general background data was also developed with the intention of incorporating all available data into a comprehensive computerized water quality data bank This data bank was to be used by the 208 project as planning progressed beyond the initial two-year period and was also to be available as a regional resource for all other parties interested in water quality protection. The shift in emphasis in 1976 to "hard outputs" required the abandonment of most of the general data collection and codification activities, while staff resources were directed toward project-specific data collection, in particular relating to urban runoff and individual waste disposal.

Most of the data collected is now available through incorporation into the specific project report documents and appendices, while the rest of the data remain in "open" files of the 208 project. A portion of the water parameter and urban area land use data was computerized and is available from the L-COG research section in printout or map-plot form as appropriate. Additionally, published and unpublished information has been gathered and is available from various other sources on the subjects of silviculture, agriculture, sediments and erosion, residual waste, non-point sources, urban runoff, pesticides, sewage treatment, structural modifications, industrial waste treatment, municipal waste generation, stream flow, statewide planning, and remote sensing. This data is maintained in open files or has been catalogued into the L-COG library. A published listing of available local data was envisioned but was not completed.

PUBLICATIONS AND SUBMITTAL DOCUMENTS: None - see other project elements.

OUTPUTS: None - see other project elements.

PROCESS FLOW DIAGRAMS: See Appendix A, p. 1.

DESIGNATIONS: L-COG (208 Program) is a designated Areawide Wastewater Management Planning Agency.

#### B. Eugene-Springfield Metropolitan Area Sewage Treatment Plan

This activity was begun as a result of a grant condition by DEQ for designation of L-COG as a 208 management agency requiring the inclusion of metro sewage treatment planning in the work plan. This was done because this metro process had been pursued locally for several years without a satisfactory conclusion such that EPA was able to accept 201 design and construction grant requests. Inasmuch as the combined municipal discharges of Eugene and Springfield represent the largest waste source in the area, and since the state desired to be able to proceed with its design and construction awards according to the statewide facility priority list, this was felt to be the local priority activity. A detailed description of the activities of this project element is documented in the materials sent to EPA for certification review.

Briefly, the 208 staff and the Metropolitan Sewer Advisory Commission (MSAC) prepared a management alternatives report and pursued public information and local government coordination programs. With 208 staff and consultant support, MSAC developed a joint powers agreement between Eugene, Springfield and Lane County that agreed on the construction of a regional facility and established the Metropolitan Wastewater Management Commission (MWMC) for the purpose of preparing design and construction grant requests and to later be responsible for the design, construction and operation of this facility. The MWMC applied for and was awarded a Step II design grant in mid-1977. The 208 staff and funding support was extended to all phases of MWMC implementation effort through November 1977, and additional 208 grant support will be provided to the MWMC staff until it becomes self-supporting from user revenues.

Although the metro planning process was a separate planning element, the results of this activity had direct impacts on the River Road/Santa Clara Sewer Service project. The decision not to include River Road/Santa Clara in the initial bonding district meant that this River Road/Santa Clara work activity had to be abandoned and the allocated funds transferred to the MWMC. The extensive public information program indirectly resulted in the City of Eugene formalizing their policy against the provision of urban sewer service independently of annexation. This policy was formulated with specific regard to the River Road/Santa Clara area. Concern with the long-term solution of waste disposal problems in the urban, unincorporated areas resulted in the development of information files on alternative individual waste disposal systems (primarily composting toilets), and in the pursuit of ground water testing studies in the River Road and Santa Clara areas.

The effects of the metro process on urban storm runoff planning are not direct since separate storm and sanitary systems are maintained by both cities. However, changes in the types of industrial wastes acceptable to the new facility may have impacts on industrial operations and hence on the wastes discharged or running off into the storm channels. These effects are not expected to be extensive.

The effects of the final decision to pursue a regional facility are fully described in the facility plan environmental assessment, but it is worth noting here that the overall effect on water quality will be quite dramatic in that discharge points to the river are removed from the metropolitan center and the loading to the Willamette River from these sources (in combination the largest point source loading in the upper Willamette Basin) will be reduced by over 65 percent when the facility becomes operational in roughly five years.

#### PUBLICATIONS AND SUBMITTAL ITEMS:

- <u>208 Plan: Eugene-Springfield Metropolitan Area Waste</u> Treatment Management Alternatives; 1976, L-COG/CH2M-Hill
- <u>"AGREEMENT</u>, Metropolitan Wastewater Management Commission," February 9, 1977 (Joint Powers Agreement; Eugene, Springfield, Lane County)
- "Metropolitan Wastewater Management Commission-201 Step II Design Grant Application - #C-410624-01-0," May 16, 1977
- "Information Packet", River Road-Santa Clara, June 28-June 29, 1977; MWMC, L-COG (for public meetings).
- "Information Packet", North Springfield, Glenwood, etc., July 17, 1977, MWMC, L-COG (for public meetings).
- "208 Newsletter" 208 Citizens Advisory Committee, October 1976 (#2)

### OUTPUTS:

- Preparation of a facility alternatives plan in compliance with EPA Step II grant eligibility requirements.
- Agreement to build a regional sewage treatment facility.
- Formation of a regional management commission.
- Submittal and approval of a Step II design grant application.
- Provision of 208 interim funding for the management commission.

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- Effective public information and involvement program.

- Decision on initial size of the service district.

PROCESS FLOW DIAGRAM: See Appendix A, page 2.

DESIGNATIONS: The Metropolitan Wastewater Management Commission (MWMC) has been designated as the area agency responsible for planning design, construction and operation of the metropolitan sewage treatment facility. The MWMC possesses all the legal and financial authority required by P.L. 92-500 to be able to receive grants and perform these functions. It is understood that L-COG will remain the designated areawide agency for the utilization of 208 planning monies.

#### C. River Road/Santa Clara Sewer Service Project

The River Road/Santa Clara Project was included as a program element since this urbanized area contains over 8,000 homes on individual waste disposal systems within the metro area. There has been growing concern with ground water contamination, and it was felt that sewering was a probable eventual solution that had not yet been adequately provided for. This project was not incorporated into the metro sewer study since sewering is not eligible for 201 funding and involves serious questions of annexation, service district boundaries, land use priorities, etc., that are not inherent in the construction of a regional facility. It was felt that the Cities and County might not agree on a treatment facility option if the question of sewering policy regarding contiguous unincorporated areas needed to be solved concurrently, and the only restriction on facility sizing was that it be designed to service a population that would probably need the service within the 20-year planning framework.

The pursuit of a sewering mechanism for the River Road/Santa Clara area was abandoned at an interim stage when it became obvious through Eugene city policy that sewer service would be opposed without an annexation timetable, but that the residents of this area steadfastly opposed annexation. A decision not to resolve those issues at this time and to proceed with a cities-only service system was made so as to not jeopardize the metro facility planning process. Following the decision not to sewer at this time, the remaining funds in this project were transferred to the metro process.

A subelement of the River Road/Santa Clara project involving a resampling of groundwater to test for mineral and bacterial contamination to update a 1971-72 ground water study was pursued but was inconclusive due to the persistence of drought conditions.

A more detailed description of the work and limited results of this project are provided in the "River Road/Santa Clara Sewer Service Summary Report." Ongoing activities are also recommended in that summary report.

The impacts of the River Road/Santa Clara sewer project on the metro facility planning process have already been described. The political nature of annexation questions combined with the lack of a health mandate to alter the present situation makes the process difficult to plan for. A county building moratorium has been proposed. Combined with the facts that many residents in the River Road area are favorably disposed to having sewers, and that the potential problems of ground water contamination are accepted by most, this leaves the scheduling and mechanism for providing this and other urban services open to the winds of political change. An individual waste disposal management program is an unlikely option for these densely populated areas, yet enough interest was generated in this and other alternatives to mandate the inclusion of these considerations in the implementation phases of the individual waste management program. In particular, Lane County and L-COG will investigate the possibility of an enabling ordinance aimed at establishing voluntary districts for individual waste management programs, and the River Road/Santa Clara situation will be evaluated in this context. This reassessment of alternatives will include a restudy of ground water information and an attempt to pinpoint the extent of subsurface problems.

The River Road/Santa Clara study presently has limited relationship to other urban pollution problems since the area is largely residential, not generally served with storm sewers and has very porous soils. The future development of metro urban runoff management plans will affect the area since a major open channel traverses the western part of the area, and it is conceivable that severe failing septic system problems (during heavy rain or flood periods) could be transmitted to this channel and hence become an acute urban runoff health hazard.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- "Information Packet" River Road, Santa Clara, June 28, June 29, 1977, MWMC, L-COG 208 (for public meetings).
  - <u>River Road/Santa Clara Sewer Service Program</u> <u>Summary</u> Report (draft), L-COG 208, October, 1977.
  - "River Road/Santa Clara Final Public Hearing Transcript," October 26, 1976.

#### OUTPUTS:

- Active public information program with considerable public involvement.
- Eugene annexation policy resolution.
- A decision to resolve sewer service questions independently of and at a later time than the metro facility planning process.
- Conclusion that the groundwater contamination information was still inconclusive and required reevaluation and further study.

# PROCESS FLOW DIAGRAM: See Appendix A, page 3.

DESIGNATIONS: None made, Lane County maintains jurisdiction and responsibility for subsurface systems in unincorporated areas.

#### D. Lowell-Dexter Facilities Plan

The Lowell-Dexter planning processes are documented in some detail in the "Lowell-Dexter Area Sewerage Facilities Plan". This area was selected for special planning because of the close contiguity of a small city with a presently inadequate sewage treatment facility, an unincorporated community with severe septic system problems, and several large state and Corps of Engineers Parks in the process of planning for expansion and sewerage treatment.

The facility planning effort was initially pursued from the standpoint of potential regional solutions so as to spread facility construction costs. A series of alternatives and their costs were developed, and there was a vigorous public information effort and considerable public response.

The unincorporated area of Dexter decided that the costs of sewerage were exorbitant, and they did not want to encourage further growth in their area and therefore did not want to participate in a regional solution. Lane County, in an effort to forestall a worsening of septic system failure problems, requested and obtained a "new system installation moratorium" from the State Environmental Quality Commission. This moratorium was not opposed by the Dexter community.

The Oregon State Parks and U.S. Army Corps of Engineers decided that their development plans did not require facility expansion or the implementation of a regional solution at this time. Unfortunately, this left the City of Lowell in the position of having to make costly repairs to their present system without being able to share the service. They reluctantly decided to begin an interim approach involving the upgrading of their facility, with the realization that their facility adequacy and the options of regional systems would be reevaluated in five to ten years.

This project element had no direct ties with other 208 planning activities, since the area is physically delimited and was chosen for its unique situation. The individual waste disposal management program will apply to the Dexter area, but the Dexter moratorium decision carries this management to its extreme. Of secondary impact but great interest was the decision of a rural community near an urban area to restrict its growth through a decision not to provide sewer services, and this decision may have precedential implication in other rural communities. This decision may have additional implications on the development of a voluntary septic management area enabling ordinance as proposed for the extension phase of the individual waste management program.

In another area, it is felt that the involvement of state and federal park agencies is a crucial planning issue if a regional solution is to be developed. Such involvement would set precedents for intergovernmental facility planning and cost sharing and should be actively pursued when new facility construction is foreseen. It is in the long range planning-coordination role that the 208 Program may have a continuing role.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- Lowell-Dexter Area Sewerage Facilities Plan, L-COG 208, July 1977.
- "Lane County Board of County Commissioners Resolution in the Matter of Establishing a Moratorium on Construction Permits for Subsurface Sewage Disposal Systems in Dexter, Oregon," June 10, 1977 (Request to the Oregon Environmental Quality Commission).

#### OUTPUTS:

- Preparation of a regional facilities alternatives plan.
- Decision by Lowell to adopt an interim facilities improvement program with concurrence by the Oregon Department of Environmental Quality.
- Decision by Dexter not to provide for sewer service (with subsequent moratorium resolution by Lane County and the State EQC)..
- Incorporation of regional facility planning considerations into further development considerations.

PROCESS FLOW DIAGRAM: See Appendix A, pages 4 and 5.

DESIGNATIONS: The City of Lowell was designated as the appropriate agency for upgrading their treatment facility according to DEQ requirements. Lane County maintains jurisdiction for moratorium enforcement in the Dexter Area by contact with the DEQ.

### E. Coburg Treatment Alternatives Study

The "Coburg Sewerage Facilities Plan" details the process and outputs from this program element. This program element was chosen because of the unique situation opportunities presented in Coburg for providing waste treatment management for an incorporated city. Coburg is small, on septic systems, not inclined toward rapid growth, and has septically suitable soils. In order to satisfy the need for waste management planning, alternatives were evaluated, including facility construction and various existing system management techniques. A concentrated public information program induced considerable citizen involvement on the issue. For cost as well as growth control reasons the City of Coburg eventually chose to adopt a nuisance ordinance as a means to effectively forestall individual waste disposal problems by providing a repair/replacement mechanism.

Although this program element was a separate and discreet project without immediate impacts on the other 208 projects, its precedentsetting results provide a model for other small cities and unincorporated rural communities throughout the state. If the management system proves effective, it provides a cost-effective technique for domestic waste management for small communities. This program also provides a limited pilot test for evaluating aspects of the more general individual waste management program. In terms of land use considerations, the use of septic limitations to control growth and land use is an interesting example, with, however, little direct application in this 208 area, since it is not available as a technique to other small cities. The use of defined management areas in unincorporated communities is a control technique that will draw upon the Coburg experience but remains to be developed and used, and will, obviously, be subject to considerable political massage.

Ongoing activity in Coburg requires the practical implementation of their management approach with subsequent, periodic review and assessment. These needs have been incorporated into the 208 Program's grant extension activities as well as ongoing planning proposals.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- Coburg Sewerage Facilities Plan, L-COG 208, July 1977.
- City of Coburg "Ordinance No. A-95", An ordinance declaring it to be a nuisance to allow sewage from subsurface 'sewage disposal systems to surface, repealing conflicting ordinances, and declaring an emergency to exist. September 27, 1977.
- "Information Packet Sewerage Facilities Alternatives, Coburg, Oregon," L-COG 208, April, 1977.

OUTPUTS:

- Coburg facility alternatives study document.
- Decision to manage domestic wastes (and to concurrently control development) through a nuisance ordinance for failing subsurface systems.
- Adoption of a nuisance ordinance for the City of Coburg.

PROCESS FLOW DIAGRAM: See Appendix A, page 6.

DESIGNATIONS: The City of Coburg was designated as the appropriate management agency to implement the septic system management program. As a city they have all the necessary authority to meet the requirements of PL 92-500 for grant eligibility. As a small city their in-house staff capacity is limiting, and they will need to establish practical channels to carry out this work.

#### F. Updated Comprehensive Sewerage Plan Review

The updating of sewage treatment facility planning in the 208 area was a grant requirement and required a summary status report on the planning/design/construction activities for the cities that have treatment facility permits. This process was not intended to provide detailed facility planning as was provided to Eugene-Springfield, Lowell, and Coburg, but was, rather, an update of the preliminary facilities review performed by Lane County in 1974 (Lane County Preliminary General Plan - Water Quality Management Plan - Willamette Basin), and was intended to coordinate the compliance of these facility planning efforts with PL 92-500 requirements for the purpose of meeting section 201 grant eligibility requirements.

An initial interim report was prepared in 1976, and this was updated to include new data in 1977 as a comprehensive facility review. Recommendations for future work were made, and the needs of special districts and unincorporated communities were addressed.

Coordination with the cities was used to acquire necessary data, and at the beginning of the project the needs of these cities to have detailed facility planning aid was assessed. Only Coburg, Eugene-Springfield, and Lowell required this assistance, with the other cities being further along in the design/construction process and higher on the state construction grant priority list. No special public program was initiated, since no action was required.

Impacts of this facility review process on other aspects of the 208 program were negligible, except that these documents provide a data base for A-95 review comments. In a general way, the preparation of these documents will help to strengthen the consideration given to facility adequacy during comprehensive city planning. This information provides a tool for ensuring that population and land development tendencies do not exceed the capacities of this urban service, i.e., it helps foster "ordered growth."

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- Lane County 208 Program Interim Facilities Report, L-COG 208 and Lane County, August 1976.
- Comprehensive Sewerage Facility Planning Review Report -Upper Willamette Basin of Lane County, L-COG 208, Lane County, October 1977 (draft).

OUTPUTS:

- Interim Facilities Report.

- Updated Facility planning review reports, with recommendations for further activities.

PROCESS FLOW DIAGRAM: See Appendix A, p. 7.

DESIGNATIONS: None needed since the incorporated cities are committed to and capable of managing their own treatment facilities. The unincorporated rural communities come under the individual waste management jurisdiction of Lane County.

### G. Individual Waste Disposal Management Program

There are over 40,000 subsurface disposal systems in the County, many of them failing or marginal because of poor maintenance and inadequate soils. Local water quality and health hazard problems have surfaced sporadically throughout the area. This program element was developed to find a way to more adequately prevent these problems and to extend the life of those systems currently in use.

A consultant firm was retained to develop a report detailing optimum management practices. These proposals were reviewed and adapted to the local management, social and political situations and carried out to the rural areas through extensive public meetings as a set of proposals for review and comment. The response was considerable in some areas and, on the whole, in opposition to the mandatory portions of the management plan. The proposals were redrafted to reflect public comment and a second round of meetings was held with nearly overwhelming negative response. A final proposal, recommending little more than public information and home buyer protection elements, was finally submitted to the Lane County Board of Commissioners and taken under their advisement.

The results of the planning effort are documented in a Summary Report that explains the incorporation of the consultant proposals into the public involvement process. The consultant report is also available and details the "state of the art" on septic system management.

The Individual Waste Disposal Management Program generated more controversy than any other 208 planning activity. This project involved serious questions of land use and governmental involvement with pollution on private lands. The most serious controversy arose over the initial recommendation for mandatory periodic inspection and maintenance. The reaction to this proposal was definitely hostile and centered on issues more encompassing than the question of whether or not there was a problem with subsurface systems that could be alleviated by inspections and pumping.

A major concern was the right of government to delve ever more intimately into the life style of landowners, and many people remembered with apparent rancor that L-COG was the agency by whom they had first been exposed to land use planning and controls. A recurrent theme was that the individual was capable of and responsible for doing his own system maintenance and that this program proposal represented just another example of bureaucracy attempting to enlarge at the expense of individual freedoms, a tendency they were stoutly prepared to fight.

Consumer protection elements for home buyers and installers of new systems was less poorly received, but it was still felt that it was

an invasion of privacy and a function that individuals could best handle themselves. The public information elements received moderate and sometimes reluctant support due to a common attitude that owners were more "on top" of the situation than bureaucrats in county government.

Individual waste disposal control in semi-rural areas has strong interaction with land use control and development intensity, and this connection is not lost on most rural residents, especially those with parcel sizes less than five acres. In active farming areas with a greater availability of land, the problems of subsurface systems lose much of their importance in comparison with agricultural concerns.

In the densely populated areas of River Road and Santa Clara, there was a complex and not entirely clear interaction of the individual waste and sewer service programs. Perhaps most importantly, this issue tended to differentiate these two neighborhoods. In River Road, with small lot sizes and 10-15 year old systems, the eventuality of sewers was almost conceded, while in Santa Clara, with newer systems and larger lots, management of these systems was felt to be a viable alternative to expensive sewers. This feeling of a need for alternatives also brought out a strong interest in alternate systems such as composting toilets. In other areas close to the urban boundaries there was a similar composite of interests in individual versus sewerage systems, this interest being proportional to the density and age of the neighborhood. The most important planning consideration to come out of these public discussions was the realization that individual waste management may provide a needed interim solution in those urban fringe areas where densities are of serious concern but where annexation is not imminent. This consideration will have implications in developing an enabling ordinance for voluntary management areas as part of the ongoing individual waste management effort. This same ordinance might have important implications for water quality protection in rural communities along critical stream corridors.

There are no other direct ties of the individual waste program with the other urban, industrial, or facility oriented 208 programs, but it is important to realize that the reason for this lack of overlap is precisely because the individual waste program fills in the gap not covered under other point and non-point categories.

It is not clear at this time what the extent of positive impact of this program on water quality and reduction of waste loading will be. Public information programs may have few immediate but many long range effects; property transfer inspection, while of great benefit in prolonging service life to second or third owner systems, is not guaranteed implementation. Both the 208 TAC and CAC, as well as the L-COG Board of Directors, noted that the final proposal, while useful and perhaps the maximum acceptable, was not the optimal in terms of water quality protection or health hazard reduction.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- "Septic Problems are Surfacing," L-COG 208 Citizens Advisory Committee Newsletter #3, March 1977.
- "Public Information Septic Tank and Drainfield Management System," Lane County and L-COG 208, for firstround public meetings, spring 1977.
- "Care and Feeding of Your Septic Tank," Lane County Water Pollution Control Division, brochure, spring 1977.
- <u>Draft Septic Tank Systems Management</u>, L-COG 208 and Lane County, draft proposal and public information for second round of public meetings, September 1977.
- "208 Project <u>Individual Waste Disposal Management Program</u>, Lane County, Oregon," L-COG 208 and Brown & Caldwell, September 1977.
- <u>Individual Waste Disposal Management Program Summary</u> Report (Draft), L-COG 208, October 1977.

### OUTPUTS:

- Development of an optimal management program report document.
- Vigorous public information and very active public involvement programs with strong feedback - dispersal of considerable information.
- Final program recommendations to Lane County Commissioners accepted under advisement - implied acceptance of Lane County basic responsibility to implement any adopted programs.

PROCESS FLOW DIAGRAM: See Appendix A, page 8.

DESIGNATIONS: None needed - acceptance of proposal under advisement by Lane County Commissioners implies responsibility to implement if adopted. Lane County is presently the designated management agency by contract to Oregon DEQ for management and enforcement of individual waste disposal programs for Lane County, including the 208 area.

#### H. Urban Storm Runoff and Industrial Overland Flow Management Program

Initially the Urban Storm Runoff and Industrial Wastes Survey project elements were separate and independent, since it was thought that industrial point source discharges were the major contributors to water quality degradation. However, in the course of the Industrial Waste Survey it was found that major industrial concentrations were in urban areas and most process waste discharges were to sanitary treatment facilities, leaving industrial overland (storm related) flows as the single largest uncontrolled industrial source. It was also determined that point source and sanitary system discharges were already subject to planning and control consideration through the DEQ and the Metropolitan Wastewater Commission. The survey report was produced and the industrial overland flow portion was then incorporated into the urban runoff planning effort. This implies that, in the future, point and non-point industrial wastes for urban areas will receive separate planning efforts, with overland flows being dealt with as a subelement of urban runoff management.

The urban runoff project was initially envisioned as a two-phase activity of problem identification and implementation. It was decided early on that the lack of data for this area, with its unique winter storm patterns, separate storm and sanitary sewers and open channel systems, would demand a concentrated focus on problem identification. The second implementation phase would have to wait until later. Major effort was directed toward a sampling and monitoring program with the development of a predictive model. At the same time, preliminary work was done to develop a list of major problems and potential strategies for control and prevention. Little effort was to be devoted during this phase to implementation and integration into comprehensive planning. Public information efforts were to be initiated towards the end of the project period, when the problem identification was sufficiently advanced to provide relevant information.

Urban Storm Runoff and Industrial Overland Flow are addressed in separate technical reports. It is these technical reports that provide the basis for the program summary report, the public involvement effort, and the development of ongoing and extension project proposals. Further, these technical evaluations, although hampered and delayed by drought problems. provided a sufficiently clear indication of problem magnitude (though not impacts) that it was possible to incorporate preliminary management and control recommendations into the summary report.

The urban runoff identification effort generated more interest than was expected, especially in regards to the open-channel storm collectors where multiple-use values are recognized. At the same time, the acceptance of major sanitary sewer and treatment responsibility by the MWMC has allowed for more attention to storm sewer concerns by city public works staff. This interest has been enhanced by increasing concern over the potential for flooding on these open channels as rapid urban development continues. This concern has also involved both city planning and public works departments.

There seems to be a growing recognition that urban runoff control is an important urban service that has both quality and quantity impact implications on land use and development, beneficial water use, facilities operation and maintenance, and urban life style characteristics. The economic and social impacts of the control or lack of control of runoff quantity and quality are hard to assess because of their diffuse nature, but as population grows and concentrates in urban areas, it becomes foolish to ignore these impacts. It seems probable that these concerns will become elements of comprehensive urban planning, so that a variety of public and private entities will have a chance to influence their resolution.

Presently, the local "state of the art" is in the position of stimulating the concern with urban runoff by identifying as many of the tie-ins between runoff management and other water quality/urban planning concerns as is possible. The next stage is the development of specific recommendations for best management practices in coordination with a refinement of the problem identification. Since the diffuse sources of this pollution will to some extent require diffuse solutions, the coordination of urban runoff management planning with other urban service and development activities is expected to be quite involved.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- Urban Stormwater Analysis--Eugene-Springfield Metropolitan Area, L-COG 208, Jordan/Avent and Associates, September 1977.
- Draft Lane County/Upper Willamette River Basin Industrial Wastes Survey Study, L-COG 208, August 1977.
- "Urban Stream or Open Sewer?," Newsletter #4, L-COG 208 Citizens Advisory Committee, September 1977.
- Draft <u>Urban Storm Runoff Management Study Summary Report</u> (including environmental assessment), L-COG 208, October 1977.

#### OUTPUTS:

- Completed preliminary sampling program.
- Development of predictive (20-year) model for estimation of runoff volumes and pollution content.

- Industrial waste survey in draft form with a comparison of point and non-point problem levels.
- Identification of the magnitude and locations of urban runoff problems in Eugene and Springfield, including industrial overland flow problems.
- Identification of preliminary management policy and implementation strategy recommendations.
- Development of public and private awareness of urban runoff problems.
- Development of ongoing and extension programs for BMP determination and implementation.

PROCESS FLOW DIAGRAM: See Appendix A, pages 9 and 10.

DESIGNATIONS: The L-COG 208 program is a designated areawide agency for non-point wastewater management planning for this area. Since this urban runoff project is still in its initial stages, it is premature to designate local bodies as implementation agencies. The cities of Eugene and Springfield and Lane County have tentatively agreed to support continuing 208 activities in this area, and this commitment of interest implies at least a minimal acceptance of responsibility for continued activity.

