

6/5/1981

OREGON
ENVIRONMENTAL QUALITY
COMMISSION MEETING
MATERIALS



State of Oregon
Department of
Environmental
Quality

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OREGON ENVIRONMENTAL QUALITY COMMISSION MEETING

June 5, 1981

City Council Chambers
Medford City Hall
411 West Eighth Street
Medford, Oregon

AGENDA

9:00 am CONSENT ITEMS

Items on the consent agenda are considered routine and generally will be acted on without public discussion. If a particular item is of specific interest to a Commission member or sufficient public interest for public comment is indicated, the Chairman may hold any item over for discussion.

- A. Minutes of the April 24, 1981, Commission meeting.
- B. Monthly Activity Reports for March and April, 1981.
- C. Tax Credit Applications.
- D. Request for authorization to conduct a public hearing on proposed amendments to rules governing on-site sewage disposal, OAR 340-71-100 to 340-71-600.
- E. Request for authorization to conduct a public hearing on housekeeping modifications to water quality-related rules, OAR 340, Divisions 42, 43, 44, 45 and 52.
- F. Vehicle inspection rules - Request for authorization to hold a public hearing to amend inspection program fee structure.
- ✓G. Draft response to Program Assessment Report.

9:15 am PUBLIC FORUM

- H. 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.

ACTION ITEMS

The Commission may hearing testimony on these items at the time designated but may reserve action until the work session later in the meeting.

- I. Status report and discussion of Medford-area attainment strategies for total suspended particulate (TSP) and carbon monoxide (CO).
- J. Informational report: Status of Hood River County landfill.
- Copy in folder*
✓ ~~K. Appeal of subsurface variance denial: Mr. and Mrs. Allen Ferrette.~~
- L. Appeal of subsurface variance denial: Mrs. and Mrs. Daniel J. Walsh.

WITHDRAWN

(MORE)

- M. Request for a variance from general emission standards for volatile organic compounds at bulk gasoline plants, OAR 340-22-120(2) for the Rogue Valley Oil Co., Medford.
- N. Workshop and consideration of adopting proposed new Plant Site Emission (PSEL) and New Source Review (NSR) Rules for both nonattainment and attainment (PSD) areas and proposed revocation of the following existing rules:
1. Special permit requirements for source locating in or near nonattainment areas, OAR 340-20-190 through 198.
 2. Criteria for approval of new sources in the Portland Special AQMA, OAR 340-32-005 through 025.
 3. Specific air pollution control rules for the Medford-Ashland AQMA, OAR 340-30-110.
 4. Prevention of significant deterioration, OAR 340-31-105, definitions 1 through 11, 13 and 14, and 17 through 22; 340-31-125 and 340-31-135 through 195.
- O. Water Quality rule adoption - Amendment of water quality permit fees (OAR 340-45-070, Table 2) to increase revenues for 1981-83 Biennium.
- P. Proposed adoption of geographic area rule for lands overlaying the Alsea Dunal Aquifer, Lincoln County, OAR 340-71-400(3).

WORK SESSION

The Commission reserves this time if needed to further consider proposed action on any item on the agenda.

Because of the uncertain time span involved, the Commission reserves the right to deal with any item at any time in the meeting except those items with a designated time certain. 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) at Stanley's Restaurant, 510 N. Riverside, Medford; and will lunch at noon with the Jackson County Air Quality Advisory Committee; Jackson County Commissioners; and the Medford City Council at the Jackson County Courthouse Auditorium, Oakdale and Eighth Streets, Medford.

THESE MINUTES ARE NOT FINAL UNTIL APPROVED BY THE EQC

MINUTES OF THE ONE HUNDRED THIRTY-SECOND MEETING
OF THE
OREGON ENVIRONMENTAL QUALITY COMMISSION

June 5, 1981

On Friday, June 5, 1981, the one hundred thirty-second meeting of the Oregon Environmental Commission convened in the City Council Chambers, Medford City Hall, Medford, Oregon. Present were Commission members Mr. Joe B. Richards, Chairman; Mr. Albert H. Densmore, Vice-Chairman; Mr. Fred J. Burgess; Mrs. Mary V. Bishop; and Mr. Ronald M. Somers. Present on behalf of the Department were its Director, William H. Young, and several members of the Department staff.

The staff reports presented at this meeting, which contain the Director's recommendations mentioned in these minutes, are on file in the Office of the Director of the Department of Environmental Quality, 522 SW Fifth Avenue, Portland, Oregon. Written information submitted at this meeting is hereby made a part of this record and is on file at the above address.

BREAKFAST MEETING

The breakfast meeting convened at 7:30 a.m. at Stanley's Restaurant in Medford. All five of the Commissioners were present, as were several members of the Department staff.

The Commission members discussed the following items:

1. Regional Managers report: Gary Grimes, Regional Manager, SW Region, briefly highlighted activities in his five-county area.
2. Budget update: Mike Downs, Administrator, Management Services Division, reported on the most recent budget activities.
3. Legislative update: Jim Swenson, Assistant to the Director for Public Affairs, brought the Commission up to date on the latest legislation which is of interest to the Department.
4. Dates and locations of future EQC meetings: The Commission decided to stay with the current six-week schedule. The dates and locations will be as follows:

July 17	Portland	Fish & Wildlife
August 28	Portland	
October 9	Portland	
November 20	Medford?	
January 8	Portland	

FORMAL MEETING

Commissioners Richards, Densmore, Somers, Burgess, and Bishop were present for the formal meeting.

AGENDA ITEM A - MINUTES OF THE APRIL 24, 1981, MEETING.

AGENDA ITEM B - MONTHLY ACTIVITY REPORT FOR MARCH AND APRIL, 1981.

AGENDA ITEM C - Tax Credit Applications.

Gary Goodman, Prineville Disposal, Inc., and Rimrock Leasing Co., appealed to the Commission to reverse the Director's Recommendation to deny his tax credit request for a solid waste pollution control facility (T-1340).

It was MOVED by Commissioner Somers, seconded by Commissioner Bishop, and carried unanimously that the Director's Recommendations in the three above items (Agenda Items A, B, and C) be approved.

It was MOVED by Commissioner Somers, seconded by Commissioner Burgess, and carried unanimously that the Director's Recommendations in the next three agenda items (Agenda Items D, E, and F) be approved.

AGENDA ITEM D - Request for Authorization to Conduct Public Hearings on Proposed Amendments to Rules governing On-Site Sewage Disposal, OAR 340-71-100 to 340-71-600.

Agenda Item D was a request for authorization to conduct public hearings on proposed amendments to the On-Site Sewage Disposal Rules. The proposal includes a new general fee schedule, fee schedules for three contract counties, and a number of technical rule amendments. Public hearings are proposed at nine locations throughout the state on June 16.

Summation

1. ORS 454.625 provides that the Commission, after hearing, may adopt rules for on-site sewage disposal, including adoption of fee schedules.
2. ORS 454.745(4) provides that the Commission may by rule increase maximum fees contained in ORS 454.745(1), provided the fees do not exceed actual costs for efficiently conducted minimum services.
3. Three counties, Multnomah, Josephine and Columbia, have requested the Commission to establish by rule new fee schedules that exceed, in some categories, those set forth in ORS 454.745(1).
4. The Department's budget is predicated on a fee increase.

5. In addition, a number of technical rule amendments are necessary to provide for smoother rule administration.

Director's Recommendation

Based upon the summation, it is recommended that the commission authorize public hearings, to take testimony on the question of amending OAR 340-71-100 to 340-71-600 as set forth in Attachment "C".

AGENDA ITEM E - Request for Authorization to Hold a Public Hearing on Housekeeping Modifications to Water Quality Related Rules, OAR 340, Divisions 42, 43, 44, 45, 52 and 81.

The Department proposed to update water quality control regulations by repealing Divisions which are unnecessary and by making housekeeping changes to others. The purpose of this agenda item is to request authorization for a public hearing on the rule changes.

Summation

1. ORS 468.020 grants the Commission authority to adopt rules and standards as it considers necessary in performing the functions vested by law.
2. Periodically rules need to be revised or revoked as they fail to address current policy and procedure.
3. The Department is proposing certain housekeeping changes in Chapter 340 Divisions 44, 45 and 52.
4. The Department recommends Divisions 42 and 43 be revoked because they are redundant, unnecessary and do not necessarily relate to current policy.
5. The Department is prepared to schedule a public hearing in order to receive input on the proposed rule modifications and revocations.

Director's Recommendation

Based on the summation, the Director recommends that the Commission authorize the Department to hold a public hearing on the proposed change in the Water Quality Rules.

AGENDA ITEM F - Vehicle Inspection Rules Request for Authorization to Hold a Public Hearing to Amend Inspection Program Fee Structure.

HB 2289, listed as HB 2239 in the staff report, has passed the House and is awaiting action in the Senate. HB 2289, if enacted, will require the Commission to establish the Vehicle Inspection Program Certification Fee.

The existing \$5 certification fee is not sufficient to support the program operational costs during the 1981-83 biennium. A \$7 certification fee provides sufficient funds to cover program operational cost and capital construction during the 1981-83 biennium.

It is recommended that the Department be authorized to schedule a public hearing before the Commission at its July 17, 1981, meeting. After the public hearing at that meeting, the Commission may be asked to act on the proposed amendments.

Summation

1. House Bill 2289, if enacted, will require the Commission to establish the vehicle inspection program certification fee.
2. The existing \$5 certification fee is not sufficient to support program operational cost during the 1981-83 biennium.
3. There has been no certification fee change since 1975.
4. A \$7 certification fee provides sufficient funds to cover program operational cost and capital construction needs during the 1981-83 biennium.

Director's Recommendation

Based upon the summation, the Director recommends that the Commission authorize the Department to schedule a public hearing before the Commission at the July 17, 1981, meeting to amend the vehicle inspection program rules to establish a fee structure which includes a \$7 certification fee.

As noted above, the Director's Recommendations for the above three agenda items were approved.

AGENDA ITEM H - Public Forum.

Paul Renquist, Ashland, appeared before the Commission to describe a wood combustion device he has developed which controls 90-95% of particulate emissions.

Elliott Briner, Ashland Chamber of Commerce, appeared in opposition to any rule banning wood stoves.

No one else chose to appear at Public Forum.

AGENDA ITEM G - Draft Response to Program Assessment Report.

This item presented the Department's proposed response to the recommendations in the Program Assessment Report prepared by the Executive Department.

This draft response was offered to give the Commission time for review and comment prior to responding formally to the report as requested by the Executive Department. Staff proposes to revise the draft response upon Commission input and return the final response to the Commission for approval at its July 1981 meeting.

The Commission approved the Director's response for forwarding to the Executive Department.

AGENDA ITEM I (1) and (2) - Status Report and Discussion of Medford Area Attainment Strategies; Total Suspended Particulate.

Status Report and Discussion of Medford Area Attainment Strategies; Carbon Monoxide.

This item was a status report on the Medford Air Quality Strategies. The Medford area has problems with three pollutants:

- Total Suspended Particulates,
- Carbon Monoxide, and
- Ozone.

A strategy to meet the federal ozone standard was included in the 1979 SIP, and attainment of this standard is expected by the end of 1982. The other two pollutant problems are more serious and the standards will be more difficult to achieve. The Jackson County Air Quality Committee has been assisting the Department since March of this year to develop a plan to reduce particulate and carbon monoxide to acceptable levels.

I (1): Summation

1. Particulate Air Pollution in the Medford area exceeds the Federal health standard of 75 ug/m³ and the State standard of 60 ug/m³. Particulate air pollution is expected to continue to exceed standards unless additional control measures are implemented. Levels would average about 93 ug/m³ by 1984.
2. The major sources of particulates in the Medford area are vegetative burning - 31% (primarily wood stove and fireplace emissions), soil & road dust - 30%, and the wood products industry - 20%. Vegetative burning emissions are increasing, soil & road dust will remain relatively constant and industrial emissions are decreasing (due to controls required by the 1978 strategy).
3. The major source of respirable particulates, those having the greatest effect on health and visibility in the Medford area, is vegetative burning emissions, primarily from firewood use in stoves and fireplaces. Any control strategy to meet air quality standards will have to rely heavily on effective control of this source of emissions.

4. DEQ has recommended several control measures to reduce particulate emissions. The single most effective measure appears to be an aggressive retrofit weatherization program to reduce wood stove and fireplace emissions.
5. The Jackson County Air Quality Committee is currently evaluating the DEQ recommended control measures as well as several alternative measures. The implementation of several control measures, including a weatherization program, would require local ordinances.
6. The Air Quality Committee is expected to recommend a particulate strategy to the Jackson County Commissioners during June, 1981.
7. The Department intends to request the Environmental Quality Commission at its July or August meeting to authorize a public hearing on the Medford Particulate Control Strategy.

Director's Recommendation

It is recommended that the Commission review the proposed TSP strategies and alternatives and provide the Department with some feedback as to their acceptability. Discussion with local officials and advisory committee members at the lunch meeting should be directed toward broadly identifying the best mix of strategies that can be supported by each entity and which might be most acceptable to the community. Any possible problems with implementing the strategies should also be discussed.

I (2): Summation

1. Carbon monoxide (CO) levels in Medford frequently exceed the air quality standard for this pollutant. In fact, these exceedances are among the most frequent of any urban area in the country.
2. Motor vehicles contribute about 75% of the CO in the Medford area and over 90% in the identified problem area.
3. CO levels are expected to decrease about 1800 t/y by 1987 based on the Federal new vehicle automobile emission control program, however another 3500 t/y reduction is needed to meet health standards.
4. Jackson County has been designated lead agency for developing a CO attainment plan required by the Clean Air Act for the Medford area. This plan must demonstrate how the CO health standard can be met by 1987.
5. The Medford Area Transportation Study (MATS) was completed in March, 1981. MATS includes roadway, transit and bicycle recommendations. Public hearings on MATS will be held in July and August, 1981.

6. The most effective CO control measure by far for Medford appears to be an inspection/maintenance (I/M) program. An annual I/M program may be needed due to the severity of Medford's CO problem and the lack of other viable alternatives.
7. Other control measures under consideration include roadway improvements, a parking and traffic circulation plan and carpool/vanpool programs.
8. Jackson County plans to have the necessary transportation control measures analyzed, selected and adopted by January, 1982.
9. The Department intends to request the Commission to authorize a public hearing on the Medford CO attainment plan in early 1982 in order for the Commission to revise the State Implementation Plan by July 1, 1982.

Director's Recommendation

It is recommended that the Commission discuss the various elements being considered for the CO SIP with local officials and the Advisory Committee at the lunch meeting and in particular discuss the options and local concerns associated with implementation of an I/M program.

The above status report was accepted by the Commission with no further action.

AGENDA ITEM J - Informational Report: Status of Hood River County Landfill

The Department has been trying to get the Hood River County Landfill closed for several years. The site is located in a drainage way and is discharging leachate to public waters. A great deal of staff time and public money has been spent in attempts to help the County find an acceptable alternative. Although many alternatives have been examined, the County has failed to make a firm commitment to implement any of them.

The landfill is now at approved final grade, and Wasco County has agreed to receive Hood River County wastes at a landfill in The Dalles. The Department has, therefore, issued a permit to order the Hood River County Landfill closed effective July 1 and seeks the Commission's concurrence in this action.

Summary

The Hood River County Landfill is almost full unless the Department allows the county to add one more lift. The Department has been trying to close the site for several years because of leachate problems. The county has been trying to find an alternative to the landfill, but progress has been slow. No specific alternative has been chosen nor is there a schedule for

developing an alternative. The Department has issued a solid waste disposal permit that will close the site on July 1, 1981. The county will then have to use a temporary transfer site until a permanent solution is implemented.

Director's Recommendation

It is recommended that the Commission concur with the Department's issuance of a permit to close the Hood River Sanitary Landfill on July 1, 1981.

Tony Klein, Hood River County public works director, appeared to request a two-year extension on closure of the landfill site.

Elmer Murray, Chairman, Hood River County Commission, appeared to support Mr. Klein's plea for a two-year extension on any closure orders.

Glenn Palmer, Hood River County Commissioner, appeared in support of an extension of time to allow for alternative sites to be researched.

It was MOVED by Commissioner Somers, seconded by Commissioner Burgess, and carried unanimously, that the Director's Recommendation be approved with the closure date amended to read August 5, 1981.

AGENDA ITEM L - Mr. and Mrs. Daniel J. Walsh - Appeal of Subsurface Variance Denial

Mr. and Mrs. Walsh, owners of a subdivision lot in Tillamook County, are appealing a variance officer's findings that their property is unsuitable for placement of an on-site sewage disposal system.

Summation

1. The pertinent legal authorities are summarized in Attachment "A".
2. On April 5, 1978, Mr. James Seabrandt evaluated the 50 foot by 100 foot lot identified as Tax Lot 8400, in Section 7 DB, Township 1 South, Range 10 West, to determine if a standard subsurface sewage disposal system could be installed. Mr. Seabrandt issued a Certificate of Favorable Site Evaluation, subject to conditions.
3. Mr. Seabrandt issued another Certificate of Favorable Site Evaluation on September 21, 1979, for the same property, based on the original evaluation of April 5, 1978.
4. The Environmental Quality Commission adopted a temporary rule on March 21, 1980, that voided all Certificates of Favorable Site Evaluation issued in Tillamook County from January 1, 1974 through December 31, 1979.

5. At the request of Mr. and Mrs. Walsh, the property was reevaluated on September 24, 1980 by Department staff. It was found that the site did not meet the Department's minimum standards to install a subsurface sewage disposal system because of insufficient area on the small lot to locate a system and its replacement. The lot size also prevents a system from being installed that maintains the minimum setbacks from property lines. Mr. and Mrs. Swanson were notified of the reevaluation denial by letter.
6. Mr. and Mrs. Walsh submitted a variance application to the Department, which was assigned to Mr. Michael Ebeling.
7. On December 17, 1980, Mr. Ebeling examined the proposed drainfield site and found it had been filled with woodwaste to depths ranging from thirty-two (32) to forty-eight (48) inches. He expected water levels would rise to within thirty-four (34) inches of the ground surface. He also found the lot to be very limited in area.
8. A public information gathering hearing was conducted by Mr. Ebeling on December 17, 1980, so as to allow Mr. and Mrs. Walsh and others the opportunity to supply the facts and reasons to support the granting of the variance.
9. Mr. Ebeling reviewed the variance record and found the testimony did not support a favorable decision. Mr. and Mrs. Walsh were notified by letter that the variance request was denied.
10. A letter from Mr. and Mrs. Walsh appealing the Variance Officer's decision was received by the Department on January 26, 1981.

Director's Recommendation

Based upon the findings in the Summation, it is recommended that the Commission adopt the findings of the variance officer as the Commission's findings uphold the decision to deny the variance.

The Walshes did not appear and did not submit any additional written testimony.

It was MOVED by Commissioner Somers, seconded by Commissioner Bishop, and carried unanimously that the Director's Recommendation be approved.

AGENDA ITEM M - Request for a Variance from General Emission Standards for Volatile Organic Compounds at Bulk Gasoline Plants, OAR 340-22-120(2) for the Rogue Valley Oil Co., Medford.

At its last meeting, the Commission extended the deadline for installation of VOC controls until July 30, 1981. The Rogue Valley Oil Co. has requested a variance from that deadline for its existing plant until October 1, 1981, to allow time to complete construction of a new plant,

including all necessary VOC controls.

Summation

1. Rogue Valley Oil Co. leases a bulk gasoline storage plant from Texaco. Rogue Valley Oil Co. has requested a variance to allow operations of this plant without controls until October 1, 1981. This variance would enable the company to remain in business while building a new facility with controls or purchasing an existing facility and installing controls.
2. The Department supports this variance request. This variance would result in 5 tons of emissions during the variance period. Failure to grant a variance would result in closure of the plant.
3. The Commission is authorized by ORS 468.345 to grant variances if it finds that strict compliance would result in the closing down of a plant.

Recommendation

Based upon the findings in the Summation, it is recommended that the Commission grant a variance from OAR 340-22-120(2) from July 31 until October 1, 1981 to Rogue Valley Oil Co. for operation of the bulk gasoline plant at 1024 S. Riverside in Medford.

It was MOVED by Commissioner Densmore, seconded by Commissioner Burgess, and carried unanimously that the Director's Recommendation be approved.

AGENDA ITEM P - Proposed Adoption of Geographic Area Rule for Lands Overlaying the Alsea Dunal Aquifer, Lincoln County, OAR 340-71-400(3).

The Department is proposing adoption of an on-site sewage disposal geographic rule for lands overlaying the Alsea Dunal Aquifer in Lincoln County. Adoption of the rule would allow residences to be built on the previously platted lots with alternative pressurized distribution systems. The Department believes that allowing development using these most protective on-site sewage disposal systems will lower groundwater quality somewhat, but, based on present knowledge and ability to predict nitrate-nitrogen concentrations, usage of these systems will not preclude future use for drinking water.

Conclusions and Summation

The Department has evaluated the testimony received and concludes as follows:

1. The Bayshore-Sandpiper Subdivisions are platted for urban densities. Existing practices of subsurface sewage disposal are inadequately treating the sewage before it enters the groundwater. The lots were purchased in good faith and the property owners invested in a subdivision which was platted and approved in the early 1960's under completely different subsurface sewage disposal rules, land use goals, and other circumstances.
2. The Lincoln County Comprehensive Plan, Ordinance #138, Air, Land and Water Quality Resources Policy and states:

"Lincoln County should cooperate in the identification and monitoring of known aquifers. The quality of aquifers capable of augmenting domestic water supplies shall be protected."

The lands overlaying the Alsea Dunal Aquifer are also within the city of Waldport Urban Growth Boundary.

3. The Alsea Dunal Aquifer is relatively small in volume and yield potential. No individual or community domestic water supply wells presently exists. Estimated yield of the aquifer is between 0.5 mgd to 1.5 mgd. On a preliminary analysis, the potential for groundwater development exists only in the Bayshore Flow Basin, which has a maximum yield of 300,000 gallons per day. The aquifer is not proposed to be used as a drinking water source through the year 2000. Surface streams are expected to be the principal drinking water sources through the foreseeable future.

Nevertheless, there is conflicting information as to water supply considerations (see Attachment G - letter from Seal Rock Water District - Mr. Heinz Neuman and letter from Lincoln County Planning Department - Mr. Craig Hall). The need for the future use as a public water supply is, therefore, neither established nor ruled out. However, the density of the developments on top of the aquifer makes the use undesirable except as a last resort.

4. Allowing development using most protective on-site sewage disposal systems will lower groundwater quality somewhat; but based on present knowledge and ability to predict nitrate-nitrogen concentrations, usage of these systems will not preclude future use for drinking water. The Department of Land Conservation and Development indicated that continued development on the aquifer could be a conflicting use unless standards are developed that ensure a desired degree of resource protection.

Calculations shown in Attachment H shows nitrate-nitrogen concentration could range from 3.5 to 8.2 mg/l. It should be noted that these calculations are based on year-around occupancy with flows of 375 gal/day/dwelling. Experience through the experimental systems program indicates that these assumptions are very conservative. The estimated levels are, therefore, "worst" case results.

5. Construction of a sewerage system would be more protective of the groundwater. Costs, however, appear likely to be higher.
6. No public agency exists to implement a sewerage facility plan. Since the area is within the Walport Urban Growth Boundary creating a separate special purpose sewage agency would be questionable.
7. If a determination is made in the future to utilize the aquifer for domestic drinking water supply purposes, the aquifer will clear in 3-7 years after a sewerage facility system is built.
8. If a geographic region rule allowing the use of the most protective on-site technology is adopted, the rule should recognize the potential for requiring construction of sewage collection and treatment facilities in the event uses or quality conditions of the groundwater change.

Director's Recommendation

Based upon the Conclusions and Summation, it is recommended that the Commission adopt Proposed Rule, OAR 340-71-400(3), Geographic Area Rule for Lands Overlaying Alsea Dunal Aquifer, Lincoln County, as set forth in Attachment E.

Craig Hall, Lincoln County Planning Department, appeared to plead for additional lead planning time and spoke in favor of Recommendation #5.

Don Vandehey, Bayshore, appeared to speak generally in favor of the Director's Recommendation.

It was MOVED by Commissioner Somers, seconded by Commissioner Densmore, and carried unanimously that the Director's Recommendation be approved.

AGENDA ITEM Q - Water Quality Rule Adoption - Amendment of Water Quality Permit Fees (OAR 340-45-070, Table 2) to Increase Revenues for 1981-83 Biennium

The Department has concluded the public participation process on the proposed water permit fee increases and requested adoption of the revised fee schedule.

Summation

1. ORS 468.065(2) authorizes the Commission to establish a schedule of fees for issuing and enforcing water permits.
2. A three-part fee was adopted April 30, 1976.
3. The Legislature expects the Department to adjust the fee revenues proportional to general fund inflation.
4. The Governor's recommended 1981-93 biennium agency budget requires an increase in water permit fee revenues of about \$54,000.
5. The Department proposes to increase the annual compliance determination fee in order to raise the required revenue.
6. The Department received only 10 letters in response to the fee increase public notice. All responses were against a fee increase. None of them suggested an alternative.

Director's Recommendation

Based on the summation, the Director recommends that the Commission adopt the new fee schedule which proposes to modify Table 2 of OAR 340-45-070.

It was MOVED by Commissioner Somers, seconded by Commissioner Burgess, and carried unanimously that the Director's Recommendation be approved.

AGENDA ITEM N - Consideration of Adopting Proposed Plant Site Emission Limit and New Source Review Rules and Proposed Revocation of the Following Existing Rules:

- a) Special Permit Requirements for Source Locating In or Near Nonattainment Areas, OAR 340-20-190 through 198.
- b) Criteria for Approval of New Sources in the Portland Special AQMA, OAR 340-32-005 through 025.
- c) Specific Air Pollution Control Rules for the Medford-Ashland AQMA, OAR 340-30-60 and 110.
- d) Prevention of Significant Deterioration, OAR 340-31-105, definitions 1 through 11, 13 and 14, and 17 through 22; 340-31-125; 340-31-135 through 195.

At the April 24, 1981, Commission meeting, a public hearing was held concerning proposed revisions to the Plant Site Emission Limit rules and the New Source Review Rules.

The staff has attempted to respond to questions raised during the hearing and public comment period and has recommended some revisions to the proposed rules. The responses and revisions are addressed in detail in the staff report for this agenda item.

The Department recommended that the Commission consider adoption of these rules at this time.

Due to the complexity of these rules and questions by Commission members, staff from the Air Quality Division were present and were prepared to conduct a work session with the Commission to insure full understanding of the proposed rules.

Summation

1. A revised New Source Review rule must be adopted in order for Oregon's State Implementation Plans to be fully approved by EPA.
2. A revised rule for Prevention of Significant Deterioration must be adopted in order for Oregon to receive delegation of that program from EPA.
3. A revised Plant Site Emission Limit rule must be adopted to adequately define the basis for setting permit limits and to provide for adequate management of airshed capacity in both attainment and nonattainment areas.
4. The Department has reviewed the testimony received during the public comment period and at the April 24, 1981, public hearing. Several key policy questions are at issue that have great bearing on the ability of the Department to effectively manage airshed capacity, implement desirable regulatory reforms, and keep the overall ownership and control of airshed rights within the public sector. The Department has reached the following conclusions and recommendations:
 - a. Plant Site Emission Limits must be based on an actual emissions baseline adjusted upward or downward in accordance with specific criteria in order to provide for adequate administration of nonattainment control strategies, PSD increment consumption and banking, bubbling, and offset programs.
 - b. Basing Plant Site Emission Limits on plant capacity could allow sources to unknowingly and illegally exceed PSD increments or air quality standards.
 - c. Basing Plant Site Emission Limits on plant capacity would require that the nonattainment SIPs be redone on a higher baseline and that more control strategies be added.