# I. Non-Point Source Analysis

In addition to the non-point pollution problems posed by industrial and urban storm runoff and individual waste disposal, the 208 Program had originally intended to address the problems associated with agricultural and silvicultural activities. The original Project Control Plan called for pilot studies to the into a data survey to verify local conditions and provide a means of extrapolation towards future problems and needs.

A small quantity of data on agricultural and silvicultural runoff was collected during the first phase, but it became rapidly apparent that there were insufficient in-house resources and time during the two-year project period to develop an adequate data base for detailed analysis without jeopardizing the urban runoff analysis and industrial survey programs. As a result, the pilot study phase was abandoned. In retrospect, this was a fortunate decision, since the subsequent drought in the winter of 1976-77 would have made data collection on agricultural and forest runoffs futile.

The pursuit of detailed survey studies was similarly abandoned for two reasons related to federal and state guidelines. To begin with, it became clear that the Statewide 208 program was focusing a major effort on a re-evaluation of forestry practices under the Forest Practices Act, and the areawide agencies were largely precluded from developing their own independent alternatives. On the other hand, it was at about this time that the EPA changed its Region X emphasis from long range comprehensive planning to "hard outputs," thus requiring a transfer and reallocation of local funds toward projects that were more limited in scope and for which implemented products could be developed in the short, two-year period.

The above-listed program changes were not intended to imply that silvicultural and agricultural activities were not causing water quality problems, but it would be accurate to presume that these elements are of lower priority (as a result of preliminary evaluation) in this 208 area. The study of agricultural and silvicultural pollutions remains a need identified in the ongoing plan proposals. Future constraints that may be placed upon these activities for pollution control purposes can be expected to have both serious land use and economic ramifications.

PUBLICATIONS AND SUBMITTAL DOCUMENTS: None.

OUTPUTS:

- Development of open data files on agricultural practices, agricultural pollution problems, and the use of toxic chemicals on agricultural lands.

- Development of open data files on logging practice relationships to water quality and on best logging management practices.
- Development of a pilot model for the conversion of ERSAL satellite data into an interpretable land cover identification system (open data file).
- Development of proposals for ongoing forestry and agriculture pilot studies including sediment analysis and small woodlot management studies.

PROCESS FLOW DIAGRAM: See Appendix A, page 11. Studies to be developed contingent on the availability of funds as indicated in the 208 Continuing Program Proposals summary.

DESIGNATIONS: Not applicable since the Statewide 208 Program is in the process of designating the Oregon State Department of Forestry as the management agency for forest practices. The Soil Conservation Districts have been actively working with the Statewide 208 Program on agricultural BMP development.

### J. Water Quality Protection Program

The original intent of the water quality protection program was to evaluate (estimate) and compare the assimilative capacities of major stream segments, both in relation to point and non-point source loadings and also in relation to each other, i.e., prioritize segments on the basis of loading as well as loading impact. It was hoped that this information would lead to predictions of approaching serious water quality problems.

As the 208 Program progressed, it became obvious that this evaluation and comparison depended on the results of other non-point source studies, several of which were abandoned. In addition, it was determined from a review of existing water quality data that, since local stream water quality generally exceeds required standards, this loading evaluation was more of a chronic than an acute water quality problem. Hence, this project was continuously pushed back to be done as time might permit near the end of the project period.

Toward the end of the project, when data on point source loadings and input from urban and individual waste disposal non-point sources was finally available, it was no longer time-wise possible to develop the estimates of loading necessary to adequately develop this evaluation. Also, the loadings from agricultural and silvicultural activities were not available. As a result, a considerable portion of this program element is incomplete.

The Water Quality Protection Summary Report develops a brief summary of known stream quality characteristics and causative problems and provides recommendations according to specific stream basin for additional studies necessary (or helpful) in developing stream specific protection programs.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

OUTPUTS:

- Updated summary of water quality concerns and recommended studies related to basin-specific water quality protection.

PROCESS FLOW: See Appendix A, page 12. Studies to be developed contingent upon availability of federal funds as indicated in the 208 Continuing Program Proposals summary.

DESIGNATIONS: None. L-COG remains a designated Areawide 208 Planning Agency with responsibility for developing water quality protection programs as funding and priorities allow.

<sup>-</sup> Water Quality Protection Program - Summary Report, L-COG 208, October 1977 (draft).

### K. Continuing Planning Process

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There are two elements to the continuing or ongoing 208 planning process. The first of these is the maintenance of an ongoing staff capacity to provide for daily application of adopted plan policies to general planning considerations as well as A-95 and environmental reviews. This staff capacity could provide an information resource for the public and might staff technical and citizen advisory committees.

The second important function of continuing planning is the development and pursuit of specific problem identification or implementation projects. On-board staff plays an important role in this activity, both in writing up grant requests for new projects as well as coordinating these new projects with local agencies and local planning efforts.

The ongoing staff function is one for which, ideally, there will be both local and state/federal support. In the present 208 process, however, the intense nature of the work effort that was necessary to achieve "hard outputs" and the uncertainty of federal funding (specifically, the near certainty of funding that dissolved in September 1977) combined with Statewide 208 directives that "new projects" were to receive priority over "ongoing" functions to lower the priority of ongoing maintenance functions. It was not possible to develop and incorporate a continuing in-house staff element into local planning activities at the 100 percent local funding level.

The development of a "new projects" program, on the other hand, was pursued because of clear indications that these projects, where tied to state-identified water quality needs, would be eligible for statewide 208 funding support. The staff developed a list of projects that had been identified but not attacked during the present grant periods. The Technical and Citizens Advisory Committees were actively involved in the review and prioritization of these projects. These new projects, as approved for submittal by the L-COG Board of Directors, are listed in the 208 Continuing Program Proposals summary. In spite of the constraints that were placed on the development of data bases for non-point problem identification, the new program proposal does attempt to address the major water quality problems and protection needs and leans heavily on a 20-year planning framework concept. For these reasons, these new program proposals also satisfy some of the needs of a "continuous" planning proposal.

The implementation of these program proposals depends heavily on the availability of federal funds and state approval, not to mention the local support and direction. It is premature to indicate which of these projects are likely to be pursued until local governments identify their special information needs or until the statewide 208 Program develops its priority criteria for new projects. The proposed project list will be updated as new information becomes available or as political situations demand.

PUBLICATIONS AND SUBMITTAL DOCUMENTS:

- "208 Continuing Program Proposals, " L-COG 208, September 1977.

### OUTPUTS:

- Identification of study project needs for the next twofive year planning period.

PROCESS FLOW: Development of project flow diagrams will depend entirely on the specific projects selected for investigation and the availability of funding.

DESIGNATIONS: L-COG 208 remains a designated Areawide 208 planning agency for the purpose of doing local waste management planning. Proposals will have to meet concurrence with State 208 Planning criteria and funding allocation will flow through the Statewide 208 Program.

### L. Public Involvement

The Public Involvement program of L-COG consisted of two major components: The Citizens Advisory Committee (CAC) and projectspecific direct involvement publics. The CAC provided general liaison between L-COG staff and the public by helping in the development of involvement strategies. They also produced a series of general information newsletters on major 208 Program efforts. The direct involvement public component consisted of groups that were contacted because of their special interests in particular projects, e.g., the Lowell-Dexter project involved all the Lowell-Dexter area residents, but not those from surrounding areas, and the metro sewer information process was focused on the urban metro population. In several cases the Citizens Advisory Committee assisted in contacting the special concern publics and in developing information for their use.

The Citizens Advisory Committee was formed during the early part of 1976 and was initially involved in the development of general public involvement goals and strategies for the entire 208 Program. As data became available and the projects assumed definite forms, the CAC developed a series of general involvement newsletters. In all, four newsletters were produced on General 208 Program Goals, the Metro Sewage Treatment Process, Individual Waste Disposal and Urban Storm Runoff. The CAC was also directly involved in reviewing the goals and projects proposed in the Continuing Program from the standpoint of public acceptability and interest.

The individual project public involvement programs were generally quite involved because each was tailored to meet the needs of the specific project element. Several general principals were followed as guidelines. First, it was felt necessary to clearly identify the "interested public" and to define what were the key elements of their interest, i.e., economic, land use rights, water use and quality, etc. This determination was essential to minimize the waste of time in supplying useful information to disinterested publics. Secondly, there was a need to develop a flexible and changeable process for providing information. This process had to recognize that information demands changed as a result of past information, political events, and perceptions of their power in the decision-making process. The third important consideration was the preparation of visible and effective summary charts, graphics and diagrams. These devices enabled many people who had not received the materials in time for study to develop an understanding of the problem while a presentation was being made.

Finally, it was realized that on important issues it would be necessary to provide more than one opportunity for review and comment so that people could have time to digest previous information and develop a position on the recommendations. Each of these principles is discussed in more detail as follows:

### 1. Interested Public

The definition of a special interest public is not an easy task and involves a knowledge of the area, its population and lifestyles, and the prevailing feelings on a range of environmental interests. Fortunately each project element had some inherent limitations, i.e., confined to a district, affected only septic tank owners, urban oriented, etc., that made a first-level cut easier. It then became necessary to pool the information and opinions of all available staff (including staff from related activities such as land use planning, public works, etc.) in a brainstorming session to try to define which portion of the defined population had the greatest concerns and what their major interests were liable to be. In most, but not all, cases the people with the greatest interest are those receiving the most direct impacts. The major impacts of concern were found to revolve around economic issues. property rights and specific environmental concerns. It was found that it was extremely difficult to determine which of these three issues would predominate before the initial public meetings.

The definition of an "interested public" for general water quality planning concerns was a much more nebulous affair and used a "hit and miss" technique that did not prove too effective in reaching or stimulating great numbers independently of special projects. This is not unreasonable, since most people have many daily concerns with which a plea for "water quality activism" is in competition.

#### 2. Information Change Process

The maintenance of a flexible "information response" process was an interesting aspect of the public information process. The first presentation often hit only half the mark, but this information often changed the people's perception of what they needed to know. In some cases, River Road/Santa Clara for example, information on the subject of alternate sewage plant configurations prompted an interest in two related items that had not been initially addressed--those of local sewer service costs and alternative (composting) individual waste disposal systems.

The public recognized that our planning group could not be expert in all fields, but they nonetheless demanded that the program have and be able to present information on subjects representative of all their major concerns. It was an expectation, and not unreasonably, that the planning staff have a wider range of expertise at their disposal than the group of concerned citizens. This was not always an easy task, but, when done, it provided the planning effort with a crucial credibility both on the present projects and into the future. Failure to develop this credibility will sound the death knell on any innovative and many traditional projects.

An important point in the information transferral process is the self-perception of any group as to its own power to change, support or retard the process. It becomes important to clearly state which elements are alterable by public concern, and in most cases, it is better to also clearly define those areas beyond public control rather than try to obscure these already decided issues. If there are no real points for public control, it was found that public hearings were often effective in providing a forum, but a truly interactive involvement program seemed to require a defined response role with an identifiable response in the project.

Since most public participants approach a planning process with preconceived opinions, usually hostile in relation to land use controls, it was recognized that the first meetings were often more useful for "misconception diffusion" rather than new information transfer. Staff tried to respond to this variation in information need.

3. Presentation Graphics

Most people attending public involvement sessions come with a stronger sense of their own preconceptions than of the material they may have received. There are many practical reasons for this such as work requirements, lack of lead time, moderate interest level, etc. It should not be implied that these preconceptions are incorrect, even if these preconceptions are not usually the same as the staff project conceptions.

It was easy for staff to make the false assumption that attendees had a level of familiarity with the material comparable to staff. We found that the best way to minimize this communication gap was to distill project information into a series of short statements, pictures, and graphic summaries and to have these posted in a readable and accessible format. Even with these efforts, the communication problem sometimes seemed insurmountable, since human communication is not a precise process and all people have unique perceptions, even of a uniform set of words.

The need for graphic presentation material did not reduce the need for written handout or mailout materials, since these materials were often read away from the meetings and formed the basis for re-evaluation of opinions. But the graphic

presentation materials did provide a more uniform base for discussion during the meetings and enhanced the opportunity for new arrivals to participate.

4. Multiple Response Opportunities

It was fairly clear from the outset that more than one meeting would be necessary to draw a maximum response. This was proven several times, and it became obvious that many people with only a moderate initial interest level would not comment or state opinions until they had read and digested information and formed a considered ppinion.

A serious problem that arose on several occasions was that other sources of information (sometimes correct, sometimes misleading) became available between rounds of meetings and vied with staff material for credibility. In strongly contested cases, this can turn opinion against a recommendation, and for this reason it was important for staff to distribute consistent "baseline" informational materials as widely as possible.

Efforts were made to respond to initial comments at subsequent meetings and, where possible, the focus was shifted to correspond to the range of citizen responses. This was not always possible, but it was found that because of the efforts to provide handout information and graphic presentations during initial meetings, the positions expressed at subsequent meetings were at least usually directed toward the relevant issues. This was a detriment to some projects since it enabled a more concentrated project opposition, but it seemed to eliminate a portion of the potential confusion in the process.

The Citizens Advisory Committee perhaps summed up the public involvement process best in their public hearing testimony to the L-COG Board of Directors when they said, "public involvement, like the democratic process itself, does not always provide efficiency in government, but most citizens feel their right to be heard is quite important even if, or especially if, it slows governmental action."

GR:jw:I-1009 12/19/77 ROBERT W. STRAUB



OFFICE OF THE GOVERNOR STATE CAPITOL SALEM, OREGON 97310

June 28, 1978

Mr. Donald P. Dubois Regional Administrator U. S. Environmental Protection Agency Region X 1200 Sixth Avenue Seattle, WA 98101

Dear Mr. Dubois:

The Department of Environmental Quality has completed the review of the Columbia Region Association of Governments 208 Water Quality Management Plan. Based on this review and the Department's recommendations, I am hereby certifying the plan and designating management agencies for planning and implementation.

The plan emphasizes control of municipal wastes, urban stormwater runoff management and combined sewer overflows. Emphasis on these waste sources is consistent with the Department's identified water quality needs in the 208 planning area.

The plan has been found to be in conformance with the Department's approved planning process. The process utilized to develop the plan was reviewed and approved by the Department prior to plan initiation.

The plan will be accepted as a detailed portion of the water quality management strategy for the state. Specifically, the plan will be approved by the Environmental Quality Commission as a part of the Department's Water Quality Management Plan. The tentative approval date is October 1978.

The plan is generally in conformance with applicable state and local regulations governing land use and protection of the environment. However, as soon as practicable, after urban growth boundaries are established and approved by the Columbia Region Association of Governments and the Land Conservation and Development Commission for Clackamas, Multnomah and Washington Counties and the cities within these counties, the plan must be reviewed. If necessary, the plan must be changed to conform with the approved urban growth boundaries. Mr. Donald P. Dubois June 28, 1978 Page 2

Management agencies for planning and implementation are identified in Attachment A, Item G, Allocation of Responsibility, for each plan element. Management agencies are further identified in the Columbia Region Association of Governments <u>Public Facilities and Services Element</u> <u>Part 1: Waste Treatment Management Component</u>. This element is presented as Attachment B. It will be adopted by the Columbia Region Association of Governments Board of Directors in June 1978. The designated management agencies have adequate authority to implement the plans and meet federal requirements set forth in 40 CFR 131.11(0).

Particular attention should be given to the allocation of responsibility. This element presents the agreed upon division of planning responsibility and authority between the Department and the Columbia Region Association of Governments pertinent to 208 water quality planning. This allocation of responsibility will be subject to annual review.

Attachment A endeavors to provide a brief overview of the plan. In particular the attachment gives an indication of the status of both point and non-point waste sources in the planning area. Water pollution problems are identified along with the agency committments to address the problems. The major accomplishments are summarized. Plan approval is indicated where applicable. Additional planning which should be undertaken is identified. Finally, the above mentioned allocation of responsibility both for planning and implementation is presented.

Sincerely,

Governor

RWS:aes Attachment

#### SEWAGE WORKS MASTER PLAN

# A. IDENTIFIED PROBLEM

ŀ.	Lack of true regional analysis of treatment
	and disposal in the CRAG area. Need to
	extend planning time frame to provide
•	orderly expansion of collection and treatment
	consistent with emerging comprehensive plan.

- 2. The 1969 CRAG Plan was outdated.
- 3. There appeared to be a strong possibility for sewage treatment plant consolidation.
- 4. There were apparent water pollution problems in the Tualatin River and small urban streams.
- There was no direct relationship between water quality planning and regional land use planning in the CRAG area.

#### B. COMMITMENTS

- 1. Develop sewerage works master plan, to accommodate growth, and consistent with the comprehensive plan.
- Identify service areas for collection and treatment.
- 3. Identify effluent disposal sites and methods for Washington County.
- Identify areas where regionalization appeared feasible.
- 5. Identify management agencies.

#### C. ACCOMPOISHMENTS

- 1. Adopted regional goals and objectives.
- 2. Adopted regional land use framework element of CRAG's comprehensive plan.
- Adopted Growth Management Strategy (strategy for identification of service areas for local jurisdictions including water, sewer, drainage, schools, policy, fire and others).
- Adopted population projections and allocation for service areas.
- 5. Report on uniqueness of CRAG.
- Consortium planning agreement signed by Troutdale, Gresham and Multhomah County to study regionalization in East Multhomah County.
- 7. Partial moratorium agreement signed by USA and Sherwood, Tualatin and King City to restrict sewer extension outside of cities until urban growth boundaries adopted.

### SEWAGE WORKS MASTER PLAN

- C. ACCOMPLISHMENTS (continued)
- Hillsboro signed agreement with USA for membership as a result of regionalization proposal.
- 9. Adopted sewerage system planning areas.
- Identified 5 year capital improvement program and 20 year needs list.
- D. CERTIFICATION/ APPROVAL

### Conditional

E. WORK TO BE COMPLETED

- 1. Adopt Sewerage Works Master Plan June 1978.
- Complete analysis of proposals for STP consolidation and regionalization.
- 3. Adopt effluent disposal plan for Washington County - June 1978.
- Adopt management agency designations -June 1978.
- 5. Adopt treatment and collection system service areas June 1978.
- F. NEW PLANNING ELEMENT

ALLOCATION OF RESPONSIBILITY

G.

None identified.

- Designated management agencies for 201
  planning and implementation agencies and
  jurisdictions identified in CRAGS's Public
  Facilities and Services Element, Part 1:
  Waste Treatment Management Component (see
  also Attachment B).
- Revisions to and updates of Master Plan -CRAG.
- New planning tasks pertinent to Master Plan -CRAG.
- Water quality standards, 303e planning elements - DEQ.

## SLUDGE DISPOSAL MANAGEMENT

- A. IDENTIFIED PROBLEM
- Lack of regional sludge disposal management plan.
- 2. No sludge handling facilities at Troutdale and Wilsonville.
- 3. Portland is at capacity, implementation program not accepted. Gresham is nearing capacity.

#### B. COMMITMENTS

Develop regional sludge disposal management plan, excluding Portland and USA (Durham) treatment areas. Portland and Durham covered by ongoing 201 studies.

- C. ACCOMPLISHMENTS
- Proposed sludge disposal plan as a part of the Sewerage Works Master Plan.
- Identified site areas generally acceptable for land disposal.
- Recommendations to truck liquid digested sludge to rural agricultural areas for disposal on land as a soil supplement.
- D. CERTIFICATION/ APPROVAL

Conditional

- E. WORK TO BE COMPLETED
- EPA acceptance of Portland sludge disposal plan.
- CRAG adopt Sludge Disposal Management component of Sewerage Works Master Plan -June 1978.
- F. NEW PLANNING ELEMENTS

None identified.

- G. ALLOCATION OF RESPONSIBILITY
- 1. Planning revisions and updates CRAG.
- Implementation the designated management agencies and jurisdictions are identified in CRAG's Public Facilities and Services Element, Part 1: Waste Treatment Management Component(see also Attachment B).

### URBAN STORMWATER RUNOFF

IDENTIFIED Α. PROBLEM 1 Extent of urban stormwater as a pollution problem not identified. 2. No analysis on plans for treatment and control of urban stormwater in the CRAG planning area. COMMITMENTS Β. Quantify the extent of the stormwater runoff 1. pollution and the stormwater runoff. 2. Develop conceptual alternatives to treat and control the runoff. ACCOMPLISHMENTS C. Computer simulation of rainfall/runoff 1. relationships. 2. Bacteria and sediment found in the runoff. Proposed non-structural alternatives. 3. D. CERTIFICATION/ **APPROVAL** Conditional Ε. WORK TO BE COMPLETED USGS to complete final interpretive report covering rainfall/runoff monitoring. F. NEW PLANNING **ELEMENTS** 

CRAG has submitted a proposal to continue the urban runoff project. Subject to federal funding, the tasks would entail the following work:

- 1. Quantify water quality impacts of urban runoff.
- Develop on-site detention measures as indicated by problem quantification.
- Develop control for pollution abatement from construction sites.
- Develop model ordinances for management/ implementation.

If funded, the above tasks should be initiated by about October 1978 and completed by October 1981.

- G. ALLOCATION OF RESPONSIBILITY
- 1. Planning CRAG
- 2. Implementation to be determined.

### COMBINED SEWER OVERFLOWS

A. IDENTIFIED PROBLEM

> There are substantial overflows of raw waste from the City of Portland's combined sewer system during periods of heavy rain. An estimated 30% of the waste load in the Willamette River comes from combined sewer overflows. There is a lack of quantifiable data to show the amount of waste, waste characteristics and impact on the river.

- B. COMMITMENTS
- Quantify the amount of waste and water characteristics resulting from combined sewer overflows.
- 2. Propose conceptual alternatives to control continued sewer overflows.

#### C. ACCOMPLISHMENTS

- 1. Computer modeling of rainfall runoff and overflow relationships.
- 2. Waste loadings and waste composition estimated.
- 3. Four conceptual alternatives developed.
- 4. Proposed NPDES Permit Modification to better manage combined sewers.

### D. CERTIFICATION/ APPROVAL

Conditional

E. WORK TO BE COMPLETED

None identified.

### F. NEW PLANNING ELEMENTS

Crag has submitted a proposal to continue the combined sewer overflow project. Subject to federal funding CRAG will develop combined sewer overflow control measures which can be implemented to reduce the strength and quantity of pollution from this service. Prior to initiation of this project the following issues must be resolved:

- 1. EPA policy in construction grants to abate pollution from combined sewer overflows.
- DEQ policy on combined sewer overflows as a part of its statewide water quality management program. This policy should be described in the City of Portland's NPDES Permit Conditions.

### G. ALLOCATION OF RESPONSIBILITY.

- 1. Planning CRAG/City of Portland
- 2. Implementation City of Portland.
SEPTIC TANK MANAGEMENT

A. IDENTIFIED PROBLEM

> There are identified septic tank problem areas, particularly in rural and natural resource areas of CRAG's 208 planning area.

B. COMMITMENTS

Septic tank management was not included in CRAG's initial 208 plan.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

> CRAG has submitted a proposal, subject to federal funding, to develop a management program to reduce the pollution from septic tank-drainfield systems in the CRAG region. If funded, the management program should be initiated by about October 1978 and complete by October 1981.

- G. ALLOCATION OF RESPONSIBILITY
- 1. Planning CRAG

2. Implementation - Individual counties.

#### CONSTRUCTION

A. IDENTIFIED PROBLEM

Construction related pollution problems have not been identified or assessed.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

> CRAG has submitted a proposal, subject to federal funding, to characterize the nature and extent of problems caused by pollutants from construction, and develop management programs for the control of these pollutants. If funded, the management program should be initiated by about October 1978 and complete by October 1981.

- G. ALLOCATION OF RESPONSIBILITY
- 1. Planning CRAG/DEQ

2. Implementation - to be determined.

#### NONPOINT SOURCES (Tualatin River)

#### A. IDENTIFIED PROBLEM

Nonpoint sources of waste are suspected to be a major source of pollution in the Tualatin River.

#### B. COMMITMENTS

Conduct sampling program to determine if nonpoint sources of waste are a significant cause of pollution in the Tualatin River.

#### C. ACCOMPLISHMENTS

The sampling program concluded that the Tualatin River was nutrient enriched from background sources but was not polluted from identified nonpoint sources of waste.

D. CERTIFICATION/ APPROVAL

Full

E. WORK TO BE COMPLETED

None identified.

F. NEW PLANNING ELEMENTS

None identified.

G. ALLOCATION OF RESPONSIBILITY

> DEQ is responsible for the ongoing sampling program in the Tualatin River and for management of the river.

#### NONPOINT SOURCES (Silyiculture)

A. IDENTIFIED PROBLEM

Not a part of the initial CRAG 208 plan.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable.

E. WORK TO BE COMPLETED

Not applicable.

Not applicable.

F. NEW PLANNING ELEMENTS

G. ALLOCATION OF RESPONSIBILITY

1. Planning - DEQ

2. Implementation -

a. State and private forest lands - OSFD

b. Federal forest lands - BLM, USFS.

NONPOINT SOURCES (Agriculture)

- IDENTIFIED Α. PROBLEM Not a part of the initial CRAG 208 plan. Β. COMMITMENTS Not applicable. C. ACCOMPLISHMENTS Not applicable. CERTIFICATION/ D. APPROVAL Not applicable. Ε. WORK TO BE COMPLETED Not applicable. NEW PLANNING F. ELEMENTS Investigate need for nonpoint source planning in CRAG area under DEQ statewide program. . G. ALLOCATION OF RESPONSIBILITY 1. Planning - DEQ
  - 2. Implementation to be determined.

## MINING

Α.	IDENTIFIED PROBLEM	
		None, mining is not a pollution problem in the CRAG area.
В.	COMMITMENTS	
		Not applicable.
C.	ACCOMPLISHMENTS	
		Not applicable.
D.	CERTIFICATION/ APPROVAL	
		Not applicable, mining is not a pollution problem in the CRAG area.
Ε.	WORK TO BE Completed	
		Not applicable.
F.	NEW PLANNING ELEMENTS	
		Not applicable.
G.	ALLOCATION OF RESPONSIBILITY	

ì

DEQ

#### HYDROLOGIC MODIFICATIONS

Α. IDENTIFIED PROBLEM

> None. There are no known problems resulting from hydrologic modifications.

Β. COMMITMENTS

Not applicable.

ACCOMPLISHMENTS С.

Not applicable.

D. CERTIFICATION/ APPROVAL

> Not applicable. There are no known problems resulting from hydrologic modifications.

- WORK TO BE Ε. COMPLETED
- F. NEW PLANNING

Not applicable.

Not applicable.

ELEMENTS

G.

ALLOCATION OF

RESPONSIBILITY

DEQ

#### SALT WATER INTRUSION

A. IDENTIFIED PROBLEM

None. There are no known problems resulting from salt water intrusion.

B. COMMITMENTS

Not applicable.

C. ACCOMPLISHMENTS

Not applicable.

D. CERTIFICATION/ APPROVAL

Not applicable. There are no known problems resulting from salt water intrusion.

E. WORK TO BE COMPLETED

Not applicable.

F. NEW PLANNING ELEMENTS

Not applicable.

G. ALLOCATION OF RESPONSIBILITY

DEQ

#### PUBLIC PARTICIPATION

A. IDENTIFIED PROBLEM

> Past regional planning efforts pertinent to water quality in the CRAG area have been largely unsuccessful. The lack of success has been due, in part, to lack of adequate public participation.

#### B. COMMITMENTS

CRAG committed to develop and implement a public participation program.

#### C. ACCOMPLISHMENTS

 CRAG disseminated information regarding the 208 program through brochures, newsletters, visual aids, press releases, newspaper and television coverage.

- 2. CRAG developed an extensive committee structure to solicit public input.
- CRAG held numerous public meetings to solicit public input.
- 4. Public input was utilized on plan formulation.

#### D. CERTIFICATION/ APPROVAL

Conditional

E. WORK TO BE DONE

None identified.

F. NEW PLANNING ELEMENTS

Public involvement should be included in all new planning elements.

G. ALLOCATION OF RESPONSIBILITY

CRAG

AFTACHMENT B

:		PUBLIC FACILITIES and SERVICES ELEMENT						
а Г		PART I: WASTE TREATMENT						
	MANAGEMENT COMPONENT							
	1	COLUMBIA REGION ASSOCIATION OF GOVERNMENTS PUBLIC FACILITIES AND SERVICES ELEMENT						
	2	PART I: WASTE TREATMENT MANAGEMENT COMPONENT						
	3	TEXT						
	4							
	5	ARTICLE I. INTENT AND POLICIES						
	6	SECTION 1. INTENT: The Waste Treatment Management Component						
	7	is a portion of the Public Facilities and Services Element of the						
	8	Regional Plan pursuant to Regional Objective II, "Planning Pro-						
	9	cesses", and to Section 3 of the Rules Adopting and Implementing						
	10	the Columbia Region Association of Governments' (CRAG) Goals and						
	11	Objectives. This document is intended to:						
	12	(A) Address and implement portions of the following Regional						
	13 Objectives:							
	14	(1) Objective II, Section lb (Plan Documents).						
	15	(2) Objective III, Section la (Maintain Quality).						
	16	(3) Objective III, Section lb (Future Discharges).						
	17	(4) Objective IV, Section 2b (Capital Improvement						
	18	Programs).						
	19	(5) Objective IX, Section la (Support of Development).						
LAW LAW STREET ON P72	20	(6) Objective IX, Section 1b (Public Facilities).						
A. JOH NEY AT V. HALL D. OREGO	21	(7) Objective IX, Section 1c (Public Services).						
MUND ATTOR 527 S. V RTLAND TELEPH	2 <b>2</b>	(8) Objective IX, Section 2a (Local Cooperation).						
ED Pos	23	(9) Objective IX, Section 2b (Facilities Inventory).						
	24	(10) Objective IX, Section 2c (Capital Improvement						
	25	Programs).						
	2 <b>6</b>	(11) Objective IX, Section 2d (Fiscal Capacity).						
	Pag	ge 1						

(12) Objective IX, Section 2c (Facilities in Natural
 Resource Classifications).

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(B) Address portions of State Planning Goals #6 (Air, Water
4 and Land Quality) and #11 (Public Facilities and Services).

5 (C) Establish a structure within which staging of regional 6 wastewater management facilities for a minimum of twenty (20) 7 years can be accomplished by local jurisdictions in conformance 8 with the Regional Plan.

9 (D) Provide a means for coordination of Part I of this 10 Element with regional and local jurisdiction plans.

(E) Establish a priority setting structure for water qualityneeds within the CRAG region.

(F) Establish an interim structure for wastewater management
services until implementation of the Growth Management Strategy
is complete, at which time appropriate changes will be made in
this Plan, if necessary. Changes may include, but not be limited
to, boundary delineations for management agencies.

18 SECTION 2. ASSUMPTIONS: Part I of the Public Facilities19 and Services Element is based upon the following assumptions:

(A) Publicly owned wastewater management facilities will 21 serve only those geographical areas as deemed appropriate in the 22 adopted Land Use Framework Element.

(B) All wastewater facilities will be designed and operated
in conformance with regional, state and federal water quality
standards and regulations, and with due consideration for the
groundwater resources of the area.

Page 2

(C) Identification of a local jurisdiction's responsibility
 to provide wastewater management facilities in a geographical
 area will not be construed as a requirement to provide immediate
 public services.

5 (D) Any land use related action or any action related to 6 development or provision of a public facility or service may be 7 reviewed by the CRAG Board of Directors for consistency with this 8 Element of the Regional Plan. The Board of Directors will accept 9 for review only such actions which are of regional significance 10 or which concern areas or activities of significant regional 11 impact.

12 The control of waste and process discharges from privately (E)13 owned industrial wastewater treatment facilities not discharging 14 to a public sewer is the responsibility of the State of Oregon. 15 Because the need for wastewater treatment facilities  $(\mathbf{F})$ 16 is based on population, employment and waste load projections 17 which cannot be estimated with certainty, use of such projections 18 must be limited to a best effort evaluation. To ensure that 19 these projections are sufficiently reliable, a monitoring process 20 will be established to regularly compare the projected values 21 with both actual values and new projections as they are produced 22 by CRAG studies. The projections are subject to revision to 23 achieve consistency with actual conditions and new adopted projections 24 in accordance with the Rules, Section 9, Continuing Planning 25 Process. 26

Page 3

SECTION 3. POLICIES AND PROCEDURES: The Waste Treatment
 Management Component, Part I of the Public Facilities and Services
 Element, includes the following policies and procedures:

4 (A) An annual Capital Improvement Program for the Oregon
5 portion of the CRAG region shall be compiled for use by member
6 jurisdictions in planning and coordination of local wastewater
7 treatment facilities.

8 (B) Part I of the Public Facilities and Services Element
9 will be reviewed and updated annually and submitted to the Governor
10 for certification no later than the 30th of June each year.

(C) Projects receiving review under A-95 OMB circular shall
be given positive comment only if in conformance with this Element.
(D) Treatment plants shall be programmed for modification
only when one or more of the following conditions will exist:

15 (1) Dry weather flow exceeds plant capacity;

Life of plant is reached;

17 (3) Wet weather flow exceeds plant capacity and I/I
18 study results indicate wet weather flow should be
19 treated;

(4) Organic loadings reach critical stage in plant operation as determined by the Oregon Department of Environmental Quality;

23 (5) Facility Plan underway at the time of adoption of
24 Part I of this Element; er

25 (6) CRAG Board of Directors determines modification to
26 be necessary;

Page 4

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(7) Effluent flows result in an adverse effect on 1 2 groundwater resources; or

3

(8) New treatment standards are adopted.

Operating agencies, so designated by Part I of this 4 (E) Element shall conduct or provide such services as are mutually 5 agreed upon with all management agencies which provide services 6 7 to the same geographical area.

8 The Waste Treatment Management Component of the Public (F) 9 Facilities and Services Element is based on a large body of 10 information, including technical data, observations, findings, 11 analysis and conclusions, which is documented in the following 12 reports:

13

14

15

(1) Volume 1--Proposed Plan.

(2) Volume 2--Planning Process.

(3) Technical Supplement 1--Planning Constraints.

(4) Technical Supplement 2--Water Quality Aspects of 16 17 Combined Sewer Overflows, Portland, Oregon.

18 (5) Technical Supplement 3--Water Quality Aspects of 19 Urban Stormwater Runoff, Portland, Oregon. (In summary form 20 at the time of this component's adoption.)

(6) Technical Supplement 4--Analysis of Urban Stormwater 22 Quality from Seven Basins Near Portland, Oregon. (In summary 23 form at time of this component's adoption.)

24 (7) Technical Supplement 5--Oxygen Demands in the 25 Willamette.

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Page 5

(8) Technical Supplement 6--Improved Water Quality in
 the Tualatin River, Oregon, Summer 1976.

3 (9) Technical Supplement 7--Characterization of Sewage
4 Waste for Land Disposal Near Portland, Oregon.

(10) Technical Supplement 8--Sludge Management Study.

6 (11) Technical Supplement 9--Sewage Treatment Through
 7 Land Application of Effluents in the Tualatin River Basin.

8 (12) Technical Supplement 10--Institutional, Financial
 9 and Regulatory Aspects.

10

5

(13) Technical Supplement 11--Public Involvement.

(14) Technical Supplement 12--Continuing Planning
 Process.

13 This support documentation shall be used as a standard of 14 comparison by any person or organization proposing any facilities 15 plan or action related to the provision of public facilities and 16 services.

17 (G) CRAG shall review state approved facilities plans for 18 compliance with the Regional Comprehensive Plan. Upon acknowledg-19 ment of compliance, the approved facilities plan shall be incor-20 porated by amendment to this Component and all appropriate support 21 documents pursuant to Section 9 of the Rules for Implementation 22 of the Waste Treatment Management Component of the Public Facili-23 ties and Services Element.

24 ARTICLE II. BOUNDARY AND ALIGNMENT INTERPRETATION

25 SECTION 1. Boundaries and alignments appearing on maps 26 contained in the Wastewater Treatment Management Component are of Page 6 1 two types with respect to the level of specificity. They are:

(A) <u>Type 1</u>. Boundaries and alignments fully specified
3 along identified geographic features such as rivers and roads or
4 other described or legal limits such as section lines and district
5 boundaries. Such boundaries and alignments appear on the Waste
6 water <u>Treatment</u> Management Maps as solid lines. Unless otherwise
7 specified, where a Type 1 line is located along a geographic
8 feature such as a road or river, the line shall be the center of
9 that feature.

10 (B) <u>Type 2</u>. Boundaries and alignments not fully specified
11 and not following identified geographic features. Such lines
12 will be specified by local jurisdiction plans. Such lines appear
13 on the Wastewater <u>Treatment</u> Management Maps as broken lines.

#### 14 ARTICLE III. DEFINITIONS

15 Terms used in this text employ the same definitions as those 16 contained in the CRAG Goals and Objectives unless otherwise 17 defined herewithin:

18 (A) <u>Collection System</u>. A network of sewer pipes for the
19 purpose of collecting wastewater from individual sources.

(B) <u>Combined Sewer</u>. A sewer which carries both sewage and

(C) Effluent. The liquid that comes out of a treatment 23 plant after completion of the treatment process.

(D) <u>Facilities Plan</u>. Any site-specific plan for wastewater management treatment facilities. Said Plan shall be equivalent to those prepared in accordance with Section 201 of P.L.92-500. Page 7 1 (E) <u>Interceptor</u>. A major sewerage pipeline with the purpose 2 of transporting waste from a collection system to the treatment 3 facility, also a transmission line.

4 (F) Land Application. The discharge of wastewater or 5 effluent onto the ground for treatment or reuse, including irriga-6 tion by sprinkler and other methods.

7 (G) <u>Pollution</u>. Such contamination or other alteration of 8 the physical, chemical or biological properties of any waters of 9 the state, including change in temperature, taste, color, turbidity, 10 silt or odor of the waters, or such radioactive or other substance 11 into any waters of the state which either by itself or in connec-12 tion with any other substance present, will or can reasonably be 13 expected to create a public nuisance or render such waters harmful, 14 detrimental or injurious to public health, safety or welfare, or 15 to domestic, commercial, industrial, agricultural, recreational 16 or other legitimate beneficial uses or to livestock, wildlife, 17 fish or other aquatic life or the habitat thereof.

18 (H) <u>Sanitary Sewers</u>. Sanitary sewers are pipes that carry
19 only domestic and industrial wastewater.

 $\frac{8}{5}$  20 (I) Sewage. Refuse liquid or waste normally carried off by  $\frac{5}{5}$ 

22 (J) <u>Sewers</u>. A system of pipes that collect and deliver
23 wastewater to treatment plants or receiving streams.

24 (K) <u>Sludge</u>. The solid matter that settles to the bottom,
25 floats, or becomes suspended in sedimentation tanks- <u>of a waste-</u>
26 <u>water treatment facility.</u>

Page 8

(L) <u>Step 2 Construction Grant</u>. Money for preparation of
 construction drawings and specifications of major wastewater
 treatment facilities pursuant to Public Law 92-500, Section 201.
 (M) <u>Step 3 Construction Grant</u>. Money for fabrication and
 building of major wastewater treatment facilities pursuant to
 Public Law 92-500, Section 201.

(N) <u>Treatment Plant</u>. Any devices and/or systems used in
8 storage, treatment, recycling and/or reclamation of municipal
9 sewage or industrial wastes of a liquid nature wastewater.

10 (O) Wastewater. The flow of used water (see "Sewage").

11 (P)Wastewater Treatment Facility. Any treatment plants, intercepting sewers, outfall sewers, pumping, power and other 12 equipment and their appurtenances; any works, including land that 13 will be an integral part of the treatment process or is used for 14 15 ultimate disposal of residues resulting from such treatment; or, 16 any other method or system for preventing, abating, reducing, 17 storing, treating, separating or disposing of municipal waste, 18 including stormwater runoff, or industrial waste, waste in combined 19 stormwater and sanitary sewer systems.

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#### ARTICLE IV. AREAS OF RESPONSIBILITY

SECTION 1. TREATMENT SYSTEM SERVICE AREAS

(A) <u>General</u>. Geographical areas provided service by sewage
 treatment plants within the CRAG region are designated on the
 Treatment System Service Area Map, incorporated by reference
 herein.

26 (B) <u>Policies</u>. All planning and/or provision of service by Page 9 each treatment plant must be consistent with the Treatment System
 Service Area Map.

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SECTION 2. COLLECTION SYSTEM SERVICE AREAS

(Å) <u>General</u>. Geographical areas provided service by wastewater collection facilities of local agencies within the CRAG
region are designated on the Collection System Service Area Map,
and incorporated by reference herein.

8 (B) <u>Policies</u>. All local sewage collection planning and/or
 9 provision of service must be consistent with the Collection
 10 System Service Area Map.

11 ARTICLE V. IMPLEMENTING AGENCIES

12 SECTION 1. MANAGEMENT AGENCIES

13 (A) Designated management agencies shall include the14 following:

15 (1) Operating agency, with the following authorities
16 or responsibilities:

17 (a) Coordination with CRAG during formulation,
 18 review and update of the Public Facilities and Services
 19 Element;

(b) Conducting facilities planning consistent
 with the terms and conditions of this Component;

(c) Constructing, operating and maintaining waste
 treatment facilities as provided in this Component,
 including its capital improvement program;

(d) Entering into any necessary cooperative
 arrangements for sewage treatment or sludge management
 Page 10

1 to implement this Component; 2 (e) Financing capital expenditures for waste 3 treatment; 4 (f)Developing and implementing a system of just 5 and equitable rates and charges pursuant to federal and б state law; 7 Implementing recommended systems development (q) 8 charges or connection fee policies, if any; and 9 Enacting, enforcing, or administering regula-(h) 10 tions or ordinances to implement non-structural controls. 11 (2)Planning agency: For the purposes of this section, 12 planning shall be defined to include regional planning and 13 comprehensive land use planning. Agencies and their intended 14 planning functions are as follows: 15 Local Management Agencies: Local management (a) 16 agencies, as defined in Article V, shall have responsi-17 bility for waste treatment management planning within 18 the CRAG region as follows: 19 (i) Coordination with CRAG to ensure that 20 facilities planning and management activities 21 conform to this Element; 22(ii) Coordination with CRAG and DEQ in the 23 grant application, capital improvement programming, 24 project prioritization and continuing planning 25 process; 26 (iii) Preparation of master plans, capital Page 11

improvement programs and project priorities
lists; and

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(iv) Participation in a planning consortium to conduct 201 Step 1 facility planning for plant expansions within a designated Treatment System Study Area. Agencies affected by a proposed regional alternative shall form a consortium, deliberate and designate a lead agency to undertake an investigation of the regional alternative in light of any proposed non-regional plant expansion. Any such agency shall notify CRAG of its intent to form a consortium. If, after 90 days of such notification a consortium has not been formed and a lead agency has not been designated, CRAG shall assume the lead agency role, or designate a lead agency. If, by mutual agreement of the affected local jurisdictions and CRAG, an extension of time is necessary, the 90 day time limit may be extended.

 (b) Columbia Region Association of Governments
 (CRAG): CRAG shall be designated as the planning agency for areawide waste treatment management planning, with responsibility for:

24 (i) Operating the continuing planning process
25 or the process by which the Waste Treatment Manage26 ment Component will be kept responsive to changing
Page 12

1 information, technology and economic conditions; 2 (ii) Maintaining coordination between: 3 (aa) All appropriate state agencies, including DEQ, on matters such as discharge S permits, water quality standards and grant б evaluation procedures;  $\overline{7}$ (bb) All CRAG member jurisdictions on 8 matters such as review of local agency grant 9 applications and local agency plans for 10 conformance to the Waste Treatment Management 11 Component; 12 (iii) Designation of management agencies as 13 required; 14 (iv) Carrying out or contracting for studies 15 to identify water quality problems and recommended 16 means of control; 17 (v) Receiving grants and other revenues for 18 planning purposes; and 19 (vi) CRAG shall be responsible for comprehen-20 sive land use planning including waste treatment 21management planning under ORS 197. 22 Department of Environmental Quality (DEQ) (c) 23 shall have responsibility for waste treatment management 24 planning within the CRAG region in the following areas: 25 (i) Coordination with CRAG to ensure that 26 this Element is in conformance with the Statewide Page 13

(303e) Plan. .

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(ii) Coordination with CRAG and local agenciesto set grant and capital improvement prioritiesand administer grant programs.

(iii) Determination of statewide standards and regulations applicable to the CRAG region.

(iv) Other areas as prescribed by state law.
(d) Metropolitan Service District (MSD): MSD
shall have responsiblity for developing and implementing
plans for processing, treatment and disposal of solid
waste within MSD boundaries.

12 (3) Regulatory agency: For the purposes of this
13 section, regulation shall mean to identify problems and to
14 develop and enforce consistent solutions to those problems.
15 Agencies and their regulatory responsibilities for the
16 Public Facilities and Services Element are as follows:

 (a) Local Agencies: Regulation of waste treatment management through the enforcement of building code provisions, construction practices, sewer use regulations, zoning ordinances, land use plans, pretreatment requirement (where appropriate), grant and loan conditions (where appropriate), and all other local regulations affecting water quality.

(b) Columbia Region Association of Governments
 (CRAG): CRAG shall perform the following regulatory
 functions in the area of waste treatment management:
 Page 14

1 (i) Develop, monitor enforce and implement the Public Facilities and Services Element by 2 3 means of: 4 (aa) Review and coordination of grants 5 and loans for waste treatment facilities. б (bb) Conduct or contract for studies on 7 non-point source controls and septic tank 8 maintenance with recommended improvements 9 being incorporated in the Plan. (cc) Coordination with local and state 10 11 agencies. 12 (ii) Ensure conformance of local wastewater 13 planning to Part I of the Public Facilities and Services Element. 14 Department of Environmental Quality (DEQ): 15 (c)16 Regulatory functions of DEQ for waste treatment manage-17 ment in the CRAG region are as follows: 18 (i) Develop and monitor water quality stan-19 dards consistent with state and federal regulations. 20 (ii) Control of the location, construction, 21 modification and operation of discharging facilities 22through the discharge permit process and through 23 administration of the State's water laws. 24 (iii) Review and approval of grants and loans 25 for waste treatment facilities. 26 (iv) Other functions as provided by state Page 15

law.

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2 (d) Metropolitan Service District (MSD): Regula-3 tion of all solid waste disposal within MSD boundaries 4 and other functions as may be assumed by the MSD Board 5 of Directors. б (e) Department of Agriculture (DA): The applica-7 tion of pesticides is within the regulatory powers of 8 the DA pursuant to ORS 634. 9 (f) Department of Forestry (DF): The DF shall be 10 responsible for the enforcement of the Forest Practices 11 Act, ORS 527. 12 Portland Metropolitan Area Local Government (q) 13 Boundary Commission (LGBC): The LGBC is responsible 14 for regulating sewer extension policies outside local 15 jurisdictional boundaries within the CRAG region and 16 for formation of new governmental entities. 17 Designated management agencies and their classifications (B) 18 are listed below. Some designations are subject to resolution of 19 Study Areas. 21 2223 24 25 26 Page 16

# MANAGEMENT AGENCY CLASSIFICATIONS

	2	Management Agency	Operating*	Planning	Regulatory
-	3	Banks	С	X	х
		Barlow	T,C	Х	Х
	4	Beaverton	С	Х	X
		Canby	T,C	Х	Х
	5	Cornelius	C	Х	Х
		Durham	С	Х	Х
	б.	Estacada	T,C	Х	Х
	- · ·	Fairview	С	Х	Х
	7	Forest Grove	С	Х	X
-	•	Gaston	С	X	Х
	8	Gladstone	C	X	Х
	0	Gresham	T,C	X	Х
	q	Happy Valley	T,C	Х	Х
	5	Hillsboro	T,C	Х	X
	10	Johnson City	Ċ	Х	X
	10	King City	С	Х	x
	11	Lake Oswego	T,C	Х	Х
	**	Mavwood Park	T.C	Х	Х
	12	Milwaukie	i c	Х	Х
	14	Molalla	T,C	X	X
	13	North Plains	Ċ	X	Х
	10	Oregon City	T.C	Х	Х
	14	Portland	T,C	Х	Х
	17	Rivergrove	Ċ	Х	Х
	15	Sandy	T.C	X	Х
	*0	Sherwood	Ċ	Х	Х
	16	Tigard	· c	X	Х
	10	Troutdale	T.C	Х	X
	17	Tualatin	Ċ	Х	X
	**	West Linn	T.C	Х	X
	18	Wilsonville	T.C	Х	X
	20	Wood Village	- ´ Ċ	Х	Х
	10	Clackamas County	NA T.C	X	Х
	12	Multnomah County	NA T.C	Х	X
1200 N. J	20	Washington County	HA T.C	Х	X
Lavel 1.5	40	Ara Vista County S.D.	c	Х	Х
22588	21	Central Multnomah	-		
A Sector	41	County S.D.	T,C	X ,	Х
Ath 27 S floa	22	Clackamas County S.D. #1	T.C	X	Х
Por S		Columbia Wilcox CSD	Ċ	• X	X
	<b>03</b>	Dupthorpe-Biverdale	<b>-</b> .	•	
	20	County S D	C	X	х
	94	Government Camp	~		
	4 T	Sanitary District	T.C	x	x
	25	Highlande County S D	· · · · · · · · · · · · · · · · · · ·	x	x
		ingination country D.D.	$\sim$	41	4 <b>2</b>
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	1	Management Agency	Operating*	Planning	Regulatory
	2	Oak Lodge Sanitary District	T.C	·• X	x
	3	Sylvan Heights CSD	°C	X	X
		Tualatin Heights CSD	C	Х	Х
	4	Unified Sewerage Agency	T,C	Х	X
		CRAG	NA	Х	X
	5	MSD	Solid Waste Facilities Onl	X Y	X
	б	State DEQ Department of	NA	x	X
	7	Agriculture Department of	NA	NA	Х
	8	Forestry	NA	NA	х
		Portland Metropolitan			
	a	Area Local Government			
		Boundary Commission	NA	NA	Х
	10	*T = Treatment System On	eration	·	
	11	C = Collection System O NA = Not Applicable	peration		
	12	WW - WOR WEETCODIC			
	13	SECTION 2. NON-DESIGNAT	ED AGENCIES: A	Agencies not de	signated
	14	as management agencies are no	t eligible for	federal water	pollution
	15	control grants except as may	be provided els	sewhere in this	; Component.
	16				
	17	SB:kk:01	*		
	18	S:211/3-19			
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RULES FOR ADOPTION AND IMPLEMENTATION OF PART 1 1 WASTE TREATMENT MANAGEMENT COMPONENT OF THE 2 PUBLIC FACILITIES AND SERVICES ELEMENT 3 OF THE CRAG REGIONAL PLAN 4 5 SECTION 1. AUTHORITY AND PURPOSE 6 (A) These rules are adopted pursuant to ORS 197.735 (4) and 7 197.755 (2) for the purpose of adopting and implementing the 8 Q, Waste Treatment Management Component of the Public Facilities and Services Element of the CRAG Regional Plan, hereinafter referred 10 to as the "Waste Treatment Component". The Waste Treatment 11 Component shall include the Waste Treatment Management Component 12 Text, Treatment System Service Area Map and Collection System 13

14 Service Area Map.

(B) These rules shall become effective forty-five (45) days
after the date of adoption.

17 SECTION 2. ADOPTION

18 That document entitled the Public Facilities and Services 19 Element, Part 1, Waste Treatment Management Component, of the 20 CRAG Regional Plan, dated \_\_\_\_\_\_\_ a copy of which is 21 on file at CRAG offices, is hereby adopted and shall be implemented 22 as required in these rules and the Rules for Implementation of 23 the CRAG Regional Plan.

24 SECTION 3. CONFORMITY TO THE PUBLIC FACILITIES ELEMENT

25 Members shall not take any land use related action or any 26 action related to development or providing of public facilities Page 23 or services which are not in conformance with the Waste Treatment
 Component or these Rules.

# 3 <u>SECTION 4. REVIEW OF VIOLATIONS OF THE WASTE TREATMENT MANAGE-</u> 4 MENT COMPONENT

5 (A) Any member, interested person or group may petition the 6 Board of Directors for review of any action, referred to in 7 Section 3 of these Rules, by any member within sixty (60) days 8 after the date of such action.

9 (B) Petitions filed pursuant to this section must allege 10 and show that the subject action is of substantial regional 11 significance and that the action violates the Waste Treatment 12 Component.