- d. The proposed Plant Site Emission Limit rule allows considerable flexibility for sources to obtain higher emission limits at the time Plant Site Emission Limits are initially set if the airshed capacity is available or can be made available through offsets.
- e. The cutoff criteria for major new sources and modifications locating in or adjacent to nonattainment areas should be the significant emission rate criteria. Any higher level would allow significant impact on the nonattainment areas.
- f. The proposed banking rule, with the modifications included in response to comments, provides a means for sources to reserve offset credits for future growth without permanently giving away the public's airshed rights. Several rule changes were made in response to comments including adding a provision allowing for submittal of shutdown or curtailment plans extending beyond the one year period and changing the uniform discounting requirement to a moratorium.
- g. Several other minor proposed revisions to the draft rules have been made in response to comments and are shown in the attachments for the Commission's consideration.

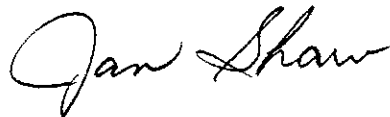
Director's Recommendation

I recommend that the Commission consider the comments received at the public hearing and during the comment period and consider adopting the proposed rules and revoking the existing rules for Plant Site Emission Limits and New Source Review.

The Commission decided to set over any more discussion on this item to a work session to be held before the next regular EQC meeting. No other action was taken on this matter.

There being no further business, the meeting was adjourned. The Commission lunched with the Jackson County Air Quality Advisory Committee, the Jackson County Commissioners, and the Medford City Council. There was general discussion on Medford-area air quality matters at the lunch meeting.

Respectfully submitted,



Jan Shaw
Recording Secretary

JS:g
MG279 (1)

Environmental Quality Commission

June 5, 1981

BREAKFAST AGENDA

- | | |
|--|--------------|
| 1. Regional Manager's report | Grimes/Hough |
| 2. Budget update | Downs |
| 3. Legislative update | Swenson |
| 4. Dates/locations of future EQC meetings | Young/Shaw |
| 5. Buddy Mobile Homes, Marion County:
proposed extension of compliance date
from May 30 to July 1. | Weathersbee |



STATE OF OREGON

INTEROFFICE MEMO

O/D

229-5300

DEPT.

TELEPHONE

TO: EQC/Underwood

DATE: May 22, 1981

FROM: Jan Shaw *JAS*

SUBJECT: Regional Manager's report

Gary Grimes expects to appear before you at breakfast to review significant activities in his five-county region, and the attached memo is his effort to highlight those activities.

JAS
Attachment




STATE OF OREGON

INTEROFFICE MEMO

TO: Joe Richards, Chairman
Members of the Environmental Quality Commission

DATE: May 21, 1981

FROM: Gary Grimes, Manager
Southwest Region 

SUBJECT: Significant Southwest Region Activities and Concerns

Attached is a county-by-county presentation of significant environmental activities and concerns in the Southwest Region. A presentation of this packet to the Commission is scheduled for your June 5, 1981 breakfast meeting. The report is lengthy and covers a wide range of Regional concerns. We would be glad to highlight only those items of special interest to the Commission in order to meet the demands of your time schedule.

GG:fs

COOS COUNTY

Coos Bay-North Bend. Sewage Treatment Plants - There are three (3) major sewage treatment plant discharges to Coos Bay. This past year has seen major improvement in the operation and management of Coos Bay #1, Coos Bay #2 and the North Bend plant. Inflow and infiltration requires constant attention at all plants. Salt water intrusion has been discovered at Coos Bay #1 and industrial waste shock loading is suspect for causing problems at all three plants. The cities have been asked to address these problems.

Weyerhaeuser-North Bend. Weyerhaeuser has initiated construction of a new facility for the storage, handling and application of fungicide retardants (pentaclorophenol-PCP). Virtually all export lumber is treated prior to shipment. Extra care was taken in the facility's design to insure on-site containment of all chemical used. Two (2) spill incidents of this chemical occurred in late 1980. Construction of this new facility is in response to an in-depth analysis of then existing practices and procedures. The proximity of this mill site to Coos Bay necessitated maximum security measures be taken to prevent any discharge or spillage.

Coos Bay. 208 Grant Funds - Water Quality 208 funds are in the Department's 1981-1983 budget for data acquisition and field work in Coos Bay. Surveys of discharges to the Bay are planned with some emphasis on toxic discharges affecting shell fish propagation in the Upper Bay. This study will be similar in scope to the Tillamook Bay study.

Coos County. Solid Waste - Coos County's municipal solid waste program is now based primarily on the use of Consumat incinerators at Beaver Hill. Ash is disposed of at Beaver Hill. The Joe-Ney site is closed to the receipt of municipal wastes and is being converted to a demolition landfill.

An open burning dump exists at Powers, operating under a variance granted by the Commission. This site has been placed on the EPA Open Dump list with upgrading or closure expected by 1984. The 50-mile distance of this community from Beaver Hill makes direct haul or transfer of wastes impractical at this time.

Coos County. On-Site Sewage Disposal Program - The Department administers the on-site sewage disposal program in Coos County. The County Health Department, on behalf of the Board of Commissioners, explored the possibility of assuming the program. Due to fiscal constraints, the County has decided to forego negotiations for another year. New construction dropped drastically at the end of 1980. In the first quarter of 1981, only 31 construction permits were issued. Applications for 32 site evaluations were received in April, 1981, which may indicate some increasing activity in new construction or anticipation by property owners of pending activity.

The Coos Bay Office has one full-time Waste Management Specialist working Coos County. We are closely monitoring the program to insure reasonable response time for applicants. In the past, we have drawn upon the resources of other branch offices to assist in removing temporary backlogs.

COOS COUNTY (Cont.)

Coos Bay-Log Storage. Log Transport and Handling - Implementation of the Log handling policy adopted by the EQC in October 1975 and amended in September 1979 is ongoing despite the Region's severe economic slowdown in timber products production. Permit modifications have been issued to all affected facilities in line with the Commission's policy. Eleven (11) inspections were made of log handling facilities in 1980, and only minor discrepancies were noted with improvements made as requested.

Two (2) companies, Coos Head Timber and Al Pierce Lumber, were granted economic hardship variances until July and September 1982 respectively.

CURRY COUNTY

Brookings. The City passed an ordinance in May to prohibit (60 days hence) acceptance of local septic tank pumpings by the Brookings Sewage Treatment Plant. The County is reacting to this by initiating discussions with the City and evaluating other alternatives. The Plant has a history of inflow and infiltration problems coupled with the rising maintenance requirements inherent with older facilities. Septage has to be carefully metered into a facility of this size to prevent shock loading.

Gold Beach, Wedderburn - The Department has initiated discussion with the Wedderburn Sanitary District concerning a large Resort-Condo development by the owners of Jot's. Questionable at the time of this writing is the capability of the District's no-discharge lagoons to handle the extra loading. Total project consists of 110 new lodging units, new food and beverage facilities, a banquet room, and convention facilities. Mitigating factors include removal of an 85 unit RV park with shower, bathroom and laundry facilities and removal and/or alteration of existing food, beverage and motel facilities. Construction on the first phase is expected to commence in fall of 1981. The Department of Economic Development gave revenue bonding approval for this project in March of 1980.

Rogue River, Main Stem. The increasing popularity of rafting Wild Rivers has created a concern over the adequacy of sanitary facilities for Rogue River travelers. Our office is working with the Bureau of Land Management on the placement of outdoor privys and with Curry County on the evaluation and upgrading of subsurface systems at the various lodges where systems are inadequate. Construction is extremely difficult along this segment of the Rogue as materials and equipment have to come in by boat, helicopter or airplane. In 1980, 10,737 permitted persons floated the Wild and Scenic section of the River between Memorial Day and Labor Day. In addition, 2,357 and 1,621 made the downstream trip in September and October of 1980 respectively (data from BLM). Upstream jet boat visitors departing Gold Beach with destinations of Agness (32 mi) and Paradise Bar (52 mi) are estimated to be 50,000 persons annually (USFS data).

Countywide. The Curry County solid waste program is expensive to operate with the addition of the Consumat units at Brookings, transfer stations, and upgraded landfill operations. Increased awareness of solid waste costs has been brought to the attention of the Board of Commissioners as they prepared to defend an increased costs recovery suit brought against the County by the operator of the Consumat units. Budget constraints may ultimately effect increased or maintained County support of the solid waste program. Fees have been initiated at the privately operated Wridge Creek landfill and they may be proposed for County-operated sites. The County has expressed an interest in obtaining a long-term backup landfill site for the incinerators. Energy recovery from these incinerators does not appear feasible at this time.

Countywide. On-Site Sewage Disposal - Curry County is a contract county maintaining an on-site sewage disposal program through agreement with the Department. Activity in that program has dropped significantly due to the new construction slowdown (economy) and the DLCD enforcement order against the County prohibiting any new subdivisions outside urban growth boundaries. The Region will be asked to provide technical assistance to the County's staff on the alternative (formerly experimental) systems in the recently adopted rule package. Negotiations are ongoing on a new County-DEQ contract for providing on-site sewage disposal program services. The County is now in the budgetary process -- a significant activity precluding immediate concurrence on contract elements.

DOUGLAS COUNTY

Riddle. Hanna Nickel - Hanna Nickel is under a Department order to make repairs and improvements to the electrostatic precipitator on the calciners. The Company requested and received permission pursuant to OAR 340-21-070 to bypass the precipitator for a two-week period. During this period of by-pass, partial source control will be provided through the primary cyclones. Work will proceed 24 hours a day, 7 days a week until completed. The Company will be doing ambient TSP monitoring in Riddle and Tri City, and the data will be made available to the Department. Hanna has assumed the responsibility of informing the public of its actions. The Air Contaminant Discharge Permit Renewal for this facility is now out for public comment through May 31, 1981.

"Cancer We Care" is a group formed in the Riddle-Tri City area to focus attention on a suspected high incidence rate of cancer in youths as well as adults. Studies have been undertaken to categorize cancer incidences and causative effects particular to the area. The group is concerned about all industrial air and water discharges impacting that portion of Douglas County.

Roseburg - North Roseburg. The failure of Roseburg, North Roseburg Sanitary District and Douglas County to meet EPA criteria for grant eligibility resulted in the loss of Federal funds for development of a regional sewage treatment plant. That loss of funds will be hard to make up locally with economic conditions being as they are. This Region anticipates doing a higher level of monitoring on the Roseburg and North Roseburg STP's performances and impacts of discharges to the Umpqua River. We are desirous of maximizing the facilities efficiencies and deriving the best treatment possible while other funding alternatives are explored. Hopefully forward progress will preclude the need for any imposed moratorium.

Douglas County. On-Site Sewage Disposal Program - Malfunctioning septic tanks were creating severe sewage pollution problems in four areas of Douglas County. Those areas and their current status are:

Rifle Range Road - This area was recently annexed to the City of Roseburg and the construction of sewers is being pursued. The Federal cutoff of grant monies for interceptors has slowed progress. Alternative funding is being investigated.

Camas Valley - It is felt that most problems can be corrected by repairing old systems using criteria in the new subsurface rules package.

Landers Lane - Progress is being made towards annexation to the Winston-Green Sanitary District.

Glide - Most subsurface problems have been solved following construction of the Glide sewage treatment plant and installation of pressure sewers. This County sponsored project has received nationwide attention.

In addition to the four above areas, some residents of the City of Elkton claim Elkton has a significant rate of subsurface failures. This will require further investigation. It does appear that future growth in Elkton will be dependent upon available adequate lot sizes for subsurface disposal or eventual sewerage with collective treatment. On April 8, 1981

DOUGLAS COUNTY (Cont.)

Director WH Young, Wes Kvarsten, Director DLCDC, and the Douglas County Commissioners shared the spotlight at a Town Hall meeting in Elkton. Planning, growth and onsite or collective sewage treatment predominated the topics of interest to local city and rural citizens.

The Department administers the onsite sewage disposal program in Douglas County. There are no negotiations ongoing with the County to assume this program and the County has not expressed a desire to assume it. 756 permit actions were made in 1980, 333 of which were new construction permits. 138 permit actions were made from January through March, 1981, with 47 new construction permits being issued.

International Paper - Gardiner. Pulp Mill - Immediately following expansion of this facility, IP had trouble in meeting BOD effluent limitations. The Company was issued a civil penalty of \$2500 for BOD violations in October and November, 1980. A violation occurred again in February. The treatment system now appears to be balanced with no violations reported in March of 1981.

JACKSON COUNTY

Medford-Ashland AQMA. There is a status report on the Commissioners agenda that covers this issue in great detail. We will note herein that it is probably the most significant and complex of issues in the Southwest Region.

Butte Falls. Solid Waste Disposal Site - The Butte Falls "dump" is the only municipal solid waste facility in Jackson County recommended for inclusion on the EPA Open Dump List. Jackson County, the City of Butte Falls, and Medford Corporation (landowner) are working together to make this site a transfer station. Solid wastes would be transferred to the Dry Creek landfill designated in the County's Solid Waste Plan as the long-term regional landfill. Again, costs and budgetary constraints are a primary consideration.

Jacksonville. Tie-in to Regional Sewage Treatment System - It appears that conflict (8 years) over what option the City should choose to handle their sewage treatment problems is about to end. The City's sewage treatment lagoons will be abandoned following hookup to the Medford regional sewage treatment plant via an 15" line constructed and maintained by the Bear Creek Valley Sanitary Authority. A Memorandum of Agreement between EPA and the National Council for Historic Preservation controlling sewer hookups is in the final stages of negotiation. Growth and development requiring sewer hookup will not be allowed until the City has an approved Comprehensive Plan detailing measures to protect the areas of historic significance.

Gold Hill. New Sewage Treatment Plant - Gold Hill won the court case over siting of a new sewage treatment plant. The City voters approved an additional bond levy to pick up inflationary increases in the project caused by legal delays. Hopefully this project will soon be under construction.

Shady Cove. New Sewer and Sewage Treatment Plant System - The City of Shady Cove has just recently started up the new treatment plant. City residents are in the process of hooking up.

Medford. Regional Treatment Plant - The City of Medford has initiated expansion of its sewage treatment plant without going through the Federal grant process. Funding is from a \$3.5 million dollar reserve and imposition of new hookup fees of \$660 per residence.

COMMENT: The overall position of sewage treatment capabilities in Jackson County is encouraging. In the last five (5) years, new facilities and/or improvement modifications have occurred at Butte Falls, Shady Cove, Rogue River and Ashland. New construction and/or expansion at the Gold Hill and Medford plants and the tie-in of Jacksonville are imminent. The White City collection system is undergoing major rehabilitation to correct inflow and infiltration problems prior to hookup to the Medford regional plant and abandonment of the old lagoons. Eagle Point is approaching a decision point over abandonment of its lagoons and tie-in to the Medford regional plant. Local governments have been decisive with timely actions to protect the Upper and Middle Rogue.

JACKSON COUNTY (Cont.)

Jackson County. On-Site Sewage Disposal Program - Jackson County administers the on-site sewage disposal program under contract to the Department. A new contract defining responsibilities under the new rule package as adopted March 13, 1981 is now being negotiated. Through use of alternative systems, the County has raised its approval rate from 40% in 1978 to 93% in 1980. Some further increase in that approval rate is expected from application of other alternative systems contained in the new rules.

JOSEPHINE COUNTY

Airport Lagoons. Industrial Sludges and Glue Wastes - These non-overflow design lagoons have been closed by the County. The process that led to the closing was a very emotional one over whether or not seepage from the lagoons did or could contaminate groundwater and local wells. A local septage pumper further caused concern by illegally dumping septage in the lagoons. The County has received approval from the Department to land farm the remaining liquid in the lagoons. The sludge will then be analyzed for a determination on ultimate disposal needs. Once the sludge is safely removed, the lagoons will be leveled and closed out permanently.

COMMENT: Josephine County has appointed a Groundwater Policy Review Advisory Committee and adopted ordinances on the use of groundwater, particularly where new development is occurring. Groundwater is a valuable resource in Josephine County and the County intends to maintain active vigil over activities affecting its quality and quantity.

Gold Placer Mining. Illinois and Rogue River Tributaries - The placer mining of gold has increased significantly since the price went up and the local employment situation went down. The typical "recreational" miner has added a 2-4' dredge to his equipment. The more serious individuals have gone to 6 and 8' dredges and mechanical machinery to assist in removing overburden. The permit process -- Division of State Lands, Department of Environmental Quality, and Department of Fish and Wildlife review -- does not work with adequate speed. By the time you get the source into the permit process he has finished, quit, or relocated. Locally, Department of Fish and Wildlife representatives have expressed sentiment that we do not move quick enough on mining complaints. Due to the extreme mobility of operating with newer style dredges, the "slug" of mud and the operator are usually gone when we get there. Gross violations would appear to be more appropriately and judiciously handled through criminal proceedings.

Eighteen (18) mining sources on established claims are currently under WPCF permits. There are probably several times this number using some form of settling ponds on their own volition. Needless to say, the Department's presence on a marginal mining site is not welcome. Even at today's gold prices, to do the job right on most sites is not economical. In some cases, it is physically impossible.

Josephine County. Solid Waste - Two (2) landfill sites serve the County. The Kerby landfill (County operated) serves the Cave Junction, Southwest County area. The Merlin landfill (privately operated and on BLM land) serves the greater Grants Pass area. The Merlin landfill was given indeterminate RCRA status pending evaluation of groundwater monitoring well information. At this time, based upon preliminary data, it is thought that the landfill does not have significant impact upon groundwater. Preliminary data, however, showed the need for more evaluation prior to final RCRA classification.

Josephine County. On-Site Sewage Disposal Program - Josephine County administers the on-site sewage disposal program under contract to the Department. The County and Department are negotiating a new contract which more clearly defines obligations under the rule package as adopted in March of 1981. The County Counsel has approved that contract and forwarded it to the Board of Commissioners for signature.

JOSEPHINE COUNTY (Cont.)

The County had a 71% approval rate in 1980 and expects that to increase with the use of more alternative systems as provided for in the current rules. New permits issued in 1980 totaled 476 as compared to 471 in Jackson County.

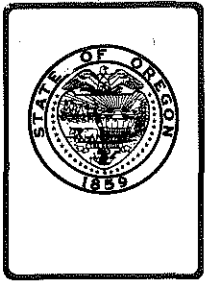
SOUTHWEST REGION OFFICE					
NUMBER OF PERMITTED SOURCES	ROSEBURG BRANCH	MEDFORD BRANCH		COOS BAY BRANCH	
	DOUGLAS COUNTY	JACKSON COUNTY	JOSEPHINE COUNTY	COOS COUNTY	CURRY COUNTY
Air	116	83	31	39	14
Water (Majors)	86 (4)	61 (2)	27 (1)	47 (4)	19 (0)
Solid Waste Sites	29 (15)*	18 (13)*	6 (4)*	15 (10)*	8 (3)*
On-Site Sewage Responsibility	DEQ	County	County	DEQ	County

*(industrial sites)

Present Filled Positions
Total Regional FTE Breakdown

<u>Positions</u>	<u>ROSEBURG BRANCH</u>	<u>MEDFORD OFFICE</u>	<u>COOS BAY BRANCH</u>
Region Manager		1	
Admin. Asst. (Clerical)		1	
Clerical	1-1/2	1/2	1
Program/Field	2	2	2
On-Site Sewage Program	2		1
On-Site Sewage Program (Exp.)		1	
Air Monitor Tech.		1	
TOTAL	<u>5-1/2</u>	<u>6-1/2</u>	<u>4</u>

GRAND TOTAL: 16 Regional FTE



Environmental Quality Commission

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

MEMORANDUM

TO: Environmental Quality Commission

FROM: Director

SUBJECT: Breakfast Agenda, June 5, 1981 EQC Meeting

Request for Compliance Date Extension for
Buddy Mobile Homes, Marion County

Background & Problem

Buddy Mobile Homes is a mobile home manufacturing plant located in Mt. Angel and owned by Skyline Corporation of Elkhart, Indiana. After complaints were received from adjacent residences, the Department found the Commission's noise control standards were being exceeded by the operation of the plant's cyclone system. After notification that standards were being exceeded, the company requested a variance from the rules be granted. At the January 30, 1981 EQC meeting, the Commission denied the variance request and ordered Buddy Mobile Homes to install necessary controls to achieve compliance with the standards before May 30, 1981.

On April 13, 1981, the Department received proposals to mitigate the cyclone noise from the company with a request for DEQ evaluation and comments. The Department responded on April 21 that the proposals would probably not provide significant noise reduction. Further evaluation by an acoustical consultant was therefore encouraged prior to installation of the proposed controls.

On May 21, 1981, a letter was received from the company requesting that an extension to the Commission's compliance order be granted so that the noise control proposals could be evaluated and recommendations made by their acoustical consultant.

The company has requested a 30-day extension to permit their consultant to evaluate the control proposals and make recommendations. They would then submit any alternative proposals for DEQ comment and accomplish the installation of controls.

Discussion

Buddy Mobile Homes has been reasonably responsive to the Commission's compliance order to install necessary controls by May 30, 1981. The Department, after reviewing control proposals, recommended further evaluation prior to installation due to lack of confidence in the proposals. Therefore, additional time is warranted for further proposal evaluation and controls development.



Contains
Recycled
Materials

Although the company has requested an additional 30 days, it appears that this request is only to provide additional time for the development of an adequate control proposal. Therefore, it is anticipated that still further additional time would be necessary for the purchase and installation of controls.

The Department believes the company has made an acceptable effort to comply with the Commission order to achieve compliance with the noise emission standards by May 30, 1981. In order to fully evaluate proposed controls and, if necessary, develop additional or alternate controls, an extension of the compliance date is required.

Director's Recommendation

Barring objection of the Commission, the Department will exercise prosecutorial discretion and not initiate enforcement action toward Buddy Mobile Homes until the proposed control plan is submitted by June 30, a compliance schedule is developed, and the Commission has considered an amended compliance order at its next meeting scheduled for July 17, 1981 in Portland.

Bill

WILLIAM H. YOUNG

John Hector:pw
May 29, 1981
229-5989

Attachment:

1. Extension request dated 5/20/81

ACKER, UNDERWOOD, BEERS & SMITH
ATTORNEYS AT LAW
1200 ORBANCO BUILDING
1001 S.W. FIFTH AVENUE
PORTLAND, OREGON 97204

G. MARTS ACKER
LAUREN M. UNDERWOOD
WM. M. BEERS
MILTON R. SMITH

MARK A. HIEFIELD
TIMOTHY N. BRITTLE
DAVID B. CUNNINGHAM
PAMELA J. BEERY

TELEPHONE
(503) 224-4000

May 20, 1981

Mr. John Hector
Department of Environmental Quality
522 S.W. Fifth Ave.
P.O. Box 1760
Portland, Oregon 97207

RE: Noise Pollution Controls for Buddy Mobile
Homes, Mt. Angel, Marion County

Dear Mr. Hector:

This will confirm our telephone conversation of May 20, 1981 relating to the noise source at the Buddy Mobile Homes plant in Mt. Angel, Oregon. As I indicated to you, after receiving the letter from the Department of Environmental Quality dated April 21, 1981 concerning the proposals which had been submitted to Buddy Mobile Homes by Benz Air Engineering Co., Inc., we became concerned as to the Department's expressions of doubt that the proposed modifications would in fact solve the noise standards problems even though Benz had "guaranteed" this result. I know the Department had recommended that our acoustical consultant, Ed Daly at Daly Engineering Company, become involved to provide some additional assistance in evaluating the proposals and some delay occurred before that additional consultation while Skyline Corporation was making a determination as to the future of the Mt. Angel plants. As you may know, one of the two Skyline Mt. Angel plants is being closed and obviously the future of the other has been considered as well, a factor which obviously weighs heavily on any determination to spend additional money on the plant.

In any event, additional material has been sent to Daly Engineering Company for their assistance in evaluating the proposals, or in the alternative, in making recommendations as to proposals which hopefully would resolve the noise problems at the plant. Unfortunately, the various delays which have occurred at this point would preclude the modifications being made to the plant by May 30, 1981 as previously directed. As I indicated to you in our telephone discussion, I feel that if we would get another 30 day extension to permit Mr. Daly to do the evaluation and

Department of Environmental Quality
RECEIVED
MAY 21 1981
Noise Pollution Control

Mr. John Hector
May 20, 1981
Page 2

make his recommendations, we could then submit alternative proposals and accomplish the changes as required. Accordingly, we are requesting an extension of the time permitted to make the modifications and look forward to the Department's prompt response to this request.

Thank you for your cooperation and assistance.

Very truly yours,

ACKER, UNDERWOOD, BEERS & SMITH

Milton R. Smith

MRS:dlp

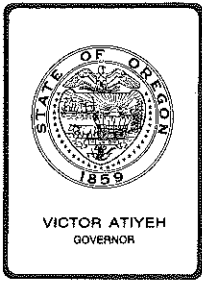
cc. Mr. William Young
Mr. Jon E. Gjertsen
Skyline Corporation
Daly Engineering Company

Environmental Quality Commission
Jackson County Courthouse Auditorium
Oakdale and Eighth Streets
Medford, Oregon

June 5, 1981
Noon

LUNCH AGENDA

1. Auto emissions testing program for Jackson County.
2. Possible weatherization programs.
3. Woodstove use curtailment when air pollution reaches health standard.



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. B, June 5, 1981, EQC Meeting
March and April, 1981, Program Activity Reports

Discussion

Attached are the March and April, 1981, Program Activity Reports.

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

Water Quality and Solid Waste facility plans and specifications approvals or disapprovals and issuance, denials, modifications and revocations of air, water and solid waste permits are prescribed by statutes to be functions of the Department, subject to appeal to the Commission.

The purposes of this report are:

- 1) to provide information to the Commission regarding the status of reported 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 contaminant source plans and specifications; and
- 3) to provide logs of civil penalties assessed and status of DEQ/EQC contested cases.

Recommendation

It is the Director's recommendation that the Commission take notice of the reported program activities and contested cases, giving confirming approval to the air contaminant source plans and specifications.