13 (C) Upon receipt of a petition for review, the Board of Directors shall decide, without hearing, whether the petition 14 15 alleges a violation of the Waste Treatment Component and whether 16 such violation is of substantial regional significance and, if 17 so, shall accept the petition for review. The Board shall reach 18 a decision about whether to accept the petition within sixty (60) 19 days of the filing of such petition. If the Board decides not to 20 accept the petition, it shall notify the petitioner in writing of 21 the reasons for rejecting said petition. If the Board decides to 22accept the petition, it shall schedule a hearing to be held 23 within thirty (30) days of its decision. A hearing on the peti-24 tion shall be conducted in accordance with applicable procedural 25 rules.

26 (D) The decision on whether to accept a petition filed Page 24 under this section may be by vote or by poll and each Director
 shall have one vote. Acceptance shall require a simple majority.
 of the Board of Directors. Acceptance shall require either a
 simple majority of the Board with each Director having one vote
 or a majority of the weighted votes of the Board.

6 (E) Upon receipt by CRAG of any petition filed pursuant to 7 this section, each member shall be notified of the petition and 8 of the essential elements of the petition. Such notice will be 9 sent within ten (10) days of filing.

#### 10 SECTION 5. CHANGE OF WASTE TREATMENT MANAGEMENT COMPONENT

(A) Revisions in the Waste Treatment Component shall be in
accordance with procedural rules adopted by the General Assembly
pertaining to review and amendment of the Regional Plan.

14 (B) Mistakes discovered in the Waste Treatment Component
15 Text or Maps may be corrected administratively without petition,
16 notice or hearing. Such corrections may be made by order of the
17 Board upon determination of the existence of a mistake and of the
18 nature of the correction to be made.

19 SECTION 6. STUDY AREAS

(A) Treatment System Study Areas.

(1) Certain areas are designated on the Treatment System Service Area Map as "Treatment System Study Areas". Such designations are temporary and indicate areas requiring designation of that land to which each member and special district intends to provide wastewater treatment services, as identified in an acceptable Facilities Plan.

Page 25

- 1 (2) Wastewater treatment facilities within Treatment System Study Areas shall be allowed only if:
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(a) Required to alleviate a public health hazard or water pollution problem in an area officially designated by the appropriate state agency;

(b) Needed for parks or recreation lands which are consistent with the protection of natural resources or for housing necessary for the conduct of resourcerelated activities; or

(c)Facilities have received state approval of a Step 1 Facilities Plan, as defined by the U.S. Environmental Protection Agency regulations (Section 201, P.L. 92-500), prior to the effective date of these Rules.

14 Facilities planning for a designated Treatment (3)15 System Study Area shall include investigation of the regional 16 alternative recommended in the support documents accepted by 17 the Waste Treatment Management Component. Such investigations 18 shall be conducted in accordance with Article V, Section 1, 19 (A)(2)(a)(iv) of the Waste Treatment Component Text.

(4) No federal or state grants or loans for design or construction of any major expansion or modification of treatment facilities shall be made available to or used by agencies serving designated Treatment System Study Areas until such time as a state approved Facilities Plan has been completed.

26 (5)Upon completion of a Facilities Plan and acknow-Page 26

1 ledgment by CRAG of compliance with the Regional Comprehensive 2 Plan, a Treatment System Study Area shall become a designated 3 Treatment System Service Area and shall be eligible to apply 4 for Step 2 and Step 3 construction grants. The Treatment 5 System Service Area shall be incorporated by amendment to 6 the Waste Treatment Management Component and all appropriate 7 support documents pursuant to Section 9 of these Rules. 8

#### (B) Collection System Study Areas.

9 Certain areas are designated on the Collection (1)10 System Service Area Map as "Collection System Study Areas". 11 Such designations are temporary and exist only until such 12 time as each member and special district designates that 13 land to which it intends to provide sewage collection services 14 pursuant to Section 8(d) of the Rules for Adoption of the 15 Land Use Framework Element. At the time of designation, 16 Collection System Study Areas shall become designated Collec-17 tion System Service Areas. The Waste Treatment Management 18 Component and the appropriate support documents shall be 19. amended to incorporate the Collection System Service Area 20 pursuant to Section 9 of these Rules.

(2) Designation as a Collection System Study Area shall not be construed to interfere with any grants or loans for facility planning, design or construction.

### 24 SECTION 7. CAPITAL IMPROVEMENT PROGRAMS AND NEEDS LIST

25 (A) For the purpose of implementing Article I, Section 3(A)
26 of Part 1 of the Public Facilities and Services Element, all
Page 27

designated management agencies shall submit to CRAG no later than
 March 30 annually a five year Capital Improvement Program and a
 3 20 year needs list by five year increments.

4 (B) Projects to be included on the five year Capital
5 Improvement Program and the 20 year needs list shall meet one or
6 more of the following criteria:

7 (1) Projects which are grant eligible under EPA '201'
8 facilities planning guidelines pursuant to federal regulations
9 40 CFR 35.900-35.960;

10 (2) Projects for which a management agency intends to11 apply for state or federal funds; or

12 (3) Projects submitted for informational purposes by13 the management agency.

14 (C) Projects submitted in either the five year Capital
15 Improvement Program or the 20 year needs list shall be accompanied
16 by the following information:

Population serviced by project; and

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Project description;

(4)

(2) Estimated completion date;

(3) Project cost and proposed funding source;

AUND A. JORDAN. ATTORNEY AT LAW 27 S. W. HALL STREE ATLAND, OREGON 97 TELEFHONE 221-1640

(5) Waste flows projected for the project.

(D) Amendments and/or additions to the Capital Improvement A Program and related 20 year needs list may be requested by the 4 designated management agency from CRAG. Such requests must be 5 submitted in writing and include information as noted in Section 26 7(C). Amendments or additions may be summarily approved if in Page 28 1 compliance with Section 7(B) of these Rules.

2 SECTION 8. PROJECT PRIORITIZATION

3 CRAG shall review each publication of the DEQ grant priorities4 list and shall comment thereon.

5 SECTION 9. CONTINUING PLANNING PROCESS

6 (A) For the purpose of implementing Article V, Section 1
7 (A)(2)(b)(i) of the Waste Treatment Management Component, the
8 continuing planning process shall follow, but not be limited to,
9 the procedure shown below.

10 (1) Evaluation of new information with respect to its
11 impact on the Waste Treatment Management Component. Component
12 changes shall be based upon:

(a) Changes in custody, maintenance and/or distribution of any portion of the Waste Treatment Component;

(b) Changes in population forecasts and/or wasteload projections;

(c) Changes in state goals or regional goals or objectives;

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(d) Changes in existing treatment requirements;(e) Implementation of new technology or completion

of additional study efforts; <u>development of more</u> energy-efficient wastewater treatment facilities; or

(f) Other circumstances which because of the impact on water quality are deemed to effect the Waste Treatment Component.

26 (2) CRAG Board of Directors review and release of Page 29
1 Component changes for public comment.

2 (3) Adequate public review and comment on the Component.
3 (4) Adoption of Component change by CRAG Board of
4 Directors.

5 (5) Submittal of change to DEQ for approval and state6 certification.

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(6) EPA approval of change.

8 (B) For the purpose of amending support documents referenced
9 in Article I, Section 3(F) of the Waste Treatment Management
10 Component, the process shall be as shown below:

(1) Any proposed change to the support documents shall
be presented to the CRAG Board of Directors with the following
information:

14 (a) Reasons for proposed action; 15 (b) Basis of data; Method of obtaining data; 16 (C) 17 (d) Period in which the data was obtained; 18 (e) Source of the data; 19 (f) Alternatives considered; and 20 Advantages and disadvantages of the proposed (q) 21action. 22 Following approval by the CRAG Board of Directors, (2) 23 amendments to the support documents shall be attached to

25 (a) Approved change and replacement text for
26 document;

appropriate documents with the following information:

Page 30

24

(b) Specific location of change within document;

(c) Reasons for change; and

3 (d) Date of Board action approving change.

#### 4 SECTION 10. APPLICATION OF RULES

5 These rules shall apply to all portions of Clackamas, Wash-6 ington and Multnomah County.

#### 7 SECTION 11. SEVERABILITY

8 (A) The sections hereinabove shall be severable, and any 9 action or judgment by any state agency or court of competent 10 jurisdiction invalidating any section of these rules shall not 11 affect the validity of any other section.

(B) The sections of the document adopted by these rules
13 shall also be severable and shall be subject to the provisions of
14 subsection (a) of this section.

15 (C) For purposes of this section, the maps included in the 16 Waste Treatment Component of the Public Facilities and Services 17 Element shall be considered as severable sections, and any section 18 or portion of the Maps which may be invalidated as in subsection 19 (A) above shall not affect the validity of any other section or 8 portion of the maps."

22 SB:kk:01 23 S:211/20-28

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Page 31



# Environmental Quality Commission

POST OFFICE BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

#### MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item L, July 28, 1978, EQC Meeting

Report on Emergency Response Plan

#### FOREWORD

The Oregon Accident Response System (OARS) was developed to fill a need for coordinated handling of accidents, spills and incidents involving chemicals. In the evolution of the current plan coverage has extended to raw product preparation, manufacturing, processing, merchandising, transporting, use of materials and disposal of containers or residues. Response is geared for incidents involving chemicals, oil products, radiological products, industrial or municipal spills or by-passes, biological impact and general public concern with suspected problems. Because no one State agency has the time, money, expertise or capability to handle all situations, the response team concept was developed to use the combined expertise of agencies to best cope with incidents in Oregon. Industry is tied to the system because they have developed nationwide capability particularly for response to chemical problems. Federal DOT, EPA and Coast Guard are the normal Federal response agencies, though FDA and OSHA have considerable expertise for advising on exotic chemicals. For a system to work it must be a cooperative effort with delegated people in responsible charge at the scene. OARS attempts to effect this kind of miracle.

#### BACKGROUND

In 1969 under ORS Chapter 634, the newly formed Committee on Synthetic Chemicals (COSCITE) was given the charge to set up a statewide contingency plan to protect the people, fish, wildlife, environment and property from the effects of accidental spills of chemicals. Initially a subcommittee of COSCITE formulated a functional plan and presented it to State Agency Heads for general approval. It was decided to give the plan quasi-statutory status through a memorandum of understanding among agencies involved and a Governor's executive order. A Clearing House Council became the governing board of the system responsible to agency heads and the Governor.

The OARS plan is now in its fourth edition. Figure 1, the cover sheet of the plan, is the core of the simplified system. Figure 2, indicates the scope of involvement among respondees to the system.

#### **RESPONSE NEED**

Significant spills of chemicals, oil and other materials have occurred in the past and increasing use of these materials in the Northwest increases the chance of spills. EPA estimates a near doubling along the nations waterways, highways and railroads in the next two years. And we are vulnerable! It can happen! It will!

New Federal Laws for OSHA, FDA, DOT, EPA, Department of Agriculture and others emphasize the toxicity and hazardous nature of chemicals that used to be taken for granted as being necessary for use despite effects. These tighter laws have made people more careful with use of hazardous-toxic materials, but more and different kinds are being used resulting in an increased number of accidents. Prevention is the keyword in industry and agency approaches, but incidents still occur, necessitating protection of people, property and the environment in that order.

#### OREGON'S SYSTEM

The success of any response system depends on three elements:

- 1. Communication (simple, rapid, two way).
- 2. Line Function Responsibility (Outlined and delegated).
- 3. Simplicity of system (KISS principle).

Under this plan communications are defined as follows:

- 1. Any accident, spill or other significant problem involving chemicals affects people. These people normally call the police, fire or other emergency groups who respond to the emergency. The 800-452-0311 number is available for them to call directly and get police, fire and OARS response.
- 2. The police officer in charge (generally State Police) is responsible for calling auxiliary help as he needs it and informs the state response teams through the Emergency Services Division of the nature and extent of the problem.
- 3. Emergency Services Division carries a duty roster from the agencies and serves as the major communications link between agencies and emergency officers. Under this plan, an oil spill will be reported by Emergency Services directly to the Coast Guard in Portland, who will get state response as needed.
- 4. Command post communication is set up by the response team if the nature and duration of the problem warrant it.
- 5. Communications to the press are through information officers in the Department of Environmental Quality, State Health Division and the Department of Agriculture. Uncoordinated reporting without technical advice might panic people unnecessarily.

Line function responsibility is established in OARS to assure orderly progression of needed work with minimal duplication of effort.

- 1. The emergency officer who responded to the scene or his chief officer is in charge of all efforts at the scene. <u>All response must be</u> coordinated through this officer.
- 2. Response team efforts whether they be state, local, private or Federal are to be directed by a coordinator named by the Department of Environmental Quality. This coordinator is cleared through the emergency officer and has co-workers from Health Division, Department of Agriculture, Fish and Wildlife and other pertinent agencies for collaboration on decisions.
- 3. In large spill situation, a State Policeman and vehicle may be on standby for a communications link at the site in addition to a telephone or radio station command post.
- 4. All response team members are to carry identification cards stating their name and department affiliation to present to the officer in charge.

The Clearing House Council is involved in the management of OARS with responsibilities of:

- 1. Standing by for administrative decisions needed during and following the accident.
- 2. Handling arbitration, if needed.
- 3. Reporting to Governor and other members of the Clearing House Council.
- 4. Holding critique on each major accident.
- 5. Conducting simulated response situations.
- 6. Following up with adjustments to OARS.

#### IMPLEMENTATION OF PLAN

The best laid plans are <u>no good</u> unless they are put into practice. Implementation is a never-ending process. Revisions are made every time an incident occurs and a critique indicates need for change. It must be loose and simple. The following outline gives the general approach:

- A. Tie in plan with others. Use their experience and expertise to the fullest extent possible.
  - 1. CHEMTREC (Appendix A)
  - 2. NACA
  - 3. Railroads
  - 4. State
  - 5. Federal
- B. Set up Response Teams.
  - 1. Coordination (on scene). Make sure someone is in charge
  - 2. Communications
    - a. Response Team.
    - b. Public
    - c. Management

- 3. Response Teams for spill emergency
  - a. Evaluation
  - b. Real location of work
  - c. Clean up
  - d. Disposal
  - e. Follow up.
- 4. Training.
- C. Make sure materials are stockpiled or available and someone knows how to use them in emergency.
- D. Make sure all liaison can be effected on an emergency basis without worrying about purchase orders and minor details of "Whose responsibility."

#### REMIND SUMMARY

No one ever knows enough about spills and spill handling. You can never plan exactly for spill control. Each instance is a special case. Each incident is a separate learning experience. However, we can remember the following:

- A. Hope it never happens to me.
- B. Know that if it can happen it will (Murphy's Law Murphy was an optimist).
- C. Know that it will happen.
- D. Be prepared to respond when it does happen.

#### DIRECTOR'S RECOMMENDATION

No action required Information only.

Rill

WILLIAM H. YOUNG

#### REFERENCES

Crude lists of references are appended in B and C. The lists grow day by day and need refinement on a frequent basis.

Warren C. Westgarth:mm 229-5983 July 17, 1978 Attachments: Figure 1, Figure 2, Appendix A, Appendix B, Appendix C.



EMERGENCY RESPONSE INFORMATION

CLEAR	INGHOUSE	COUNCI	L
	AND		
TECHNICAL	ADVISORY	WORK	GROUP

Appendix XIV Planning Post Spill Evaluation Prevention Education

Appendix	11	-	DEQ
Appendix	111	-	Health Division
Appendix	١V	-	Highway Division
Appendix	V	-	Dept. of Agriculture
Appendix	VI	-	Radiological
Appendix	VH	-	Fish and Wildlife
Appendix	VIII	-	State Police
Appendix	XV	-	Emergency Services

#### CLEARING HOUSE COUNCIL

Warren C. Westgarth Chairman			Nept of Environmental Quality
werten of westgartin, onarrhand	•	•	Dept. Of Environmental Quarty
Ramona Q. King, Administrative Assistant	•		Dept. of Environmental Quality
Harvey Latham, Vice Chairman	•		Division of Emergency Services
Joseph Capizzi, Secretary-Recorder			Oregon State University
Gil Bellamy	•	•	Traffic Safety Commission
Harold E. Burke		•	• • • • • • • Attorney General
H. Scott Coulter	•		Highway Division
Donald A. Haakenson	•		Public Utility Commissioner
William H. Kosesan			Department of Agriculture
LaVerne S. Miller			
P. H. Franzen		•	Fire Marshal
John C. Williams			State Police

#### OREGON ACCIDENT RESPONSE SYSTEM Work-Responsibility Chart



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#### APPENDIX B

## RESPONSE SYSTEMS FOR CHEMICAL INCIDENTS

## Warren C. Westgarth May 9, 1978

#### 1. State of Oregon Emergency Operations Plan, Emergency Services Division

- Oregon Accident Response System, Clearing House Council (Multi-Agency) (Chemtrec, NACA, Chlorep)
- 3. Oregon Emergency Water Supply Plan, EPA, Region X
- 4. Hazardous Materials Spills Emergency Handbook, AWWA
- 5. State of Idaho Draft Plan, James Perry, Department of Health & Welfare
- Emergency Response Plan Development Guide for Water Utilities, State of Washington, Department of Social & Health Services.
- 7. <u>Debris and Hazardous Material Cleanup and Control</u>, State of Washington State Patrol.
- A Guide for Control and Cleanup of Hazardous Material, American Association of State Highway and Transportation officials.
- Poison Control Center, University of Oregon Health Sciences Center, Portland: 225-8968. Rest of State: (800) 452-7165
- 10. Coast Guard EPA DEQ Oil Spill Contingency Plan

#### APPENDIX C

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#### BIBLIOGRAPHICAL REFERENCES

These references in listing form and the annotations are not in order of importance or need, but rather are listings of the accumulated material currently on file in State Offices.

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Railway Systems and Management Association (RSMA), <u>Handling Guide</u> for Potentially Hazardous Commodities, 1972

Fire Protection Guide on Hazardous Materials, National Fire Protection Association, 3rd Edition, 1969.

Dangerous Articles Emergency Guide, Bureau of Explosives, Association of American Railroads, New York, N. Y., March 1970.

<u>Clinical Handbook on Economic Poisons</u>, USPHA, Publication No. 476 Superintendent of Documents, 1967.

<u>Pesticide Information and Safety Manual</u>, University of California, Berkely,CA, July, 1968.

Wood, William S., Transporting, Loading and Unloading Hazardous Materials, Chemical Engineering, June 25, 1973, Pp. 72-94

Crossland, Janice and Kevin P. Shea, <u>The Hazards of Impurities</u>, Environment, June, 1973, Pp. 35-38.

Wolf, Harold W. and Jack E. McKee, <u>Water Quality Criteria</u>, 2nd Edition, State Water Quality Control Board, Sacramento, California, Publication No. 3-A, 1963.

Control of Spillage of Hazardous Polluting Substances, Battelle Northwest Laboratories for EPA, 15090-FOZ, November, 1970.

<u>A Study of Transportation of Hazardous Materials</u>, National Academy of Sciences, National Research Council, Wash. D.C., May 7-9, 1969.

The Disposal of Environmentally Hazardous Wastes, Task Force Report, Environmental Health Sciences Center, OSU, December, 1974.

<u>Control of Hazardous Materials Spills</u>, Conference Proceedings, EPA, March 21-23, 1972, Houston, Texas.

Transportation of Hazardous Materials, DOT, Oklahoma, 1973.

Oil Spill Primer, Coastal States Organization, June, 1975.

CHRIS, Hazardous Chemical Data, CG-446-2, Coast Guard, DOT, January 1974.





# Department of Environmental Quality

522 S.W. 5th AVENUE, P.O. BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5373

#### MEMORANDUM

To: Environmental Quality Commission

From: Regional Operations

Subject: Informational Report: Eastern Region Petition on nuisance from rotten potatoes being used as cattle feed EQC meeting July 25, 1978, LaGrande

#### Background

During the Public Forum portion of the Commission meeting in LaGrande, Mr. Steve Gardels, Eastern Region Manager, "presented a petition on behalf of approximately 50 citizens in the Hermiston area dealing with odors from rotten potatoes being used for cattle feed in an area near their residences. Mr. Gardels said that he was presented the petition because none of the petitioners were able to appear, and he was acting for those petitioners. This petition is made a part of the Commission's record on this matter. Mr. Gardels said that the smell from the rotting potatoes and the flies and other pests that go along with them, was indescribable."

Mr. Gardels said that rural cattle feedlots were currently exempt from the air quality rules. Under normal circumstances where cattle were fed grain materials accepted odors did occur, he said. Because of the large potato production in the area, Mr. Gardels continued, more and more cattle raisers were using waste potatoes as feed, and this was not the only feedlot with odor problems. Commissioner Somers asked why the owners of this property were not cited for lack of a solid waste disposal permit. Mr. Gardels replied that they did not need a solid waste permit because they were actually feeding cattle. The problem was, he said, that more potatoes were dumped in the area than the cattle could eat."

He met with the owners of the feedlot and they informed him they intended to bring in more potatoes because they were good feed. The owners said they would try to get the potatoes spread out to where the cattle could eat them faster. Mr. Gardels said he could only deal with this problem through the water quality rules because the Department did not have air quality rules to deal with the odors from feedlots and they did not need a solid waste permit because the potatoes were being used as feed. Commissioner Somers suggested that this might come under the solid waste rules as a salvage site."

Chairman Richards asked why they were buying more than the cattle could eat. Mr. Gardels replied that because they were already harvesting potatoes in the area, last year's storage was being cleaned out. He said the owners indicated they were going to bring in more cattle to consume the potatoes. Even if that happened, he said, there would still be a gross amount of odors."

Mr. Gardels requested guidance from the Commission on this matter. He said it was a legitimate use of a waste product, but it was developing into a large environment concern in the area. He said he did not think it was a salvage operation."



Chairman Richards said that one remedy would be for the petitioners to hire an attorney to test this. He said that the Commission was not in a position to make a decision on this matter at this time. Chairman Richards asked that Mr. Gardels check with Headquarters staff and legal counsel to see if this matter fell within the Department's regulations. He said that Mr. Gardels might have to advise the petitioners that they may have recourse through the courts. Commissioners Phinney suggested that the petitioners may want to call this to the attention of their Legislators."

#### Legal Recourse

By definition, odors are air contaminants, ORS 468.275(2). But ORS 468.290(1) exempts agricultural operations from the air pollution statutes. ORS 459.120 enables any County to enact an ordinance to regulate solid wastes which create offensive odors, etc. on private property, but ORS 459.130(3)(b) again exempts "agricultural operations and growing or harvesting of crops and the raising of fowl or animals" from any County ordinance that is enacted under ORS 459.120.

Obviously, the legislative mandate is to not regulate odors from agricultural operations.

If an agricultural operation is receiving solid wastes from a Company that is on a waste-water discharge permit, we have some regulatory authority against the Company. Usually, a general condition is written into the permit which provides that solid waste shall not be disposed of in a manner that will create nuisance conditions.

ORS 468.720(2) provides that no person shall violate the conditions of any waste discharge permit issued under ORS 468.740 and subsection (3) therefore provides that a violation is a public nuisance. Thus, the Company who initiates the chain of events with which we are concerned could be proceeded against by injunction to abate a public nuisance as well as by civil penalty or criminal proceedings for violation of the applicable permit condition.

In J. R. Simplot Company's permit under special conditions (Schedule D) "Waste solids removed from the waste water shall be disposed of in a manner such that nuisance conditions are not created and such that the waste solids or leachates therefrom are not discharged into public waters of the state."

It is understood from Mr. Gardels that this approach would not apply in this particular situation. Potato culls from Simplot are just one of many sources of solid waste feed for this feedlot. Simplot's wastes are now being hauled to an isolated site on the feedlot which is not near the area of the citizens' complaints. The potato culls which are deposited in the problem area come from a number of sources, none of which are on a DEQ wastewater discharge permit.

If potato culls are accumulated beyond a reasonable amount which is needed for stockpile to feed animals, then one could argue that the excess is solid waste and should be under a solid waste permit. This may happen in a situation where a feedlot is on contract to take all the solid waste from a Company, not just what it needs, to feed the number of animals it has on hand. What constitues an excess amount could be hard to define and verify.

The resolution of this particular problem is for the farmer to move the one storage/feeding site which is bothering the neighbors. If he doesn't, the affected citizens should pursue legal action. Citizens have certain legal rights. They can file a common law nuisance suit to enjoin the operation or collect damages. In this case, it appears that the citizens have a much better legal handle to regulate than does the Department. We cannot regulate without legislative mandate.

#### Follow-up Results

In August 1978 a field inspection revealed the waste water from the feedlot was discharging into a roadside ditch. Mr. Gardels took action by notifying the feedlot owners of the violation and requested that they remove the waste from the ponding water on their property and fill in the low area to prevent more waste from entering the ditch.

Umatilla County did explore using their County Ordinance on nuisance problems but they felt it could not handle this type of problem.

The owners did fill in all the low water areas and they also reduced the cattle that were confined at the feedlot.

Simplot's decided that the potatoes they were supplying the feedlot operation free could be handled better so they eliminated the source and set up a program to sell and moved the potatoes to other markets.

Since these corrections have occurred, the DEQ Eastern Region office in Pendleton has received no further complaints. Word was received from a resident of the area that odors had disappeared since standing water which had potato waste in it was removed from the low area.

hk

# City of Prairie City

Prairie City, Oregon 97869

#### July 27, 1978

Steve Gardels Department of Environmental Quality Pendleton,Oregon

Dear Mr. Gardels:

We would like to bring you up to date on some of the things that have been done toward improvements to our sewer system.

A survey was made to determine if the residents would be willing to support a bond issue for this purpose. A copy of the survey is enclosed. 132 questionaires were returned. 110 persons indicated that they would vote for a bond issue, while 22 said they would not.

On June 28th the council authorized an appraisal and a review of potential sites, and authorized the Engineer to make a preliminary study of the feasibility of anew site which is currently in progress.

Last Friday a public hearing was held on Land Use Planning for a Comprehensive Plan.

The City will be requesting grant assistance for correction of existing infiltration inflow to be performed this winter. The council is aggressively pursuing a program to remedy and upgrade present sewage treatment and collection facilities.

An election will be held as soon as costs have been determined for sites and improvements.

Very truly yours, City of Prairie City

max City Recorder

enc.

The City of Prairie City, by 1983, must have no discharge into the river, from H's sewer facilities. We used to expand the sewer facilities to the South end of rown and parts of the North end. This, plus additional improvements and a movatorium on present construction poses the following questions:

Are you is favor of expending and improving our sewer system?