Bill

William H. Young

M. Downs:a
229-6485
May 13, 1981
Attachments
MA98 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

Monthly Activity Report

March/April, 1981

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

AQ, WQ, SW Divisions (Reporting Unit)	March 1981 (Month and Year)
--	--------------------------------

SUMMARY OF PLAN ACTIONS

	Plans Received		Plans Approved		Plans Disapproved		Plans Pending
	<u>Month</u>	<u>FY</u>	<u>Month</u>	<u>FY</u>	<u>Month</u>	<u>FY</u>	<u>Pending</u>
<u>Air</u>							
Non-Permitted							
VOC Sources	0	0	113	614	0	0	103
Direct Sources	3	68	3	83	-	-	89
Total	3	68	116	697	0	0	192
<u>Water</u>							
Municipal	39	402	38	418	-	-	26
Industrial	10	57	14	51	-	-	15
Total	49	459	52	469	-	-	41
<u>Solid Waste</u>							
Gen. Refuse	0	11	3	16	0	0	6
Demolition	0	0	1	1	0	0	0
Industrial	0	6	0	9	0	1	5
Sludge	0	3	0	3	0	0	0
Total	0	20	4	29	0	1	11
<u>Hazardous Wastes</u>							
	-	-	-	-	-	-	-
<u>GRAND TOTAL</u>	52	547	172	1195	0	1	244

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT

PLAN ACTIONS COMPLETED

DIRECT SOURCES

NONPERMITTED VOC SOURCES

County	Number	Source	Process Description	Date Recorded	Action Status	
1	CLACKAMAS	03	E063 JENNINGS LODGE TEXACO	VAPOR RECOVERY GAS STATION	01/30/80	COMPLETED-APRVD
1	CLACKAMAS	03	E476 CLACKAMAS TEXACO	VAPOR RECOVERY GAS STATION	12/13/79	COMPLETED-APRVD
1	CLACKAMAS	03	V056 CHEVRON CHEMICAL CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V057 F & W FABRICATING INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V058 MILWAUKIE PLUMBING CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V059 L B FOSTER CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V060 MILWAUKIE TRANSFER	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V061 BELL HEATING INC.	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V062 PACIFIC SEA FOOD CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V063 DON GLAUBITZ	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V064 MCFARLANE BARK INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V065 ARLOS B CROCKER	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V066 DEMARTINI TRUCK FARMS	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V067 CLACKAMAS COUNTY FIRE I	VAPOR RECOVERY, GAS STATIONS	03/26/81	COMPLETED-APRVD
1	CLACKAMAS	03	V068 CLACKAMAS COUNTY FIRE I	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V069 CHEVRON USA INC	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
1	CLACKAMAS	03	V070 J M	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
1	CLACKAMAS	03	V071 KAISER WAREHOUSE	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
1	CLACKAMAS	03	V072 MILLIKEN & SERVAS	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	CLACKAMAS	03	V074 PORTLAND GENERAL ELEC	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
1	CLACKAMAS	03	Z097 MCLOUGHLIN CHEVRON	VAPOR RECOVERY GAS STATION	01/30/80	COMPLETED-APRVD
1	JACKSON	15	C480 LITHIA MOTORS INC	VAPOR RECOVERY GAS STATION	12/26/79	COMPLETED-APRVD
1	JACKSON	15	V001 WILLIAMS BAKERY	VAPOR RECOVERY, GAS STATIONS	02/08/80	COMPLETED-APRVD
1	JACKSON	15	V007 ROGUE VALLEY SKYWAYS	VAPOR RECOVERY, GAS STATIONS	02/08/80	COMPLETED-APRVD
1	MARION	24	E430 EARL'S UNION SERVICE	VAPOR RECOVERY GAS STATION	01/09/80	COMPLETED-APRVD
1	MARION	24	V005 UNION OIL CO.	VAPOR RECOVERY, GAS STATIONS	01/30/80	COMPLETED-APRVD
1	MARION	24	V006 SALEM AVIATION	VAPOR RECOVERY, GAS STATIONS	01/31/80	COMPLETED-APRVD
1	MARION	24	V035 J C JONES OIL CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	MULTNOMAH	26	A390 EVERIST BROS INC	VAPOR RECOVERY GAS STATION	12/26/79	COMPLETED-APRVD
1	MULTNOMAH	26	A430 EAST SIDE TIRE & BATTERY	VAPOR RECOVERY GAS STATION	02/13/80	COMPLETED-APRVD
1	MULTNOMAH	26	A813 POWELL & POWELL	VAPOR RECOVERY GAS STATION	02/13/80	COMPLETED-APRVD
1	MULTNOMAH	26	B789 HOLGATE MOBIL SERVICE INC	VAPOR RECOVERY GAS STATION	12/26/79	COMPLETED-APRVD
1	MULTNOMAH	26	B794 SPEEDY CAR WASH	VAPOR RECOVERY GAS STATION	02/13/80	COMPLETED-APRVD
1	MULTNOMAH	26	C750 POWELL VALLEY MARKET	VAPOR RECOVERY GAS STATION	12/26/79	COMPLETED-APRVD
1	MULTNOMAH	26	E092 POWELL & POWELL	VAPOR RECOVERY GAS STATION	02/13/80	COMPLETED-APRVD
1	MULTNOMAH	26	E298 APOLLO OIL SERVICE	VAPOR RECOVERY GAS STATION	02/13/80	COMPLETED-APRVD
1	MULTNOMAH	26	E452 BOB LAURENCE CHEVRON	VAPOR RECOVERY GAS STATION	02/08/80	COMPLETED-APRVD
1	MULTNOMAH	26	E509 TOM'S AUTO CARE	VAPOR RECOVERY GAS STATION	01/09/80	COMPLETED-APRVD
1	MULTNOMAH	26	V002 STEINER CORP.	VAPOR RECOVERY, GAS STATIONS	02/08/80	COMPLETED-APRVD
1	MULTNOMAH	26	V034 FLIGHTCRAFT, INC.	VAPOR RECOVERY, GAS STATIONS	01/31/80	COMPLETED-APRVD
1	MULTNOMAH	26	V312 WESTERN EQUIP. CO.	VAPOR RECOVERY, GAS STATIONS	01/07/81	COMPLETED-APRVD
1	MULTNOMAH	26	V319 FREIGHTLINER CORP.	VAPOR RECOVERY, GAS STATIONS	01/07/81	COMPLETED-APRVD
1	MULTNOMAH	26	V321 ASSOCIATED BUIL. MAINT.	VAPOR RECOVERY, GAS STATIONS	01/07/81	COMPLETED-APRVD
1	MULTNOMAH	26	V324 MARYATT INDUSTRIES	VAPOR RECOVERY, GAS STATIONS	01/07/81	COMPLETED-APRVD
1	MULTNOMAH	26	V339 GATEWAY VOLKSWAGEN	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	MULTNOMAH	26	V340 RIVERSIDE GOLF & COUNTRY	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
1	MULTNOMAH	26	V341 PACIFIC CONSOLIDATED INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT

PLAN ACTIONS COMPLETED

DIRECT SOURCES

NONPERMITTED VOC SOURCES

County	Number	Source	Process Description	Date Recorded	Action Status
MULTNOMAH	26	V342 PACIFIC SEA FOOD CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V343 DONALDSON'S MARINA	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V344 WESTINGHOUSE ELECTRIC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V345 STENNO CARBON CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V347 ROSE AUTO WRECKING	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V348 PACIFIC INSULATION	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V349 MYLESS O'DONNELL & CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V350 HOLMAN'S FUNERAL SERVICE	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V351 SIRIANNI ELECTRIC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V353 OREGON ASPHALTIC PAVING	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V354 WALT JOHNSON MAZDA	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V355 WALT JOHNSON LINCOLN-MERC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V356 GREEN TRANSFER & STORAGE	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V357 LEW WILLIAMS CADILLAC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V358 BELL & KURP BODY SHOP	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V359 ROTH VOLKSWAGEN INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V360 FOUR SEASONS DODGE	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V361 RHONE-POULEC INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V362 ROCKWOOD SUBARU	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V363 INGERSOLL-RAND EQUIP	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V364 DATA DISTRIBUTORS INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V365 INDUSTRIAL LAUNDRY & DRY	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V366 ACME GLASS CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V367 SEARS ROEBUCK & CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V368 AMERICAN TRUCK & AUTO LSE	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V369 WALLACE BUICK-AMC CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V370 PETTIJOHN ENGR CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V371 SPE-DE-WAY PRODUCTS	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V372 LEWIS BROS INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V373 A-I SANDBLASTING	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V374 RANCHO FORD	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V375 COAST CRANE & EQUIP	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V376 CASE POWER & EQUIP	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V377 RON TONKIN INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V378 FABRI-VALVE DIVISION	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V379 SAVE U RENT A CAR	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V380 FARIS SHEET METAL CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V381 CHEVRON USA INC	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V382 GILBERT'S TOWING & STORAG	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V383 TRAIL EQUIPMENT CO	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V384 DIESEL SERVICE UNIT	VAPOR RECOVERY, GAS STATIONS	03/20/81	COMPLETED-APRVD
MULTNOMAH	26	V385 DAHLIN DENTAL LAB	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V386 CALBAG METALS CO	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V387 CITY CENTER PARKING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V388 CAPITOL PARKING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V389 CITY CENTER PARKING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V390 CITY CENTER PARKING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 MONTHLY ACTIVITY REPORT

PLAN ACTIONS COMPLETED

DIRECT SOURCES

NONPERMITTED VOC SOURCES

County	Number	Source	Process Description	Date Action Recorded	Status
MULTNOMAH	26	V391 CITY CENTER PARKING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V393 A & W EQUIP CO	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V394 GRESHAM COOP	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V395 CITY OF GRESHAM	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V396 HYSTER TECHNICAL CENTER	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V397 UNITED EQUIP CO	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V398 BIGHOUSE AUTO SERVICE	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V399 BRADSHAW AUTO SERVICE INC	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V400 BRADSHAW AUTO SERVICE INC	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V403 HAMILTON ENGINE SALES	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V404 TRENCHER EQUIP CO	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V405 ALEXANDER MANUFACTURING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V406 YALE INDUSTRIAL TRUCKS	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V407 RIVERVIEW CEMENTARY	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V408 GREAT NORTHERN PRODUCTS	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V409 FRIDAY OLDSMOBILE	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V410 COLUMBIA RIVER YACHT CLUB	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
MULTNOMAH	26	V411 CAPITOL PARKING	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD
WASHINGTON	34	V070 RYDER TRUCK RENTAL	VAPOR RECOVERY, GAS STATIONS	03/24/81	COMPLETED-APRVD

TOTAL NUMBER QUICK LOOK REPORT LINES 113

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT

PLAN ACTIONS COMPLETED

DIRECT SOURCES

County	Number	Source	Process Description	Date of Action	Status
Multnomah	1731	Flintkote Cement and Lime	Dust Collection System	3/10/81	Approved
Jackson	1732	Boise Cascade Corp	Sanderdust Combustion System	3/16/81	Approved
Multnomah	1733	Northwest Battery Recycle	Dust and Fume Control System	3/16/81	Approved



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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

<u>Water Quality Division</u>	<u>March, 1981</u>
(Reporting Unit)	(Month and Year)

PLAN ACTIONS COMPLETED - 52

*	County	*	Name of Source/Project	*	Date of	*	Action	*
*		*	/Site and Type of Same	*	Action	*		*
*		*		*		*		*

Municipal Waste Sources (Cont'd.)

Curry	Harris Beach Sanitary Sewers Brookings	3/25/81	P.A.
Union	North Depot St. Pump Station Sewer Extension LaGrande	3/25/81	P.A.
Jackson	Sunburst Acres Sub. Sanitary Sewer Shady Cove	3/26/81	P.A.
	Upper Rogue Terrace Sub. Sanitary Sewer Shady Cove	3/26/81	P.A.
Lincoln	Quiet Water Sub. Pump Station Sanitary Sewer Yachats	3/26/81	P.A.
Clackamas	Royal Heights Sub. Sanitary Sewer Lake Oswego	3/27/81	P.A.
Clackamas	Columbia Avenue Sanitary Sewer Extension Gladstone	3/27/81	P.A.
Lincoln	Fairway Heights Phase II Sewer Improvements Waldport	3/30/81	P.A.
Jackson	Westwood Drive Sewer Project #80-1 Bear Cr. Valley San. Auth.	3/30/81	P.A.
Umatilla	Seaquist & Long Sub. Sanitary Sewers Milton-Freewater	3/31/81	P.A.

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

March, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 52

* County	* Name of Source/Project	* Date of	* Action	* Action	* Action
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Municipal Waste Sources (Cont'd.)

Clackamas	Scott Court-Oak Lodge S.D. Sanitary Sewer Gladstone	3/23/81	P.A.		
Washington	Amber Glen Sanitary Sewer USA, Cornelius	3/24/81	P.A.		
	Shonna Park Sanitary Sewer USA, Rock Creek	3/24/81	P.A.		
	Oleson Acres Sanitary Sewer USA, Durham	3/24/81	P.A.		
	Osprey Park Sanitary Sewer USA, Cornelius	3/24/81	P.A.		
Linn	Phase VII of East Cen. Separation Project Albany	3/24/81	P.A.		
Yamhill	Meadowlark Subdivision Sanitary Sewer Newberg	3/24/81	P.A.		
Clackamas	Ash Meadows Sanitary Sewers Wilsonville	3/24/81	P.A.		
Clackamas	Hayward Meadows Sanitary Sewers Oak Lodge Sanitary Dist.	3/24/81	P.A.		

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division	March, 1981
(Reporting Unit)	(Month and Year)

PLAN ACTIONS COMPLETED - 52

*	County	*	Name of Source/Project	*	Date of	*	Action	*
*		*	/Site and Type of Same	*	Action	*		*
*		*		*		*		*

Municipal Waste Sources (Cont'd.)

Jackson	Sunset Avenue Area Sewer Extension Bear Cr. Valley S.A.		3/12/81		P.A.
Clackamas	Town Center Heights Sanitary Sewer Clack. Co. SD		3/12/81		P.A.
Washington	Shannon Park Condominiums Off-Site Sewer Extensions Hillsboro		3/13/81		P.A.
Benton	N.E. Circle Blvd. Sanitary Sewer Corvallis		3/13/81		P.A.
Deschutes	Fairway Crest Village IV and V Sanitary Sewers Sunriver		3/17/81		P.A.
Multnomah	SE 108th South of SE Foster Road Sanitary Sewer Portland (Columbia Blvd.)		3/18/81		P.A.
Washington	Nimbus Industrial Sub. Sanitary Sewer USA, Rock Creek		3/20/81		P.A.
Lincoln	Otter Village, Phase I Sewer System Otter Crest		3/23/81		P.A.
Multnomah	SW 54th Avenue to Fairview Ct. Sanitary Sewer Portland		3/23/81		P.A.

MAR.3 (5/79) WG706 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	March, 1981 (Month and Year)
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PLAN ACTIONS COMPLETED - 52

* County	* Name of Source/Project * /Site and Type of Same	* Date of * Action	* Action	*
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Municipal Waste Sources - 38

Lane	Butterfly Gates Contract E-22 MWMC/Eugene-Springfield	3/5/81	P.A.	
Lane	Aeration Basins Contract C-4 MWMC/Eugene-Springfield	3/5/81	P.A.	
Lane	Aeration Equipment Contract E-16 MWMC/Eugene-Springfield	3/5/81	P.A.	
Jackson	Plant Expansion Contract C-1 Medford	3/20/81	P.A.	
Jackson	Clarifier Equipment Contract E-3, Sec. Medford	3/20/81	P.A.	
Jackson	Clarifier Contract C-3, Sec. Medford	3/20/81	P.A.	
Jackson	Contract C-2 Medford	3/20/81	P.A.	
Jackson	Contract E-2 Medford	3/20/81	P.A.	
Deschutes	Flow Equalizer Basin Additions Sunriver	3/20/81	P.A.	
Washington	Cornelius Industrial Park Pump Station USA, Cornelius	3/12/81	P.A.	

MAR.3 (5/79) WG706 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

March, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 52

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	*	*	*	*

Industrial Waste Sources - 14

Jackson	Husky Industries Eliminate Furnace Wash Down Water White City	8/16/79	Approved
Tillamook	Gary Bordessa, Bay City Manure Holding Tank	6/1/80	Cancelled
Polk	Stan Stellingworf Dairy, Manure Pump and Irrigation Equipment	3/5/81	Approved
Clackamas	Western Rock Products Eagle Creek Holding and Recycle Ponds	3/12/81	Withdrawn
Clatsop	Crown Zellerbach, Wauna Green Liquor Dregs Clarifier	3/17/81	Approved
Lane	Darwin Vanderstelt Animal Waste Storage Lagoon	3/9/81	Approved
Lincoln	Georgia Pacific, Toledo New Pulp Mill Clarifier	3/9/81	Approved
Clark	Brazier Forest Products PCP Drip Pan	3/13/81	Approved
Tillamook	Edwin L. Jenkins Waste Holding Tank Tillamook	3/26/81	Approved
Tillamook	Ron Baune, Tillamook, Manure Holding Tanks	3/26/81	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

March, 1981
(Month and Year)

PLAN ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same	* Date of * Action	* Action	*
Tillamook	Bob Durrer, Tillamook, Manure Tank and Holding Basin	3/26/81	Approved	*
Washington	Tektronix, Inc. Engineering Design for Water Treatment Plant	3/26/81	Approved	*
Tillamook	Joe Donaldson, Jr. Cloverdale, Manure Holding Tank	3/26/81	Approved	*
Tillamook	Fairview Acres Dairy Farms, Inc. --Tillamook Manure Holding System	3/26/81	Approved	*

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Air Quality Division
(Reporting Unit)

March, 1981
(Month and Year)

SUMMARY OF AIR PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sources Under Permits	Sources Reqr'g Permits
	Month	FY	Month	FY			
<u>Direct Sources</u>							
New	0	3	0	14	16		
Existing	1	10	1	7	13		
Renewals	2	56	40	110	78		
Modifications	0	1	1	18	6		
Total	3	70	42	149	113	1981	2010
<u>Indirect Sources</u>							
New	1	11	0	20	5		
Existing	0	0	0	0	0		
Renewals	0	0	0	0	0		
Modifications	2	5	0	4	2		
Total	3	16	0	24	7	184	0
GRAND TOTALS	6	86	42	173	120	2165	0

Number of
Pending Permits

Comments

14	To be drafted by Northwest Region
19	To be drafted by Willamette Valley Region
7	To be drafted by Southwest Region
3	To be drafted by Central Region
19	To be drafted by Eastern Region
1	To be drafted by Program Planning Division
16	To be drafted by Program Operations
14	Awaiting Public Notice
<u>18</u>	Awaiting the end of the 30-day period
113	TOTAL

20 Technical Assistance 6 A-95's

MAR.5 (8/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT
PERMITS ISSUED

DIRECT STATIONARY SOURCES

COUNTY	SOURCE	PERMIT NUMBER	APPLIC. RECEIVED	STATUS	DATE ACHIEVED	TYPE OF APPLICATION
LAKE	LAKEVIEW LUMBER	19	0006 01/16/80	PERMIT ISSUED	02/25/81	RNW
BENTON	NORSE BROS., INC L&T DIV.	02	5004 10/23/80	PERMIT ISSUED	02/26/81	RNW
CLACKAMAS	PARKER-NORTHWEST PAVING	03	1760 11/21/80	PERMIT ISSUED	02/26/81	RNW
CLATSOP	VALLEY RIDGE	04	0022 11/24/80	PERMIT ISSUED	02/26/81	RNW
COOS	MOORE MILL & LUMBER CO.	06	0026 11/17/80	PERMIT ISSUED	02/26/81	RNW
DOUGLAS	ROSEBURG LUMBER CO	10	0017 06/11/80	PERMIT ISSUED	02/26/81	RNW
GRANT	EDWARD HINES LUMBER CO	12	0016 10/08/79	PERMIT ISSUED	02/26/81	RNW
JACKSON	SOUTHERN OREGON STATE COL	15	0088 09/16/80	PERMIT ISSUED	02/26/81	RNW
JACKSON	HILTON FUEL & SUPPLY CO	15	0095 11/10/80	PERMIT ISSUED	02/26/81	RNW
KLAMATH	D G SHELTER PRODUCTS CO.	18	0015 11/10/80	PERMIT ISSUED	02/26/81	RNW
MULTNOMAH	OREGON STEEL MILLS	26	1865 10/14/80	PERMIT ISSUED	02/26/81	RNW
MULTNOMAH	GOULD INC., METALS DIV.	26	1866 11/17/80	PERMIT ISSUED	02/26/81	RNW
MULTNOMAH	GEORGIA PACIFIC CORP	26	2911 07/29/80	PERMIT ISSUED	02/26/81	RNW
MULTNOMAH	WALLY HUWALDT	26	3056 11/05/80	PERMIT ISSUED	02/26/81	EXT
TILLAMOOK	BRUCE NERRITT WOOD PROD	29	0016 10/08/80	PERMIT ISSUED	02/26/81	RNW
WASHINGTON	DURHAM TREATMENT PLANT	34	2623 09/23/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	BAKER REDI-MIX, INC.	37	0020 10/16/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	ROY HOUCK CONSTR CO	37	0022 12/04/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	L.W. VAIL CO. INC	37	0029 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	TILLAMOOK CNTY RD DP	37	0034 10/02/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	TIDEWATER CONTRACTORS INC	37	0053 11/14/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	S D SPENCER AND SON	37	0075 10/20/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	ACME CONCRETE CO	37	0077 07/28/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	AMERICAN ASPHALT PAVING	37	0078 10/16/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	ANGELL ASPHALT&AGGREGATE	37	0091 11/10/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	MIDLAND ROCK PRODUCTS	37	0092 08/12/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	BABLER BROS INC	37	0094 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	PETER KIEWIT SON'S CO	37	0095 10/02/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	S D SPENCER & SONS	37	0109 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	BABLER BROTHERS INC	37	0121 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	POLK COUNTY RD DEPT	37	0124 07/16/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	SUPERIOR ASPHALT&CONCRETE	37	0166 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	BABLER BROS INC	37	0168 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	J C COMPTON CO	37	0173 10/02/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	L W VAIL CO INC	37	0175 10/23/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	JOHNSON ROCK PRODUCTS INC	37	0201 11/05/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	DESCHUTES READY MIX S & G	37	0220 12/04/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	LOPEZ PAVING, INC.	37	0233 12/04/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	POE ASPHALT PAVING INC.	37	0240 11/21/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	WILDISH MEDFORD S & G CO.	37	0250 09/29/80	PERMIT ISSUED	02/26/81	RNW
PORT.SOURCE	TRU MIX LEASING CO.	37	0249 11/10/80	PERMIT ISSUED	03/02/81	RNW
DESCHUTES	BROOKS SCANLON INC	09	0003 00/00/00	PERMIT ISSUED	03/10/81	MOD

TOTAL NUMBER QUICK LOOK REPORT LINES

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DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT
GASOLINE DELIVERY TRUCKS

PRESSURE-VACUUM TESTED; NON-PERMITTED VOC SOURCES

Direct Sources			Tank No.	Expiration
County	Number	Source	Last Three Digits	Date
DESCHUTES	09	V002 ANDERSON PETROLEUM CO.	OWNER'S UNIT NO.	3 01/29/82
MULTNOMAH	26	V057 ARROW TRANSPORTATION CO.	OWNERS UNIT NO.	728 03/04/82
				714 02/12/82
				645 02/10/82
				247 02/10/82
				742 01/27/82
				611 02/25/82
				798 02/25/82
MULTNOMAH	26	V056 ASBURY TRANSPORTATION CO.	OWNERS UNIT NO.	716 03/11/82
				175 03/12/82
				702 03/05/82
				966 03/05/82
				701 03/13/82
				958 03/11/82
				701 03/13/82
				703 03/13/82
				710 03/16/82
MULTNOMAH	26	V335 ATLANTIC RICHFIELD CO.	OWNERS UNIT NO.	859 03/09/82
				259 03/10/82
				760 03/10/82
				383 03/11/82
				779 03/11/82
				342 03/16/82
				773 03/16/82
				398 03/12/82
				788 03/12/82
				343 03/13/82
				774 03/13/82
PORT.SOURCE	37	V006 CENEX TRANSPORTATION	OWNERS UNIT NO.	155 03/09/82
				402 03/09/82
LANE	20	V001 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	494 02/27/82
MULTNOMAH	26	V332 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	594 02/20/82
PORT.SOURCE	37	V001 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	845 02/03/82
LANE	20	V001 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	494 02/27/82
MULTNOMAH	26	V332 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	594 02/20/82
PORT.SOURCE	37	V001 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	845 02/03/82
MULTNOMAH	26	V054 D & H OIL CO., INC.	OWNERS UNIT NO.	11 03/03/82
MULTNOMAH	26	V334 DON THOMAS PETROLEUM	OWNERS UNIT NO.	2 02/19/82
YAMHILL	36	V002 EVERGREEN HELICOPTER	OWNERS UNIT NO.	411 03/11/82
YAMHILL	36	V001 FARMERS CO OP	OWNERS UNIT NO.	14 01/16/82
MULTNOMAH	26	V329 G-R LEASING CO.	OWNERS UNIT NO.	81 02/06/82
				A81 02/06/82
MULTNOMAH	26	V327 GULL OIL CO.	OWN'S UNIT NO.	11 01/23/82
				11A 01/23/82
PORT.SOURCE	37	V004 HALL OIL CO.	OWNERS UNIT NO.	10 02/13/82
CLATSOP	04	V001 HENDRICKSEN OIL CO.	OWNERS UNIT NO.	9 03/06/82
DESCHUTES	09	V001 JUNIPER FUEL	OWNER'S UNIT NO.	6T 01/23/82

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 MONTHLY ACTIVITY REPORT
 GASOLINE DELIVERY TRUCKS

PRESSURE-VACUUM TESTED; NON-PERMITTED VOC SOURCES

Direct Sources

County	Number	Source	Tank No. Last Three Digits	Expiration Date
DESCHUTES	09	V001 JUNIPER FUEL	OWNER'S UNIT NO.	6TT 01/23/82
CLACKAMAS	03	V055 MILLIKEN & SERVAS	OWNERS UNIT NO.	16 02/27/82
MULTNOMAH	26	V333 MOBIL OIL CORP.	OWNERS UNIT NO.	321 03/05/82
				300 03/06/82
				191 03/05/82
				192 02/26/82
				254 02/27/82
				194 02/26/82
				255 02/24/82
				244 02/24/82
				190 03/06/82
POLK	27	V003 RICKREALL FARM SUPPLY	OWNERS UNIT NO.	11A 03/12/82
MULTNOMAH	26	V330 SHELL OIL CO.	OWNERS UNIT NO.	384 03/03/82
PORT. SOURCE	37	V003 SHELL OIL CO.	OWNER' UNIT NO.	391 02/23/82
MULTNOMAH	26	V330 SHELL OIL CO.	OWNERS UNIT NO.	945 03/03/82
PORT. SOURCE	37	V003 SHELL OIL CO.	OWNER' UNIT NO.	542 02/18/82
MULTNOMAH	26	V330 SHELL OIL CO.	OWNERS UNIT NO.	921 02/27/82
PORT. SOURCE	37	V003 SHELL OIL CO.	OWNER' UNIT NO.	390 02/27/82
MULTNOMAH	26	V330 SHELL OIL CO.	OWNERS UNIT NO.	385 02/27/82
				913 02/06/82
				380 02/06/82
				252 02/20/82
				872 02/20/82
				946 02/25/82
				379 02/25/82
PORT. SOURCE	37	V005 SOURDOUGH EXPRESS	OWNERS UNIT NO.	946 03/04/82
				46B 03/05/82
				946 02/27/82
MULTNOMAH	26	V338 SUN TRANSPORTATION	OWNERS UNIT NO.	21 03/09/82
				18A 03/09/82
MULTNOMAH	26	V328 TEXACO INC.	OWNERS UNIT NO.	293 02/11/82
				290 02/24/82
				291 03/11/82
MULTNOMAH	26	V337 UNION OIL CO. CALIFORNIA	OWNERS UNIT NO.	096 03/04/82
MULTNOMAH	26	V331 WESTERN HIGHWAY OIL CO.	OWNERS UNIT NO.	2A 02/04/82
				I 02/19/82
				1A 02/19/82
TOTAL NUMBER QUICK LOOK REPORT LINES			84	