NO NO

Are you on the sever at present?

NO NO

Preserge of a bond issue would enable the City to be eligible for various Covernment grants of beroden 75% and 85%. Are you willing to vote for a bond issue to construct and improve the sever system up to the following smoont of approximately \$2.29 per \$1,000.00 of present assessed valuation and an incrusse in over therges?

 $r \geq$ 

XEB\_\_\_\_\_EO

Additional comments would be appreciated .....

#### TO WHOM IT MAY CONCERN:

In a residential area outside Hermiston, Oregon at the corner of East Funkin Center and South Edwards roads, a situation exists which is of deep concern to the people of the community. Rotten potatoes have been and are being dumped at this location in a low swampy area. The potatoes are supposedly being dumped as cattle feed, but the cattle are unable to eat even a small part of the potatoes. The piles of rotten potatoes have been irrigated and left to stand and rot in stagnent water thus creating a feed ground for thousands of sea gulls, a breeding ground for flies and mosquitoes, and a smell that is indescribable. The smell is sickening \_\_\_\_\_\_ something worse than cat manure or vomit. The putrifying smell permeates the atmosphere for at least a one mile radius of the quagmire of rot and putrification.

The repulsive odor is actually sickening and people living in the area can't sleep at night.

Most of the people in the area are anxious and concerned about the situation \_\_\_\_\_ anxious enough to have called upon the Health Department, The D. E. Q. and other supposedly interested agencies.

In this area people have not approved one neighbor's right to build a slaughter house. Also in this area, residents are required to have nineteen acres before they can have a sewer approved. This situation is much worse than a hundred open seweres.

We the undersigned expect and demand some immediate action on this matter.

John I packard

Ola M. Sauyer GT 3 Box 32 Nermston Aug DEnglish RT 3, Box 3432 HERMISTON Nettie English Rt 3. Bri 3432 Alumitan Que. Rt.3, Box 3439 - Hermiston, Org, Ruhard A Chilles Rt. 3, Box 3439 - Hermitton, Orlg. Fatricia J. Childs R13 BOX3360 Herminton Only Charles JEastin Rt3 Box 3360. Humitan Maney Easton Rt3 But 3355 Hermietan Rt3 Bry 3303 Hermistm Estation & Parkard Mr. & Mrs. Don laptale 13438 Hermisht; Bob Wilson RA3 Doy 3440 Nerminton Solucita & Dowe Rt. 3-BX. 3430 Hermiston Al. 3-BX-3430 Hermiston Joy my. Aindo Jack L. Hinds HERMISTON 127-3 BOX 3424 Horold & Townsend HERMISTON N+ 3 Box 3424 Moxine Townslad Herneston RT1 BOX 1382 Linda Comption Amy Mills multiple Jenison Hermitalon Q1 3Ber 3422 Hermiston R+ 3 Box 3628 Rt. 3 Bay 3628 dermestore R+3 Ba 3630 Ethel Kitterson Rt3 BOX3446 Hermiston Daniel Liebe Rt. 3 Kry 3370 Hermiton Shirley & Ellion Rt 3 Box 3374 Hermiton Orl. Quoight S. Lockett Rt 3 Voy 3374 To chuldbycene, Gendip Rockett

1506 Sebalt Rt. 3 Boy 3372 Hermanton Mabel Liovanni Rt. 3 Bou 3316 Resiminton Mina Star Iracy Rack Hermiston, Oce. Hermiston, Ore, Hermiston, augur Donceld'Elleat Rt 5 Box 3370 R#3. box 3382 Pt 3 Bg 3514 Edwin enge Earl M. Johnston R13-B13514-Hermicton acey. Marlene phratin Dermiston, One P.O. BOXISTS Donnie J. Schuster P.O. Box 496 Hermister, accor HERMISTON, Ea Linda S. Schisler ROUT 3 BOX 3516 Corroll Koberts Donnabelle Roferts Rt3 Box 3516 Themister On. Anequeline Fernack RT.3 Box 35-15 RT3 Box 3512 Kenneth & Lafter Hermiton Cize Q13 Box 3512 Afernation along Mar year Loftus Mary Matter

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COME WHERE

# CITY of IRRIGON

IRRIGON, OREGON

97844

July 27, 1978

Honorable members-officers; Environmental Quality Commission.

In the early Fall 1977, the City of Irrigon had a mild epidemic of Infectious Hepatitis. The origin was not determined. In the late Winter of 1978 the city had another outbreak, Which started in Irrigon and moved east into Umatilla, some 8 miles. A total of 15 cases were reported. This beaame a real concern to the Morrow County Health Nurse, who innoculated some 486 to curb the spread. In the Spring an outbreak of 2 or 3. It was determined by the city. and Pat Wright, Health Nurse, that existing problems were becomming a hazard and were becomming more evident. We made the decision to seek water samples in the river and the city wells. It had been previously determined that the last source had-eeme of Hepatitis had either originated from a local source(private well) or the wwimming area at the city park. The enclosed test reports will show several fecal (human or warm blooded) Coliform on the rivers edge. Particularly high in two areas. (which later appears to be a pattern). The last outbreak had two children who had been swimming in the river. It was later determined that these outbreaks and the largest outbreak occurred by some of the proven bad wells and directly in a verticle line with the worst areas in the river. In the last two tests, the paterns became more evident and convincing. In all of the outbreaks, the possible epidemic was diverted. But- the source still remains. And may continue to do so, until the present non-conforming septic systems are replace with a modern sewer system. In all. 72 samples were taken. 26 were either bad or showing a trend upward. (36%). With the guidance and suggestions of the Vitro Engineering Corp. of the TriCities area (Washington), the city has decided to change the plans to a low maintnance costs, lagoon system. About a year ago Mr. Stwe Gardels, Regional Directer of D.E.Q., recommended 'funding' for our project, but his recommendation was rejected ..

The City of Irrigon requests that this rejection be recinded on the strength of our findings. "the City of Irrigon has a health hazard" in its present aged septic tank systems and drain **fie**lds.

The City cannot expand or grow, nor will commercial entities come into the City with the hazards as evidneced above. There are letters in file(17) in which, "if these poor sewer conditions were eliminated, local and other merchants would expand and increase



# CITY of IRRIGON IRRIGON, DREGON 97844

continued.

the needed payroll by over 165 new employees.

The City, due to the spill-over from Umatilla and Boardman, has increased in population, since January 1977 by over 38%. 400 1977(Jan.), estimated 550(july,78) Official State Census March 1978 was 515. Irrigon must grow to take care of the needs in N.E. Oregon.

A city that can not grow, may die slowly. A Health Hazard, can also be the contributo of this slow death.

We want to live, we need your acknowledgement, we do have a Health HAZARD.

Sincerely, Jack R. Basiden IRRIGON, OR. city manager

JRB/jrb

Enclosure;



# CITY of IRRIGO IRRIGON, OREGON 97844

"Members of the Commission:

It is the policy of the Department of Environmental Quality to refuse septic tank permit requests when the drain field is within 36" of a gravel aquifer or to require the importation of fill material to assure this dimension is not violated.

We of the City of Irrigon would therefore like you to adopt the logical extension of this existing policy - namely, give priority ratings for funding those municipalities which have existing septic systems over such an aquifer and who are attempting to correct the situation by having a sewer treatment facility and collection system installed."

Sincerely,

Mayor Vernon Stewart

Jack R. Baisden, City Manager



CITY of IRRIGON IRRIGON, DREGON 97844

#### RESOLUTION 78-7

WHEREAS the City Council of Irrigon, Oregon resolves to seek from D. E. Q. (Department of Environmental Quality) and/or E. Q. C. (Environmental Quality Commission), both State of Oregon agencies, relief or variance from restrictive permits or non-permits for septic systems and/or drain fields within the city or its growth pattern or requests for those agencies to declare the city a health hazard area.

PASSED and APP	ROVED this	134	day of	June	_, 19 <u>78</u> .
Jamer	Stewart U	<u>L</u>			
			•		

ATTEST: 0 mil Recorder

#### VITRO ENGINEERING CORPORATION

July 13, 1978

Mr. Clarence Hillbrick DEPT. OF ENVIRONMENTAL QUALITY Yeon Building 522 S. W. Fourth Portland, Oregon, 97204

Dear Sir:

Enclosed is the data from three sets of samples taken on June 22, June 27, and July 7, 1978. Also enclosed is a map showing the location of the various sample points.

Prior to the sampling period, several farmers south of the City fertilized their fields. The data indicates that this fertilization significantly influenced the nitrate level in the groundwater. The samples show a seven-fold reduction between the first and second set of samples, and a sixty-fold reduction between the first and third set of samples. The rate that the nitrate compounds decreased in the groundwater strongly indicates that the soils of the region have a very poor exchange capacity.

The shoreline river samples show that the nitrate levels are significantly declining during the sample period. This trend strongly suggests that the river is recharged by the groundwater in the area.

An evaluation was made of the well samples taken July 7, 1978 to determine if a trend could be established. The coliform tests did show four wells with measurable coliform counts. These wells are located in the north end of the City. The depth of these wells are reported to be approximately sixty feet.

Seven rivershore samples were taken on July 7, 1978. The three samples taken west of the City limits showed significantly higher fecal coliform counts, with the highest fecal coliform count (350 MPN/100 ML) occurring at the end of First Street. The area is close to two of the wells with measurable coliform counts. There are no known water discharge points that could account for this substantial increase in fecal coliforms in the river water.

CONCLUSION: Some sample points indicate the probability that the groundwater near the river is being contaminated by septic tank effluent. Four wells are showing measurable coliform counts and may require abandonment in the near future.

Very truly,

VITRO ENGINEERING CORPORATION

R. M/away

R. Marvin Carroll, P. E. Projects Director

RMC/djg

Enclosures

cc: R. C. Anderson/File

Aorrow County Health De. .rtment

LEXINGTON, OREGON 97839 July 18, 1978

Mr. Clarence Hilbrick Supervisor of Sewage Works & Construction P.O. Box 1760 Portland, OR 97207

> Re: Irrigon's Reclassification of Sewer Grant

Dear Sir:

It has been brought to my attention that a probable health hazard exists in the city of Irrigon.

I am concerned with the results of numerous water samples analysis obtained recently from the Columbia River and numerous private wells located in town; some of them exceed the standards for fecal coliform counts.

Morrow County has had a continuous problem the past several months in the Irrigon area with infectious hepatitis. Last week, 10 cases of shigella was reported in the Hermiston area. As you know, both diseases are spread through the oral-fecal route.

I would like to encourage you to do everything possible to raise the city of Irrigon on the sewer priority list before an endemic breaks out.

> Yours truly, Dat W-yl PN. Pat Wright, R.N.

County Health Nurse

PW:blm

#### VITRO ENGINEERING CORPORATION

127910

July 13, 1978

Mr. Clarence Hillbrick DEPT. OF ENVIRONMENTAL QUALITY P. O. Box 1760 Portland, Oregon, 97207

Subject: City of Irrigon Request for Reclassification (Sewer Project)

Dear Mr. Hillbrick:

In our effort to get requested and critical information to you prior to July 14, we failed to enclose pertinent information - and compounding our problem, we used S.W. Fourth Street instead of S.W. Fifth and the wrong zip code in your address.

For fear of your not receiving this information in time, we are duplicating our efforts. I attempted to contact you at 3:30 p.m., but you were not available. We were able to get ahold of Mr. Gildow who said it would be all right as long as we mailed duplicate information Special Delivery on this date.

It should be noted that we have added information on known hepatitis cases to this duplicate map. After Vitro Engineering's analysis of our problem and viewing the enclosed map it is found that most of the hepatitis cases have occurred close to areas showing problem wells. There appears to be a connection between the problem wells and hepatitis.

Please find enclosed a duplicate of the original letter from Vitro Engineering as well as the missing data sheets and map.

Thank you for your interest and assistance.

Very truly yours,

Jack R. Baisden, City Manager CITY OF IRRIGON, OREGON

JRB/djg

Enclosures

cc: R. C. Anderson/File R. M. Carroll J. R. Baisden



Environmental Laboratory

Date: 27 June 1978 Invoice No.: 25391

Subject: Analysis of water samples from the City of Irrigon, Oregon. The samples were received 23 June 1978 and assigned reference Nos. 4303-17.

	Parar	eter		
	Fecal Coliform			
Sample	MPN Index/100 ml.	Nitrate as ppm N		
No 1	(190)	0.200		
	(100)	0.299		
NO. 2	(19)	0.216		
No. 3	$\sim$ (110)	0.225		
No. 4	(170)	0.203		
No. 5	26	0,139		
No. 6	33	0.032		
No. 7	26	0,039		
No. 8	(170)	0.053		
No. 9	(170)	0.047		
No. 10	$\langle 1600 \rangle$	0.216		
Pump No. 1	<2.	5.11)		
Pump No. 2	<2	(5.24)		
Pump No. 3	<2	(5.18)		
Tank No. 1	<2	5.46		
Tank No. 2	<2	(3.85)		

ppm indicates "parts per million"

< indicates "less than"

ew

All tests are performed in accordance with current Environmental Protection Agency guidelines as published in the Federal Register.

The information shown on this sheet is test data only and no analysis terpretation is intended or implied.

Samples will be retained 30 days unless otherwise requested.

Reported by: San



scientists

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Environmental Laboratory Date: (3 July)1978

Invoice No.: 25397

Subject: Analysis of water samples from the City of Irrigon, Oregon. The samples were received 28 June 1978 and assigned reference Nos. 4424 - 51.

x	Parameter	`
	Fecal Coliform	Nitrate
Sample	MPN Index/100 ml	as ppm N
	< <b>1</b> . 5	0.05
Pump #1	< 2 . 2	0.85
Pump #2	<. Z . Z	0.71
	<2	0.91
lank #2	<2	1,83
Cafe - Pivot Pt.	<2	0.60
Will McCog	<2	0,047
Ken Lamb - Wash, & 8th	2 burner	0.071
STUHL	<u>470</u> )	0.050
A.C. Houton School	<2	0,369
Bev Fry	<2	0.039
Vern Stewart	<2	1.66
Mrs. Irish Well	<2	1.66
Wayne Schnell	<2	<u>(9.84)</u> -
Ridex	<2	(2.72)
Howell	<2	2.72)
J.B.	<2	0.067
Irrigon (City shop)	<2	2.22
Van Weems (well)	, <2	<u>(4.79</u> )
Mat Doherty, Rt. 2 Box 38 East	. <2	(3.32)
Beach (Eppenbach)	. 5	0.064
Beach (Shore)	2 hours	0.056
50' off shore	<u>(4)</u>	0.050
‡-mile off Park beach	2	0,050
±-mile off boat dock	2	0.039*
Fish and wildlife	2	0.047
A Swim Hole	(33)	0.117
B Swim Hole	87-	0,340
C Swim Hole	(B) 2000	0.185

< indicates "less than" ppm indicates "parts per million"

ъ

All tests are performed in accordance with current Environmental Protection Agency guidelines as published in the Federal Register.

The information shoon on this sheet is test data only and no analysis or interpretation is intended or implied.

Samples will be retained 30 days unless otherwise requested.

Reported by:

Kelly E. Cook

Corvallis Office (Corvallis Origin 9730 - 503/752-4271 - Cable: CH2M CVO) TROPS W. Western Blvd - 210 Box 428, Corvallis Origin 9730 - 503/752-4271 - Cable: CH2M CVO

#### WATER SAMPLE NUMBERING FOR

1978

'TA

Shore off 2nd 1.

- 2. Shore between 1st and 2nd
- 3. Shore off "1st
- 4. Shore off 5th
- Shore off 6th 5.
- 6. Swimming area
- 7. Easterling Washington
  - 1-----
- 8. Swimming area
- 9. Cement House 2nd West
- Washington 2nd West 10. Proctor
- 11. Murray Washington West 2nd
- Riley 12.

4

- 13. 2nd West Washington Rider
- 15. Swift Washington
- 16 Oregon 1st St**ohl**
- 17. Hadley Trailor Court
- 18. Lamb
- 19. Doherty
- CURLEN 20.
- 21. Anderson
- 55. Clark
- 23. White
- 24. Creamers
- 25. Rock
- 26. Schnell outside
- 27. Gilcrease
- 28. Schnell inside
- 29. Well #1
- 30. Well #2



4

Date: 11 July 1978 Invoice No.: 25405

Parameter

Subject: Analysis of water samples from Irrigon, Oregon. The samples were received 8 July 1978 and assigned reference nos. 4480-4508.

Sample		Total Coliform MPN Index/100ml	Fecal Coliform MPN Index/100ml	Nitrate as ppm N
Charalir	NO 1	مبر م	70 .	0 064
Shorelir			120	0.004
Shorelir			(150)	0.055
Shorelir				0.000
Shorelin				0.057
Shorelin				0.057
Shoreili			$(13)^{\circ}$	0.004
Chorolin			15	0.005
Shoreili	10 0			0.004
West	10		<2.2	0.055
west	10		<2.2	0.230
West	11		<2.2	0.099
West	12		<2.2	0.077
West	13	2.2	<2.2	0.080
West	15		1 <2.2	0.083
Southwes	st16	<u>~16</u> / «	216	0.107*
Southwes	st17		<2.2	0.067
South	18	<u>&gt;16</u>	(5.1) ·	0.085
South	19	and the second sec	<2.2	0.063
South	20	(>16)	<2.2	0.110 *
South	21	and the second of the second o	<2.2	0:050
South	22		<2.2	0.083
North	23		<2.2	0.057
North	25		<2.2	0.074
North	26		<2.2	0.129 👳
North	27		<2.2	0.101 >
North	28		<2.2	0.101
Well 1	29		<2.2	0.091
Well 2	30		<2.2	0.080

ppm indicates "parts per million"

< Indicates "less than"

> Indicates "greater than"

engineers planners economists scientists

#### Date: 11 July 1978

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AUE 0.012 ± 0.042

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Invoice No.: 25405

Subject:

: Analysis of water samples from Irrigon, Oregon. The samples were received 8 July 1978 and assigned reference nos. 4480-4508.

		Parameter		
Sample	Total Colif MPN Index/1	orm Fecal Coliforn 00ml MPN Index/100m	n Nitrate nl as ppm N	. • •
Sample / Shoreline 2 Shoreline 3 Shoreline 4 Shoreline 5 Shoreline 7 Shoreline 7 Shoreline 9 West 10 West 10 West 10 West 11 West 12 West 14 West 15 Southwest 15 Southwest 16 Southwest 17 South 18 South 19 South 19 South 20 South 21 South 22 North 24 North 26 North	$\frac{MPN \ Index/1}{MPN \ Index/1}$ $= 1 \qquad$	$\begin{array}{c cccc} & & \text{Pecal collion}\\ \hline 00ml & & \text{MPN Index/100m}\\ \hline & & & & & \\ \hline & & & & & \\ \hline & & & & $	n1       as ppm N         0.064         0.053         0.060         0.061         0.062         0.063         0.064         0.057         0.064         0.053         0.064         0.053         0.053         0.053         0.053         0.053         0.053         0.053         0.053         0.053         0.077         0.080         0.083         0.1077         0.063         0.107         0.063         0.110         0.050         0.083         0.057         0.074         0.129         0.101	0.087 0.087 0.078 76% incurs 0.042
2/Well 1 28Well 2	29 30	<2.2 <2.2	0.091 0.080	

ppm indicates "parts per million"

< Indicates "less than"

> Indicates "greater than"

R ank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
500	239AMD	Staff Offices & Director	628 1		4 da l	
500	200700		020.1			
499	044AMD	Information-Services				
499	043AMD	Hearings-Office(239)	127.5			
499	041AMĐ	Personnel-Unit-Retention(239)				
499	037AMD	Publie-Affairs-Officer(239)	86-2			
499	036AMD	Director's-Office(239)	171-0			
490	001AQD	AQD Administration & LRAPA Grant	613.2	1		
480	156WQD	Program Planning and Administration	218.3	1		
470	059SWD	SW Administration	112.0	1		· .
460	223LAB	LAB Adm. Repair & Maintenance	594.2	2		
460	112156	Repair and Maintenance (Labonatony (222)	10 0			
409	1101 CU	Repatr-anu-Matheenanters (002)	+A*A			
459	±±ć±∋₩	Laberatery-Administration(223)	90-9			
459	Ŧ <del>0</del> 3FMŐ	Kepatr-and-Maintenanee(223)				
459	095EWQ	Laboratory-Administration(223)	256+1			~~~~~~~~~

Rank	Number Title	Package Dollars	Cumulative Dollars	Percent	Comments
450	240AMD Management Services	2214.0	4		
449	42aAMDSupport-Services-(15%)(206)	197,2	18765.9		
449	046AMDPurchasing-and-Property-Glerk-(207)	66-2			
449	042AMDSupport-Services-(85%)-(206)	1117-3			
449	039AMDAccounting-(207)	511.0	13884		
449	207AMDAcctg&-Purch(39,-46)(240)	577-2			
449	206AMDSupport-Services-(42,-42a)(240)	1314-5			
449	040AMDBudgeting(240)	176-5			
449	038AMDAdministrator,-Management-Services-Div.,EQG	145-8			
440	224AQD Air Program Planning and Development	730.6	5		
439	021AQDPrevention-of-Significant-Deterioration-Prgm.				
439	019AQDAir-Monitoring-Program-Management(224)	58-5			
439	003AQDNew-Source-Review(224)	181.7			
439	002AQDControl-Strategy-Development(224)	431-1			

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
430	225AQD	Data Acq. & Monit.	1737.8	6		
429	205AQD	-Special-MonitMed/GP-(149,-133)(221)	75-0			
429	204AQD	-SAMWG-(132,-151)(225)		,		
429	151LAQ	-SAMWG-Requirements,-EPA(204)		24613-9		
429	149LAQ	-Other-Special-MonitoringMedford-(205)	153-9	17744-6		
429	135LAQ	-Source-Test-Analysis-(see-7,-18)(225)				
429	133EAQ*-	-Special-MonitoringGrants-Pass(205)		20228		
429	131EAQ	-Ground-level-MeteroroligealPortland-(225)	175-1			
429	130LAQ	-Other-Special-SamplingPortland(225)	71-0			
429	129EAQ*-	-MonitoringMedford-(Also-205)-(221)	71.7			
429	128LAQ	-MonitoringEastern-Region(225)	56-8			
429	127EAQ	-Basie-MonitoringMidupper-Willamette-Valley				
429	125EAQ	-Monitoring-Portland-Network(225)	317-1			
429	124LAQ	-Monitoring-Southwest{225}	102-9			
429	123LAQ	-Laboratory-Administration <del>(</del> 223)				
429	020AQD	-Emission-Inventory-(see-7)(225)	73-0			
429	018AQD	-EstSource-Test-&-Data-Capability-(see-7,135)	46-2			
429	007AQĐ	-Est-Source-Test-Capability-(see-18,-135)-(225)	76-5			

409

Rank	< Number Title	Package Dollars	Cumulative Dollars	Percent	Comments
				<u> </u>	
429	006AQDMeteorology(225)	80-4			
429	005AQDEmission-Inventory-(See-20)(225)	73-0			
429	004AQDData-Processing-&-Reporting(225)	-239-1			
429	132LAQ\$AMWG-Requirements-(204)	72-8	16610-8		
420	228AQD Air Source Compliance	1674.6	8		
419	73bR0D10%-of-#73R0D-(209)	-110-0	17431-5		
419	73aR0D14%-ef-#73R0D-(209)	-154-0	16538		
419	134LAQPlume-evaluation-trainingRegional-Offices	32-2			
419	091R0DSW-Region-PHE-2(AIR)(228)	60:5			
419	073R0DAir-Pollution-Source-Control-(76%)-(209)	-770:0	7623-6		
419	011AQDInspections,-enforcement,-tracking-(228)	-127-5			
419	010AQDProg.OperMajor-Plan-Review(228)	92.5			
419	009AQDAGDP-Issuance-Management(228)	54-6			
419	008AQDProgram-Operation,-Training(228)	-173.7			
419	209DEQApe-See-Gontrol-Reg(73,-73a,-73b)(228)	<del>1</del> 034.0			
410	202AQD Smoke Management	287.2	8		
409	030AQDSmoke-ManagementData-Glerk-(202)	9-7	22883-5		

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
400	014AQD	Vehicle Inspection Program	2134.1	10		
390	213N	Noise Cont.(Hq/Reg)	729.8	11		
389	081R0D	-Noise-Control-(Restore)(213)	138-6			
389	029AQD	Increase-Development-of-Local-Programs	87-4	<b></b>		
389	017AQD	Noise-Local-Programs(213)	210.1		<b></b>	
389	016AQD	Noise-Compliance-and-Assurance-(213)	181.7			
389	015AQD	Noise-Control-Program(213)	112:0			
380	229WQD	Water Source Control	2311.9	13		
379	159WQD	-Gonstruction-Grants-(229)	618-1			
379	157WQD	-Permits/Gompliance-Assurance/Enforcement(229)-	219-1			
379	101LWQ	-Point-Source(229)	147.7			
379	074R0D	-Water-Pollution-source-controlReg.(229)	-1252-8			
Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
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370	230WQD	Subsurface Sewage Program	1211.7	15		
369	220R0D	-Subsurface-Regions-Restore-(230)	285-4			
369	170WQD	-Subsurface-Licensing(230)				
369	167WQD	-Subsurface-Variance-Program(230)	58-3			
369	158WQD	-Subsurface-Evaluations/Permit/Enforcement-(230)	60-7			*
369	075R0D	-Subsurface-sewage-disposalPermits-&-Asst	-833-9			
360	231WQD	Water Monitoring	556.4	15		
359	105LWQ	-Groundwater(231)	9-0			
359	100EWQ	-Estuaries-Water-Analyses(231)	71:0			
359	099EWQ	-Biology(Resolve-Question)(231)	-146-2			
359	098FM6	-Water-Supply-Analyses(231)	25-4			
359	097EWQ	-Surface-Water-Monitoring(231)	-304-8			
350	232WQD	Water Planning and Analysis	811.4	16		
349	172WQD	-Improve-Data-Storage-&-Retrieval(232)	61-4			
349	171WQD	-Restore-Planning-Gapąbility-(add-pp.p.)	-154-1			****
349	166WQD	-Water-Quality-Management-Plan-Dev.&-Update	-136-6			
349	165WQD	-Special-Water-Quality-Studies-(232)	78-8			

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
349	164W0D	Water-Quality-Problem/Progress-Ident_(232)	88-1			
349	163W0D	Data-Storage/Retrieval/Display-(232)	52-6			
349	104LW0	Special-StudiesLaboratory(232)				
349	096EW0	STORET-(also-109,-163,-172)(232)	12-5			
340	233WQD	Experimental Systems	374.3	16		
339	078R0D	Soil-Investigation-services(230-&-233)	141.0			
339	161WQD	Experimental-OnSite-Systems(See-#-75)-(233)	101:2			
339	102LWQ	Subsurface(233)	29-0			
330	217SWD	Sol.Waste.Plang. & Control	1178.9	18		
329	116LSW	Landfill-leachates(217)	55-5	<b></b>		
329	114LSW	Section-Administration/Laboratory(217)	8-5			
329	076R0D	Solid-Waste-Source-ControlRegional-Offices	469-9			
329	063SWD	Operation-of-Recycling-Information-(217)	167.7			
329	062SWD	Solid-Waste-Planand-Imple(comb-w/69)	270:8			
329	060SWD	Solid-Waste-Disposal-Control(217)	181-6		~~~~~~~~~~~	

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
320	212SWD	HW Min. St. Program	223.6	18		
319	061SWD	Hazardous-Waste-Disposal-Control(212)	144 <b>.</b> 4			
319	118LSW	Alkali-Lake	31-5			
319	117LSW	Ghem-Nuelear	22-1			
300	025AQD	Noise Vehicle Enforcement Effort	73.8	18		
290	222AQD	DB1 Port.Data Base Cont.	182.4	18		
289	139LAQ	Low-Volpartsize-seg(see-22,-205)	153-4			
289	022AQD	Data-Base-Imprv:Pdx/Will:(see-139-205)	30-0			
280	234WQD	Restore Water Sce. Cont.	416.8	19		
279	169WQB	Plan-Review(Relates-to-#-84)(234)				
279	080R0D	Restore-Field-Monitoring-(Effluent-Samples)	264-3		<b>-</b>	
270	241AMD	Contract Cont. & Acctg.	69.7	19		
269	054AMD	-Аєєоцяtіng-System(241)				
269	050AMD	Contract-Administration-&-Space-Management	57-4			

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
260	236WQ	WQ Plng. Stud.	279.7	19		
259	110LWQ	-Extended-Estuaries(236)	40-3			
259	109LWQ	-(See-96,170,168)-Data-Base,-eval&-reporting-	33-1			
250	179WQD	Increase Planning Capability	129.4	19		
240	242AMD	Prgms. Coord. & Anal.	311.2	19		
239	214DEQ	-Intgovt-&Gurrent-LGDG-(198,45)	132.5			
239	1980EQ	-LGDG-Gurrent-Effort-(51)(242)	0-0			
239	053AMD	-Policy-Analysis(242)	70:0			
239	048AM0	-Eeonomie-Analysis(242)	58-8			
239	947AMD	-Program-Planning-Goordination-(242)	49-9			
239	045AMD	-Intergovernmental-Goordination-NO-LGDG	69:4			
230	052AMD	Graphic Artist	45.3	19		
220	085R0D	SanitarianEastern Region	47.0	19		

Rank	Number Title	Package Dollars	Cumulative Dollars	Percent	Comments
210	215DEQ LCDC Loc.Pl.Rev.&Tech.Asst.	472.0	20		
209	2008EQLGBG-TechAsst(51)(215)	216-0	·		
209	1999EQLGDG-Local-Plan-Review-(51)(215)	256.0			
200	218SWD Sol.Waste Restore & Improve	373.3	20		
199	121LSWIncreased-Landfill-Leachate-Monitoring	35-1			
199	071SWDRCRA-Procurement-&SW-Reduction-Program	45-5			~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
199	069SWDPubPartSW-(Restore)-(Comb.w-162)	48-8			~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
199	068SWDSolid-Waste-Data-Base-Development-(Restore)				
199	065SWDRestore/Increase-Recycling-Information	60-6			
199	120LSWResource-Recovery(218)	16-6			
190	203AQD Field Burning R&D	801.9	21		
189	140LAQFB-surveillance,-monitoring-network-(203)	330-1	21538-1		
189	028AQDField-Burning-Technician(203)	28-0	22346-6		
189	024AQDField-Burning-Monitoring-Program-(203)	31.0	21637		

189 013AQD---Field-Burning-Research-(203)-----778-6-----16371-3-----16371-3-----

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
180	211SWD	HW Auth. RCRA	193.5	21		
179	119LSW	Special-Projects/Laboratories-(211)	25:6			
179	072SWD	Pesticide-Container-Control-Prog(211)	28-3			
179	067SWD	RGRA-Hazardous-Waste-Mgt(211)	106-0			
179	066SWD	Hazardous-Waste-Manifest-System(211)	59-2			
170	208LAB	GC/MS	221.6	21		
169	154LAQ	Organic-Identification-by-GC/MS-(208)	44-3	23078:6		
169	122LSW	-Organic-Identification-by-G.G./M.S(208)		20939-8		
169	106LWQ	-Organic-identification-by-GC/MS-(208)		20570		
160	056AM	Additional Hearing Officer	55.6	22		
150	226AQD	Air Lab Qual.Assurance	51.9	22		
149	143LAQ	-Quality-Assurance-of-Industrial-Emission-Anal.	7.4			
149	137LAQ	-Meterological-data-Quality-Assurance	44-5			
140	219SW	RCRA ReqmtsSolid Waste	56.5	22		
139	064SWD	Open-Dump-Inventory-Under-RGRA(219)	56-5			

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
130	245R0D	Increase WVR	68.0	22		
129	092R09	Will,-Yalley-Office-Support	12-5			
129	087R00	WillValley-Region-Inspections	55-5			
120	141AQ	Millersburg Special Monitoring	16.8	22		
110	089R0D	Management of Spill Response	68.8	22		
100	238WQD	Asst.Grant Proj. to Red. Cost	245.4	22		
099	191WQD	"Fast-Tracks"-Gontract-Management(238)				
099	182WQD	-Grant-Management-for-Small-Communities				
090	026AQD	Eugene Air Strategy	69.3	22		
080	237WQ	Increase water source control	460.4	23		
079	108LWQ	-Intralaboratory-Quality-Assurance(237)	74-4			
079	107LWQ	-Workload-Increase/Biology(237)			~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
079	084R0D	-Sewer-Insp(see-169)-(rede-wWQD)(237)	220-0			

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Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments
070	227AQ	Air Monit. Improvmt.	72.2	23		
069	146LAQ	-SF-6-Traeer-Studies-(227)				
069	142EAQ	-Upper-Air-Sounding-Metsystem-(227)				
069	136LAQ	-Mieroseopie-Analysis(227)	22-2			
060	090R0D	SW Region Sanitarian	47.0	23		
050	032AQD	Indirect Source Permit Program	64.6	23		· · · · · ·
040	197 AMD	Buy Out Word Processing Leases	0.0	23		
030	031AQD	Airshed StudyThe Dalles	201.6	23		
020	201DEQ	LCDC "everything else"	111.8	23		
010	058AMD	Tax Credit Program	183.4	23		
001	776R0D		9-0	7753-6		
001	77 aR00	-(14%-of-#77Enforce-Air)-(210)				

Rank	ank Number Title Package Dollars	Cumulative Dollars	Percent	Comments
				······································
001	01 210DEQEnforcement-(77,-77a,-77b)			
001	01 083R0DEastern-Region-Environmental-Engineer61.5			
001	01 079R0DSW-Planning-and-Subsurface-(Restore)406.4			
001	01 077R0DAdministrationDEQ's-formal-Enforcements-(210)-236-6	10416-8		
001	01 051AMDLCDC-(ALL-DEQ)-(198,-199,-200,-201)705.9	19963-5		
000	00 93RODSouthwest-Region-Chemist			
000	00 82R0DCoordinationLCDC			
000	00 35AQBLGDC-Coordination			~~~~~~~~~~~
000	00 34AQDNoise-ControlLand-Use-PlanNoise-ControlLand-Use-Plan			
000	00 33AQDProgram-OperationsMajor-PlanProgram-OperationsMajor-Plan			
000	00 27AQDData-Processing			** ** ** ** ** ** ** ** ** ** ** ** **
000	00 243R0DRestore/Improve-AQ-Sce:-Compl-(part-80;)73:6			*****
000	00 23AQDClean-Air-Act-Subprogram			
000	00 196WQDRestore-Water-Supply-Analysis			
000	00 195WQDTax-Gredits			
000	00 194WQBStep-III-Grant-Delegation	25061		
000	00 193WQDStep-II-Grant-Delegation	25656		
000	00 192WQBStep-I-Grant-Delegation	25459-4		
000	00 190WQDExpand-Roseburg-Subsurface-staffExpand-Roseburg-Subsurface-staff			

Rank	Number	Title	Package Dollars	Cumulative Dollars	Percent	Comments

000	189WQDProvide-Spill-Goordination
000	188WQDIncrease-Soils-Staff
000	187WQDExpand-Staff-Will+-Valley-Region
000	186WQDExpand-Staff-SubsurfaceERO
000	185WQDEstablish-Construction-Inspection
000	184WQDExpand-Estuary-Monitoring
000	183WQDLCDG-Coordination-(See-Agency-Mgt.)
000	181WQBAssume-Federal-Facility-Permit-Issuance61.423873.5
000	180WQDProvide-Capability-for-Source
000	177WQDDevelop-Toxics-Analysis-Capability
000	176WQDIncrease-Eastern-Region-Technical
000	175WQDRestore-Compliance-Assurance
000	174WQDRestore-Subsurface-Technical
000	173WQDMonitor-Groundwater
000	168WQDPlanning-Contract-Administration
000	162WQDWater-Quality-Monitoring
000	160WQDComplaints/Spills
000	155LAQConsulting-Service-&-Analysis-AQ13-424099-724099-7
000	153LAQData-Handling-Pkgfor-Lab-Analysis22.224173.124173.1

Rank	Number Title	Package Dollars	Cumulative Dollars	Percent	Comments
					· ·
000	152LAQRetractible-Booms-KPTV-Tower-site	36+3	24150-9		
000	150LAQPollen-Sampling-and-analysis	34-6	24648-5		
000	148LAQSpecial-Analysis/AQ-Laboratory		24011.9		******
000	147LAQAnalysis-for-sulfur-in-oil	1+1	24230-7		الله الله الله الله الله الله الله الله
000	145LAQPartiele-Fallout-Network	4-4	23534+1		~~~~~
000	144LAQQuality-Assurance,-Software-DAS	55-1			
000	138LAQPollution-standards-Index-software	26-1			~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
000	115LSWRepair-and-Maintenance/Laboratory				
000	1111LWQWater-Supply-Analyses		24667+3		
000 `	094R0DSW-Region-ET-3-Medford	45.7	22929-2		
000	088R0DSoil-Investigation-services	55-5	23589-6		
000	086R0DOffice-Support-Eastern-Region	25-0	18568-7		
000	070SWDImproving-Solid-Waste-Gontrol	56-5	24229:6		
000	057AMDModular-Furniture	14-9	24114-6		
000	055AMDTraining; Affirmative-Action-and-Safety	58+8			
000	049AMDCentral-Stores	35-2	23624+8		

	DEPARTMEN FY'79 Proposed for (Pri	T OF ENVIR PRIORITY I Adoption c ority Point	DNMENTAL QUA POINTS LIST n August 25 : Breakdown)	ALITY , 1978	АТТАСН	MENT III
Project	Need Category	Regulatory Emphasis	PEP Stream Segment Points	Project Type Points Step Status	Total Points	Priority No.
PORTLAND SE RELIEVING P CORVALLIS - INCREASE LAKE OSWEGO - WILLAM-MA TILLAMOOK CITY BROWNSVILLE LAKESIDE PRINEVILLE - LAUGHLIN	HASE 2 - WI * RYL INCR * * *	LL BF CEF	RTIFIED FR	OM FY 78	FUNDS - GP	ANT INCR 1 2 3 4 5 6
BEND - INCREASE ROSEBURG METRO CANYONVILLE MT. VERNON HILLSBORO - IRRIGATION HARRISBURG MONMOUTH	다 나 다 나 나 나 나 나 나 나 나 나 나 나 나 나 나 나 나 나				· · · · · · · · · · · · ·	7 8 9 10 11 12 13
INDEPENDENCE EUGENE-MWMC DUNDEE USA - ROCK CREEK TRUNK GOLD HILL REEDSPORT PORTLAND - SLUDGE	13 15 15 15 15 15 15 15 15 15 15 15 15 15				·····	14 15 16 17 18 19 20
HAMMOND GERVAIS WILLAMINA WOODBURN ROCKAWAY LINCOLN CITY -PHASE II	* * * *				• • • • • • • • • • • • • • • • • • • •	22 23 24 25 26 27 29
SHADY COVE ROSEBURG - 1/1 CORRECTI ST PAUL HAINES BCVSA - WESTSIDE TRUNK DAYTON	44 ON 44 44 44				· · · · · · · · · · · · · · · · · · ·	29 30 31 32 33 33
BCVSA-JACKSONVILLE BCVSA - WHITE CITY PORTLAND SE RELIEVING P PORTLAND SE RELIEVING P SILVERTON PORTLAND - 45TH DRIVE CORVALLIS - SW ANNEXATI	H3 * H4 * A ON A	150 130 150	•5 79.82 •1 48.00 •2 48.00	10 2 3 3 3 1	A242.32 A204.10 A202.20	33 36 37 37 38 39 40
WARRENTON MEDFORD - FOOTHILLS-LON ROSEBURG - RIFLE RANGE TERREBONNE AREA WESTSIDE SD MADRAS COTTAGE GROVE	A RD A A A A B	150 150 150 150 150 150 150	.2       40.00         .1       46.00         .44.00         .2       36.00         .1       38.00         .2       36.00         .2       36.00         .7       73.00	10 1 3 2 3 2 7 1 3 2 3 2 10 2	A201.20 A201.10 A199.00 A194.20 A193.10 A191.20 B235.70	41 42 43 44 45 46 47
DONALD SALEM - 1/1 CORRECTION WAUNA-WESTPORT TRI-CITY - COUNTY ASTORIA - WILLIAMSPORT IONE COOS BAY - 1/1 CORRECT	B B INT ON P	150 90 150 90 150 150 90	48.00 7 93.45 1 40.00 3.3 93.45 40.00 34.00 84 82.00	7 2 10 1 7 2 10 2 3 2 7 2 10 1	B207.00 B202.15 B199.10 B198.75 B195.00 B193.00 B184.40	48 49 50 51 52 53 54
PORTLAND - ELK ROCK INT MEDFORD STP EXPANSION FALLS CITY CLACKAMAS CO - RHODOWEL	H R B CHES P	90 80 80	.3 93.45 3.7 58.50 .1 61.64 .1 38.67	5 3 10 1 7 1 7 2	B181.75 B163.20 B149.74 B127.77	55 56 57 58

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Project	Ż	щ	ፈ	S L	<u>م</u> م	S.	· from	۵_
SW I TNCOLN CO SO	D	0.0	1	22 66		•		-
KLAMATH FALLS REGIONAL	р С	20 150	د ا ۱ ۸	32.00 69.00	10	1	8120.10	59 60
STANFIELD	č	150	- • 1 _ 1	67.33	10	2	C229.43	60
E MULTNOMAH CO CONSORTIUM	c	150	6.0	48,00	10	1	C215.00	62
SEASIDE	C	150	•2	48.33	10	2	C210.83	63
LAGLE POINT	<u></u>	150	3_	46.00	ΪÛ	5	C208.30	64
PRAIRIE CITY	C C	90	10.0	95.73	10	S	C207.73	65
CANNON BEACH	č	150	د ه ا	40.00	10	2	C207.10	65 67
CLACKAMAS CO SD - KELLOGG SLUDGE	Č	<u> </u>	े <b>ं र्ड</b> े	93.45	10	2.0	C198.95	67
USA - GASTON	Ċ	9n	• 1	95.73	10	Z	C197.83	69
NEWBERG	C	<u>9</u> 0 (	,9	93.45	1.0	5	C196.35	70
NEWPORT	C	150	<b>"</b> 7	32.00	10	1	C193.70	71
	C C	90	ے م ا	88.91	10	2	C191.11	72
FLORENCE	ॅंट		a 1 (6	77 00	10	· 🗶		74
PRINEVILLE	C C	90	.6	77.50	10	د ۱	C175.10	75
OAKRIDGE	С	90	.4	70.73	10	ż	C173.13	76
LOWELL	С	90	• 1	70.73	10	2	C172.83	77
ESTACADA	ç	90	2.	68.45	10	2	C170.65	78
	C	90		63.91	10	2	C166.71	79
PHILOMATH	U C	90 30	• 4	51.33	10	2	C163.53	8.0
MONROE	c	90	•	- 570,30 - 54,82	10	2	C156-92	84
SCIO ,	C	90		50,27	10	2	C152.37	83
RAKER	С	90	1.0	49.00	10	2	C152.00	84
JUNCTION CITY	c	90	• 3	48.00	10	S	<b>C150.3</b> 0	85
OPECHEL	Ç.	90	•3	48.00	10	2	C150.30	86
UNEDWELL HANKS	C C	90	• <b>C</b>	48.00	10	2	C150.20	87
CORVALLIS ATRPORT	<u>c</u>		9 Å	48.00	10	<u>د</u> .	CI50.10	<u>38</u> 20
HALSEY	č	90	.1	48,00	10	د ۱	C149.10	<u>9</u> 7
ENTERPRISE	С	90	.2	44.67	10	2	C146.87	91
HUBBARD	ି <b>C</b> -	90	2ء	48.00	7	1	C146.20	92
DAKLAND	<u>C</u> -	90	s ]	44.00	10	5	C146.10	93
URAIN USA - CEDAR MILL TOUNK	C C	90	<b>* *</b> .	44.00	10	1	C145.10	94
ST HELENS	č	90	a 1 Q	48.00	3	2	C143.10	95
RAINIER	č	90	5.	40,00	10	2	0142.80	90
TWIN ROCKS SD	С	9.0	• I	40.00	10	2	C142-10	98 55
HEPPNER	С	90	• 2	34.00	10	1	C135.20	99
ATHENA CONTRACTOR OF THE TRACE AND A	<u> </u>	90	<b>, 1</b>	34.00	10	1	C135.10	100
	C	90 90	, L	30.00	10	2	C135.10	101
ONTARTO	r r	90 90	8 *1	26 00	10	2	C130-10	102
NORTH POWDER	č	90		24.00	10	· · · · · · · · · · · · · · · · · · ·	C126.00	100
FOSSIL	C	90	.1	20.00	ĩŏ	1	C121.10	105
MILTON-FREEWATER	c	90	<b>"</b> 5	18.00	10	Ż	C120.50	106
BURNS	C	90	• 4	16,00	10	1	C117.40	107
ULARMARI Multnoval Co - tnvednego	D	150		48.33	7	1	D206.43	108
HAPPY WALLEY	U Sh	150 Niews-	3.U	48.00		2	0206.00	109
CLATSOP BLAINS ARFA	_ H_ ≆⊡D	1.12型(注) 1.50		40.00 40.00	3	4	0203.10	は現現した。 「東京市であるのです。
FT STEVENS STATE PARK	D	150	• •	40.00	ે તુવ્ય .	2	0195-10	1112 112
NORTH ALBANY SD	D	80	.6	91,18		2	D176.78	113
HIGHWAY 101 SD	D	80		81.67	3	S	D166.67	114
MILL CITY	n	80	• 2	75.27	7	_ <b>]</b> .	D163.47	115
COVE ODCHADD ADEA	् D ) े	80		70.73	7	1	D158.73	116
TURNER	200 100	81/ Rn	1 1	48.00	. 7 · · ·	4	U137.00	
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Project	Z	жū	<u>n</u> .	S T	പപ	S.	june	۵_
CRANCE CONDE ADEA	0	3.4			~	•		110
SODANTILE	0	80		48.UV 77 EE	/ 7	1	D136.00	119
BOVSA-WHETSTONE	ט ח	ויכ		11.00	ן בי	1	0130.20	120
COLUMBIA CITY	n	QV		40.00	ວ ?		0125.10	122
CARMEL-FOULWEATHER SD	ñ	80	• • •	32.00	7	ົ້	D121.10	123
THE DALLES - FOLEY LAKES	Ď	80		30.00	3	2	D115.00	124
HOOD RIVER - WESTSIDE	Ð	80		30.00	3	2	D115.00	125
MAPLETON AREA	D	50	.1	52.00	7	1	D110.10	150
CAMAS VALLEY AREA	D	50		52,00	7	1	D110.00	127
IRRIGON	D	50		.50,67	7	S	D109.67	128
NORTH PLAINS	D	50	<u>, 1</u>	48.00	7	1	D106.10	159
BROOKS	<u>D</u>		·	48.00	7	1	D106.00	130
MERLIN - COLONIAL VALLEY	D	50		46.00	7	2	D104.00	131
ALBANY - DRAPERVILLE AREA	D	50		48.00	3	1	D102.00	132
MODUC POINT	<u>, 0</u>	<u>50</u>		38.00	7	1	D 96.00	133
SISTERS	D.	<u>5</u> 0	• 1	36.00	7	2	D 95.10	134
CPESCENT SU	. 0	50		36.00	7 -	1	D 94.00	135
POPTIAND COL DIND DELITENTING	<u></u>	<u>. 50</u>	20 0	<u>34.00</u>		. 4 .	0 93.00 E157 45	1.30
PORTLAND COL BLVD RELIEVING	Ľ. 5	ວນ ຮຸດ	7 0 U	73042 D2 45	ວ ເ	1	5197049 5153-25	131
PORTLAND - LINNTON INT	្ព	50	.2	93.45	ې ۲	1	E132025	120
PORTLAND RIVERGATE INT	F	50	1.3	93.45		1	E149.00	140
DETROIT	F	50	1.90	75.27	7	1	E133.27	141
VERNONIA	E	50	.2	70,56	10	1	E131.76	142
GRANTS PASS I/I	E	50	1,4	58,50	10	1	E120.90	143
POWERS	E	50	.1	62.00	7	1	E120.10	144
VENETA	E	50	.2	48.00	10	1	E109.20	145
TANGENT	F	50	. 1	48.00	7	1	E106.10	146
YONCALLA	E	50.1	.1	44.00	10	1	E105.10	147
BANDON	E	50	.2	42.00	10	2	E104.20	148
USA - REEDSVILLE TRUNK	E	50	• 1	48.00	3	2	E103.10	149
USA - SUNSET TRUNK	E .	50	" <b>i</b>	48.00	3	Z	E103.10	150
LUSTINE MALLOWA LARE CAN	Ę_	<u>) C</u>	·····	44.01		1	E102.5/	151
ALLUWA LANC DA		50	1	44.01	2	1	E102.0/	154
SCAPPONSE		50		48.00 40 00	1.0	1	E102.10	153
NESKOWIN SA	<u></u>	50	<u>, ,</u>	40.00	7	· · · <sup>1</sup>	E 08 00	107
ROSEBURG - LOOKINGGLASS	F	50		44.00	<u>د</u>	ì	E 98-00	156
LAPINE	F	50		36.00	7	i	E 94.00	157
HELIX	Ē	50		34.00	.7	1	E 92.00	158
ODELL SD	F	50		30.00	10	ī	E 91.00	159
BIGGS JUNCTION	. <sup>2</sup> E.	50		36.00	3	1	E 90.00	160
REITH AREA	E	50		34.00	3	1	E 88.00	161
CASCADE LOCKS	Ę.	50		30.00	3	1	E 84.00	162
GRESHAM - LINNEMAN	E	<u>5 n</u>	,1	22.00	3	2	E 77,10	163
SANDY	E	50.		55*00	3	1	E 76.00	164
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STATE OF OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY FY'79 SEWERAGE WORKS CONSTRUCTION GRANT PRIORITY LIST Proposed for Adoption on August 25, 1978 (Target Schedules and Estimated Grant Dollars)