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	March, 1981 (Month and Year)
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SUMMARY OF WATER PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sources Under Permits	Sources Reqr'g Permits					
	Month	Fis.Yr.	Month	Fis.Yr.								
	* /**	* /**	* /**	* /**	* /**	* /**	* /**					
<u>Municipal</u>												
New	0	/1	2	/5	0	/0	1	/2	4	/6		
Existing	0	/0	0	/0	0	/0	1	/0	1	/0		
Renewals	2	/3	17	/20	11	/3	32	/11	18	/16		
Modifications	0	/0	5	/1	2	/0	8	/2	2	/0		
Total	2	/4	24	/26	13	/3	42	/15	25	/22	262/91	267/97
<u>Industrial</u>												
New	0	/3	8	/14	2	/0	8	/7	6	/19		
Existing	0	/0	1	/1	1	/0	3	/0	0	/2		
Renewals	0	/0	45	/24	5	/0	72	/16	56	/24		
Modifications	0	/0	8	/3	3	/0	9	/4	1	/1		
Total	0	/3	62	/42	11	/0	92	/27	63	/46	369/155	375/176
<u>Agricultural (Hatcheries, Dairies, etc.)</u>												
New	0	/0	1	/0	0	/0	1	/0	2	/0		
Existing	0	/0	0	/0	0	/0	0	/0	0	/0		
Renewals	1	/0	2	/0	0	/0	27	/0	8	/0		
Modifications	0	/0	0	/0	0	/0	0	/0	0	/0		
Total	1	/0	3	/0	0	/0	28	/0	10	/0	53 /20	55 /20
<u>GRAND TOTALS</u>	3	/7	89	/68	24	/3	162	/42	98	/68	684/266	697/293

* NPDES Permits
** State Permits

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	March, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

*	County	*	Name of Source/Project	*	Date of	*	Action	*
*		*	/Site and Type of Same	*	Action	*		*
*		*		*		*		*

Municipal and Industrial Sources NPDES Permits (19)

Malheur	City of Ontario STP	3/6/81	Permit Renewed
Lane	L. D. McFarland Comp. Ltd. (Wood Preserving-Eugene)	3/6/81	Permit Issued
Douglas	City of Myrtle Creek STP	3/10/81	Permit Renewed
Douglas	USFS, Steamboat Ranger Station STP	3/10/81	Permit Renewed
Douglas	City of Reedsport STP	3/10/81	Permit Renewed
Douglas	USFS, Wolf Creek CCC, STP	3/10/81	Permit Renewed
Josephine	City of Grants Pass STP	3/10/81	Permit Renewed
Coos	City of Powers STP	3/10/81	Permit Renewed
Multnomah	Ross Island Sand & Gravel (Hardtack Island)	3/10/81	Permit Renewed
Douglas	Roberts Creek Water Dist.	3/13/81	Permit Renewed
Douglas	Roseburg Lumber Co. Sutherlin Log Pond	3/13/81	Permit Renewed
Klamath	Jeld Wen - Inc.	3/13/81	Permit Issued
Marion	Green Veneer Inc.	3/13/81	Permit Renewed
Douglas	Douglas Co. Lumber Co. (Veneer and Sawmill)	3/23/81	Permit Renewed
Lane	Driftwood Shores, Inc. (Florence - STP)	3/23/81	Permit Renewed

MAR.6 (5/79) WG704.A (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	March, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same	* Date of * Action	* Action	*
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Municipal and Industrial Sources NPDES Permits (19) - continued

Lane	City of Westfir - STP	3/23/81	Permit Renewed	
Union	Boise Cascade Corp. (LaGrande Sawmill)	3/23/81	Permit Issued	
Curry	City of Port Orford STP	3/23/81	Permit Renewed	
Curry	Port Orford - Langlois STP (School Dist. 2CJ STP Pacific High School)	3/23/81	Permit Renewed	

Municipal and Industrial Sources State Permits (3)

Curry	Knoxtown Sanitary District	3/6/81	Permit Renewed	
Curry	Wedderburn Sanitary District	3/6/81	Permit Renewed	
Deschutes	City of Redmond STP	3/13/81	Permit Renewed	

Municipal and Industrial Sources Modification (5)

Lane	The Murphy Co. - Florence (Green Veneer)	3/6/81	Addendum #2	
Lincoln	Newport Seafood Company	3/6/81	Addendum #1	
Umatilla	City of Hermiston STP	3/13/81	Modification	
Linn	Crown Zellerbach Corp. (Lebanon)	3/13/81	Addendum #1	
Lane	City of Creswell STP	3/13/81	Addendum #1	

MAR.6 (5/79) WG704.A (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

March 1981
(Month and Year)

SUMMARY OF SOLID AND HAZARDOUS WASTE PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sites Under Permits	Sites Reqr'g Permits
	<u>Month</u>	<u>FY</u>	<u>Month</u>	<u>FY</u>			
<u>General Refuse</u>							
New	-	7	-	3	4		
Existing	-	-	1	3	-		
Renewals	1	38	6	26	26		
Modifications	-	4	-	11	-		
Total	1	49	7	43	30	166	166
<u>Demolition</u>							
New	-	3	-	3	1		
Existing	-	2	-	-	2		
Renewals	-	3	1	4	2		
Modifications	-	2	-	3	-		
Total	-	10	1	10	5	20	21
<u>Industrial</u>							
New	1	10	-	7	4		
Existing	-	3	-	-	2		
Renewals	-	19	3	20	17		
Modifications	1	2	-	1	2		
Total	2	34	3	28	25	101	101
<u>Sludge Disposal</u>							
New	1	5	1	5	1		
Existing	-	-	-	1	-		
Renewals	-	2	-	1	1		
Modifications	-	-	-	-	-		
Total	1	7	1	7	2	14	15
<u>Hazardous Waste</u>							
New	40	261	40	261	0		
Authorizations	-	-	-	-	-		
Renewals	-	-	-	-	-		
Modifications	-	-	-	-	-		
Total	40	261	40	261	0	1	1
<u>GRAND TOTALS</u>	44	361	52	349	62	302	304

SC259.C
MAR.5S (4/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

<u>Solid Waste Division</u> (Reporting Unit)		<u>March 1981</u> (Month and Year)		
<u>PERMIT ACTIONS COMPLETED</u>				
* County	* Name of Source/Project * /Site and Type of Same	* Date of * Action	* Action	*
Lane	Bohemia-Cascade Existing Facility	3/2/81	Permit Issued	*
Deschutes	Brothers Landfill Existing Facility	3/2/81	Permit Issued	*
Lane	London Transfer Station Existing Facility	3/2/81	Permit Issued	*
Lane	South Willamette Existing Facility	3/2/81	Permit Issued	*
Lane	Rattlesnake Transfer Station Existing Facility	3/2/81	Permit Issued	*
Douglas	Lemola Landfill Existing Facility	3/2/81	Permit Issued	*
Yamhill	Fort Hill Lumber Existing Facility	3/2/81	Permit Issued	*
Wasco	Antelope Landfill Existing Facility	3/2/81	Permit Issued	*
Columbia	Vernonia Landfill Existing Facility	3/2/81	Permit Issued	*
Lane	Creswell Landfill Existing Facility	3/2/81	Permit Issued	*
Linn	Willamette Indus.-Narrows Existing Facility	3/6/81	Letter Authorization Issued	*
Lincoln	Day Sludge Site New Facility	3/17/81	Special Permit	*

SC259.D
MAR.6 (5/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

March 1981
(Month and Year)

HAZARDOUS WASTE DISPOSAL REQUESTS

CHEM-NUCLEAR SYSTEMS, GILLIAM CO.

WASTE DESCRIPTION

* Date *	Type	Source	Present	Quantity * Future *
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Disposal Requests Granted (40)

OREGON (11)

2/26	PCB liquid, capacitors and contaminated solids	Lumber co.	16 drums	0
2/26	PCB liquid, capacitors and contaminated solids	Non-ferrous metal manuf.	80 ft ³	80 ft ³ /yr.
3/3	PCB-contaminated oil	Spill cleanup	1,595 gal.	0
3/5	PCB liquid	Utility	51 drums	0
3/9	Lead-bearing ink wastewater	Printing ink manuf.	0	30 drums/yr.
3/12	Lead oxide-contaminated filters	Battery co.	0	120 ft ³ /yr.
3/17	Machine coolant	Aerospace co.	0	240,000 gal/yr.
3/23	Chloroform/alcohol	Pharmaceutical co.	13 drums	13 drums/yr.
3/24	Cimfree machine coolant	Machine shop	4,125 gal.	1,000 gal/yr.
3/24	Paint sludge, machine coolant, trichloroethylene, and zinc phosphate sludge	Fireplace implements manuf.	0	300 gal/yr.
3/24	Paint sludge	Paint manuf.	0	15 drums/yr.

SC259

MAR.15 (4/79)

WASHINGTON (20)

2/26	PCB liquid, capacitors and contaminated solids	Utility	170 gal.	0
2/26	Mixed chemonite and pentachlorophenol	Wood preserving	0	7,500 gal/yr.
3/3	Mixed lab chemicals	Chemical co.	10 drums	0
3/3	Acid-soluble oil/HF-contaminated soil	Waste disposal co.	146 ft ³	0
3/3	Coal tar	Aerospace co.	19 drums	25 drums/yr.
3/3	Petroleum solvent tank bottoms	Chemical supplier	22 drums	150 drums/yr.
3/5	Sodium borohydride caustic oil/water emulsion	Chemical co.	5,000 gal.	0
3/9	Lead-bearing ink wastewater	Printing ink manuf.	0	100 drums/yr.
3/9	Lead-contaminated soil	Oil co.	9 drums	0
3/9	Chlorinated hydrocarbon-contaminated soil	Chemical co.	2,000 yd ³	0
3/10	Organic ink pigments	Paper mill	0	36 drums/yr.
3/17	Machine coolant	Aerospace co.	0	300,000 gal/yr.
3/17	PCB capacitors	Utility	11 drums	0
3/17	Caustic solution	Paper mill	0	350 gal/yr.
3/19	Pentachlorophenol sludge	Federal agency	600 gal.	0
3/23	Toluol, xylene, and thinner-contaminated rags	Electrical equipment manufacture	0	150 gal/yr.
3/23	Spent solvents	Commercial lab	510 gal.	72 drums/yr.
3/24	Cleaning solvent sludge, asbestos and trichloroethane	Paint manuf.	0	450 drums/yr.

SC259

MAR.15 (4/79)

3/24	Misc. lab chemicals	Research	5 drums	10 drums/yr.
3/24	Soda ash-contaminated filters	Oil co.	2 drums	8 drums/yr.
OTHERS (9)				
2/26	Petroleum distillate/ polyacrylamide emulsion (B.C.)	Chemical co.	33 drums	0
3/5	PCB-contaminated cable (Hawaii)	Federal agency	40 drums	0
3/10	Heptachlor-contaminated soil (Alberta)	Chemical co.	1,000 yd ³	0
3/16	Anti-freeze, photo- graphic solutions, out- dated drugs, sodium nitrate, phosphates, halogenated and non- halogenated solvents, paint sludge, otto fuel, pesticides and misc. chemicals (Hawaii)	Federal agency	0	733 drums/yr.
3/16	Cyanide cake (B.C.)	Electroplating	22 drums	0
3/17	PCB capacitors (Utah)	Chemical co.	1 drum	0
3/17	PCB transformers (Idaho)	Mining co.	0	75 gal/yr.
3/19	Mixed lab chemicals (Utah)	University	6,000 lb.	32,000 lb/yr.
3/24	Impure calcium arsenate (B.C.)	Mining	15,000 metric tons	15,000 tons/yr.

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Noise Control Program
(Reporting Unit)

March 1981
(Month and Year)

SUMMARY OF NOISE CONTROL ACTIONS

<u>Source Category</u>	<u>New Actions Initiated</u>		<u>Final Actions Completed</u>		<u>Actions Pending</u>	
	Mo.	FY	Mo.	FY	Mo.	Last Mo.
Industrial/ Commercial	1	16	1	20	61	62
Airports			2	8		

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Noise Control Program
(Reporting Unit)March 1981
(Month and Year)FINAL NOISE CONTROL ACTIONS COMPLETED

* County	* Name of Source and Location	* Date	* Action
Clackamas	Publishers Paper Molalla	3/81	Exception Granted
Marion	Smith Airport Brooks	3/81	Airport Boundary Approved
Washington	PCC Rock Cr. Airport Rock Creek	3/81	Airport Boundary Approved

CIVIL PENALTY ASSESSMENTS

Department of Environmental Quality
1981

CIVIL PENALTIES ASSESSED DURING MONTH OF MARCH 1981:

<u>Name and Location of Violation</u>	<u>Cases No. & Type of Violation</u>	<u>Date Issued</u>	<u>Amount</u>	<u>Status</u>
Main Rock Products, Inc. Coos County	WQ-SWR-81-16 NPDES permit violations.	3/ 2/81	\$ 6,000	Contested 3/16/81. Settlement negotiations in progress.
Wheels I, Inc. Clackamas County	AQ-NWR-81-21 Burning commercial wastes in a burn barrel.	3/25/81	50	Paid 3/31/81.
Melvin Mead Jackson County	SS-SWR-81-25 Operating a SSS without a certificate of satisfactory completion.	3/25/81	500	Contested 4/6/81.

OTHER SIGNIFICANT ACTIONS ISSUED IN MARCH 1981:

<u>Name & Location</u>	<u>Case No. & Type</u>	<u>Date Issued</u>	<u>Status</u>
Mid-Oregon Crushing Co. Deschutes County	AQ-CR-81-19 Notice of denial of air contaminant permit renewal application.	3/2/81	Contested 3/23/81.
Richard Chaix Tillamook County	SS-NWR-81-12 Notice of intent to revoke 3 SSS permits and certificates issued unlawfully.	3/18/81	Hearing request and answer due by 4/9/81.
Melvin Mead Jackson County	SS-SWR-81-26 Notice of violation and order requiring remedial action (abandon illegal subsurface sewage disposal system).	3/25/81	Contested 4/6/81.

<u>ACTIONS</u>	<u>LAST MONTH</u>	<u>PRESENT MONTH</u>
Preliminary Issues	3	9
Discovery	1	1
Settlement Action	5	5
Hearing to be Scheduled	2	1
Hearing Scheduled	8	5
HO's Decision Due	3	3
Brief	3	1
Inactive	3	3
SUBTOTAL of Active Files	28	28
HO's Decision Out/Option for EQC Appeal .	0	2
Appealed to EQC	3	1
EQC Appeal Complete/Option for Court Review	0	0
Court Review Option Pending or Taken . . .	1	1
Case Closed	4	4
TOTAL Cases	36	36

KEY

15-AQ-NWR-76-178 15th Hearing Section case in 1976 involving Air Quality Division violation in Northwest Region jurisdiction in 1976; 178th enforcement action in Northwest Region in 1976.

ACDP Air Contaminant Discharge Permit
AQ Air Quality Division
CLR Chris Reive, Enforcement Section
Dec Date Date of either a proposed decision of hearings officer or a decision by Commission
\$ Civil Penalty amount
ER Eastern Region
Fld Brn Field Burning incident
RLH Robb Haskins, Assistant Attorney General
Hrngs Hearings Section
Hrng Rfrl Date when Enforcement Section requests Hearings Section to schedule a hearing
Hrng Rqst Date agency receives a request for hearing
VAK Van Kollias, Enforcement Section
LMS Larry Schurr, Enforcement Section
MWR Midwest Region (now WVR)
NP Noise Pollution
NPDES National Pollutant Discharge Elimination System wastewater discharge permit
NWR Northwest Region
FWO Frank Ostrander, Assistant Attorney General
P Litigation over permit or its conditions
Prtys All parties involved
Rem Order Remedial Action Order
Resp Code Source of next expected activity in case
SSD Subsurface Sewage Disposal
SW Solid Waste Division
SWR Southwest Region
T Litigation over tax credit matter
Transcr Transcript being made of case
Underlining New status or new case since last month's contested case log
WVR Willamette Valley Region
WQ Water Quality Division

March 1981
DEQ/EQC Contested Case Log

Pet/Resp Name	Hrng Rqst	Hrng Rfrl	DEQ Atty	Hrng Date	Resp Code	Case Type & No.	Case Status
FAYDREX, INC.	05/75	05/75	RLH	11/77	Dept	03-SS-SWR-75-02 64 SSD Permits	<u>Resp's brief due 05-04-81</u>
MEAD and JOHNS, et al	05/75	05/75	RLH		All	04-SS-SWR-75-03 3 SSD Permits	Awaiting completion of EQC Faydrex review
POWELL, Ronald	11/77	11/77	RLH	01/23/80	Hrngs	\$10,000 Fld Brn 12-AQ-MWR-77-241	Decision due
WAH CHANG	04/78	04/78	RLH		Resp	16-P-WQ-WVR-78-2849-J NPDES Permit Modification	Hearing postponed pending further evaluation of permit conditions. To be completed by 07/01/81.
WAH CHANG	04/78	04/78	RLH		Resp	08-P-WQ-WVR-78-2012-J NPDES Permit Modification	Hearing postponed pending further evaluation of permit conditions. To be completed by 07/01/81
MALLORY & MALLORY INC.	11/79	11/79	JHR	01/10/80	Dept	14-AQ-CR-79-101 Open Burning Civil Penalty	<u>AG's office drafting Modified Order</u>
M/V TOYOTA MARU No. 10	12/10/79	12/12/79	RLH		Dept	17-WQ-NWR-79-127 Oil Spill Civil Penalty of \$5,000	<u>Summary Judgment requested</u>
LAND RECLAMATION, INC., et al	12/12/79	12/14/79	FWO	05/16/80		19-P-SW-329-NWR-79 Permit Denial	Court of Appeals review in process
FORRETTE, Gary	12/20/79	12/21/79	RLH	10/21/80	Hrngs	20-SS-NWR-79-146 Permit Revocation	<u>Record closed 03-18-81</u>
GLASER, Dennis F. dba MID-VALLEY FARMS, INC.	02/06/80	02/07/80	CLR	06/19/80	Dept	02-AQ-WVR-80-13 Open Field Burning Civil Penalty of \$2,200	<u>Hearing Officer's Order issued 04-07-81</u>
MEDFORD CORPORATION	02/25/80	02/29/80		05/16/80	Prtys	07-AQ-SWR-80 Request for Declaratory Ruling	<u>Rule modification before EQC 04-24-81</u>
J.R. SIMPLOT COMPANY	04/15/80	04/16/80	RLH	<u>06-24-81</u>	Prtys	12-WQ-ER-80-41 Civil Penalty of \$20,000	<u>Hearing location changed to Pendleton at 9 a.m.</u>
R.L.G. ENTERPRISES, INC., dba THE MOORAGE PLACE	08/06/80	08/08/80	CLR	11/10/80	Resp	20-WQ-NWR-80-114 Civil Penalty of \$150	<u>Hearing Officer's Order issued 04-08-81</u>
COKE, Benoni	10/27/80	10/28/80	RLH	01/15/81	Prtys	24-SS-SWR-80-173 Permit revocation	Settlement action
PUBLEN, Arthur W. dba/FOLEY-LAKES MOBILE-HOME-PARK	11/07/80	11/10/80	GBR	04/23/81	Prtys	27-WQ-CR-80-188 Civil penalty of \$1,600	Case closed, EQC signs Stipulated Order 03-13-81 mitigating civil penalty to \$500
PUBLEN, Arthur W. dba/FOLEY-LAKES MOBILE-HOME-PARK	11/07/80	11/10/80	GBR	04/23/81	Prtys	28-WQ-CR-80-189 Remedial action required	Case closed, Stipulation & Final Order signed by EQC 03-13-81
BROWN, Victor	11/05/80	11/12/80	LMS	02/19/81	Hrngs	29-AQ-WVR-80-163 Civil Penalty of \$1,800	<u>Transcript being prepared</u>
LOGSDON, Elton	11/12/80	11/14/80	CLR	02/26/81	Hrngs	30-AQ-WVR-80-164 Field Burning Civil Penalty of \$950	<u>Decision due</u>
MORRIS, Robert	11/10/80	11/14/80	<u>RLH</u>		Resps	31-SS-CR-80 Permit revocation	<u>Dept's Motion for Partial Summary Judgment filed 03-30-81</u>
HAYWORTH, John W. dba/HAYWORTH FARMS INC.	12/02/80	12/08/80	LMS	04/28/81	Prtys	33-AQ-WVR-80-187 Field burning civil penalty of \$4,660	Hearing scheduled in Eugene at 9:30 a.m.
LOWELL, James R.	12/05/80	12/08/80	LMS		Prtys	34-AQ-WVR-80-186 Field burning civil penalty of \$1,800	Case closed, EQC signed Stipulation & Final Order 03-13-81 mitigating civil penalty to \$1,500
ROGERS, Donald E.	12/08/80	12/09/80	<u>RLH</u>		Prtys	35-SS-NWR-80-196 Permit denial	<u>Site evaluation to be performed</u>

March 1981
DEQ/EQC Contested Case Log

<u>Pet/Resp Name</u>	<u>Hrng Rqst</u>	<u>Hrng Rfrl</u>	<u>DEQ Atty</u>	<u>Hrng Date</u>	<u>Resp Code</u>	<u>Case Type & No.</u>	<u>Case Status</u>
HOPPER, Harold	12/09/80	12/09/80	<u>RLH</u>		Prtys	36-SS-NWR-80-197 Permit revocation	<u>Depositions</u>
JENSEN, Carl F. dba/JENSEN SEED & GRAIN, INC.	12/19/80	12/24/80	CLR	04/16/81	<u>Prtys</u>	37-AQ-WVR-80-181 Field burning civil penalty of \$4,000	Hearing rescheduled in Salem at 9:30 a.m.
SETERA, Frank	12/27/80	01/05/81	CLR	<u>05-14-81</u>	Prtys	01-AQ-NWR-80-199 Open burning civil penalty of \$500	Hearing scheduled in Portland at 9 a.m.
GINTER, Lloyd M.	01/02/81	01/05/81	CLR		Hrngs	02-SS-SWR-80-205 Subsurface sewage Civil penalty of \$100	Response to Dept's. Motion for Summary Judgment due.
DELASHMUTZ, Biden	01/06/81	01/08/81	CLR	03/24/81	Prtys	03-SS-WVR-80-209 Subsurface-sewage civil-penalty-of-\$200	Case-closed---EQC signs-Stipulated-Order 03-13-81-mitigating civil-penalty-to-\$100
R-D MAC, INC.	01/06/81	01/08/81	LMS		Prtys	04-WQ-ER-80-24 Water Quality civil penalty of \$5,000	Compliance effected; mitigation sought
BROOKINGS ENERGY FACILITY, INC.	12/18/80	01/14/81	<u>CLR</u>		Prtys	05-SW316-SWR-80 Solid waste facility permit denial	Settlement action
JAL CONSTRUCTION, INC.	02/06/81	02/09/81	LMS	05/07/81	<u>Prtys</u>	06-AQOB-NWR-81-02 Open burning civil penalty of \$3000	Hearing scheduled in Portland at 9 a.m.
CURL, James H., et al	02/09/81	02/12/81			<u>Prtys</u>	07-SS-CR-81 Request for Declaratory Ruling	<u>Attempting informal resolution</u>
OREGON SHORES ASSOCIATES, LTD.	02/11/81	03/09/81			<u>Resp</u>	09-WQ-NWR-81	<u>Amended Answer Due 04-15-81</u>
<u>MAIN ROCK PRODUCTS, INC</u>	<u>03-11-81</u>	<u>03-16-81</u>	<u>CLR</u>		<u>Prtys</u>	<u>10-WQ-SWR-81-16</u> <u>Water Quality civil</u> <u>penalty of \$6,000</u>	<u>Preliminary Issues</u>
<u>MID-OREGON CRUSHING COMPANY, INC.</u>	<u>03-18-81</u>	<u>3-23-81</u>			<u>Hrngs</u>	<u>11-AQ-CR-81-19</u> <u>Air Contaminant</u> <u>Discharge Permit</u> <u>application denial</u>	<u>To be scheduled</u>
<u>MONTGOMERY, Clyde</u>		<u>04-08-81</u>				<u>12-AQ-WVR-80-166</u> <u>Field burning civil</u> <u>penalty of \$500</u>	<u>Answer filed</u> <u>04-08-81</u>
<u>MEAD, Mel</u>	<u>04-04-81</u>	<u>04-08-81</u>				<u>13-SS-SWR-81-25</u> <u>Subsurface sewage</u> <u>permit denial</u>	<u>Answer filed</u> <u>04-08-81</u>

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

AQ,WQ,SW Divisions
(Reporting Unit)

April 1981
(Month and Year)

SUMMARY OF PLAN ACTIONS

	Plans Received		Plans Approved		Plans Disapproved		Plans Pending
	Month	FY	Month	FY	Month	FY	
<u>Air</u>							
Non-Permitted							
VOC Sources	0	0	0	614	0	0	103
Direct Sources	5	73	3	88	0	0	41
Total	5	73	3	702	0	0	144
<u>Water</u>							
Municipal	62	464	40	458	0	0	41
Industrial	13	70	13	64	0	0	15
Total	75	534	53	522	0	0	56
<u>Solid Waste</u>							
Gen. Refuse	1	12	0	16	0	0	6
Demolition	0	0	2	3	0	0	0
Industrial	0	6	1	10	0	1	3
Sludge	0	3	0	3	0	0	0
Total	1	21	3	32	0	1	9
<u>Hazardous Wastes</u>							
	-	-	-	-	-	-	-
<u>GRAND TOTAL</u>	81	628	59	1256	0	1	209

MAR.2 (4/79)

WL788.B (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT

PLAN ACTIONS COMPLETED

DIRECT SOURCES

County	Number	Source	Process Description	Date of Action	Status
MARION	591	MOBIL OIL CORP.	BULK PLANT VOC CONTROL	10/16/80	EQC ACTION
JACKSON	728	BOISE CASCADE CORP	SEAL EXISTING VENEER DRYER	02/18/81	EQC ACTION
KLAMATH	742	WEYERHAEUSER	CYC. & HI-PRESS XFER-SYS	04/14/81	EQC ACTION
TOTAL NUMBER QUICK LOOK REPORT LINES			3		

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 53

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	*	*	*	*

Municipal Waste Sources - 40

Lincoln	Quiet Water Subdivision Sanitary Sewer Yachats	3/26/81	P.A.
Benton	Garfield Trunk Sanitary Sewer Project No. 80-215 Corvallis	4/1/81	P.A.
Clackamas	Crites Addition Sanitary Sewer Canby	4/1/81	P.A.
Jackson	Plant Expansion Contract C-5 Medford	4/1/81	P.A.
Jackson	David Greene Trunk Sewer Ashland	4/1/81	P.A.
Deschutes	North Unit Canal Crossing Nasu Park Subdivision Bend	4/2/81	P.A.
Malheur	K-W-M Development Corp. Sanitary Sewer Ontario	4/2/81	P.A.
Deschutes	Fy Creek Lodge Mt. Bachelor Ski Resort	4/3/81	Sent to C.R.C. for Approval
Washington	Gentle Woods Subdivision Sanitary Sewers U.S.A., Durham Plant	4/2/81	P.A.

Mar.3 5/79 WL786 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 53

* County	* Name of Source/Project	* Date of	* Action	* Action	* Action
*	* /Site and Type of Same	* Action	*	*	*
*	*	*	*	*	*

Municipal Waste Sources Continued

Umatilla	S.E.Sixth Street Sewer Umatilla	4/7/81	P.A.		
Umatilla	Riverhall Phase II Umatilla	4/7/81	P.A.		
Marion	Sunnyview Development Sanitary Sewers Salem	4/7/81	P.A.		
Clackamas	Sher Brook Subdivision Sanitary Sewer Lake Oswego	4/7/81	P.A.		
Deschutes	Nasu Park Phase No. 1 Sanitary Sewers Bend	4/15/81	P.A.		
Deschutes	Rock Villa Mobile Home Park Sanitary Sewers Bend	4/16/81	P.A.		
Jackson	Cedar Way Subdivision Sanitary Sewers Ashland	4/17/81	P.A.		
Lincoln	Little Whale Cove Sanitary Sewer Depoe Bay	4/17/81	P.A.		
Multnomah	Sewer From S.W. 48th Pl. to Shattuck Rd. Multnomah County	4/19/81	P.A.		

Mar.3 5/79 WL786 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 53

* County	* Name of Source/Project	* Date of	* Action	* Action	* Action
*	* /Site and Type of Same	* Action	*	*	*
*	*	*	*	*	*

Municipal Waste Sources Continued

Washington	Winston Park Sewer System Hillsboro	4/20/81	P.A.
Lane	Wellette Subdivision Sanitary Sewer Veneta	4/20/81	P.A.
Lane	Allen Kraal Sewer Sanitary Sewer Springfield	4/20/81	P.A.
Jackson	Laurel Street Alley Sewer Sanitary Sewer Ashland	4/20/81	P.A.
Clackamas	236 Unit Apt. Development Sanitary Sewer West Linn	4/20/81	P.A.
Clackamas	Courtside Condominiums Sanitary Sewer Wilsonville	4/20/81	P.A.
Umatilla	Seaquist-Long Subdivision Std. Details Sanitary Sewer Milton-Freewater	4/21/81	P.A.
Multnomah	S.W. Cascade Terrace South of Cascade Drive Sanitary Pressure Sewer Portland	4/21/81	P.A.

Mar.3 5/79 WL786 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 53

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	*	*	*	*

Municipal Waste Sources Continued

Lane	Adams Street Sanitary Sewer Eugene	4/21/81	P.A.	
Lane	Thorne Brook Subdivision Sanitary Sewer Eugene	4/21/81	P.A.	
Lane	McKinley Street Sanitary Sewer Eugene	4/21/81	P.A.	
Clackamas	Actress Acres Sanitary Sewers Oak Lodge S.D.	4/21/81	P.A.	
Clackamas	Milwaukie Hillcrest Sanitary Sewers Clackamas County Service District No. 1	4/21/81	P.A.	
Clackamas	Arrowhead Subdivision Phase II Sanitary Sewers McMinnville	4/22/81	P.A.	
Marion	Replacement of Trunk System on Edgewater St. N.W. Pump Station Salem	4/23/81	P.A.	
Washington	Kneeland Estates II Sanitary Sewers Tigard	4/24/81	P.A.	

Mar.3 5/79 WL786 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 53

* County	* Name of Source/Project	* Date of	* Action	* Action	* Action
*	* /Site and Type of Same	* Action	*	*	*
*	*	*	*	*	*

Municipal Waste Sources Continued

Washington	S.W. McDonald St. Sanitary Sewer L.I.D. Tigard	4/24/81	P.A.
Washington	Fanno Industrial Park Sanitary Sewers Beaverton	4/24/81	P.A.
Jackson	Wilson Way Sewer Extension B.C.V.S.A. White City	4/27/81	P.A.
Lane	Contract C-16 Sec. Control Sanitary Sewer M.W.M.C.	4/28/81	P.A.
Lane	Contract C-7 Oper. Bldg. Sanitary Sewer M.W.M.C.	4/28/81	P.A.
Lane	Park West Project Sanitary Sewer Corvallis	4/29/81	P.A.

P.A. = Provisional Approval

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April 1981
(Month and Year)

PLAN ACTIONS COMPLETED - 53

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	*	*	*	*

INDUSTRIAL WASTE SOURCES - 13

Washington	Tektronix, Beaverton Chemical Waste Treatment System	4/1/81	Approved
Douglas	International Paper Co. Gardiner Sawmill Oil Water Separator	4/6/81	Approved
Marion	Stayton Canning Co. Coop. Replacing Vibrating 20 Mesh Screen with Two 30 Mesh Sidehill Screens	4/9/81	Approved
Linn	Willamette Industries Filling Log Pond	3/24/81	Approved
Marion	Mill Creek Trout Farm Settling and Aeration Ponds	3/26/81	Approved
Polk	Lee Gilling & Sons Animal Waste Holding Tank, Separator, and Pond	3/30/81	Approved
Marion	Pall E. Carroll Dairy Turner, Animal Waste Storage Pond	3/31/81	Approved
Marion	National Preserve Co. Salem, Screen and pH Probe for Sump	4/21/81	Approved
Multnomah	Owens Corning Portland Oil/Water Separator	4/20/81	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April 1981
(Month and Year)

PLAN ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	*	*	*	*

INDUSTRIAL WASTE SOURCES Continued

Yamhill	Calvin Haight Pump & Honeywagon Amity	4/16/81	Approved
Union	American Capitol Ethanol Plant Recycle Elgin	4/15/81	Approved
Tillamook	Tim Christensen Dairy Animal Waste Tank Tillamook	4/20/81	Approved
Clackamas	American-Strevell, Inc. Oil/Water Separator	5/6/81	Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Air Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

SUMMARY OF AIR PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sources Under Permits	Sources Reqr'g Permits
	<u>Month</u>	<u>FY</u>	<u>Month</u>	<u>FY</u>			
<u>Direct Sources</u>							
New	0	3	2	16	15		
Existing	0	10	1	8	12		
Renewals	20	76	9	119	90		
Modifications	0	1	3	21	5		
Total	20	90	15	164	122	1984	2037
<u>Indirect Sources</u>							
New	2	13	0	20	7		
Existing	0	0	0	0	0		
Renewals	0	0	0	0	0		
Modifications	0	5	2	6	0		
Total	2	18	2	26	7	186	0
<u>GRAND TOTALS</u>	22	108	17	190	129	2170	2037

Number of
Pending Permits

Comments

18	To be drafted by Northwest Region
18	To be drafted by Willamette Valley Region
10	To be drafted by Southwest Region
1	To be drafted by Central Region
16	To be drafted by Eastern Region
1	To be drafted by Program Planning Division
11	To be drafted by Program Operations
26	Awaiting Public Notice
19	Awaiting the end of the 30-day period
<u>122</u>	TOTAL

22 Technical Assistants

7 A-95's

MAR.5 (8/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Air Quality Division
(Reporting Unit)

April, 1981
(Month and Year)

PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same	* Date of * Action	* Action	* *
Multnomah	ORBANCO Operations Center 190 Spaces File No. 26-5052	4/20/81	Final Permit Issued	*
Multnomah	Good Samaritan Hospital Parking Structure 704 Spaces File No. 26-8022	4/22/81	Final Permit Issued	*

MAR.6 (5/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

MONTHLY ACTIVITY REPORT

GASOLINE DELIVERY TRUCKS

PRESSURE-VACUUM TESTED; NON-PERMITTED VOC SOURCES

Direct Sources

County	Number	Source	Tank No.	Expiration Date
			Last Three Digits	
CLATSOP	04	V002 JOHNSON OIL CO.	OWNERS UNIT NO.	11 03/25/82
DESCHUTES	09	V001 JUNIPER FUEL	OWNER'S UNIT NO. 6T	12 03/25/82
				1A 04/09/82
MARION	24	V010 MERRITT TRUAX INC.	OWNERS UNIT NO.	1A 04/09/82
MULTNOMAH	26	V333 MOBIL OIL CORP.	OWNERS UNIT NO.	2 03/26/82
				316 04/03/82
MARION	24	V036 OIL PRODUCTS INC.	OWNERS UNIT NO.	322 03/30/82
				101 03/31/82
MULTNOMAH	26	V414 PIE	OWNERS UNIT NO.	166 03/19/82
				4 03/19/82
MULTNOMAH	26	V417 POWELL DISTRIBUTING CO.	OWNERS UNIT NO.	4A 03/19/82
				232 03/26/82
MULTNOMAH	26	V415 PREMIUM OIL CO.	OWNERS UNIT NO.	346 03/26/82
				257 03/20/82
YAMHILL	36	V003 R. D. BARKER PETROLEUM	OWNERS UNIT NO.	355 03/20/82
				7A 03/27/82
JACKSON	15	V025 ROGUE VALLEY OIL CO.	OWNERS UNIT NO.	7 03/27/82
				5B 03/24/82
PORT.SOURCE	37	V009 SHIPPERS COOP ASSOCIATION	OWNERS UNIT NO.	5 03/24/82
				14 03/20/82
MULTNOMAH	26	V338 SUN TRANSPORTATION	OWNERS UNIT NO.	18A 03/20/82
				194 03/31/82
MULTNOMAH	26	V328 TEXACO INC.	OWNERS UNIT NO.	7 03/26/82
				7A 03/26/82
TILLAMOOK	29	V001 TILL-O-MAC OIL	OWNERS UNIT NO.	19A 03/25/82
				119 03/25/82
MULTNOMAH	26	V416 TOWER OIL CO.	OWNERS UNIT NO.	15 03/17/82
				15A 03/17/82
WASHINGTON	34	V071 TRI-CITY FUEL	OWNERS UNIT NO.	317 04/02/82
				292 03/27/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	317 03/26/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	13 03/20/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	10 03/20/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	20 03/19/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	20A 03/19/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	T2 04/07/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	502 04/07/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	4A 04/02/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	5 04/09/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	9 04/02/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	5A 04/13/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	8A 03/31/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	5A 04/13/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	8 03/31/82
BENTON	02	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	5 04/09/82
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	1A 04/09/82
				4 04/13/82

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DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT
GASOLINE DELIVERY TRUCKS

PRESSURE-VACUUM TESTED; NON-PERMITTED VOC SOURCES

Direct Sources

County	Number	Source	Tank No.	Expiration Date
			Last Three Digits	
MULTNOMAH	26	V419 ARMOUR OIL CO.	OWNERS UNIT NO.	67A 04/02/82
				167 04/02/82
				166 04/01/82
				66A 04/01/82
				1B 03/19/82
				1A 03/19/82
				762 04/02/82
				744 04/13/82
				701 03/18/82
				972 04/07/82
				975 04/06/82
				976 04/04/82
	782 03/20/82			
	706 04/01/82			
	999 04/01/82			
	985 03/31/82			
	979 03/19/82			
	989 03/19/82			
	137 03/20/82			
	960 03/24/82			
	981 03/24/82			
	954 03/23/82			
	956 03/26/82			
	964 03/27/82			
MULTNOMAH	26	V418 BURNS BROS, HUSKY	OWNERS UNIT NO.	05A 03/31/82
MULTNOMAH	26	V413 CARSON OIL CO.	OWNERS UNIT NO.	104 03/18/82
				84 03/18/82
MULTNOMAH	26	V332 CHEVRON U. S. A., INC.	OWNERS UNIT NO.	943 04/01/82
				943 04/01/82
				595 03/30/82
				595 03/30/82
				997 03/23/82
				806 03/23/82
				10 03/20/82
				700 04/01/82
				8 03/17/82
				1A 04/09/82
				1 04/09/82
				6A 03/18/82
	11 03/17/82			
PORT.SOURCE	37	V011 EXXON U. S. A.	OWNERS UNIT NO.	095 04/02/82
				059 04/02/82
PORT.SOURCE	37	V004 HALL OIL CO.	OWNERS UNIT NO.	11 04/02/82
HOOD RIVER	14	V001 I. D. JOHNSON & CO.	OWNERS UNIT NO.	1T 04/06/82
				1 03/24/82
CLATSOP	04	V002 JOHNSON OIL CO.	OWNERS UNIT NO.	11 04/01/82
				11A 04/01/82

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

MONTHLY ACTIVITY REPORT

GASOLINE DELIVERY TRUCKS

PRESSURE-VACUUM TESTED; NON-PERMITTED VOC SOURCES

Direct Sources

County	Number	Source	Tank No. Last Three Digits	Expiration Date
LINN	22	V001 TRUAX OIL, INC.	OWNERS UNIT NO.	3A 04/08/82
				3 04/08/82
				2A 04/06/82
				2 04/06/82
LANE	20	V002 WEST COAST TRUCK LINES	OWNERS UNIT NO.	186 04/07/82
				56T 04/07/82
				184 03/25/82
				59T 03/25/82
MULTNOMAH	26	V331 WESTERN HIGHWAY OIL CO.	OWNERS UNIT NO.	3 03/26/82
				4 03/18/82
TOTAL NUMBER QUICK LOOK REPORT LINES			104	

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
MONTHLY ACTIVITY REPORT

SMALL GASOLINE STORAGE TANKS
VAPOR RECOVERY SYSTEM REPORTED INSTALLED

Direct Sources

County	Number	Source	Process Description	Date of Action	Status
CLACKAMAS	03	A240	CROCKER'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	A478	WILSONVILLE CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	A481	MARLYN'S HILLTOP CHEVRON	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
CLACKAMAS	03	A484	WILLS' MOBIL SERVICE	ENTIRE SOURCE	03/19/81 COMPLETE CONSTR
CLACKAMAS	03	A674	A & B AUTOMOTIVE & TOWING	ENTIRE SOURCE	12/16/80 COMPLETE CONSTR
CLACKAMAS	03	A682	LAUNDER'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	A685	LAKE GROVE TEXACO	ENTIRE SOURCE	01/15/81 COMPLETE CONSTR
CLACKAMAS	03	A687	LAKE OSWEGO ROCKET	ENTIRE SOURCE	02/02/81 COMPLETE CONSTR
CLACKAMAS	03	A688	WOODARD'S STANDARD SERV	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	B132	WOODARD CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	B183	WEST LINN MOBIL	ENTIRE SOURCE	03/19/81 COMPLETE CONSTR
CLACKAMAS	03	B220	NICHOLS UNION SERVICE	ENTIRE SOURCE	12/29/80 COMPLETE CONSTR
CLACKAMAS	03	B653	ASHLAND BROS	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	C400	HAROLD'S TEXACO	ENTIRE SOURCE	01/20/81 COMPLETE CONSTR
CLACKAMAS	03	D488	OREGON CITY MOBIL	ENTIRE SOURCE	03/19/81 COMPLETE CONSTR
CLACKAMAS	03	E174	HARMON'S EXXON	ENTIRE SOURCE	12/26/80 COMPLETE CONSTR
CLACKAMAS	03	E501	R J'S MOBIL SERVICE	ENTIRE SOURCE	03/23/81 COMPLETE CONSTR
CLACKAMAS	03	V053	OREGON DEPT. FISH & WILDL	ENTIRE SOURCE	11/12/80 COMPLETE CONSTR
CLACKAMAS	03	V057	F & W FABRICATING INC	ENTIRE SOURCE	03/01/81 COMPLETE CONSTR
CLACKAMAS	03	V058	MILWAUKIE PLUMBING CO	ENTIRE SOURCE	03/04/81 COMPLETE CONSTR
CLACKAMAS	03	V060	MILWAUKIE TRANSFER	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
CLACKAMAS	03	V063	DON GLAUBITZ	ENTIRE SOURCE	03/20/81 COMPLETE CONSTR
CLACKAMAS	03	V064	MCFARLANE BARK INC	ENTIRE SOURCE	03/17/81 COMPLETE CONSTR
CLACKAMAS	03	V070	J M	ENTIRE SOURCE	03/25/81 COMPLETE CONSTR
CLACKAMAS	03	V074	PORTLAND GENERAL ELEC	ENTIRE SOURCE	03/10/81 COMPLETE CONSTR
CLACKAMAS	03	Z008	JOHN DALE MOBIL SERV	ENTIRE SOURCE	03/27/81 COMPLETE CONSTR
CLACKAMAS	03	Z092	BABBITT CHEVRON SERVICE	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
CLACKAMAS	03	Z094	MEL'S MOBIL SERVICE	ENTIRE SOURCE	03/24/81 COMPLETE CONSTR
CLACKAMAS	03	Z096	HICKMAN'S UNION SERVICE	ENTIRE SOURCE	01/27/81 COMPLETE CONSTR
CLACKAMAS	03	Z103	STEWART'S TEXACO	ENTIRE SOURCE	12/19/80 COMPLETE CONSTR
CLACKAMAS	03	Z392	OAK GROVE CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
JACKSON	15	A216	EASTSIDE UNION SERVICE	ENTIRE SOURCE	12/29/80 COMPLETE CONSTR
JACKSON	15	A303	WOLFF'S N MAIN CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
JACKSON	15	A717	MESSAL'S AUTO SERVICE	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
JACKSON	15	A723	JACK'S MOBIL SERVICE 501	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
JACKSON	15	A844	CHEVRON U.S.A. INC 26	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
JACKSON	15	C817	CRATER LAKE MOBIL	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
JACKSON	15	D322	BOB'S MOBIL	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
JACKSON	15	Z313	MARK'S TEXACO SERVICE	ENTIRE SOURCE	03/20/81 COMPLETE CONSTR
MARION	24	A123	REDING'S CHEVRON 24	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MARION	24	A126	PORTLAND ROAD CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MARION	24	A340	BOWDEN'S TEXACO SERVICE	ENTIRE SOURCE	12/24/80 COMPLETE CONSTR
MARION	24	A591	JAEGER'S SERVICE	ENTIRE SOURCE	03/22/81 COMPLETE CONSTR
MARION	24	B051	ERICKSON'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MARION	24	B064	KEIZER CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MARION	24	B321	PETERSON'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MARION	24	B471	BATDORF'S HOME & AUTO SUP	ENTIRE SOURCE	01/23/81 COMPLETE CONSTR

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SMALL GASOLINE STORAGE TANKS
VAPOR RECOVERY SYSTEM REPORTED INSTALLED

Direct Sources

County	Number	Source	Process Description	Date of Action	Status
MARION	24	B582 PERRY'S MOBIL SERVICE	ENTIRE SOURCE	03/22/81	COMPLETE CONSTR
MARION	24	B583 BAYLOR'S MOBIL SERVICE	ENTIRE SOURCE	03/21/81	COMPLETE CONSTR
MARION	24	B730 MARKET STREET UNION	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
MARION	24	D027 LANCASTER TEXACO	ENTIRE SOURCE	02/11/81	COMPLETE CONSTR
MARION	24	D746 JERRY'S UNION SERVICE	ENTIRE SOURCE	01/05/81	COMPLETE CONSTR
MARION	24	E429 BAYLOR'S MOBIL SERVICE W	ENTIRE SOURCE	03/21/81	COMPLETE CONSTR
MARION	24	Z863 BELLINGER BROS	ENTIRE SOURCE	01/22/81	COMPLETE CONSTR
MULTNOMAH	26	A132 BURNS BROS INC	ENTIRE SOURCE	11/16/80	COMPLETE CONSTR
MULTNOMAH	26	A406 DON'S CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	A421 BURLINGAME CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	A424 SYLVAN CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	A434 WOOD VILLAGE ROCKET SERV	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	A452 ROCKET RANCH	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	A782 WARD'S CHEVRON SERVICE	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	A792 CAPITOL CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	A800 PLISKA'S SERVICE	ENTIRE SOURCE	03/13/81	COMPLETE CONSTR
MULTNOMAH	26	A802 ROBISON'S MOBIL SERVICE	ENTIRE SOURCE	03/12/81	COMPLETE CONSTR
MULTNOMAH	26	A803 GATEWAY ROCKET SERVICE	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	A807 LUCAS DIVISION ST UNION	ENTIRE SOURCE	01/16/81	COMPLETE CONSTR
MULTNOMAH	26	A847 CHEVRON U.S.A. INC 26	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B159 BOWDISH CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B169 PHELPS CHEVRON SERVICE	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B186 BETTS CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B217 WOOD VILLAGE FREEWAY SERV	ENTIRE SOURCE	03/17/81	COMPLETE CONSTR
MULTNOMAH	26	B361 STINE'S CHEVRON SERVICE	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B426 CARTER'S GATEWAY CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B428 LAWHEAD'S MOBIL	ENTIRE SOURCE	03/17/81	COMPLETE CONSTR
MULTNOMAH	26	B429 ROCKET WAYS	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	B486 LAEL'S BURNSIDE UNION	ENTIRE SOURCE	01/16/81	COMPLETE CONSTR
MULTNOMAH	26	B492 KREBS MOBIL SERVICE STA	ENTIRE SOURCE	03/13/81	COMPLETE CONSTR
MULTNOMAH	26	B494 PAGE'S CHEVRON SERVICE	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B496 JEFF'S CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
MULTNOMAH	26	B497 TRENTHAM'S UNION SERVICE	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
MULTNOMAH	26	B521 DESBIENS ENTERPRISES INC	ENTIRE SOURCE	03/06/81	COMPLETE CONSTR
MULTNOMAH	26	B533 ROCKET EMPIRE	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	B802 MURRAY'S MOBIL	ENTIRE SOURCE	03/05/81	COMPLETE CONSTR
MULTNOMAH	26	B803 D & L MOBIL SERVICE	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
MULTNOMAH	26	B805 ROCKET CITY INC	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	B808 TAKEUCHI'S GATEWAY SERV	ENTIRE SOURCE	03/06/81	COMPLETE CONSTR
MULTNOMAH	26	C071 MULTNOMAH ROCKET	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	C098 BRANNON'S MOBIL	ENTIRE SOURCE	03/10/81	COMPLETE CONSTR
MULTNOMAH	26	C403 POE'S SERVICE	ENTIRE SOURCE	03/10/81	COMPLETE CONSTR
MULTNOMAH	26	C407 VILLAGE SQUARE MOBIL	ENTIRE SOURCE	03/13/81	COMPLETE CONSTR
MULTNOMAH	26	C751 BERTSCH MOBIL SERV INC	ENTIRE SOURCE	03/09/81	COMPLETE CONSTR
MULTNOMAH	26	C767 SHO'S AUTO REPAIR & SERV	ENTIRE SOURCE	03/27/81	COMPLETE CONSTR
MULTNOMAH	26	C873 ROCKET CAPITOL	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
MULTNOMAH	26	C940 JIM'S GRESHAM UNION INC	ENTIRE SOURCE	12/17/80	COMPLETE CONSTR

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SMALL GASOLINE STORAGE TANKS
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Direct Sources

County	Number	Source	Process Description	Date of Action	Status
MULTNOMAH	26	D085	HOLLYWOOD ROCKET	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
MULTNOMAH	26	D164	ROCKET GLISAN	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
MULTNOMAH	26	D187	TROUTDALE CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	D204	ROCKWOOD ROCKET	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
MULTNOMAH	26	D304	GRIFFITH-MURRELL PETROL	ENTIRE SOURCE	03/19/81 COMPLETE CONSTR
MULTNOMAH	26	D352	BURNS BROS INC	ENTIRE SOURCE	12/31/80 COMPLETE CONSTR
MULTNOMAH	26	D420	WARREN'S UNION 76 SERVICE	ENTIRE SOURCE	01/16/81 COMPLETE CONSTR
MULTNOMAH	26	D492	GRAHAM'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	D696	BOB'S UNION SERVICE	ENTIRE SOURCE	01/05/81 COMPLETE CONSTR
MULTNOMAH	26	D730	JUNG'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	D737	NEIL'S AUTO REPAIR	ENTIRE SOURCE	03/05/81 COMPLETE CONSTR
MULTNOMAH	26	D739	HAAK'S CHEVRON SERVICE	ENTIRE SOURCE	02/09/81 COMPLETE CONSTR
MULTNOMAH	26	D754	JONES' GRESHAM CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	D775	VERMONT STREET MOBIL	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	D801	CASTEEL'S UNION 76	ENTIRE SOURCE	01/07/81 COMPLETE CONSTR
MULTNOMAH	26	D827	JUDY'S ROCKET SERVICE INC	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
MULTNOMAH	26	D838	RON'S I-205 TEXACO	ENTIRE SOURCE	01/23/81 COMPLETE CONSTR
MULTNOMAH	26	D944	LACKMAN'S TOWING & REPAIR	ENTIRE SOURCE	03/31/81 COMPLETE CONSTR
MULTNOMAH	26	E043	GATEWAY UNION 76 SERVICE	ENTIRE SOURCE	01/05/81 COMPLETE CONSTR
MULTNOMAH	26	E115	GRAHAM'S CHEVRON 202	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	E131	162ND & GLISAN ST MOBIL	ENTIRE SOURCE	03/13/81 COMPLETE CONSTR
MULTNOMAH	26	E166	D J'S UNION	ENTIRE SOURCE	12/19/80 COMPLETE CONSTR
MULTNOMAH	26	E278	JOLLEY'S UNION 76	ENTIRE SOURCE	12/26/80 COMPLETE CONSTR
MULTNOMAH	26	E288	DAN'S SHELL #2	ENTIRE SOURCE	12/26/80 COMPLETE CONSTR
MULTNOMAH	26	E297	ALI'S UNION	ENTIRE SOURCE	12/29/80 COMPLETE CONSTR
MULTNOMAH	26	E448	GILBERT'S EXXON SERVICE	ENTIRE SOURCE	12/26/80 COMPLETE CONSTR
MULTNOMAH	26	E452	BOB LAURENCE CHEVRON	ENTIRE SOURCE	03/04/81 COMPLETE CONSTR
MULTNOMAH	26	E510	HILLSDALE MOBIL SERVICE	ENTIRE SOURCE	03/20/81 COMPLETE CONSTR
MULTNOMAH	26	E588	C & N AUTOMOTIVE	ENTIRE SOURCE	03/09/81 COMPLETE CONSTR
MULTNOMAH	26	V048	PORTLAND GEN. ELECTRIC	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	V340	RIVERSIDE GOLF & COUNTRY	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V341	PACIFIC CONSOLIDATED INC	ENTIRE SOURCE	03/30/81 COMPLETE CONSTR
MULTNOMAH	26	V343	DONALDSON'S MARINA	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V345	STENNO CARBON CO	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V346	HERTZ EQUIPMENT RENTAL	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V347	ROSE AUTO WRECKING	ENTIRE SOURCE	04/01/81 COMPLETE CONSTR
MULTNOMAH	26	V348	PACIFIC INSULATION	ENTIRE SOURCE	03/15/81 COMPLETE CONSTR
MULTNOMAH	26	V349	MYLESS O'DONNELL & CO	ENTIRE SOURCE	03/19/81 COMPLETE CONSTR
MULTNOMAH	26	V351	SIRIANNI ELECTRIC	ENTIRE SOURCE	03/12/81 COMPLETE CONSTR
MULTNOMAH	26	V353	OREGON ASPHALTIC PAVING	ENTIRE SOURCE	02/11/81 COMPLETE CONSTR
MULTNOMAH	26	V355	WALT JOHNSON LINCOLN-MERC	ENTIRE SOURCE	04/09/81 COMPLETE CONSTR
MULTNOMAH	26	V356	GREEN TRANSFER & STORAGE	ENTIRE SOURCE	02/26/81 COMPLETE CONSTR
MULTNOMAH	26	V359	ROTH VOLKSWAGEN INC	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V360	FOUR SEASONS DODGE	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V364	DATA DISTRIBUTORS INC	ENTIRE SOURCE	03/25/81 COMPLETE CONSTR
MULTNOMAH	26	V366	ACME GLASS CO	ENTIRE SOURCE	04/01/81 COMPLETE CONSTR
MULTNOMAH	26	V367	SEARS ROEBUCK & CO	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR

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SMALL GASOLINE STORAGE TANKS
VAPOR RECOVERY SYSTEM REPORTED INSTALLED

Direct Sources

County	Number	Source	Process Description	Date of Action	Status
MULTNOMAH	26	V368	AMERICAN TRUCK & AUTO LSE	ENTIRE SOURCE	03/05/81 COMPLETE CONSTR
MULTNOMAH	26	V369	WALLACE BUICK-AMC CO	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V370	PETTIJOHN ENGR CO	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V371	SPE-DE-WAY PRODUCTS	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
MULTNOMAH	26	V373	A-1 SANDBLASTING	ENTIRE SOURCE	04/10/81 COMPLETE CONSTR
MULTNOMAH	26	V374	RANCHO FORD	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V375	COAST CRANE & EQUIP	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V377	RON TONKIN INC	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V378	FABRI-VALVE DIVISION	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V379	SAVE U RENT A CAR	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	V382	GILBERT'S TOWING & STORAG	ENTIRE SOURCE	02/13/81 COMPLETE CONSTR
MULTNOMAH	26	V384	DIESEL SERVICE UNIT	ENTIRE SOURCE	02/11/81 COMPLETE CONSTR
MULTNOMAH	26	V386	CALBAG METALS CO	ENTIRE SOURCE	02/02/81 COMPLETE CONSTR
MULTNOMAH	26	V393	A & W EQUIP CO	ENTIRE SOURCE	02/18/81 COMPLETE CONSTR
MULTNOMAH	26	V394	GRESHAM COOP	ENTIRE SOURCE	04/02/81 COMPLETE CONSTR
MULTNOMAH	26	V395	CITY OF GRESHAM	ENTIRE SOURCE	04/03/81 COMPLETE CONSTR
MULTNOMAH	26	V397	UNITED EQUIP CO	ENTIRE SOURCE	03/26/81 COMPLETE CONSTR
MULTNOMAH	26	V407	RIVERVIEW CEMENTARY	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V408	GREAT NORTHERN PRODUCTS	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V409	FRIDAY OLDSMOBILE	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	V410	COLUMBIA RIVER YACHT CLUB	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	Z025	DISCOUNT GAS & OIL CO	ENTIRE SOURCE	02/24/81 COMPLETE CONSTR
MULTNOMAH	26	Z026	GRIFFITH-MURRELL PETROL	ENTIRE SOURCE	03/26/81 COMPLETE CONSTR
MULTNOMAH	26	Z027	GRIFFITH-MURRELL PETROL	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
MULTNOMAH	26	Z028	GRIFFITH-MURRELL PETROL	ENTIRE SOURCE	03/03/81 COMPLETE CONSTR
MULTNOMAH	26	Z063	WEST BURNSIDE STANDARD	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	Z065	LLOYD CENTER MOBIL	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	Z383	HAL'S MOBIL SERVICE	ENTIRE SOURCE	03/11/81 COMPLETE CONSTR
MULTNOMAH	26	Z384	POWELL'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	Z640	CAIN'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
MULTNOMAH	26	Z645	JACK'S MOBIL	ENTIRE SOURCE	03/02/81 COMPLETE CONSTR
MULTNOMAH	26	Z956	KILLINGSWORTH ROCKET	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
MULTNOMAH	26	Z957	BOB'S DIVISION ROCKET	ENTIRE SOURCE	01/02/81 COMPLETE CONSTR
MULTNOMAH	26	Z976	GIL'S FREEWAY SERVICE	ENTIRE SOURCE	03/12/81 COMPLETE CONSTR
POLK	27	Z246	NEUFELDT BROS TEXACO	ENTIRE SOURCE	01/15/81 COMPLETE CONSTR
WASHINGTON	34	A108	GREENBURG MOBIL SERVICE	ENTIRE SOURCE	03/26/81 COMPLETE CONSTR
WASHINGTON	34	A153	FOSTER'S UNION SERVICE	ENTIRE SOURCE	01/16/81 COMPLETE CONSTR
WASHINGTON	34	A194	SVELA'S UNION ORE	ENTIRE SOURCE	12/29/80 COMPLETE CONSTR
WASHINGTON	34	A202	RASMUSSEN'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
WASHINGTON	34	A203	HIGHLAND CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
WASHINGTON	34	A767	HOLMAN'S CHEVRON	ENTIRE SOURCE	12/30/80 COMPLETE CONSTR
WASHINGTON	34	B154	NINE-T-NINE SALES & SERV	ENTIRE SOURCE	03/30/81 COMPLETE CONSTR
WASHINGTON	34	B157	SHROPE'S CHEVRON	ENTIRE SOURCE	02/09/81 COMPLETE CONSTR
WASHINGTON	34	B202	BILL'S TEXACO	ENTIRE SOURCE	02/04/81 COMPLETE CONSTR
WASHINGTON	34	B233	KEN'S UNION SERVICE	ENTIRE SOURCE	12/29/80 COMPLETE CONSTR
WASHINGTON	34	B506	WILLIAMS PROGRESS TEXACO	ENTIRE SOURCE	02/04/81 COMPLETE CONSTR
WASHINGTON	34	B510	BASELINE MOBIL	ENTIRE SOURCE	03/25/81 COMPLETE CONSTR

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VAPOR RECOVERY SYSTEM REPORTED INSTALLED

Direct Sources

County	Number	Source	Process Description	Date of Action	Status
WASHINGTON	34	B659 FULLER'S MOBIL	ENTIRE SOURCE	03/29/81	COMPLETE CONSTR
WASHINGTON	34	B855 TIGARD TEXACO	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	C127 MIKES ROCKET JUNCTION	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
WASHINGTON	34	C310 GASTON ROCKET	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
WASHINGTON	34	C471 BALDWIN'S UNION 76 SERV	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
WASHINGTON	34	C644 MANNING'S UNION	ENTIRE SOURCE	01/05/81	COMPLETE CONSTR
WASHINGTON	34	C652 JOHN'S FREEWAY SERVICE	ENTIRE SOURCE	01/13/81	COMPLETE CONSTR
WASHINGTON	34	C835 COLONIAL TEXACO	ENTIRE SOURCE	01/06/81	COMPLETE CONSTR
WASHINGTON	34	C852 SVELA'S ROCKET	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
WASHINGTON	34	C868 BILL'S UNION 76 SERVICE	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
WASHINGTON	34	D643 BOB'S UNION 76 SERVICE	ENTIRE SOURCE	01/05/81	COMPLETE CONSTR
WASHINGTON	34	D773 T & R TEXACO	ENTIRE SOURCE	01/23/81	COMPLETE CONSTR
WASHINGTON	34	D970 CHICK'S ROCKET LANDING	ENTIRE SOURCE	01/02/81	COMPLETE CONSTR
WASHINGTON	34	E011 FARMINGTON MALL TEXACO	ENTIRE SOURCE	12/31/80	COMPLETE CONSTR
WASHINGTON	34	E152 CORNELL UNION 76	ENTIRE SOURCE	01/05/81	COMPLETE CONSTR
WASHINGTON	34	E163 WEST CANYON MOBIL	ENTIRE SOURCE	03/29/81	COMPLETE CONSTR
WASHINGTON	34	E215 FAIRBANKS UNION	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
WASHINGTON	34	E280 GARY & BOB'S UNION	ENTIRE SOURCE	12/29/80	COMPLETE CONSTR
WASHINGTON	34	E447 MILLER'S MOBIL SERVICE	ENTIRE SOURCE	03/29/81	COMPLETE CONSTR
WASHINGTON	34	E543 FREEMAN'S TEXACO	ENTIRE SOURCE	12/26/80	COMPLETE CONSTR
WASHINGTON	34	E572 ALOHA CAR WASH	ENTIRE SOURCE	03/24/81	COMPLETE CONSTR
WASHINGTON	34	V005 DAY'S	ENTIRE SOURCE	12/26/80	COMPLETE CONSTR
WASHINGTON	34	V006 INTEL CORPORATION	ENTIRE SOURCE	04/01/81	COMPLETE CONSTR
WASHINGTON	34	V070 RYDER TRUCK RENTAL	ENTIRE SOURCE	03/09/81	COMPLETE CONSTR
WASHINGTON	34	Z076 SIX CORNERS CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z081 FIEDLERS MOBIL SERVICE	ENTIRE SOURCE	03/26/81	COMPLETE CONSTR
WASHINGTON	34	Z083 WEST SLOPE MOBIL	ENTIRE SOURCE	03/16/81	COMPLETE CONSTR
WASHINGTON	34	Z086 HENSON'S MOBIL	ENTIRE SOURCE	03/18/81	COMPLETE CONSTR
WASHINGTON	34	Z087 TEDD'S CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z090 SHELTON'S CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z318 HAMNERLY'S MOBIL	ENTIRE SOURCE	03/18/81	COMPLETE CONSTR
WASHINGTON	34	Z332 DAILEY TEXACO & TIRE CTR	ENTIRE SOURCE	01/28/81	COMPLETE CONSTR
WASHINGTON	34	Z335 FOREST GROVE CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z412 DRYSDALE'S CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z414 BOB'S WEST SLOPE CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z418 GREG'S CHEVRON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z420 WALLY'S CHEVRON ON CANYON	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR
WASHINGTON	34	Z987 JESSE'S FREEWAY SERVICE	ENTIRE SOURCE	03/28/81	COMPLETE CONSTR
WASHINGTON	34	Z989 FRISON'S CHEVRON SERVICE	ENTIRE SOURCE	12/30/80	COMPLETE CONSTR

TOTAL NUMBER QUICK LOOK REPORT LINES 227

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division
(Reporting Unit)

April 1981
(Month and Year)

SUMMARY OF WATER PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sources Under Permits		Sources Reqr'g Permits				
	Month	Fis.Yr.	Month	Fis.Yr.		Month	Fis.Yr.	Month	Fis.Yr.			
	* /**	* /**	* /**	* /**	* /**	* /**	* /**	* /**	* /**			
<u>Municipal</u>												
New	0	/0	2	/5	0	/0	1	/2	4	/6		
Existing	0	/0	0	/0	0	/0	1	/0	0	/0		
Renewals	0	/0	17	/20	0	/2	32	13	18	12 ¹		
Modifications	0	/0	5	/1	0	/0	8	/2	2	/0		
Total	0	/0	24	/26	0	/2	42	/17	24	/18	262/91	266/97
<u>Industrial</u>												
New	0	/0	8	/14	2	/2	10	/9	4	/16		
Existing	0	/0	1	/1	0	/0	3	/0	0	/2		
Renewals	0	/0	45	/24	8	/4	80	/20	48	/21 ²		
Modifications	0	/1	8	/4	0	/1	9	/5	3	/0		
Total	0	/1	62	/43	10	/7	102	/34	55	/39	371/157	375/175
<u>Agricultural (Hatcheries, Dairies, etc.)</u>												
New	0	/0	1	/0	1	/0	2	/0	1	/0		
Existing	0	/0	0	/0	0	/0	0	/0	0	/0		
Renewals	0	/0	2	/0	6	/0	33	/0	2	/0		
Modifications	0	/0	0	/0	0	/0	0	/0	0	/0		
Total	0	/0	3	/0	7	/0	35	/0	3	/0	54/20	55/20
<u>GRAND TOTALS</u>	0	/1	89	/69	17 ³	/9	179	/51	82	/57	687 ⁴ /268	696/292

* NPDES Permits
** State Permits

1. Two state permits dropped.
2. One NPDES permit dropped.
3. General permits issued for facility which had requested new or renewed.
4. Figures include 88 general permits issued, 53 Industrial and 35 Fish Production.

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

<u>Water Quality Division</u>	<u>April, 1981</u>
(Reporting Unit)	(Month and Year)

PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	*	*	*	*

Municipal and Industrial Sources State Permits (8)

Clackamas	City of Gladstone (Sewerage System)	4/28/81	Permit Renewed
Deschutes	Juniper Utility Co. Bend STP	4/28/81	Permit Renewed
Josephine	Wm. E. Johnson dba (J.D. Placer) Merlin	4/28/81	Permit Issued
Jackson	John & Claudia Benson Ranch - Gold Mining	4/28/81	Permit Issued
Jackson	Southwest Forest Industries (Plant No. 4) White City	4/29/81	Permit Renewed
Jackson	Rogue River Paving Co., Inc. Gravel Ponds, Medford	4/29/81	Permit Renewed
Linn	Hub City Concrete Co., Inc. On-Site Settling Pond System Albany	4/29/81	Permit Renewed
Deschutes	Diamond International Coop. Oregon Lumber Division, Redmond (was Brooks-Scanlon)	4/29/81	Permit Renewed

Municipal and Industrial Sources Modification (1)

Washington	Permapost Products Co. Hillsboro	4/16/81	Addendum No. 1
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MAR.6

WL772 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	* /Old Permit & File Nos.	*	*	*

Municipal and Industrial Sources General Permits

Cooling Water - New Permits No. 0100J, File 32539 (28)

Marion	Agripac, Tile Road Salem File 962	4/81	General Permit Issued New Facility	
Polk	Fort Hill Lumber Co. Grande Ronde 2581 J/30585	4/81	Transferred to General Permit	
Jackson	Harry & David Medford 2789 J/37200	4/81	Transferred to General Permit	
Multnomah	Industrial Materials Tech. Inc. (IMP-Oregon, Inc.) Portland 3091/41680	4/81	Transferred to General Permit	
Douglas	Keller Lumber Co. Roseburg 3298 J/44615	4/81	Transferred to General Permit	
Multnomah	Kenton Packing Co. Portland 2936 J/45636	4/81	Transferred to General Permit	
Marion	Libby, McNeill & Libby Salem 50594	4/81	General Permit Issued New Facility	
Multnomah	Libby, McNeill & Libby Portland 3226 J/50590	4/81	Transferred to General Permit	

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same * /Old Permit & File Nos.	* Date of * Action	* Action	*
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Municipal and Industrial Sources General Permits
Cooling Water - New Permits No. 0100J, File 32539

Continued

Multnomah	Long Mile Rubber Co. Portland 3076 J/51185	4/81	Transferred to General Permit	
Marion	Stayton Canning Co., Liberty Plant, Salem 3244 J/84814	4/81	Transferred to General Permit	
Marion	Termicold Corp. Salem 3143 J/87663	4/81	Transferred to General Permit	
Linn	Willamette Industries, Inc. (Fairview Division - Beaumont Plant) 2879 J/97073 Sweet Home	4/81	Transferred to General Permit	

Pacific Power and Light Co.

Klamath	J. C. Boyle - Keno 2983 J/66604	4/81	Transferred to General Permit	
Douglas	Clearwater No. 1 Roseburg 3264 J/66628	4/81	" "	
Douglas	Clearwater No. 2 Roseburg 3265 J/66630	4/81	" "	
Jackson	Eagle Point 2455 J/66600	4/81	" "	
Douglas	Fish Creek, Roseburg 2435 J/66632	4/81	" "	

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	* /Old Permit & File Nos.	*	*	*

Municipal and Industrial Sources General Permits
Cooling Water - New Permits No. 0100J, File 32539

Continued

Pacific Power and Light Co. Continued

Douglas	Lemolo Plant 1, Roseburg 2411 J/66634	4/81	Transferred to General Permit
Douglas	Lemolo Plant 2, Roseburg 2412 J/66636	4/81	" "
Hood	Powerdale, Hood River 2984 J/66602	4/81	" "
Jackson	Prospect No. 1 2456 J/66620	4/81	" "
Jackson	Prospect No. 2 2457 J/66622	4/81	" "
Jackson	Prospect No. 3 2458 J/66624	4/81	" "
Jackson	Prospect No. 4 2459 J/66626	4/81	" "
Klamath	Eastside, Klamath Falls 2985 J/66606	4/81	" "
Douglas	Slide Creek, Roseburg 3263 J/66640	4/81	" "
Douglas	Soda Springs, Roseburg 2413 J/66642	4/81	" "
Douglas	Toketee, Roseburg 2436 J/66644	4/81	" "

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

<u>Water Quality Division</u>	<u>April, 1981</u>
(Reporting Unit)	(Month and Year)

PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	* /Old Permit & File Nos.	*	*	*

Municipal and Industrial Sources General Permits

Filter Backwash - New Permits No. 0200 J File 32540 (13)

Josephine	City of Cave Junction, WTP 2553 J/15253	4/81	Transferred to General Permit
Curry	City of Brookings, WTP 2473 J/11300	4/81	Transferred to General Permit
Yamhill	City of Newberg, WTP 2151 J/60598	4/81	Transferred to General Permit
Douglas	City of Roseburg Winchester, WTP 3227 J/76773	4/81	Transferred to General Permit
Douglas	City of Roseburg Oakland, WTP 3241 J/76772	4/81	Transferred to General Permit
Malheur	City of Ontario, WTP 2400 J/63632	4/81	Transferred to General Permit
Douglas	Winston-Dillard Water District Winston 3242 J/98330	4/81	Transferred to General Permit
Douglas	Roberts Creek Water District Roseburg 3313 J/75660	4/81	Transferred to General Permit
Coos	Lakeside Water District Lakeside 2686 J/48570	4/81	Transferred to General Permit

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WL772 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same * /Old Permit & File Nos.	* Date of * Action	* Action	*
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Municipal and Industrial Sources General Permits

Filter Backwash - New Permits No. 0200 J File 32540 Continued

Coos	Coos Bay-North Bend Water Board (Pony Creek) Coos Bay 3069 J/19831	4/81	Transferred to General Permit
Coos	Coos Bay-North Bend Water Board (Shorewood) Coos Bay 2432 J/19832	4/81	Transferred to General Permit
Linn	Pacific Power and Light Co. (Albany WTP) 2959 J/66584	4/81	Transferred to General Permit
Marion	Pacific Power and Light Co. (Mill City WTP) Mill City 3056 J/66614	4/81	Transferred to General Permit

Aquatic Animal Production - - New Permit No. 0300 J File 32542 (35)

Coos	Weyerhaeuser, Salmon Release (Oregon Aqua Foods, Inc.) Coos Bay 2828 J/96181	4/81	Transferred to General Permit
Tillamook	Tillamook Trout, Inc. Tillamook 88740	4/81	General Permit Issued New Facility
Coos	Anadromous, Inc. Coos Bay Salmon Coos Bay 2430 J/2805	4/81	Transferred to General Permit

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	* /Old Permit & File Nos.	*	*	*

Municipal and Industrial Sources General Permits

Aquatic Animal Production - - New Permit No. 0300 J File 32542 Continued

Oregon Department of Fish and Wildlife

Linn	Aumsville Rearing Pond 3209 J/64410	4/81	Transferred to General Permit
Clatsop	Big Creek Fish Hatchery Knappa 3169 J/64420	4/81	" "
Jackson	Butte Falls Fish Hatchery Butte Falls 2011 J/64430	4/81	" "
Multnomah	Cascade Fish Hatchery Bonnevillle 3158 J/64435	4/81	" "
Tillamook	Cedar Creek Fish Hatchery Hebo 3204 J/64440	4/81	" "
Clackamas	Clackamas R. Salmon Hatchery - Estacada 2525 J/64442	4/81	" "
Lane	Dexter Rearing Ponds Lowell 2263 J/64450	4/81	" "
Curry	Elk River Salmon Hatchery, Port Orford 2862 J/64465	4/81	" "

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DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

<u>Water Quality Division</u>	<u>April, 1981</u>
(Reporting Unit)	(Month and Year)

PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	* /Old Permit & File Nos.	*	*	*

Municipal and Industrial Sources General Permits

Aquatic Animal Production - - New Permit No. 0300 J File 32542 Continued

Oregon Department of Fish and Wildlife

Lincoln	Fall Creek Fish Hatchery Alesa 3188 J/64469	4/81	Transferred to General Permit
Deschutes	Fall River Hatchery Bend 3205 J/64470	4/81	" "
Clatsop	Gnat Creek Fish Hatchery Clatskanie 3189 J/64475	4/81	" "
Klamath	Klamath Hatchery Chiloquin 3206 J/64480	4/81	" "
Clatsop	Klaskanine River Hatchery Astoria 3170 J/64485	4/81	" "
Union	Lookingglass Hatchery Elgin 3135 J/64492	4/81	" "
Linn	Marion Forks Fish Hatchery Idanha 3199 J/64495	4/81	" "
Lane	McKenzie Salmon Hatchery Leaburg 2378 J/64500	4/81	" "

MAR.6

WL772 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project	* Date of	* Action	*
*	* /Site and Type of Same	* Action	*	*
*	* /Old Permit & File Nos.	*	*	*

Municipal and Industrial Sources General Permits
Aquatic Animal Production - - New Permit No. 0300 J File 32542 Continued

Oregon Department of Fish and Wildlife

Clatsop	N. Nehalem Fish Hatchery Nehalem 3167 J/64510	4/81	Transferred to General Permit
Lane	Oakridge Fish Hatchery Oakridge 2264 J/64516	4/81	" "
Wasco	Oaksprings Hatchery Maupin 3207 J/64515	4/81	" "
Hood River	Oxbow Hatchery Cascade Locks 3203 J/64520	4/81	" "
Linn	Roaring River Hatchery Scio 3200 J/64525	4/81	" "
Douglas	Rock Creek Hatchery Idleyld 3284 J/64530	4/81	" "
Jefferson	Round Butte Hatchery Madras 3198 J/64535	4/81	" "
Lincoln	Salmon River Hatchery Otis 2397 J/64545	4/81	" "

MAR.6 WL772 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

*	County	*	Name of Source/Project	*	Date of	*	Action	*
*		*	/Site and Type of Same	*	Action	*		*
*		*	/Old Permit & File Nos.	*		*		*

Municipal and Industrial Sources General Permits

Aquatic Animal Production - - New Permit No. 0300 J File 32542 Continued

Oregon Department of Fish and Wildlife

Clackamas	Sandy River Hatchery Sandy 3272 J/64550	4/81	Transferred to General Permit
Lincoln	Siletz Fish Hatchery Blodgett 3171 J/64555	4/81	" "
Linn	South Santiam Hatchery Sweet Home 3157 J/64560	4/81	" "
Tillamook	Trask Fish Hatchery Tillamook 3168 J/64570	4/81	" "
Tillamook	Trask Pond, E. Fork Rearing Pond, Tillamook 3202 J/64455	4/81	" "
Wallowa	Wallowa Hatchery Enterprise 2224 J/64580	4/81	" "
Lane	Willamette River Salmon Hatchery Oakridge 2264 J/64516	4/81	" "
Jefferson	Wizard Falls Hatchery Camp Sherman 3197 J/64595	4/81	" "

MAR.6 WL772 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division (Reporting Unit)	April, 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same/ * Old Permit & File Nos.	* Date of * Action	* Action
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Municipal and Industrial Sources General Permits
Log Ponds - New Permits No. 04004 File No. 32544 (11)

Douglas	Herbert Lumber Co. Riddle 3020 J/38154	4/81	Transferred to General Permit
Lincoln	3-G Lumber Co. Philomath 2960 J/88477	4/81	" "
Hood River	Champion International Coop. (Neal Creek) Odell 3299 J/15831	4/81	" "
Washington	Forest Grove Lumber Co. Forest Grove 3136 J/30509	4/81	" "
Clackamas	Harris Stud Mill Boring 2913 J/37125	4/81	" "
Douglas	Woolley Enterprises, Inc. Hwy. 58, Drain 3278 J/98960	4/81	" "
Douglas	Woolley Enterprises, Inc. Smith River, Drain 2591 J/98970	4/81	" "
Douglas	Woolley Enterprises, Inc. Yoncalla 3279 J/98975	4/81	" "

MAR.6

WL772 (1)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Water Quality Division	April, 1981
(Reporting Unit)	(Month and Year)

PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same / * Old Permit & File Nos.	* Date of * Action	* Action
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Municipal and Industrial Sources General Permits
Log Ponds - New Permits No. 04004 File No. 32544

Tillamook	Gold Medal Cedar Products Tillamook 3247 J/33925	4/81	Transferred to General Permit
Clackamas	Olaf M. Oja, Lumber Co. Sandy 2914 J/63141	4/81	" "
Douglas	Georgia Pacific Corp. Veneer Plant, Sutherlin 2108 J/32915	4/81	" "

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Solid Waste Division
(Reporting Unit)

April 1981
(Month and Year)

SUMMARY OF SOLID AND HAZARDOUS WASTE PERMIT ACTIONS

	Permit Actions Received		Permit Actions Completed		Permit Actions Pending	Sites Under Permits	Sites Reqr'g Permits
	Month	FY	Month	FY			
<u>General Refuse</u>							
New	-	7	2	5	1		
Existing	-	-	1	4	-		
Renewals	4	42	1	27	29		
Modifications	1	5	-	11	2		
Total	5	54	4	47	32	166	166
<u>Demolition</u>							
New	-	3	1	4	1		
Existing	-	2	-	-	2		
Renewals	-	3	-	4	2		
Modifications	-	2	-	3	-		
Total	-	10	1	11	5	20	21
<u>Industrial</u>							
New	-	10	1	8	2		
Existing	-	3	-	-	2		
Renewals	-	19	3	23	13		
Modifications	-	2	2	3	-		
Total	-	34	6	34	17	101	101
<u>Sludge Disposal</u>							
New	-	5	-	5	1		
Existing	-	-	-	1	-		
Renewals	-	2	-	1	1		
Modifications	-	-	-	-	-		
Total	-	7	-	7	2	14	15
<u>Hazardous Waste</u>							
New	28	289	28	289	-		
Authorizations	-	-	-	-	-		
Renewals	-	-	-	-	-		
Modifications	-	-	-	-	-		
Total	28	289	28	289	-	1	1
<u>GRAND TOTALS</u>	33	394	39	388	56	302	304

SC318.C
MAR.5S (4/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Solid Waste Division (Reporting Unit)	April 1981 (Month and Year)
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PERMIT ACTIONS COMPLETED

* County	* Name of Source/Project * /Site and Type of Same	* Date of * Action	* Action	*
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General Refuse Facilities

Tillamook	Manzanita Transfer Station New Facility	4/10/81	Permit Issued	
Tillamook	Pacific City Transfer Station New Facility	4/10/81	Permit Issued	
Crook	Crook County Landfill Existing Facility	4/21/81	Permit Issued	
Tillamook	Tillamook Landfill Existing Facility	4/23/81	Permit Issued	

Demolition Waste Facilities

Multnomah	Troutdale Brush Processing New Facility	4/28/81	Letter Authorization Issued	
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Industrial Waste Facilities

Columbia	Boise Cascade New Facility	4/2/81	Letter Authorization Issued	
Coos	Mettman Ridge Existing Facility	4/10/81	Permit Amended	
Lane	I.P.--Vaughn Existing Facility	4/20/81	Permit Issued	
Lane	Truck Road Existing Facility	4/20/81	Permit Issued	
Linn	Fred Smith Existing Facility	4/21/81	Permit Amended	
Hood River	Neal Creek Existing Facility	4/23/81	Permit Issued	

SC318.D
MAR.6 (5/79)

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Solid Waste Division	April 1981
(Reporting Unit)	(Month and Year)

HAZARDOUS WASTE DISPOSAL REQUESTS

CHEM-NUCLEAR SYSTEMS, GILLIAM CO.