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for	Project	PDE	ngr	eso.	tep	stir ran \$1,(	arg Mo∕	c tu≀ Mo∕^	ШО	г. 	<u>.</u>
		z	шÌ	<u>م</u> _	S	щα	μÇ	ΑŪ,	ŭ	<u>с</u> .	-
342-01-1 355	PORTLAND SE RELIEVNG CORVALLIS-AMENDED	NA 002636	FA 06	TNT STP TMP	3	5000 411	0778	0778	PHASE2-INC	;R .	
440-01-1	LAKE OSWEGO-MARYL	NA	- 5.1.45%	TNT	3	80	0678		INCR	2	2
440-01-1. 505	LAKE OSWEGO-MARYL	NA	34	COLL	3	600	1078	0.070	INCR	Ĩ.	2
428	BROWNSVILLE	002008	36	STP IMP	3	380	0978	V8/8		4	3 4
530	LAKESIDE	002999	33	STPOJNT	3	1600	0978			ţ,	5
545	PRINEVILLE-LAUGHLIN		43 54	INT	3	275	0379			-	5
487-03	ROSEBURG METRO	002258	14	STRAINT	- 3	2000	0779		PHASED.	ا ج	7 3
488	CANYONVILLE	002072	33	STP IMP	3	1050	1178			ç	3
439 489	HTLLSPOOD TODICATION	NA 002224	01	STPOINT	3	_586	0878			1(	)
490	HARRISBURG	002334	50 52	STP IMP	3	673	0878			1 I ] [	1 2
625	MONMOUTH	002061	09	STP	3	547	0878			1	3
640	INDEPENDENCE	102044	0.9	STP	3	812	0878		. ·	1	<b>4</b> .
624	EUGENE-MWMC	NA. NA	14	STP. INT	े <b>2</b> व	400	1178		INCR	15	2 2
626	DUNDEE	002238	84	STP INP	- 3	216	0379		EUROPA	16	5 5
611	USA-ROCK CK TRUNK	NA	16	INT	3	5500	0479			17	7
556	BEEDSPORT	002239	33	CTP TWP	3	1080	.0978. 1978.		· · · · · · · · · · · · · · · · · · ·	1 <u>}</u>	3 3
557-03	PORTLAND SLUDGE	002690	06	STP IMP	3	13000	0978	EY78	PHASE1	20	<b>o</b> . 100
557	PORTLAND SLUDGE	002690	FA	STP IMP	2	300	1278		PHASE 2	2(	<u>)</u>
475	LAGRANDE-ISLAND CITY	002046	12	STP IMP	3	360	0678	0678	PHASE 1	21	1
502	HAMMOND	002274	43	INT	3	810	0179		INCRUCINE	22	2
476	GERVAIS	002739	09	STP.INT	3	414	0279			2:	3
507 509	WILLAMINA WOODBURN	102211	41	STP IMP	3	210	0978	6670		24	+
509	WOODBURN	005000	16	STP, INT	3	3900	0778	0778	SCHED B	25	2 5
273	ROCKAWAY	002330	33	STP IMP	З	1980	1278			26	ŝ
559	HERMISTON	002047	56	STP, INT	3	4120	1178			27	7
455	SHADY COVE	NA	30	STPIINT	3	625	1078	Ì		29 - 29	2000 - 100 2
616	ROSEBURG SEWER REHAB	002258	F۸	STP, IMP	2	601	0977	0977	· · ·	30	)
516 523	ROSEBURG SEWER REHAB	002258 NA	14	STP.IMP	2	2000	0379		PHASED	3(	) 1
587	HAINES	f34.}≈≎ 1	01	STPAINT	3	253	1178			32	2
527	BCVSA-WESTSIDE	NA	14	TNT	S	41	0678	0678		31	3
527 430	BCVSA-WESTSIDE	NA 002263	14	TNT	3	960	0279	· ·		3.	3 ^
430	DAYTON	002363	84	STP IMP	3	356	0679			34	4
652	BCVSA-JACKSONVILLE	002079	30	TNT	2	38.	0778	0678		35	ŝ
552 558 <sup>77</sup>	BCVSA-JACKSDNVILLE	002019	30 12	<u>TNT</u>	3	495	0179	0570		<u>35</u>	5 2
558	BCVSA-WHITE CITY	0.02246	14	INT	3	600	0179	0210		31	6
342-01-2	PORTLAND SE RELIEVNG	NA	FA	TNT	3		0479		INCR-PHASE	3 3	7
467	SILVERTON STLVERTON	002065	36 24	STP.COLL	2	85	1078			38	3
622	PORTLAND-45TH DR	NÅ	FA	JNT, COLL	3	406	1078			39	3 9
665	CORVALLIS (SW ANNEX)			TNT.COLL	1	30	1278	- · ·		4 (	J
665	CORVALLIS (SW ANNEX)	N 2.4		INT, COLL	2	100	0979			<b>A</b> (	).
627	MEDFORD-FOOTHILLS	NA NA	- 1-1-1	TNT.COLL	<u>्र</u> २	270	0379		· · - · - · - ·	42	2019) 2
560	ROSEBURG-RIFLE RNG	NA		TNT&COLL	Š	25	0579			4	3
560	ROSEBURG-RIFLE RNG		<u>.</u> 	INT&COLL	3	110	0979			43	3
464	TERREBONNE AREA	NA		SYSTEM	」、 こっ	- 24	11/8			44	4
574	WESTSIDE SD-K FALLS		32	TNT, COLL	2	80	1078			4	5

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a.	Project 2	s De L	A Cra	AC AC	
574	WESTSIDE SD-K FALLS 32	INT, COLL 3	850 0779		45 <sup>°</sup>
579	MADRAS NA 14	INT, COLL 2	135 0279		46
512	COTTAGE GROVE 002055 47	STP IMP 2	150 0279		47
440		STPAINT 2	40 0179		
646	SALEM 002640	STP TMP 1	350 1078		40 49
437	WAUNA-WESTPORT SD NA 16	STP, INT 2	70 1078		50
437	WAUNA-WESTPORT SD NA 16	STP, INT 3	509 0879		50
493	TRI CITY-COUNTY NA 56	STP, INT 2	1500 0379		51
619	ASTORIA-WILLIAMSPT NA FA	TNT 2	88 0878		52
203 217	ASTORIA-WILLIAMSPI NA FA	INI 3	/15 04/9		52
628	COOS RAY #1 002357	CTP TMP 1			
628	COOS BAY #1 002357	STP TMP 2	198 0879		54
605	PORTLAND-ELK ROCK NA FA	TNT.COLL 3	337 1178		55
599	MEDFORD 002626	STP EXP 1	90 1078		56
449	FALLS CITY	STP, INT 1	12 0179		57
526	CLACKAMAS CO-RHODU NA 56	STP IMP 2	150 1178	· _ ·	5.8
537	SW LINCOLN CO SD NA 43	CTP.INI 2	45 1078	•	59 59
516	KLAMATH FALLS REGION002630 33	STP 2	446 1178		
565	STANFIELD 002697 67	STP.IMP 2	38 1078		61
565	STANFIELD 002697 67	STP, IMP 3	431 0679	-	61
653	E MULT CO CONSORTIUM	STP, INT 1	80 1078		62
503	SEASIDE 002040 56	STP IMP 2	330 0179		63
429	EAGLE POINT 002229 87	SIP IMP 2	45 1078		64 ·
4674		STP TMP 2	288 0679	· · · · · · · · · · · ·	
499	PRATRIE CITY 102003 80	STP.INT 2	65 1278		.6.6
499	PRAIRIE CITY 102003 80	STP.INT 3	532 0879		66
511	CANNON BEACH 002022 16	STP IMP 2	150 1278		67
604	CLACK CO-KELLOGG SL 002622 16	STP IMP 2	68 1278		68
5/5	USA-GASTON 002015 56	SIP IMP 2	72 1078		69
494	NFWERR 002015 50	CTP 2	160 1178		70
494	NEWRERG 0.02025	STP 3	2250 0879		7.0
618	NEWPORT 002257	STP IMP 1	38 1078		71
618	NEWPORT 002257	S AWI AIS	200 0979		71
506	SHERIDAN 002064 47	STP IMP 2	52 0878		72
505	SHERIDAN 002064 47	STP IMP 3	~ 248 0479		
615		STP TVP 3	465 0570		73
533	FLORENCE 002074 47	STPIMP 2	69 0179	·	74
533	FLORENCE 002074 47	STP IMP 3	600 0979		74
645	PRINEVILLE 002361 43	STP IMP 2	130 1278		75
645	PRINEVILLE 002361 43	STP IMP 3	1448 0879		75
514	OAKRIDGE 002231 47	STP IMP 2	72 1178		76
1014 ビアコ	UAKRIDGE 002231-47	SIP IMP 3	585 0979	·	77
ः उ ५७७			967 1118 967 1270		( [ 77
594	ESTACADA 002057 16	STP IMP 1	32 0878	0878	78
515	SCI0 002930 36	STP LMP 2	16 0179		83
515	SCI0 002930 36	STP IMP 3	117 0779		83
431	BAKER 002069 12	STP IMP 1	15 0978	INC	84
431	BAKER 002069 12	STP IMP 2	176 0179		84
431 458	DAKER 002069 12 CORVALLIS ATRPORT 002050 40	SIP IMP 3	1976 0879 57 AEZA		84
595	HALSEY MINIORI 002230 43	STP IMP 1	13 1278	······································	90 KV
629	DRAIN 102964	STP IMP 1	10 0279		94
648	HEPPNER 102077 01	STP IMP 1	14 0179		99

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Project No.	Project		NPDES No. Engr. Code	Project Description Step	Estimated Grant Amt. (\$1,000) Target Cert. (Mo/γr)	Actual Cert. (Mo/Yr)	Priority No.
635 651 650 558 447 659 642	ATHENA FOSSIL BURNS CLATSOP PL/ MILL CITY DEXTER ARE/ GRANDE RONI	1 1 VINS AREA N N DE AREA N	02281 01 02853 A A A	STP IMP 1 STP IMP 1 STP IMP 1 STP.INT 1 STP.INT 1 STP.INT 1	16 0779 12 0379 12 0479 137 0878 22 0479 8 0379 16 0179	0878	100 105 107 117 115 116 119
662 649 664 664 664 546 477	SODAVILLE CAMAS_VALLE ALBANY(DRAF ALBANY(DRAF ALBANY(DRAF CRESCENT_SI DETROIT	EY AREA PERVILLE) PERVILLE) PERVILLE) )	03	STP, INT 1 STP-UNC 1 TNT 2 INT 3 STP,INT 1 STP,INT 1	12 0379 8 0979 8 0978 16 0479 180 0979 12 1078 16 0479		120 127 132 132 132 135 141
501 663 551	WALLOWA LAM SCAPPNOSE SANDY		A 05	STP INF 1 STP IMP 1 INT 1	10 1278 20 0779 8 0379	······································	154 154 164
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# STATE OF OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY EXTENDED PRIORITY LIST FY'80 AND BEYOND Proposed for Adoption on August 25, 1978 (Target Schedules and Estimated Grant Dollars)