WASTE DESCRIPTION

*	*		*	*		*
* Date *	Type	Source	Present	Future		*
*	*	*	*	*		*

Disposal Requests Granted (24)

OREGON (9)

3/25	Soil contaminated with asphalt, caustic & HCl	Industrial cleaning serv.	8 cu.yd.	0
3/30	Heavy metals bearing wastewater	Electro-plating	1,000 gal.	2,000 gal.
4/13	Chrome sludge	Electro-plating	24 drums	60 drums
4/20	Mercury-treated wheat seed	Federal agency	3,650 lb.	0
4/20	Sodium cyanide, pentachlorophenol sludge and paint thinner	Plywood manuf.	17 drums	100 drums
4/20	Machine shop waste oil	Electronic plant	1,000 gal.	100 gal.
4/24	Miscellaneous lab chemicals	Hospital	10 drums	12 drums
4/27	Pesticide wastes	Federal agency	665 gal.	0
4/28	Heavy metals sludge and cyanide-contaminated ion exchange resin	Electronic plant	250 drums	250 drums

SC318.E
MAR.15 (4/79)

WASTE DESCRIPTION

* Date *	Type	Source	Present	Quantity * Future *
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WASHINGTON (9)

4/1	Paint sludge	Shipyards	100 drums	250 drums
4/1	Paint sludge, solvents and trichloroethane	Electronic	0	780 gal.
4/13	Acids and PC board chemicals	Electronic	12 drums	50 drums
4/13	Mixed solvents	Transportation	10 drums	12 drums
4/20	Misc. lab chemicals	University	41 drums	200 drums
4/20	Solvents, paint sludge, battery acid sludge, caustic solution	Federal agency	0	114,000 gal.
4/20	Cyanide solution and trichloroethane/methylchloroform	Electroplating	20 drums	4,000 gal.
4/20	Enamel paint sludge	Electrical equipment	0	5,500 gal.
4/20	Ketone solvents and toluene-saturated rags	Aerospace	11 drums	30 drums

OTHER STATES (6)

4/13	Pentachlorophenate sludge (B.C.)	Wood preserving	50 drums	20 drums
4/21	Leaded gasoline tank bottom sludge (Mont.)	Oil co.	34 drums	8 drums
4/21	PCB transformers, capacitors and contaminated debris (Utah)	Federal agency	129 drums; 20 transf; 168 capacit.	0
4/20	Spent lacquer thinner (B.C.)	Painting trucks	0	36 drums
4/27	Pesticides (B.C.)	Agricultural chemical supplier	15 drums	15 drums
4/28	Chromic acid (Utah)	Electroplating	240 gal.	1,000 gal.

SC318.E

MAR.15 (4/79)

MONTHLY ACTIVITY REPORT

Noise Control Program
(Reporting Unit)April 1981
(Month and Year)FINAL NOISE CONTROL ACTIONS COMPLETED

* County	* Name of Source and Location	* Date	* Action
Multnomah	Portland International Airport Portland	4/81	Airport Boundary Approved
	Wallace Heliport Portland	4/81	Airport Boundary Approved
Clackamas	Crowe's Nest Airport Estacada	4/81	Airport Boundary Approved

DEPARTMENT OF ENVIRONMENTAL QUALITY

MONTHLY ACTIVITY REPORT

Noise Control Program
(Reporting Unit)

April 1981
(Month and Year)

SUMMARY OF NOISE CONTROL ACTIONS

Source Category	New Actions Initiated		Final Actions Completed		Actions Pending	
	Mo.	FY	Mo.	FY	Mo.	Last Mo.
Industrial/ Commercial	2	18	0	20	62	61
Airports			3	11		

CIVIL PENALTY ASSESSMENTS

Department of Environmental Quality
1981

CIVIL PENALTIES ASSESSED DURING MONTH OF APRIL, 1981:

<u>Name and Location of Violation</u>	<u>Case No. & Type of Violation</u>	<u>Date Issued</u>	<u>Amount</u>	<u>Status</u>
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None

G0171(2)

<u>ACTIONS</u>	<u>LAST MONTH</u>	<u>PRESENT MONTH</u>
Preliminary Issues	9	4
Discovery	1	2
Settlement Action	5	4
Hearing to be Scheduled	1	4
Hearing Scheduled	5	2
HO's Decision Due	3	5
Briefing	1	1
Inactive	<u>3</u>	<u>3</u>

SUBTOTAL of Active Files 28 25

Ho's Decision Out/Option for EQC Appeal	2	2
Apealed to EQC	1	1
EQC Appeal Complete/Option for Court Review	0	1
Court Review Option Pending or Taken	1	1
Case Closed	<u>4</u>	<u>2</u>

TOTAL Cases 36 32

KEY

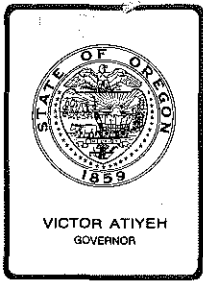
15-AQ-NWR-76-178	15th Hearing Section case in 1976 involving Air Quality Division violation in Northwest Region jurisdiction in 1976; 178th enforceent action in Northwest Region in 1976.
ACDP	Air Contaminant Discharge Permit
AQ	Air Quality
CLR	Chris Reive, Enforcement Section
DEC Date	Date of either a proposed decision of hearings officer or a decision by Commission
\$	Civil Penalty Amount
ER	Eastern Region
Fld Brn	Field Burning incident
RLH	Robb Haskins, Assistant Attorney General
Hrnngs	Hearings Section
Hrnng Rfrl	Date when Enforcement Section requests Hearings Section schedule a hearing
VAK	Van Kollias, Enforcement Section
LMS	Larry Schurr, Enforcement Section
MWR	Midwest Region (now WVR)
NP	Noise Pollution
NPDES	National Pollutant Discharge Elimination System wastewater discharge permit.
NWR	Northwest Region
FWO	Frank Ostrander, Assistant Attorney General
P	Litigation over permit or its conditions
Prtys	All parties involved
Rem Order	Remedial Action Order
Resp Code	Source of next expected activity in case
SSD	Subsurface Sewage Disposal
SW	Solid Waste Division
SWR	Southwest Region
T	Litigation over tax credit matter
Transcr	Transcript being made of case
<u>Underlining</u>	New status or new case since last month's contested case log
WVR	Willamette Valley Region
WQ	Water Quality Division

April 1981
DEQ/EQC Contested Case Log

Pet/Resp Name	Hrng Rqst	Hrng Rfr1	DEQ Atty	Hrng Date	Resp Code	Case Type & No.	Case Status
FAYDREX, INC.	05/75	05/75	RLH	11/77	Dept	03-SS-SWR-75-02 64 SSD Permits	<u>Resp's brief due 05-18-81</u>
MEAD and JOHNS, et al	05/75	05/75	RLH		All	04-SS-SWR-75-03 3 SSD Permits	Awaiting completion of EQC Faydrex review
POWELL, Ronald	11/77	11/77	RLH	01/23/80	Hrngrs	\$10,000 Fld Brn 12-AQ-MWR-77-241	Decision due
WAH CHANG	04/78	04/78	RLH		Resp	16-P-WQ-WVR-78-2849-J NPDES Permit Modification	Hearing postponed pending further evaluation of permit conditions. To be completed by 07/01/81.
WAH CHANG	04/78	04/78	RLH		Resp	08-P-WQ-WVR-78-2012-J NPDES Permit Modification	Hearing postponed pending further evaluation of permit conditions. To be completed by 07/01/81
MALLORY & MALLORY INC.	11/79	11/79	JHR	01/10/80	<u>Prtys</u>	14-AQ-CR-79-101 Open Burning Civil Penalty	<u>Final order as modified by EQC served 4/1/81</u>
M/V TOYOTA MARU No. 10	12/10/79	12/12/79	RLH		Dept	17-WQ-NWR-79-127 Oil Spill Civil Penalty of \$5,000	<u>Summary Judgment requested. Dept. to submit supplementary Summary Judgment memo</u>
LAND RECLAMATION, INC., et al	12/12/79	12/14/79	FWD	05/16/80		19-P-SW-329-NWR-79 Permit Denial	<u>Court of Appeals Oral Argument held 4/22/81</u>
FORRETTE, Gary	12/20/79	12/21/79	RLH	10/21/80	Hrngrs	20-SS-NWR-79-146 Permit Revocation	<u>Record closed 03-18-81 Decision Due.</u>
GLASER, Dennis F. dba MID-VALLEY FARMS, INC.	02/06/80	02/07/80	CLR	06/19/80	Dept	02-AQ-WVR-80-13 Open Field Burning Civil Penalty of \$2,200	<u>Appeal option expires 5/8/81</u>
MEDFORD CORPORATION	02/25/80	02/29/80		05/16/80	<u>Prtys</u>	07-AQ-SWR-80 Request for Declaratory Ruling	<u>Parties attempting to effect compromise</u>
J.R. SIMPLOT COMPANY	04/15/80	04/16/80	RLH	<u>06-23-81</u>	<u>Prtys</u>	12-WQ-ER-80-41 Civil Penalty of \$20,000	<u>Hearing location and date changed.</u>
R.L.G. ENTERPRISES, INC., dba THE MOORAGE PLACE	08/06/80	08/08/80	CLR	11/10/80	Resp	20-WQ-NWR-80-114 Civil Penalty of \$150	<u>Hearing Officer's Order issued 04-08-81. Appeal option expires 5/8/81</u>
EOKE, Benoni	10/27/80	10/28/80	RLH	01/15/81	Prtys	24-SS-SWR-80-173 Permit revocation	Case closed-by Stipulated-Order-4/14/81
BROWN, Victor	11/05/80	11/12/80	LMS	<u>03/27/81</u>	Hrngrs	29-AQ-WVR-80-163 Civil Penalty of \$1,800	<u>Record closed 03/27/81. Decision Due.</u>
LOGSDON, Elton	11/12/80	11/14/80	CLR	02/26/81	Hrngrs	30-AQ-WVR-80-164 Field Burning Civil Penalty of \$950	Decision due
MORRIS, Robert	11/10/80	11/14/80	RLH		<u>Dept</u>	31-SS-CR-80 Permit revocation	<u>Resp's memo in opposition to Partial Summary Judgment filed 04/22/81</u>
HAYWORTH, John W. dba/HAYWORTH FARMS INC.	12/02/80	12/08/80	LMS	04/28/81	<u>Prtys</u>	33-AQ-WVR-80-187 Field burning civil penalty of \$4,660	<u>Written argument due 05/15/81</u>
ROGERS, Donald E.	12/08/80	12/09/80	RLH		<u>Prtys</u>	35-SS-NWR-80-196 Permit denial	Site evaluation to be performed
HOPPER, Harold	12/09/80	12/09/80	RLH		<u>Dept</u>	36-SS-NWR-80-197 Permit revocation	<u>Discovery</u>
JENSEN, Carl F. dba/JENSEN SEED & GRAIN, INC.	12/19/80	12/24/80	CLR	04/16/81	<u>Hrngrs</u>	37-AQ-WVR-80-181 Field burning civil penalty of \$4,000	<u>Record closed 04/30/81 Decision due.</u>
SETERA, Frank	12/27/80	01/05/81	CLR	05-14-81	<u>Prtys</u>	01-AQ-NWR-80-199 Open burning civil penalty of \$500	Hearing scheduled in Portland at 9 a.m.
GINTER, Lloyd M.	01/02/81	01/05/81	CLR		<u>Resp</u>	02-SS-SWR-80-205 Subsurface sewage Civil penalty of \$100	<u>Respondent to provide supplementary memo by 05/18/81</u>

April 1981
DEQ/EQC Contested Case Log

Pet/Resp Name	Hrng Rqst	Hrng Rfrri	DEQ Atty	Hrng Date	Resp Code	Case Type & No.	Case Status
R-B-MAC, INC.	01/06/81	01/08/81	LMS		Prtys	04-WQ-ER-80-24 Water Quality civil penalty of \$5,000	Case closed by Stipulated Order 04/24/81
BROOKINGS ENERGY FACILITY, INC.	12/18/80	01/14/81	CLR		Prtys	05-SW316-SWR-80 Solid waste facility permit denial	<u>Stipulation drafted</u>
JAL CONSTRUCTION, INC.	02/06/81	02/09/81	LMS	05/07/81	Hrnga	06-AQOB-NWR-81-02 Open burning civil penalty of \$3000	<u>Hearing to be rescheduled.</u>
CURL, James H., et al	02/09/81	02/12/81			Prtys	07-SS-CR-81 Request for Declaratory Ruling	Attempting informal resolution
OREGON SHORES ASSOCIATES, LTD.	02/11/81	03/09/81			Resp	09-WQ-NWR-81	<u>To be scheduled</u>
MAIN ROCK PRODUCTS, INC.	03-11-81	03-16-81	CLR		Prtys	10-WQ-SWR-81-16 Water Quality civil penalty of \$6,000	Preliminary Issues
MID-OREGON CRUSHING COMPANY, INC.	03-18-81	03-23-81			Hrnga	11-AQ-CR-81-19 Air Contaminant Discharge Permit application denial	To be scheduled
MONTGOMERY, Clyde		04-08-81				12-AQ-WVR-80-166 Field burning civil penalty of \$500	<u>To be scheduled</u>
MEAD, Mel	04-04-81	04-08-81	LMS		Resp	13-SS-SWR-81-25 Subsurface sewage permit denial	<u>Dept's Motion to Strike filed 04/15/81</u>



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item C, June 5, 1981, EQC Meeting

TAX CREDIT APPLICATIONS

Director's Recommendation

It is recommended that the Commission take action on the following requests for Pollution Control Facility Tax Credit Certificates:

<u>Appl.</u> <u>No.</u>	<u>Applicant</u>	<u>Facility</u>
T-1258	Boise Cascade Corporation	Baghouses & associated equipment
T-1298	Tallman Orchards, Inc.	Two Tropic Breeze wind machines
T-1318	Weyerhaeuser Co.	Underfire and overfire air preheaters & associated equipment
T-1337	Hilton Fuel & Supply Co.	Truck and drop boxes
T-1338	Smith & Hill Systems, Ltd.	Recycling facilities
T-1339	Bohemia, Inc.	Raw material storage building
T-1340	Rimrock Leasing Company	Truck
T-1351	Wacker Siltronic Corp.	Wastewater treatment plant and sewer pretreatment equipment
T-1352	Vanport Mfg., Inc.	Facility to stabilize log deck yard to control erosion
T-1355	Tektronix, Inc.	Dust collector on spray dryer
T-1357	Pacific Power & Light Co.	High noise abatement walls

Bill

William H. Young

CASplettstaszer
229-6484
5/15/81
Attachments



Contains
Recycled
Materials

PROPOSED JUNE 1981 TOTALS

Air Quality	\$1,798,861
Water Quality	836,857
Solid Waste	164,635
Noise	<u>156,892</u>
	\$2,957,245

CALENDAR YEAR TOTALS TO DATE

Air Quality	\$6,653,987
Water Quality	1,635,062
Solid Waste	265,644
Noise	<u>15,929</u>
	\$8,570,622

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Boise Cascade Corp.
Northeast Oregon Region
P.O. Box 50
Boise, ID 83728

The applicant owns and operates a particleboard plant at Island City.

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

2. Description of Claimed Facility

The facility described in this application consists of 2 Clarke baghouses and associated equipment. Also included in the application were 3 new materials handling cyclones, the emissions from which are controlled by the above baghouses.

Request for Preliminary Certification for Tax Credit was made on 8/6/79, and approved on 9/25/79.

Construction was initiated on the claimed facility on 10/79, completed on 1/21/80, and the facility was placed into operation on 1/21/80.

Facility Cost: \$254,189 (Accountant's Certification was provided).

3. Evaluation of Application

Boise Cascade has modified the #2 sander system and the reman system to reduce emissions from these systems. The #2 sander system used 2 baghouses as primary collectors. The baghouses were overloaded and did not continuously operate in compliance. These baghouses were replaced by a high efficiency cyclone and a new baghouse. In the reman system, the exhaust from the 2 existing cyclones and one new cyclone was routed to a new baghouse.

The Department considers the new cyclones to be process equipment (necessary for plant operation) and therefore ineligible for tax credit. Boise Cascade Corp. furnished the cost of the baghouses and associated equipment which is eligible for tax credit (\$138,464). The primary purpose of the baghouses is air pollution control and therefore 80% or more of the cost (\$138,464) should be allocated to pollution control.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing air pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468, and the rules adopted under that chapter.
- e. The portion of the facility cost that is properly allocable to pollution control is 80% or more.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$138,464 with 80% or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1258.

F.A. Skirvin:in
(503) 229-6414
April 14, 1981
AI972

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Tallman Orchards, Inc.
3322 Thomsen Rd.
Hood River, OR 97031

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

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

2. Description of Claimed Facility

The facility described in this application is two used "tropic breeze" wind machines for frost protection.

Request for Preliminary Certification for Tax Credit was made on 3-28-80, and approved on 8-22-80.

Construction was initiated on the claimed facility on 4-12-80 , completed on 4-15-80, and the facility was placed into operation on 5-22-80.

Facility Cost: \$15,000 (Accountant's Certification was provided).

3. Evaluation of Application

There is no law limiting the use of fuel oil fired heaters to provide frost protection to fruit trees, even though the use of orchard heaters in the past has produced significant smoke and soot air pollution problems in Hood River. The orchard farmers desire a secure, long-range solution to frost protection that includes the reduction or elimination of the smoke and soot nuisance.

The two orchard fans serve twenty acres. There were 19 heaters per acre used in this orchard. To protect the 20 acres would require 380 heaters. (Using 19 heaters per acre provides less protection than the average of 34 heaters per acre used in the Hood River area). With the orchard fans, approximately 80 perimeter heaters will be used.

These are used machines at a cost of \$7,500 each compared to over \$12,000 each for similar new machines. The cost of fuel oil used to fire orchard heaters was \$.92 per gallon in March, 1980, when these machines were ordered. The ROI annual percent return on investment before taxes was estimated at 22.4%. At this ROI the percent of

actual cost of the claimed facility allocable to pollution control is 20% or more but less than 40%. The ROI data is attached.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1) (a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing air pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468, and the rules adopted under that chapter.
- e. The portion of the facility cost that is properly allocable to pollution control is 20% or more but less than 40%.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$15,000 with 20% or more but less than 40% allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1298R.

F.A. Skirvin:a
(503) 279-6414
May 13, 1981

AA1080 (1)

ROI Data

The estimated annual percent return on the investment in the facility --

This was determined for the first year of operation of one orchard fan serving 10 acres as follows:

$$\% \text{ ROI} = \frac{\text{Net Income}}{\text{Facility Cost}} \times 100$$

% ROI = Annual percent return on investment before taxes.

Net Income = Total annual income from claimed facility before taxes minus operating expenses, as determined for the first full year of normal operation. In this case it is the savings in fuel oil cost by changing from all orchard heaters to a fan with only perimeter orchard heaters.

Facility Cost = Actual certified cost of claimed facility minus salvage value of any facilities removed from service. There are no salvage values used in this case.

"Before taxes" = Means prior to assessment of federal and state income taxes.

"Operating expenses" = Means costs of operating claimed facility for the first full year of normal operation including labor, interest, property taxes, insurance, and other cash expenses. Depreciation is not an allowable operating expense. In this case, labor expenses are not reduced by using a fan. Interest is 15%. There are no property taxes on fans in Hood River County. No insurance or other cash expenses are considered

Cost to operate with all orchard heaters

$$\frac{19 \text{ heaters}}{\text{acre}} \times \frac{.75 \text{ gal.}}{\text{heater hr.}} \times \frac{.92 \text{ dollars}}{\text{gal. oil}} = \frac{13.11 \text{ dollars}}{\text{acre hr.}}$$

$$\frac{13.11 \text{ dollars}}{\text{acre hr.}} \times \frac{30 \text{ hr.}}{\text{yr.}} \times 10 \text{ acres} = \frac{3,933 \text{ dollars}}{\text{yr.}}$$

Cost to operate with fan and perimeter heaters (Basis - 1 fan/10 acres)

Fan operating cost:

$$\frac{8 \text{ gal. gasoline}}{10 \text{ acre hr.}} \times \frac{30 \text{ hr.}}{\text{yr.}} \times 10 \text{ acre} \times \frac{1.26 \text{ dollar}}{\text{gal. gasoline}} = \frac{302 \text{ dollar}}{\text{yr.}}$$

Perimeter heaters operating cost:

$$\frac{4 \text{ heaters}}{\text{acre}} \times \frac{.75 \text{ gal. oil}}{\text{heater}} \times \frac{.92 \text{ dollars}}{\text{gal. oil}} = \frac{2.76 \text{ dollars}}{\text{acre hr.}}$$

$$\frac{2.76 \text{ dollars}}{\text{acre hr.}} \times \frac{30 \text{ hr.}}{\text{yr.}} \times \frac{10 \text{ acre}}{1} = \frac{828 \text{ dollars}}{\text{yr.}}$$

$$\text{TOTAL - Fan plus Perimeter Heaters} = \frac{\$1130 \text{ dollars}}{\text{yr.}}$$

Savings in operating cost

all heaters = \$3,933
Fan & Perimeter heaters = 1,130

Savings = \$2,803 dollars
yr.

Operating expenses

First year's interest expense:

$$\frac{\$7,500 \text{ (cost of one fan)}}{1} \times \frac{15\%}{\text{yr.}} = \frac{1125 \text{ dollar}}{\text{yr.}}$$

Net income

Net Income = $\frac{\text{Savings in Cost}}{\text{Operating Cost}} - \frac{\text{Operating Expense}}{\text{Operating Expense}}$

Net Income:

$$\frac{2803 \text{ dollars}}{\text{yr.}} - \frac{1125 \text{ dollars}}{\text{yr.}} = \frac{1678 \text{ dollars}}{\text{yr.}}$$

ROI

$$\text{ROI} = \frac{1678}{7500} \times 100 = 22.4\%$$

Once the percent return on investment has been calculated from the equation above, it must be related to the five percentage ranges for percent allowable to pollution control. The following Table is used to accomplish this relationship.

Table 1

<u>Percent ROI (Pre-Tax)</u>	<u>Percent of Actual Cost of Claimed Facility Allocable to Pollution Control</u>
25% or more	less than 20%
19% to 24%	20% or more but less than 40%
13% to 18%	40% or more but less than 60%
7% to 12%	60% or more but less than 80%
less than 7%	80% or more

Table 1 is based upon the assumption that a 25% ROI is generally an adequate return on investment before taxes over the long term for most companies to justify an investment without the added incentive of a tax credit.

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Weyerhaeuser Co.
P.O. Box 389
North Bend, OR 97459

The applicant owns and operates a plywood plant, sawmill and powerhouse at North Bend.

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

2. Description of Claimed Facility

The facility described in this application consists of underfire and overfire air preheaters for boilers #1 and #2 including ductwork fans, motor, etc. Also included is a visible emission monitor and recorder.

Request for Preliminary Certification for Tax Credit was made on 6/30/78, and approved on 8/21/78.

Construction was initiated on the claimed facility on 12/4/78, completed on 2/1/80, and the facility was placed into operation on 3/15/79.

Facility Cost: \$935,123 (Accountant's Certification was provided).

3. Evaluation of Application

There are 3 hogged fuel boilers in operation at Weyerhaeuser's mill in North Bend. All three boilers are equipped with multiclones to collect particulate matter. Emission testing was done as part of extensive studies to determine the cause of the plugging in the multiclones on the boilers. The test results indicated that boiler #3 could meet the Department emission limits while boilers #1 and #2 were significantly above those limits. The only evident difference in the boilers was the use of air preheater on boiler #3.

There was much testing and investigation involved in the company's attempt to solve the multiclone plugging problem. The best explanation

of the problem is that the salt becomes molten at the high temperatures in the fire box. When cooled in the multiclone it adheres and solidifies in the tubes. After installation of the air preheaters, the salt is cooled and solidified before reaching the multiclones and therefore does not build up and block the tubes.

Air preheaters increase the temperature of the combustion air by using the heat in the boiler exhaust gases. The combustion efficiency of the boiler is increased by air preheaters; less fuel is used to generate the same amount of steam. The increased combustion efficiency results in a fuel savings of approximately 5%. When construction was started, hogged fuel was approximately \$2 per ton and the fuel savings from installation of the air preheaters was approximately \$10,000 per year.

Since this savings is only 1% of the cost of the preheaters, it is not considered significant justification for installation on an economic basis.

After installation of the air preheaters on boilers #1 and #2, all three boilers were able to demonstrate compliance with Department emission limits for non-salt particulates since multiclone plugging no longer occurs.

In addition to the air preheaters, a visible emission monitor was installed in the stack to measure and record the opacity of the boiler emissions. This monitor was required by regulation for boilers using salt laden hogged fuel.

Included in the total cost of the facility were four fans which were increased in size because of the addition of the air preheaters. A portion of these fans is necessary for boiler operation. The portion of the cost of the fans which is not eligible for tax credit (\$29,030) was determined by comparing the fan horsepower required for boiler operation to that actually installed. After comparing the ineligible cost to the total cost, approximately 97% is eligible for tax credit, therefore 80% or more of the cost should be allocated to pollution control.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1) (a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing air pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468, and the rules adopted under that chapter.

- e. The portion of the facility cost that is properly allocable to pollution control is 80% or more.

5. Director's Recommendation

Base upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$935,123 with 80% or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1318.

F.A. Skirvin:ib
(503) 229-6414
May 12, 1981
AI1001



Weyerhaeuser Company

Southwest Oregon Region
North Bend, Oregon 97459
(503) 756-5121 State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
March 16, 1981

RECEIVED
MAR 18 1981

AIR QUALITY CONTROL

Mr. Ed Woods
Dept. of Environmental Quality
522 S.W. 5th Avenue - Box 1760
Portland, Oregon 97207

Mr. Woods:

As you requested please see the following additional information on the Weyerhaeuser Company, Southwest Oregon Region powerhouse emissions application for tax credit.

A. Project Cost

Application for tax credit identified total project costs to be \$935,123. Equipment and installation costs itemized in Exhibit "C" amounted to \$743,792. The difference of \$191,331 were costs incurred for:

Engineering	\$56,199
Contractors Profit Fee	69,233
Emissions testing	44,652
Interest	12,841
Insurance	4,685
Bond	3,721
Total	<u>\$191,331</u>

B. Fans and Drives

Fan and drive costs identified in Exhibit "C" amounted to \$141,376. Per our phone conversation details for increased capacity, based on motor horsepower, is:

	<u>Estimated total cost</u>	<u>Old H.P.</u>	<u>New H.P.</u>	<u>Increased Capacity Factor</u>	<u>Cost Associated With Incr.Capacity</u>
Forced draft fans (2)	\$19,500	25	50	.5	\$9,750
Overfire air fans (2)	\$73,676	0	150	1.0	\$73,676
Induced draft fans (2)	\$48,200	100	250	.6	\$28,920
	<u>\$141,376</u>				<u>\$112,346</u>

If you have any questions please call.

Very truly yours,

WEYERHAEUSER COMPANY
Southwest Oregon Region

Dan Weybright

Dan Weybright
Engineering Manager

DW:fc

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Hilton Fuel & Supply Co.
8087 Blackwell Rd.
Central Point, OR 97502

The applicant owns and operates a wood waste salvage business at Central Point, Oregon.