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355	CORVALLIS-AMENDED	002636	06 5	TP IMP	3	6000	0580	I	NCR	1
486-01-2	BEND PHASE II	NA	03 T	NT&COLL	3	6000	1279	I	NCR	7
487-03	ROSEBURG METRO	002258	14 5	TP.INT	. 3	8000	1279	, p	HASED	8
624	EUGENE-MWMC	NA	14 5	TP, INT	÷ 3	25500	1179	P	HASED.	15
624	EUGENE-MWMC	NA	S.	TP, INT	3	30000	1080	P	HASED	15
557	PORTLAND SLUDGE	002690	FAS	TP IMP	3	5000	0380	P	HASE 2	50
616	ROSEBURG SEWER REHAL	8002258	14 5	TP, IMP	З	4000	1179	P	HASED	30
342-01-3	PORTI AND SE RELITEVN	GNA	FA T	NT	3	1000	0480	Ţ	NCB-PHASE	4 37
665	CORVALLIS (SW ANNEX	)	T	NT.COLL	ã	900	0780			40
596	WARRENTON	002087	ç	ТР ТИР	2	66	0280			41
596	WADDENTON	002087	c c	TP TVP	7	528	0181			41
464	TEDDERONNE	NA	c	VSTEM	2	880	0.380			44
570	MADDAS	NA C	14 T		7	1100	1170			46
512	COTTAGE COOVE	002055	47 ~	TO THE	ີ ເ	2300	1112			47
	CAL PH	002000	41 5	10 180 10 100	2	່ວມປປ	1070			+7 40
040	SALEM	002010		1 <u>5 105</u>		213	1019			40
040	SALEM	002640		TP IMP	3	2908	0880			49
493	TRI CLIY-COUNTY	N'A	56 5	1 P. 1 N T	. 3	55200	1081			51
583	TONE	NA	<u>63</u> S	IP. INT	3	482.	0680			<u>_</u>
628	COOS BAY #1	002357	5	TP IMP	3	1403	0880			54
599	MEDFORD	002626	S	TP EXP	5	440	0680			56
_599	MEDFORD	002626	<u>S</u>	TP EXP	3	12000	1081			- 56 -
449 ,	FALLS CITY		S	TP, INT	5	52	0180			57
49	FALLS CITY	1997 - M	٢	IP.INT	З	454	0181		•	57
526	CLACKAMAS CO-RHODO	NA	5.6 9	TP INT	3	2000	1079			58
537	SW LINCOLN CO SD	NA	43 S	TP+INT	3	2200	1180			59
516	KLAMATH FALLS REGIU	N002630	33 S	TP	3	6050	1079			60
653	E MULT CO CONSORTIU	vi	2	TP, INT	2	450	0180			62
653	E MULT CO CONSORTIU	M	5	TP. INT	3	5000	0381			52
503	SEASTDE	002040	56 5	ТР ТИР	3	2440	1279			63
634	USA DURHAM SI HDGE	002760	<u>ج</u>	TPTMP	3	2000	0880			65
511	CANNON REACH	002022	16 \$	TP TMP	3	1367	1079			67
604	CLACK CO-KELLOGG SL	002622	16 0	ТР ТИР	3	1100	1079			68
618	NEWDART	002257	- VI	ТР ТИР	2	2000	0480			71
510	FSTADADA SASA	002057	3 4 6	TO TUP	2	2000	01.80			78
504	ESTACADA	0.02051	10 7	TD TMD	ີ. ເ	715	0100			70
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572	DALLAS	0.02073	13.2	<u>LE 1205.</u>	. <u>C</u> .	90	1012			
592	DALLAS	002073	14 5		3	215	1180			19
412	ELGIN	002243	01 8	TP IMP	4	41	0380			8U 20
472		002243	01 S 2000 - S	IP IMP	<u>ک</u>	390	0181			80
620	PHILOMATH	0.02050	14 5	IP IMP	1	26	1279			81
620	PHILOMATH	002000	14 S	IP IMP	5	. 84	0780			81
620	PHILOMATH	002050	14 5	IP IMP	<u>3</u>	770	0581			81
569	MONROE	002920	47 5	TP IMP	2	26	1279			82
569	MONROE	002920	47 5	TP IMP	3	184	0880			82
496	JUNCTION CITY	002556	09 5	TP IMP	2	32	0980			85
496	JUNCTION CITY	002656	09 5	TP IMP	З	272	0581			85
588	MT ANGEL	002876	84 5	TP IMP	2	38	1179			86
588	MT ANGEL	002876	84 5	TP IMP	3	330	0780			86
553	CRESWELL	002754	40 9	TP IMP	5	.94	0180			87
513	CRESWELL	002754	40 5	TP IMP	З	495	1180			87
576	USA-BANKS	002012	02 5	TP TMP	2	65	0280			88
576	USA-BANKS	002012	02 <	TP TMP	্ট্রি	<u>495</u>	1280		<u> </u>	88
458	CORVALLIS ATRPORT	002250	43 <	ТР ТМР	्र	398	0280		1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	89
595	HALSFY	002230	N 2	TP THP	. 2		1279			96
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552	FNTEOPOISE	002237 000054	ה ה נה	ΤΡ ΤΜΡ΄ ΤΡΟ ΤΜΡ΄	<b>)</b> 7	000 04	1070			20 Q1
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635		ATHENA	102581	01	STP IMP	2	31 0980				100
635		ATHENA	105581	01	STP IMP	3	362 0681			a da anti- a da anti-	100
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651		FOSSIL	102853		STP IMP	3	350 0882				105
589		MILTON-FREEWATER	002278	16	STP IMP	5	258 1079				106 -
589	· * )	MILTON-FREEMATER	.002278	16	STP IMP	3	2800 0980				106
650		BURNS		y series y Alternation	STP IMP	5	38 0180			1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 19	107
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L         Project         R         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L         L </th <th>0</th> <th></th> <th>ы D</th> <th>дL</th> <th>sc.oj</th> <th>ер</th> <th></th> <th>o/o</th> <th>tu o/</th> <th>шш</th> <th></th> <th><u>.</u></th>	0		ы D	дL	sc.oj	ер		o/o	tu o/	шш		<u>.</u>
597       YONCALLA       002245       07       TP       147         597       YONCALLA       002245       07       SP       147         597       YONCALLA       002245       07       SP       147         577       YONCALLA       002245       07       SP       148         573       BANDON       NA       33<       STP       149       143         613       USA-REEDSVILLE       NA       TNT       2       95       1182       149         613       USA-SUNSET       TPUNK       NA       TNT       2       44       1182       150         614       USA-SUNSET       TPUNK       NA       TNT       2       44       1182       150         630       LOSTINE       NA       STP-SIMT       1       10       0583       151         630       LOSTINE       NA       STP-SIMT       2       2080       152         631       WALLOWA LAKE SA       NA       CTP-TNT       2       2080       153         640       ALBANY-MORTHEAST       NA       INT       2       20760       153         653       SCAPPONSE       STP       NA <th>ч Ц</th> <th>Project</th> <th>NP</th> <th>с Ш</th> <th>D P D P</th> <th>St</th> <th>Gr S S S</th> <th>α Σ 1</th> <th>Ас Ю</th> <th>C C</th> <th></th> <th>ц С.</th>	ч Ц	Project	NP	с Ш	D P D P	St	Gr S S S	α Σ 1	Ас Ю	C C		ц С.
597       YONCALLA       002245       07       12       12       12       12       147         597       YONCALLA       002245       07       STP       149       400       0483       147         553       BANDON       N       NA       33       STP       149       2       21       1082       148         553       BANDON       N       NA       33       STP       149       2       11082       149         613       USA-REEDSVILLE TR       NA       TNT       2       44       149       150         610       USA-SUNSET TRUNK       NA       TVT       3       342       0883       150         630       LOSTINE       NA       STP-TMT       2       20       0383       151         630       LOSTINE       NA       STP-TMT       3       22       1080       152         640       ALBANY-MORTHEAST       NA       STP-TMT       3       22       1080       153         662       ALBANY-MORTHEAST       NA       TNT       2       100       160       153         661       WALLOWA LAKE SA       NA       STP-TMP       3       10	597	YONCALLA	0022	245 07	CTP T	UP 1	12	נפוו				1 / 7
597       YONCALLA       022255       07       519       140       0483       147         563       BANDON       NA       33<       519       149       21       1082       148         613       USA-REFEDSVILE TR       NA       33<       517       149       180       0973       148         613       USA-REFEDSVILE TR       NA       TNL       2       95       1182       150         614       USA-SUNSET TRUNK       NA       TNT       2       44       1182       150         610       USA-SUNSET TRUNK       NA       TVT       3       32       0803       151         630       LOSTINE       NA       STP-TNL       10       0581       151         631       USA-SUNSET TRUNK       NA       STP-TNL       212       0780       152         631       UALDWA LAKE SA       NA       STP-TNL       212       0780       153         640       ALEANY-MORTHEAST       NA       TNT       2       0180       153         563       SCAPPONSE       STP TAP       3       100       153         563       SCAPPONSE       STP TAP       3       100	597	YONCALLA	0022	245 07	STP T	<u>MP</u> 2	12 50	1101				147
S53       BANDON       NA       S3       STP IMP       2       21       1002       148         S13       BANDON       NA       S3       CTP IMP       3       150       0983       148         613       USA-REEOSVILLE TR       NA       TNT       3       495       0783       149         610       USA-SUNSET TRUNK       NA       TNT       3       445       0783       149         610       USA-SUNSET TRUNK       NA       TNT       3       342       0883       150         630       LOSTINE       NA       STP-INT       3       342       0833       151         630       LOSTINE       NA       STP-INT       3       20       0833       151         631       MALOWA LAKE SA       NA       STP-INT       2       21       080       152         640       ALBANY-NORTHEAST       NA       INT       1       20       0861       153         643       SCAPPOOSE       STP IMP       3       50       0981       154         643       SCAPOOSE       STP IMP       3       0981       154         643       ROSEBURG-LOMINGGL       NA	597	YONCALLA	0,022	45 07	STP T	MP 3	400	0483				147
553       BANGON       N       NA       33       STP JHP       1       150       0983       149         613       USA-REEDSVILLE TR       NA       TNT       2       95       1182       149         613       USA-REEDSVILE TR       NA       TNT       3       456       0783       149         610       USA-SUNSET TRUNK       NA       TNT       2       44       1162       150         630       LOSTINE       NA       STPJINT       2       20       381       151         630       LOSTINE       NA       STPJINT       2       20       383       151         630       LOSTINE       NA       STPJINT       3       32       0383       151         631       WALLOWA LAKE SA       NA       STPJINT       3       22       0781       152         640       ALBANY-NORTHEAST       NA       INT       2       1000       0831       153         460       ALBANY-NORTHEAST       NA       INT       2       1000       0841       153         460       ALBANY-NORTHEAST       NA       INT       2       1181       153         643       S	553	BANDON	NA	33	STP T	MP 2	21	1082				149
613       USA-PEEDSVILLE TR       NA       TNT       2       95       1182       149         613       USA-SUNSET TRUNK       NA       TNT       3       495       0783       149         610       USA-SUNSET TRUNK       NA       TNT       2       44       1182       150         610       USA-SUNSET TRUNK       NA       TNT       2       44       1182       150         630       LOSTINE       NA       STP+INT       1       10       0581       151         630       LOSTINE       NA       STP+INT       3       320       0382       151         630       LOSTINE       NA       STP+INT       3       212       0780       152         640       ALBANY-NORTHEAST       NA       TNT       1       20       0180       153         460       ALBANY-NORTHEAST       NA       TNT       3       100       0881       154         663       SCAPPOOSE       STP IMP       3       00       0881       154         664       SCAPPOOSE       STP IMP       3       1154       0283       155         672       NESKOWIN SA       NA       STP-INT <th>553</th> <th>BANDON</th> <th>NA</th> <th>33</th> <th>STP I</th> <th>MP 3</th> <th>180</th> <th>0983</th> <th></th> <th></th> <th></th> <th>148</th>	553	BANDON	NA	33	STP I	MP 3	180	0983				148
613       USA-PERDSVILLE TP       NA       TNT       3       4-56       0783       149         610       USA-SUNSET TRUNK       NA       TNT       3       3-52       0883       150         630       LOSTINE       NA       STP, INT       1       10       0581       151         630       LOSTINE       NA       STP, INT       2       20382       151         630       LOSTINE       NA       STP, INT       2       20383       151         630       LOSTINE       NA       STP, INT       3       22       1080       152         631       WALLOWA LAKE SA       NA       STP, INT       3       22       1080       153         640       ALBANY-MORTHEAST       NA       INT       2       100       0881       153         663       SCAPPOOSE       STP IMP       2       50       0880       154         612       NESKOWIN SA       NA       STP, INT       18       1280       155         620       NESKOWIN SA       NA       STP, INT       124       155       155         621       NESKOWIN SA       NA       STP, INT       124       156	613	USA-REEDSVILLE TR	NA		TNT	2	95	1182			· · ·	149
610       USA-SUNSET TRUNK NA       TNT       2       44       1182       150         630       LOSTINE       NA       TNT       3       352       0.883       150         630       LOSTINE       NA       TNT       2       320       0.883       151         630       LOSTINE       NA       STP-INT       3       320       0.382       151         630       LOSTINE       NA       STP-INT       2       20       0.382       151         630       LOSTINE       NA       STP-INT       3       362       0.382       151         640       ALBANY-NORTHEAST       NA       STP-INT       2       2180       152         460       ALBANY-NORTHEAST       NA       INT       2       10160       153         643       SCAPPOOSE       STP IMP       2       50       0.860       154         663       SCAPPOOSE       STP IMP       2       20       0.861       155         664       NA       STP-INT       1       18       183       155         662       NESKOWIN SA       NA       STP-INT       3       1154       155         6	613	USA-REEDSVILLE TR	NΑ		TNT	З	495	0783				149
610       USA-SUMSET TRUNK NA       INT       3       352 0483       150         630       LOSTINE       NA       STP+INT       1       10       0581       151         630       LOSTINE       NA       STP+INT       2       2       0382       151         630       LOSTINE       NA       STP+INT       2       2       080       152         631       WALLOWA LAKE SA       NA       CTP+INT       2       22       1080       152         601       WALLOWA LAKE SA       NA       CTP+INT       2       21080       153         604       ALBANY-NORTHEAST       NA       INT       1       1000       0881       153         460       ALBANY-NORTHEAST       NA       INT       3       1000       0881       154         633       SCAPPOOSE       STP IMP       3       450       0981       154         642       NESKOWIN SA       NA       STP,INT       2       1812       155         643       ROSEBURG-LOOKINGGL       NA       TNT       3       115       1082       155         644       SCAPPOOSE       STP INT       3       116       126	610	USA-SUNSET TRUNK	NA		тΝТ	2	44	1182				150
630         LOSTINE         NA         STP:INT         1         10         0581         151           630         LOSTINE         NA         STP:INT         3         382         383         151           630         LOSTINE         NA         STP:INT         3         382         0383         151           631         WALLOWA         LAKE SA         NA         STP:INT         2         21080         152           640         ALBANY-MORTHEAST         NA         INT         2         0180         153           460         ALBANY-MORTHEAST         NA         INT         2         100         0841         153           463         SCAPPOOSE         STP         IMP         3         450         0981         154           663         SCAPPOOSE         STP         IMP         3         450         0981         154           662         NESKOWIN SA         NA         STP.INT         1         18         180         125           662         NESKOWIN SA         NA         STP.INT         1         12         1079         156           663         ROSEBURG-LOOKINGEL NA         INT         3 <t< th=""><th>610</th><th>USA-SUNSET TRUNK</th><th>NA</th><th></th><th>TVT</th><th>3</th><th>352</th><th>0883</th><th></th><th></th><th></th><th>150</th></t<>	610	USA-SUNSET TRUNK	NA		TVT	3	352	0883				150
630       LOSTINE       NA       CTP,INT       2       32       0382       151         630       LOSTINE       NA       CTP,INT       2       2       1080       152         601       WALLOWA LAKE SA       NA       CTP,INT       3       212       1080       152         601       WALLOWA LAKE SA       NA       CTP,INT       3       212       0180       152         601       WALLOWA LAKE SA       NA       CTP,INT       3       212       0180       153         640       ALBANY-MORTHEAST       NA       INT       1       1000       0881       153         663       SCAPPOOSE       STP IMP       3       000       0881       154         663       SCAPPOOSE       STP,INT       18       1280       155         63       SCAPPOOSE       STP,INT       18       1280       155         642       NESKOWIN SA       NA       STP,INT       2       0182       155         653       ROSEBURG-LOOKINGGL NA       INT       2       0581       156         654       MELOKINGGL NA       INT       3       2051       157         556       LAPINE<	630	LOSTINE	NA	중요 (17.)	STP, I	NT 1.	1.0	0.581				151
630         LUSTINE         NA         SIP.INT         3         362         363         151           601         WALLOWA LAKE SA         NA         SIP.INT         3         222         1080         152           601         WALLOWA LAKE SA         NA         SIP.INT         3         212         0781         152           601         WALLOWA LAKE SA         NA         SIP.INT         3         212         0781         152           601         ALBANY-NORTHEAST         NA         INT         1         20         0180         153           640         ALBANY-MORTHEAST         NA         INT         3         1000         0881         153           663         SCAPPOOSE         STP         IMP         2         50         0880         154           662         NESKOWIN SA         NA         STP.INT         1         1820         155           663         ROSEBURG-LOOKINGGL NA         INT         1         12         1079         156           664         ROSEBURG-LOOKINGGL NA         INT         27         0581         157           563         ROSEBURG-LOOKINGGL NA         INT         3         20	630	LOSTINE	NΔ		STP,I	NT 2	32	0382				151
COL         WALLOWA LAKE SA         NA         CTP.INT         2         22         1080         152           460         ALBANY-NORTHEAST         NA         INT         1         20         0180         153           460         ALBANY-NORTHEAST         NA         INT         1         20         0180         153           460         ALBANY-NORTHEAST         NA         INT         2         115         1080         153           460         ALBANY-NORTHEAST         NA         INT         2         1000         0681         153           460         ALBANY-NORTHEAST         NA         STP IMP         2         00600         154           563         SCAPPOOSE         STP IMP         3         4400         0681         155           602         MESKOWIN SA         NA         STP,INT         1         12         1079         156           563         ROSEBURG-LOOKINGGL         NA         INT         2         27         0561         156           563         ROSEBURG-LOOKINGGL         NA         INT         1         10         157           564         HELIX         STP,INT         3         150	630	COSTINE	NΑ		SIP.I	NT 3	_38S	0383		1. E. E.	· · · ·	151
001         WALLOWA LAKE SA         NA         CIP,INI 3         212 0781         152           460         ALBANY-NORTHEAST         NA         INT         1 20 0180         153           460         ALBANY-NORTHEAST         NA         INT         1 20 0180         153           460         ALBANY-NORTHEAST         NA         INT         3 1000 0881         153           663         SCAPPOOSE         STP IMP         3 460 0981         154           663         SCAPPOOSE         STP IMP         3 460 0981         154           662         NESKOWIN SA         NA         STP IMP         2 92 0182         155           602         NESKOWIN SA         NA         STP, INT         1 12 1079         156           563         ROSEBURG-LOOKINGGL         NA         TNT         3 0482         156           563         ROSEBURG-LOOKINGGL         NA         STP, INT         1 12 1181         157           564         LAPINE         NA         STP, INT         1 22 1181         157           536         LAPINE         NA         STP, INT         1 12 1181         157           536         LAPINE         NA         STP, INT         3 415 0783	601	WALLOWA LAKE SA	NA		STPOL	S TM	22	1080				152
ALBART HUR HUR DEAST       NA       INI       1       20       0140       153         460       ALBANY-NORTHEAST       NA       INI       2       115       1080       153         640       ALBANY-NORTHEAST       NA       INI       3       1000       0881       153         640       ALBANY-NORTHEAST       NA       INI       3       1000       0881       153         640       ALBANY-NORTHEAST       NA       INI       3       150       0880       154         640       ALBANY-NORTHEAST       NA       INI       3       1600       0881       154         640       NESKOWIN SA       NA       STP-INT       1       18       1280       155         602       NESKOWIN SA       NA       STP-INT       3       1154       0283       155         602       NESKOWIN SA       NA       STP-INT       3       1154       0283       155         602       NESKOWIN SA       NA       STP-INT       3       1154       0283       155         63       ROSEBURG-LOOKINGEL       NA       INT       2       27       0581       156         564       HELTX <th>601 460</th> <th>WALLOWA LAKE SA</th> <th>NA</th> <th></th> <th>STP.I</th> <th>NI 3</th> <th>212</th> <th>0781</th> <th></th> <th></th> <th></th> <th>152</th>	601 460	WALLOWA LAKE SA	NA		STP.I	NI 3	212	0781				152
ALBANY-NORTHEAST       NA       INT       2       115       1040       153         663       SCAPPOOSE       STP       IMT       3       1000       0841       153         663       SCAPPOOSE       STP       IMP       3       450       0981       154         663       SCAPPOOSE       STP       IMP       3       450       0981       155         662       NESKOWIN SA       NA       STP.IMP       3       1154       0283       155         602       NESKOWIN SA       NA       STP.INT       3       1154       0283       155         563       ROSEBURG-LOOKINGGL       NA       INT       3       203       0482       156         563       ROSEBURG-LOOKINGGL       NA       INT       3       203       0482       156         564       LAPINE       NA       STP.INT       1       12       181       157         564       LAPINE       NA       STP.INT       3       415       0783       157         564       HELIX       STP.INT       3       360       0281       158         654       HELIX       STP.INT       3       360<	400	ALDANI TIVORI TLASI	NA NA	<u> 2011 - 2012</u>	- ( N   - 		20	0180			· ·	123
ALBAIN ARCHINEAST         NA         LVN         1000         0881         133           663         SCAPPOOSE         STP IMP         3         500         0881         154           663         SCAPPOOSE         STP IMP         3         450         0981         154           602         NESKOWIN SA         NA         STP IMP         3         450         0981         155           602         NESKOWIN SA         NA         STP IMP         3         450         0981         155           602         NESKOWIN SA         NA         STP IMT         2         92         0182         155           602         NESKOWIN SA         NA         STP INT         1         12         1079         156           563         ROSEBURG-LOOKINGGL         NA         TNT         2         27         0581         156           564         LAPINE         NA         STP INT         1         12         181         157           564         HELIX         STP INT         1         10         1079         158           554         HELIX         STP IMP         1         10         179         159 <td< th=""><th>460</th><th>ALDAN (THOR) DEAST</th><th>NA.</th><th></th><th>. 1.39.10 (11) (T. M.T.</th><th></th><th>1:10</th><th>1080</th><th></th><th></th><th></th><th>153</th></td<>	460	ALDAN (THOR) DEAST	NA.		. 1.39.10 (11) (T. M.T.		1:10	1080				153
663         SCAPPODSE         STP IWP 3         450         0980         154           602         NESKOWIN SA         NA         STP IWP 3         450         0981         154           602         NESKOWIN SA         NA         STP IWP 3         450         0981         155           602         NESKOWIN SA         NA         STP IWP 3         1154         0283         155           602         NESKOWIN SA         NA         STP INT 3         1154         0283         155           603         ROSEBURG-LOOKINGGL NA         INT         1         12         1079         156           563         ROSEBURG-LOOKINGGL NA         INT         203         0482         156           563         ROSEBURG-LOOKINGGL NA         INT         203         0482         156           563         ROSEBURG-LOOKINGGL NA         INT         12         181         157           564         LAPINE         NA         STP+INT 1         10         1079         158           654         HELIX         STP+INT 2         38         0280         158           644         ODELL SD         NA         STP IMP 1         10         1179         159	663	SCAPPOOSE	NA C		CTD T	49 2	1000	0881			1.1	154
602         NESKOWIN SA         NA         STP.TWT         1         18         1260         155           602         NESKOWIN SA         NA         STP.IWT         1         18         1260         155           602         NESKOWIN SA         NA         STP.IWT         2         1154         0263         155           563         ROSEBURG-LOOKINGGL         NA         TWT         1         12         1079         156.           563         ROSEBURG-LOOKINGGL         NA         TWT         3         203         0482         156           563         ROSEBURG-LOOKINGGL         NA         TWT         3         23         0482         156           564         LAPINE         NA         STP.INT         1         12         1181         157           536         LAPINE         NA         STP.INT         3         415         0783         157           536         LAPINE         NA         STP.INT         3         415         0783         157           544         HELIX         STP.INT         3         350         0281         158           554         HELIX         STP.INT         3	663	SCAPPAOSE	as is atting a		CTP T	MP 3	460	0000			·	154
602         NESKOWIN SA         NA         STP.INT         2         92         0182         155           602         NESKOWIN SA         NA         STP.INT         2         92         0182         155           602         NESKOWIN SA         NA         STP.INT         1         12         1079         156           563         ROSEBURG-LOOKINGGL         NA         INT         2         27         0581         156           563         ROSEBURG-LOOKINGGL         NA         INT         2         27         0581         156           563         ROSEBURG-LOOKINGGL         NA         INT         2         27         0581         156           564         LAPINE         NA         STP.INT         1         12         1181         157           564         HELIX         STP.INT         3         415         0783         158           654         HELIX         STP.INT         3         80280         158           644         ODELL SD         NA         STP IMP         1         01179         159           644         ODELL SD         NA         STP IMP         3         243         0981         <	602	NESKOWIN SA	NΔ		STP.T			1280				155
602       NESKOWIN SA       NA       STP+INT       3       1154       0263       155         563       ROSEBURG-LOOKINGGL       NA       INT       1       12       1079       156         563       ROSEBURG-LOOKINGGL       NA       INT       2       27       0581       156         563       ROSEBURG-LOOKINGGL       NA       INT       3       203       0482       156         564       ROSEBURG-LOOKINGGL       NA       STP,INT       1       12       1181       157         536       LAPINE       NA       STP,INT       3       415       0783       157         536       LAPINE       NA       STP,INT       3       10       1079       158         654       HELIX       STP,INT       350       0281       158         654       HELIX       STP,IMP       10       1179       159         644       ODELL SD       NA       STP IMP       229       1180       159         644       ODELL SD       NA       STP IMP       223       0481       160         529       BIGGS JCT       NA       INT       1       243       0981       162 <th>602</th> <th>NESKOWIN SA</th> <th>NA</th> <th></th> <th>STP.T</th> <th>NT 2</th> <th>ú2 Q2</th> <th>0182</th> <th></th> <th></th> <th></th> <th>155</th>	602	NESKOWIN SA	NA		STP.T	NT 2	ú2 Q2	0182				155
563       ROSEBURG-LODKINGGL NA       INT       1       12       1079       156         563       ROSEBURG-LODKINGGL NA       INT       2       27       0581       156         563       ROSEBURG-LODKINGGL NA       INT       2       27       0581       156         563       ROSEBURG-LODKINGGL NA       INT       3       203       0482       156         564       LAPINE       NA       STP, INT       12       1181       157         536       LAPINE       NA       STP, INT       3       415       0783       157         536       LAPINE       NA       STP, INT       3       415       0783       157         54       HELIX       STP, INT       3       30       0280       158         654       HELIX       STP, INT       38       0280       158         644       ODELL SD       NA       STP IMP       10       1179       159         644       ODELL SD       NA       STP IMP       29       1180       159         644       ODELL SD       NA       INT       12       0480       160         529       BIGGS JCT       NA	602	NESKOWIN SA	NA		STP.I	NT 3	1154	0283				155
563       ROSEBURG-LOOKINGGL       NA       TNT       2       27       0581       156         563       ROSEBURG-LOOKINGGL       NA       TNT       3       203       0482       156         536       LAPINE       NA       STP, INT       1       12       1181       157         536       LAPINE       NA       STP, INT       2       55       1082       157         536       LAPINE       NA       STP, INT       3       415       0783       157         536       LAPINE       NA       STP, INT       3       415       0783       157         654       HELIX       STP, INT       38       0280       158         654       HELIX       STP, INT       350       0281       158         654       HELIX       STP, IMP       10       1179       159         644       ODELL SD       NA       STP IMP       10       1179       159         644       ODELL SD       NA       STP IMP       29       1180       160         529       BIGGS JCT       NA       INT       1       12       1480       160         529       BIGGS JC	563	ROSEBURG-LOOKINGGL	NΔ		TNT	1	12	1079			$\chi_{\rm eff} = \chi_{\rm eff}^2$	156
563       ROSEBURG-LOOKINGGL       NA       INT       3       203       0482       156         536       LAPINE       NA       STP,INT       1       12       181       157         536       LAPINE       NA       CTP,INT       2       55       1082       157         536       LAPINE       NA       CTP,INT       2       15       1082       157         536       LAPINE       NA       STP,INT       3       415       0783       157         536       LAPINE       NA       STP,INT       1       10       1079       158         654       HELIX       STP,INT       350       0281       158         654       HELIX       STP,INT       350       0281       158         654       HELIX       STP,INT       350       0281       159         644       ODELL SD       NA       STP IMP       10       1179       159         644       ODELL SD       NA       STP IMP       243       0981       160         529       BIGGS JCT       NA       INT       12       0480       160         529       BIGGS JCT       NA	563	ROSEBURG-LOOKINGGL	NA		TNT	2	27	0581			1.11	156
536         LAPINE         NA         STP,INT         1         12         1181         157           536         LAPINE         NA         STP,INT         2         55         1082         157           536         LAPINE         NA         STP,INT         3         415         0783         157           54         HELIX         STP,INT         3         350         0280         158           654         HELIX         STP INT         3         350         0281         159           644         ODELL SD         NA         STP IMP         1         10         1179         159           644         ODELL SD         NA         INT         1         2         0480         160           529         BIGGS JCT         NA         INT         1         2         0480         16	563	ROSEBURG-LOOKINGGL	NA		TNT	3	203	0482				156
536       LAPINE       NA       STP.INT       2       55       1082       157         536       LAPINE       NA       STP.INT       3       415       0783       157         536       LAPINE       NA       STP.INT       3       415       0783       157         654       HELIX       STP.INT       1       10       1079       158         654       HELIX       STP.INT       3       350       0281       158         654       HELIX       STP.INT       3       350       0281       158         644       ODELL SD       NA       STP IMP       1       10       1179       159         644       ODELL SD       NA       STP IMP       2       29       1180       159         644       ODELL SD       NA       STP IMP       3       265       0382       160         529       BIGGS JCT       NA       INT       1       2       2480       160         529       BIGGS JCT       NA       INT       2       32       0481       160         529       BIGGS JCT       NA       INT       3       160       161	536	LAPINE	NA		STP,I	NT 1	12	1181				157
536       LAPTNE       NA       STP+INT 3       415       0783       157         654       HELIX       STP+INT 1       10       1079       158         654       HELIX       STP+INT 2       38       0280       158         654       HELIX       STP+INT 3       350       0281       158         644       ODELL SD       NA       STP IMP 1       10       1179       159         644       ODELL SD       NA       STP IMP 2       29       180       159         644       ODELL SD       NA       STP IMP 2       29       180       159         644       ODELL SD       NA       STP IMP 2       29       180       159         644       ODELL SD       NA       STP IMP 2       29       180       160         529       BIGGS JCT       NA       TNT       1       12       0480       160         529       BIGGS JCT       NA       TNT       2       32       0481       160         529       BIGGS JCT       NA       TNT       1       6       1179       161         565       REITH AREA       INT       1       160       161	536	LAPINE	NA		STP,I	S TN	55	1082				157 .
654       HELIX       STP, INT 1       10 1079       158         654       HELIX       STP, INT 2       38 0280       158         654       HELIX       STP, INT 3       350 0281       158         654       ODELL SD       NA       STP IMP 1       10 1179       159         644       ODELL SD       NA       STP IMP 2       29 1180       159         644       ODELL SD       NA       STP IMP 3       243 0981       159         529       BIGGS JCT       NA       INT       1       12 0480       160         529       BIGGS JCT       NA       INT       265 0382       160         529       BIGGS JCT       NA       TNT       2       18 0880       161         529       BIGGS JCT       NA       TNT       3       160 0681       161         529       BIGGS JCT       NA       TNT       3       160 0681       161         529       BIGGS JCT       NA       TNT       3       160 0681       161         529       BIGGS JCT       NA       TNT       3       160 0681       161         591       CASCADE LOCKS       NA       TNT       3 <th>536</th> <th>LAPTNE</th> <th>NΑ</th> <th>46 I. P</th> <th>STP .I</th> <th>NT 🖓 🤤</th> <th>415</th> <th>0783</th> <th></th> <th></th> <th></th> <th>157</th>	536	LAPTNE	NΑ	46 I. P	STP .I	NT 🖓 🤤	415	0783				157
654       HELIX       STP+ INT 2       38 0280       158         654       HELIX       STP+ INT 3       350 0281       158         644       ODELL SD       NA       STP IMP 1       10 1179       159         644       ODELL SD       NA       STP IMP 2       29 1180       159         644       ODELL SD       NA       STP IMP 3       243 0981       159         529       BIGGS JCT       NA       INT       1 20480       160         529       BIGGS JCT       NA       TNT       2 32 0481       160         529       BIGGS JCT       NA       TNT       3 265 0382       160         529       BIGGS JCT       NA       TNT       3 265 0382       160         529       BIGGS JCT       NA       TNT       2 18 0880       161         558       REITH AREA       TNT       1 9 0381       162         591       CASCADE LOCKS       NA       TNT       2 17 0881       162         591       CASCADE LOCKS       NA       TNT       2 17 0881       162         591       CASCADE LOCKS       NA       TNT       2 163 0882       163         6455       GRESHAM	654	HELIX			STP,	INT 1	10	1079				158
554       HELIX       CTP, INT 3       350       0281       158         644       ODELL SD       NA       STP IMP 1       10       1179       159         644       ODELL SD       NA       STP IMP 2       29       1180       159         644       ODELL SD       NA       STP IMP 3       243       0981       159         529       BIGGS JCT       NA       INT       1       12       0480       160         529       BIGGS JCT       NA       TNT       2       32       0481       160         529       BIGGS JCT       NA       TNT       1       12       0480       160         529       BIGGS JCT       NA       TNT       1       61179       161         529       BIGGS JCT       NA       TNT       1       61179       161         529       BIGGS JCT       NA       TNT       1       160       161         558       REITH AREA       INT       3       160       0681       161         591       CASCADE LOCKS       NA       TNT       2       17       0881       162         591       CASCADE LOCKS       NA	654	HELIX			STP .	INT 2	38	0280				158
644       ODELL SD       NA       STP IMP 1       10       1179       159         644       ODELL SD       NA       STP IMP 2       29       1180       159         644       ODELL SD       NA       STP IMP 3       243       0981       159         529       BIGGS JCT       NA       INT       1       12       0480       160         529       BIGGS JCT       NA       INT       2       32       0481       160         529       BIGGS JCT       NA       TNT       2       32       0481       160         529       BIGGS JCT       NA       TNT       1       6       1179       161         558       REITH AREA       INT       1       6       1179       161         558       REITH AREA       INT       3       160       0681       161         591       CASCADE LOCKS       NA       TNT       2       17       0881       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         591       CASCADE LOCKS       NA       TNT       3       1061       0683       163	554	HELIX	• • •		STP,	INT 3	350	0281				158
644       ODELL SD       NA       STP IMP       2       29 1180       159         644       ODELL SD       NA       STP IMP       3       243 0981       159         529       BIGGS JCT       NA       INT       1       12 0480       160         529       BIGGS JCT       NA       INT       2       32 0481       160         529       BIGGS JCT       NA       INT       2       32 0481       160         529       BIGGS JCT       NA       INT       2       32 0481       160         529       BIGGS JCT       NA       INT       3       265 0382       160         658       REITH AREA       INT       1       6       1179       161         658       REITH AREA       INT       3       160 0681       161         591       CASCADE LOCKS       NA       INT       3       160 0681       162         591       CASCADE LOCKS       NA       INT       3       110 0482       162         591       CASCADE LOCKS       NA       INT       3       100 0482       162         645       GRESHAM-LINVEMAN       NA       56 INT       3	644 644		NA		SIP I	MP 1	10	1179				159
529       BIGGS JCT       NA       INT       1       12       0480       160         529       BIGGS JCT       NA       INT       1       12       0480       160         529       BIGGS JCT       NA       INT       2       32       0481       160         529       BIGGS JCT       NA       INT       2       32       0481       160         529       BIGGS JCT       NA       INT       2       32       0481       160         529       BIGGS JCT       NA       INT       3       265       0382       160         529       BIGGS JCT       NA       INT       1       6       1179       161         529       BIGS REITH AREA       INT       3       160       0681       161         551       CASCADE LOCKS       NA       INT       1       9       0381       162         591       CASCADE LOCKS       NA       INT       3       110       0482       162         591       CASCADE LOCKS       NA       INT       3       110       0482       162         645       GRESHAM-LINNEMAN       NA       56       INT	644		ALA .	· · · · · · · · · · · · · · · · · · ·	SIP I		243	1180				129
529     BIGGS JCT     NA     INT     1     12     0481       529     BIGGS JCT     NA     INT     2     32     0481     160       529     BIGGS JCT     NA     INT     3     265     0382     160       529     BIGGS JCT     NA     INT     3     265     0382     160       529     BIGGS JCT     NA     INT     3     265     0382     160       529     BIGGS JCT     NA     INT     1     6     1179     161       658     REITH AREA     INT     2     18     0880     161       658     REITH AREA     INT     3     150     0681     161       591     CASCADE LOCKS     NA     INT     1     9     0381     162       591     CASCADE LOCKS     NA     INT     3     110     0482     162       591     CASCADE LOCKS     NA     INT     3     110     0482     162       591     CASCADE LOCKS     NA     INT     3     100     0482     163       645     GRESHAM-LINNEMAN     NA     56     INT     3     1061     0683     163       551     SANDY	529	BIGGS OF	NI A		TATE A	2197: JS. 11	ໍ <u>ເ</u> ຊວ ຳວ	0401				109
529     BIGGS JCT     NA     TNT     3     265     0382     160       658     REITH AREA     INT     1     6     1179     161       658     REITH AREA     INT     2     18     0880     161       658     REITH AREA     INT     2     18     0880     161       658     REITH AREA     INT     2     18     0880     161       658     REITH AREA     INT     3     160     0681     161       591     CASCADE LOCKS     NA     INT     2     17     0881     162       591     CASCADE LOCKS     NA     INT     3     110     0482     162       591     CASCADE LOCKS     NA     INT     3     110     0482     162       591     CASCADE LOCKS     NA     INT     3     100     0482     162       656     GRESHAM-LINNEMAN     NA     56     INT     2     157     0882     163       465     GRESHAM-LINNEMAN     NA     56     INT     3     1061     0683     163       551     SANDY     NA     05     INT     2     23     0280     164	529	BIGGS UCT	ΝA		TAFT -	2	32	0481				160
658       REITH AREA       INT       1       6       1179       161         658       REITH AREA       INT       2       18       0880       161         658       REITH AREA       INT       3       160       0681       161         591       CASCADE LOCKS       NA       TNT       1       9       0381       162         591       CASCADE LOCKS       NA       TNT       2       17       0881       162         591       CASCADE LOCKS       NA       TNT       2       17       0881       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         465       GRESHAM-LINNEMAN       NA       56       TNT       2       157       0882       163         465       GRESHAM-LINNEMAN       NA       56       TNT       2       1061       0683       163         551       SANDY       NA       05       <	529	BIGGS JCT	NA	· · · · · · · · · · · · · · · · · · ·	TNT	3	265	0382				160
658         REITH AREA         INT         2         18         0880         161           658         REITH AREA         INT         3         160         0681         161           591         CASCADE LOCKS         NA         INT         1         9         0381         162           591         CASCADE LOCKS         NA         INT         2         17         0881         162           591         CASCADE LOCKS         NA         INT         2         17         0881         162           591         CASCADE LOCKS         NA         INT         3         110         0482         162           591         CASCADE LOCKS         NA         INT         3         110         0482         162           591         CASCADE LOCKS         NA         INT         3         110         0482         162           465         GRESHAM-LINNEMAN         NA         56         INT         2         157         0882         163           551         SANDY         NA         05         INT         2         23         0280         164           551         SANDY         NA         05         INT <th>658</th> <td>REITH AREA</td> <td>1.11</td> <td></td> <td>TNT</td> <td>ĩ</td> <td>6</td> <td>1179</td> <td></td> <td></td> <td></td> <td>161</td>	658	REITH AREA	1.11		TNT	ĩ	6	1179				161
658       REITH AREA       TNT       3       160       0681       161         591       CASCADE LOCKS       NA       TNT       1       9       0381       162         591       CASCADE LOCKS       NA       TNT       2       17       0881       162         591       CASCADE LOCKS       NA       TNT       2       17       0881       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         591       CASCADE LOCKS       NA       TNT       3       110       0482       162         591       CASCADE LOCKS       NA       TNT       2       157       0882       163         465       GRESHAM-LINNEMAN       NA       56       TNT       3       1061       0683       163         551       SANDY       NA       05       TNT       3       177       0281       164         551       SANDY       NA       05       TNT       3       177       0281       164	658	REITH AREA			TNT	2	18	0880				161
591       CASCADE LOCKS       NA       TNT       1       9       0.381       162         591       CASCADE LOCKS       NA       TNT       2       17       0.881       162         591       CASCADE LOCKS       NA       TNT       3       110       0.482       162         591       CASCADE LOCKS       NA       TNT       3       110       0.482       162         591       CASCADE LOCKS       NA       TNT       3       110       0.482       162         465       GRESHAM-LINNEMAN       NA       56       TNT       2       157       0.882       163         465       GRESHAM-LINNEMAN       NA       56       TNT       3       1061       0683       163         551       SANDY       NA       05       TNT       2       23       0280       164         551       SANDY       NA       05       TNT       3       177       0281       164	658	REITH AREA			TNT	3	150	0681		Š.	2017 - D.S.	161
591         CASCADE LOCKS         NA         TNT         2         17         0881         162           591         CASCADE LOCKS         NA         TNT         3         110         0482         162           465         GRESHAM-LINNEMAN         NA         56         TNT         2         157         0882         163           465         GRESHAM-LINNEMAN         NA         56         TNT         3         1061         0683         163           551         SANDY         NA         05         TNT         2         23         0280         164           551         SANDY         NA         05         TNT         3         177         0281         164	591	CASCADE LOCKS	NA		TNT	$1^{\circ}$	9	0381			1.1	162
591         CASCADE LOCKS         NA         INT         3         110         0482         162           465         GRESHAM-LINNEMAN         NA         56         INT         2         157         0882         163           465         GRESHAM-LINNEMAN         NA         56         INT         3         1061         0683         163           551         SANDY         NA         05         INT         2         23         0280         364           551         SANDY         NA         05         INT         3         177         0281         164	591	CASCADE LOCKS	NA		TNT	. 2	17	0881				162
465         GRESHAM-LINNEMAN         NA         56 INT         2         157 0882         163           465         GRESHAM-LINNEMAN         NA         56 INT         3         1061 0683         163           551         SANDY         NA         05 INT         2         23 0280         164           551         SANDY         NA         05 INT         3         177 0281         164	591	CASCADE LOCKS	NA		INT	3	110	0482				165
465         GRESHAM-LINNEMAN         NA         56 INT         3 1061 0683         163           551         SANDY         NA         05 INT         2 23 0280         164           551         SANDY         NA         05 INT         3 177 0281         164	465	GRESHAM-LINNEMAN	NA	56	TNT	S	157	0882				163
551         SANDY         NA         05 INT         2         23 0280         164           551         SANDY         NA         05 INT         3         177 0281         164	465	GRESHAM-LINNEMAN	NA	56	INT		1061	0683				163
DD1 DANUY 164	551	SANDY	NΑ	05	TNT	2	53	0280		:		164
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