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

2. Description of Claimed Facility

The facility described in this application consists of a 1975 White Freightliner truck (serial #CA213HL090750), a 1976 International truck (serial #D2137F6A10233) and 12 drop boxes (38.5 cu.yd. capacity).

Request for Preliminary Certification for Tax Credit was made on December 27, 1979, and approved on January 21, 1980.

The claimed equipment was ordered on December 30, 1979, received from February 1980 to October 1980, and was placed into operation during the period from February 1980 to October 1980.

Facility Cost: \$90,767.87 (Accountant's Certification was provided).

3. Evaluation of Application

This application is for an expansion of an existing facility previously certified for tax relief (Certificate #662). The applicant collects wood by-products from several industries, and processes and markets the material for a variety of uses. The applicant serves small mills that cannot afford to process the wood waste themselves.

Originally, the applicant used dump trucks to collect and transport wastes. However, this was not an efficient system and many mill owners were unhappy with it. The drop box system now in use is more efficient and has resulted in more contracts with mill operators.

The products which the applicant produces (primarily wood chips) are competitive with similar products produced in other states.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. As required by ORS 468.165, the facility was under construction on or after January 1, 1973, and
 - (1) The substantial purpose of the facility is to utilize material that would otherwise be solid waste by mechanical processing;
 - (2) The end product of the utilization is a usable source of power or other item of real economic value;
 - (3) The end product of the utilization, other than a usable source of power, is competitive with an end product produced in another state; and
 - (4) The Oregon law regulating solid waste imposes standards at least substantially equivalent to the federal law.
- c. The facility is necessary to satisfy the intents and purposes of ORS Chapter 459, and the rules adopted under that chapter.
- d. The portion of the facility cost that is properly allocable to pollution control is 100 percent.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$90,767.87 with 100 percent allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1337.

W. H. Dana:c
SC326
(503) 229-6266
5/13/81

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Smith & Hill Systems, Ltd.
P.O. Box 782
Eugene, OR 97440

The applicant owns and operates two processing facilities for recyclable domestic solid wastes at Eugene and Portland, Oregon.

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

2. Description of Claimed Facility

The facilities described in this application receive recyclable domestic solid waste such as cardboard, glass and metal beverage containers, metal cans and plastics. The materials are sorted, crushed, baled or otherwise densified and sold to various secondary materials markets. Claimed equipment includes a metal can mill, three balers, a forklift truck, three decappers, blower systems and conveyors.

Request for Preliminary Certification for Tax Credit was made on March 20, 1979, and approved on April 10, 1979.

Construction was initiated on the claimed facility in May 1979, completed in September 1979, and the facility was placed into operation in September 1979.

Facility Cost: \$39,485 (Accountant's Certification was provided).

3. Evaluation of Application

The applicant is the primary processor of recyclable domestic solid wastes in the state. Prior to installation of the claimed equipment, recycling was not a viable alternative in many small communities, due to lack of a market for the recyclable materials. In addition, many beverage distributors were simply landfilling returnable containers rather than recycling them.

The large secondary materials markets often will not deal directly with small recyclers, because of the small volume of materials recyclers generate and the sporadic nature of their output. The applicant makes recycling possible by buying from many small recyclers, cleaning & consolidating the materials and selling large

quantities of materials to the secondary materials markets on a regular basis. The materials sold are competitive with those produced in other states.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. As required by ORS 468.165, the facility was under construction on or after January 1, 1973, and
 - (1) The substantial purpose of the facility is to utilize material that would otherwise be solid waste through the production, processing and use of materials which have useful chemical or physical properties and which may be used for the same or other purposes, and materials which may be used in the same kind of application as its prior use without change in identity;
 - (2) The end product of the utilization is a usable source of power or other item of real economic value;
 - (3) The end product of the utilization, other than a usable source of power, is competitive with an end product produced in another state; and
 - (4) The Oregon law regulating solid waste imposes standards at least substantially equivalent to the federal law.
- c. The facility is necessary to satisfy the intents and purposes of ORS Chapter 459, and the rules adopted under that chapter.
- d. The portion of the facility cost that is properly allocable to pollution control is 100 percent.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$39,485.00 with 100 percent allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1338.

W. H. Dana:c
SC317
(503) 229-6266
5/8/81

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Bohemia, Inc.
2280 Oakmont Way
Eugene, OR 97401

The applicant owns and operates a particleboard plant at Eugene.

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

2. Description of Claimed Facility

The facility described in this application consists of a new raw material storage building.

Request for Preliminary Certification for Tax Credit was made on 6/5/80, and approved on 12/19/80.

Construction was initiated on the claimed facility on 6/16/80, completed on 1/7/81, and the facility was placed into operation on 12/15/80.

Facility Cost: \$696,136 (Accountant's Certification was provided).

3. Evaluation of Application

When the particleboard plant was built, it was located in an isolated area and the raw material storage building was adequate for plant needs. As houses were built around the plant, LRAPA and Bohemia received complaints about fugitive dust. Also because of variable raw material supplies, the company has been maintaining a larger raw material inventory. Not all of the larger inventory could be enclosed by the existing building. This outside storage aggravated the fugitive dust problem.

The company has built a new, larger raw material storage building which can enclose nearly all of the raw material. Construction of this building was approved by LRAPA as a means of reducing fugitive emissions. Since construction of the building, no complaints have been received.

The new building results in a small production increase during the winter because it protects more raw material from moisture. This production increase results in a 4% return on investment for this project. A substantial purpose of this project is air pollution control and 80% or more of the cost is allocable to pollution control.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1) (a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing air pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468, and the rules adopted under that chapter.
- e. The portion of the facility cost that is properly allocable to pollution control is 80% or more.

5. Director's Recommendation

Based upon the findings in the summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$696,136 with 80% or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1339.

F.A. Skirvin:ahc

(503) 229-6414

4-22-81

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Gary M. Goodman
dba Rimrock Leasing Company
P.O. Box J
Prineville, OR 97754

The applicant owns and leases out a truck equipped with a drop-box roll-off system at Prineville, Oregon.

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

2. Description of Claimed Facility

The facility described in this application consists of a 1974 White Freightliner truck chassis equipped with a 1980 Force Magnum drop-box roll-off unit.

Request for Preliminary Certification for Tax Credit was made on January 28, 1980, and approved on March 4, 1980.

The claimed equipment was ordered on December 7, 1979, delivered on February 26, 1980, and the equipment was placed into operation on March 22, 1980.

Facility Cost: \$34,383.00 (Accountant's Certification was provided).

3. Evaluation of Application

The claimed equipment was ordered, but not delivered, prior to filing for Preliminary Certification. The Department has previously obtained a legal opinion stating that ordering equipment does not constitute commencement of construction. Therefore, the application does comply with ORS 468.175.

Shortly after Preliminary Certification was granted, the Department received an informal legal opinion that the equipment might not meet the "substantial purpose" requirement of ORS 468.165(1)(A). The applicant was advised of this opinion and its implications by phone and by letter dated April 9, 1980 (copy attached). The applicant chose to proceed with the project.

Prior to purchase of this vehicle, newspaper recycling was done only occasionally, with the major portion being disposed of in the Crook County Landfill. The previous truck was not economical for long trips.

The new, larger truck has been used to transport recycled newspaper to the Portland market on a regular basis (approximately once each month). Slightly over 94 tons were delivered between March 22, 1980, and December 11, 1980.

In addition to its use for newspaper recycling, the truck is also used to collect refuse in the Prineville area for landfill disposal. On a mileage basis alone, the truck is used about 60% for newspaper recycling. However, on a calendar basis and a return-on-investment basis, the substantial purpose of the truck appears to be refuse collection. (Note: The applicant was not required to submit a cost benefit analysis, but, based on available information, it is logical to assume that refuse collection is far more profitable than newspaper recycling.) Accordingly, although the Department applauds the applicant's efforts to promote and implement recycling, we do not believe that the claimed equipment is eligible for tax credit.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. As required by ORS 468.165, the facility was under construction on or after January 1, 1973, and
 - (1) The end product of the utilization is a usable source of power or other item of real economic value;
 - (2) The end product of the utilization, other than a usable source of power, is competitive with an end product produced in another state;
 - (3) The Oregon law regulating solid waste imposes standards at least substantially equivalent to the federal law; however
 - (4) The substantial purpose of the facility does not appear to be the utilization of material that would otherwise be solid waste.
- c. The facility is necessary for newspaper recycling to occur in Crook County.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that the Commission issue an order denying Tax Credit Application No. T-1340.

W. H. Dana:c
SC322
(503) 229-6266
5/21/81

April 9, 1980

Mr. Gary M. Goodman
dba Rimrock Leasing Co.
P.O. Box J
Prineville, OR 97754

Re: RPC - Rimrock Leasing Co.

Dear Mr. Goodman:

We recently asked the Department of Justice, which serves as our legal counsel, to review your application for Preliminary Certification for tax credit. Your application is significant because there are many other collectors who are, or will be, transporting recyclables from time to time. Action on your application will therefore set a major precedent.

The Department of Justice believes that your proposal is not eligible for tax credit. This opinion does not affect our approval of Preliminary Certification by letter dated March 4, 1980. Nor does it mean for sure that the Environmental Quality Commission won't eventually grant tax credit should you go ahead with this project. What it does mean is that the DEQ will most likely not support your final application. I thought you should be aware of this fact, as it may affect your decision about purchasing the equipment.

If you have any questions regarding this matter, please call me toll-free at 1-800-452-7813.

Sincerely,

William H. Dana, Supervisor
Solid Waste Disposal Control
Solid Waste Division

WHD:vt

cc: Bob Danko
Central Region

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Wacker Siltronic Corporation
P.O. Box 03180
Portland, Oregon 97203

The applicant owns and operates a Silicon crystal growing, slicing, and polishing facility at Portland.

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

2. Description of Claimed Facility

The facility described in this application is a wastewater treatment plant and sanitary sewer pretreatment equipment. The treatment plant consists of a mechanical clarifier and neutralization tank for acids and caustics. The pretreatment system consists of six collection sumps where soluble organic wastes are neutralized and solids are removed.

A wastewater building contains lime handling equipment, pumps, mixer, mix tanks with pumps, a solids handling system consisting of a vacuum drum dryer and pump, two slurry pumps, filtrate pump, conveyor dumpster, caustic waste pumps, a wastewater laboratory, and electrical support equipment and controls.

Request for Preliminary Certification for Tax Credit was made May 7, 1979, and approved June 11, 1979. Construction was initiated on the claimed facility July 1979, completed April 1980, and the facility was placed into operation April 1980.

Facility Cost: \$776,134 (Accountant's Certification was provided).

3. Evaluation of Application

Without operation of the waste treatment facilities, wastes would be discharged with very high levels of total suspended solids, biochemical oxygen demand, fluoride, and with a pH ranging from 1.0 to 12.0. The systems have adequately controlled pollutant discharges to the City of Portland's sewerage system and the Willamette River.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing water pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.
- e. The portion of the facility cost that is properly allocable to pollution control is 100 percent.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$776,134 with 80 percent or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1351.

Charles K. Ashbaker:1
WL779 (1)
(503) 229-5325
May 4, 1981

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Vanport Mfg., Inc.
P.O. Box 97
Boring, OR 97009

The applicant owns and operates a sawmill at Boring.

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

2. Description of Claimed Facility

The facility described in this application is designed to stabilize the log deck yard to control erosion. The project consists of a rock base, fabric, surface rock and culverts.

Request for Preliminary Certification for Tax Credit was made October 10, 1978, and approved October 23, 1978. Construction was initiated on the claimed facility November, 1978, completed March 31, 1979, and the facility was placed into operation March 31, 1979.

Facility Cost: \$60,723 (Accountant's Certification was provided).

3. Evaluation of Application

Prior to installation of the claimed facility, heavy equipment working in the log yard resulted in extremely muddy conditions during the winter months. This caused turbidity violations in Deep Creek. The new fabric layer and rock cover allows water (runoff) to drain rapidly to the fabric layer and then travel horizontally to drainage ditches. Without the fabric, the soil base becomes saturated and is unable to support the rock.

The project has greatly reduced the quantity of soil entering Deep Creek from the log yard.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing water pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468 and the rules adopted under that chapter.

- e. The portion of the facility cost that is properly allocable to pollution control is 100 percent.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$60,723 with 80% or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1352.

CKA:o

(503) 229-5325

WO718 (2)

4/10/81

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Tektronix, Inc.
P.O. Box 500
Beaverton, OR 97077

The applicant owns and operates an electronics manufacturing plant at Beaverton, Oregon.

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

2. Description of Claimed Facility

The facility described in this application consists of a flex kleen dust collector on a spray dryer.

Request for Preliminary Certification for Tax Credit was made on August 8, 1978 and approved on August 29, 1978.

Construction was initiated on the claimed facility on 10/1/78, completed on 10/1/79, and the facility was placed into operation on 10/1/79.

Facility Cost: \$43,168.29 (Accountant's Certification was provided).

3. Evaluation of Application

Installation of the dust collector was required to eliminate visible emissions from the spray dryer and to prevent deposition of white ceramic dust on surrounding surfaces. The facility has been inspected by the Department and found to be in compliance with opacity and grain loading regulations. It is estimated that this facility removes 30-40 pounds of ceramic dust per day (previously emitted). This material collected has no economic value; therefore there is no return on the investment of the dust collector and 80 percent or more of the cost is allocable to pollution control.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.

- b. Facility was constructed on or after January 1, 1967, as required by ORS 468.165(1)(a).
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing air pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 468, and the rules adopted under that chapter.
- e. The portion of the facility cost that is properly allocable to pollution control is 80% or more.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$43,168.29 with 80% or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1355.

F.A. Skirvin:in
(503) 229-6414
May 12, 1981

State of Oregon
Department of Environmental Quality

TAX RELIEF APPLICATION REVIEW REPORT

1. Applicant

Pacific Power & Light Company
920 S.W. 6th Avenue
Portland, OR 97204

The applicant owns and operates an electrical power substation at 44 N.E. Knott St., Portland.

Application was made for tax credit for a noise pollution control facility.

2. Description of Claimed Facility

The facility described in this application consists of three 24 ft. high noise abatement walls. The purpose of the walls is to reduce electrical transformer noise which impacts the new H.U.D. housing project.

Request for Preliminary Certification for Tax Credit was made on October 29, 1979, and approved on December 26, 1979.

Construction was initiated on the claimed facility on December 19, 1980, completed on March 31, 1981, and the facility was placed into operation on March 31, 1981.

Facility Cost: \$156,892.56 (Accountant's Certification was provided).

3. Evaluation of Application

The three noise abatement walls were constructed only for the purpose of reducing the noise levels impacting the new H.U.D. Quadriplegic Independent Living Center. The walls reduced the noise levels by about 7 to 11 decibels. Eighty (80) percent or more of the costs of this project appear to be allocated for pollution controls.

4. Summation

- a. Facility was constructed in accordance with the requirements of ORS 468.175, regarding preliminary certification.
- b. Facility was constructed on or after January 1, 1977, as required by ORS 468.165(1)(b).

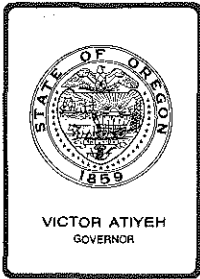
- c. Facility is designed for and is being operated to a substantial extent for the purpose of preventing, controlling, or reducing noise pollution.
- d. The facility is necessary to satisfy the intents and purposes of ORS Chapter 467, and the rules adopted under that chapter.
- e. The portion of the facility cost that is properly allocable to pollution control is 80 percent or more.

5. Director's Recommendation

Based upon the findings in the Summation, it is recommended that a Pollution Control Facility Certificate bearing the cost of \$156,892.56 with 80 percent or more allocated to pollution control, be issued for the facility claimed in Tax Credit Application No. T-1357.

John Hector:g
(503) 229-5989
May 12, 1981

NG243 (1)



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. D, June 5, 1981, EQC Meeting

Request for Authorization to Conduct Public Hearings on Proposed Amendments to Rules governing On-Site Sewage Disposal, OAR 340-71-100 to 340-71-600.

Background and Problem Statement

At its March 13, 1981 meeting, the commission adopted rules for On-site Sewage Disposal to replace rules governing subsurface and alternative sewage disposal. Since the adoption of on-site rules the Department and three counties, Multnomah, Josephine, and Columbia, find it necessary to increase fees in order to continue to provide an adequate level of service. Multnomah, Josephine and Columbia Counties have submitted proposed fee schedules with supporting documentation (Attachments "D" "E" & "F"). In addition, several technical amendments are needed to provide smoother administration of the new rules.

Alternatives and Evaluation

Alternatives appear to be as follows:

1. Authorize public hearings on the proposed fee increases as well as the proposed technical amendments.
2. Authorize public hearings on the proposed fee increases only.
3. Do not authorize public hearings.

Due to inflation, an increase in fees is necessary in order for the Department and the three counties to maintain the on-site sewage program at an effective level. Extra construction inspections required on some of the new alternatives, such as the sand filter, cannot be carried out effectively under the present fee schedule. These extra inspections are necessary to assure proper construction. In addition, the Department's budget is predicated on a fee increase. Since rule amendments are necessary to adjust fees, it is felt that the Department should take this opportunity to make some technical rule modifications.

In addition to adjustments in the general fee schedule, the amendments propose a surcharge of 10% on all new site evaluations and new construction permits issued by contract counties as well as DEQ. This surcharge will be in addition to the regular fee. This surcharge is intended to fund portions of the Department's On-Site Sewage Disposal Program administration that have been supported by general fund monies in the past. This concept has been presented to and accepted by the Legislature's Ways and Means Subcommittee.

The proposed technical rule amendments are as follows:

OAR 340-71-290(3)(a). This rule sets forth size conditions where the conventional sand filter may be approved. As the rule is written, it is difficult to interpret and understand. The proposed amendments are intended to clarify the rule without changing the standards.

OAR 340-71-305(3). This rule presently requires sand filters, other than the conventional sand filter, to be under control of a municipality, for operation and maintenance. Since aerobic systems are now exempt from this requirement, this is the only on-site system that is required to be under such control. These systems are no more complex than aerobic systems, therefore, this requirement is not equitable. The proposed amendment would remove the requirement that sand filters be under operational control of a municipality.

OAR 340-71-325. This rule deals with gray water waste disposal sumps. It is felt that the rule, as written, is inadequate to achieve its intent. The rule deals with "running water piped into" structures, rather than with discharge of sewage from structures. The proposed amendment would change the criteria for approval of gray water waste disposal sumps.

OAR 340-71-160(9) is a new rule that sets an effective period of one year for construction permits. This rule was part of the old subsurface rules, but was inadvertently omitted from the present rules.

Tables 4 and 5. These tables establish minimum length of disposal trenches according to soil type and depth and depth to temporary groundwater. As adopted, these tables are inconsistent with other criteria developed during the hearing process.

340-71-275(5)(a)(A)(ii). The Hazen-Williams coefficient of smoothness should be 150 rather than 120 for type of pipe now being used.

340-71-290(3)(c). This rule, for conventional sand filters, as written, is deficient in language to deal with permanent water tables at depths greater than 6 feet from the surface, and is inconsistent with rules for pressure distribution. The proposed amendment remedies the depth to water deficiency in the rule and makes it consistent with rules for pressure distribution systems.

Summation

1. ORS 454.625 provides that the Commission, after hearing, may adopt rules for on-site sewage disposal, including adoption of fee schedules.
2. ORS 454.745(4) provides that the Commission may by rule increase maximum fees contained in ORS 454.745(1), provided the fees do not exceed actual costs for efficiently conducted minimum services.
3. Three counties, Multnomah, Josephine and Columbia, have requested the Commission to establish by rule new fee schedules that exceed, in some categories, those set forth in ORS 454.745(1).
4. The Department's budget is predicated on a fee increase.
5. In addition, a number of technical rule amendments are necessary to provide for smoother rule administration.

Director's Recommendation

Based upon the summation, it is recommended that the commission authorize public hearings, to take testimony on the question of amending OAR 340-71-100 to 340-71-600 as set forth in Attachment "C".

Bill

William H. Young

Attachments: 5

- "A" Draft Hearing Notice
- "B" Statement of Need and Fiscal Impact
- "C" Proposed Rule Amendments
- "D" Supporting Documentation - Multnomah County
- "E" Supporting Documentation - Josephine County
- "F" Supporting Documentation - Columbia County

TJO:l
229-6218
May 20, 1981
XL322 (1)

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

In the Matter of the Amendment) Notice of Proposed
to Rule OAR 340-71-100 to 71-600) Adoption of Amendment
On-Site Sewage Disposal) to OAR 340-71-100 to 71-600
) On-Site Sewage Disposal

1. Public hearings will be held on June 16, 1981, at 10 a.m., at the locations shown below to consider the adoption of amendments to OAR 340-71-100 to 71-600, On-Site Sewage Disposal Rules:

<u>Portland</u>	<u>Grants Pass</u>	<u>St. Helens</u>
Dept. of Environmental Quality Conference Room 1400 522 S.W. Fifth Avenue	Josephine County Health Dept. Room 203 714 N.W. "A" Street	Old Circuit Court Room Old County Courthouse
	<u>Bend</u>	
	State Office Building Suite 360 700 S.E. Emigrant	State Office Building Conference Room 2150 N.E. Studio Road

2. The proposed rule amendments will adjust the general fee schedule in the rules to reflect increased costs due to inflation as well as increased inspectional costs for some new alternative systems. In addition, new fee schedules for Multnomah, Josephine and Columbia Counties will be considered. Several housekeeping rule amendments will be considered as well.
3. The issues are whether the new general fee schedule should be authorized, whether the Multnomah, Josephine and Columbia County proposed fee schedules are appropriate and whether the proposed housekeeping amendments are appropriate.
4. Interested persons may present testimony orally or in writing at the hearing or in writing to the Department of Environmental Quality, Attn: Jack Osborne, P.O. Box 1760, Portland, Oregon 97207, not later than June 16, 1981.
5. These proposed rule amendments have been identified as not affecting land use.
6. Citation of statutory authority, statement of need, principal documents relied upon and statement of fiscal impact, are filed with the Secretary of State.
7. A Department of Environmental Quality staff member or an Environmental Quality Commission hearing officer will be named to preside over and conduct the hearings.

Date: June 1, 1981

William H. Young, Director
Department of Environmental Quality

BEFORE THE ENVIRONMENTAL QUALITY COMMISSION
OF THE STATE OF OREGON

In the Matter of Amendment) Statutory Authority,
to Rule OAR 340-71-100 to 71-600) Statement of Need,
On-Site Sewage Disposal) Principal Documents Relied Upon
) and Statement of Fiscal Impact

1. Citation of Statutory Authority: ORS 454.625, which requires the Environmental Quality Commission to adopt rules pertaining to On-Site Sewage Disposal.
2. Need for Rule: The Department of Environmental Quality as well as Multnomah, Josephine and Columbia County require an increase in fees for permits and services in the on-site sewage disposal program in order to carry on an efficient level of service. In addition, some minor housekeeping amendments are necessary to provide smoother administration of the on-site rules.
3. Documents Relied Upon in Proposal of the Rule Amendments:
 - a. Letter from Josephine County with attached documentation on fees, dated March 16, 1981.
 - b. Letter from Multnomah County with attached documentation on fees, dated April 10, 1981.
 - c. Letter from Columbia County with attached documentation on fees, dated April 29, 1981.

These documents may be viewed at Department of Environmental Quality, 522 S.W. Fifth, Portland, Oregon, or at the offices of the three affected counties.
4. Fiscal and Economic Impacts: Fiscal and economic impacts would affect persons applying for a permit or service under the statewide rules for on-site sewage disposal. Generally such applicants would pay an increased fee for a permit or service. In addition, the new fee schedules will result in additional revenue for the Department and Contract Counties to use for program operation.

Date: June 1, 1981

William H. Young, Director
Department of Environmental Quality

XL322.B (1)

PROPOSED ON-SITE RULE AMENDMENTS

Amend OAR 340-71-140 as follows:

340-71-140 Fees-General.

- (1) Except as provided in Section [3] (5) of this rule, the following nonrefundable fees are required to accompany applications for site evaluations, permits, licenses and services[:] provided by the Department.

ON-SITE	MAXIMUM
<u>SEWAGE DISPOSAL SYSTEMS</u>	<u>FEE</u>
(a) New Site Evaluation:	
<u>Residential Lot:</u>	
- First Lot.....	[120] \$ <u>135</u>
- Each Additional Lot Evaluated While On-site.....	[100] <u>110</u>
Commercial Facility System: [for Each 1200 Gallons	
Projected Daily Sewage Flow or Part Thereof.....	120]

- <u>For First 1000 Gallons Projected Daily</u>	
<u>Sewage Flow</u>	<u>135</u>
- <u>Plus For Each 500 Gallons Above 1000 Gallons</u>	<u>40</u>
Evaluation Denial Review	[25] <u>50</u>

- (A) Fees for site evaluation applications made to an agreement county shall be in accordance with that county's fee schedule.

- (B) Each fee paid entitles the applicant to as many site inspections on a single parcel or lot as are necessary to determine site suitability for a single system. The applicant may request additional site inspections within 90 days of the initial site evaluation, at no extra cost.

- (C) Separate fees shall be required if site inspections are to determine site suitability for more than one system on a single parcel of land.

(b) Construction Installation Permit

Standard On-Site System [40] 50

Alternative Systems:

Sand Filter [40] 130

Capping Fill [40] 90

Holding Tank [40] 90

Pressure Distribution System 90

Tile Dewatering System 90

Other [40] 50

Commercial Facility System, Plan Review, [For Each 1200

Gallons Daily Sewage Flow, or Part Thereof 40]

- For First 1000 Gallons Projected Daily Sewage Flow 50

- Plus For Each 500 Gallons Above 1000 Gallons 10

Commercial Facility System, Permit, [for each 1200

Gallons Daily Sewage Flow, or Part Thereof..... 40]

For First 1000 Gallons Projected Daily Sewage Flow 50

Plus For Each 500 Gallons Above 1000 Gallons 10

NOTE: Fees for Construction Permits for systems with projected daily sewage flows greater than 5,000 gallons shall be in accordance with the fee schedule for WPCF permits.

Permit Denial Review [25] 50

Construction-Installation Permit Renewal

If Field Visit Required [25] 50

No Field Visit Required 10

(c) Alteration Permit [40] 50

(d) Repair Permit 25

(e) Authorization Notice:

If Field Visit Required [40] 50

No Field Visit Required 10

(f) Annual Evaluation of Alternative System

(Where Required) [40] 50

(g) Annual Evaluation of Large System (2501 to 5000 GPD)...	[40]	<u>50</u>
(h) Annual Evaluation of Temporary Mobile Home.....	[25]	<u>50</u>
(i) Variance to On-Site System Rules		225

An applicant for a variance is not required to pay the application fee, if at the time of filing, the owner:

- (A) Is 65 years of age or older; and
- (B) Is a resident of the State of Oregon; and
- (C) Has an annual household income, as defined in ORS 310.630, of \$15,000 or less.

(j) Rural Area Variance to Standard Subsurface Rules		
Site Evaluation	[120]	<u>135</u>
Permit	[40]	<u>50</u>

In the event there is on file a site evaluation application for that parcel that is less than ninety (90) days old, the above site evaluation fee shall be waived.

(k) Sewage Disposal Service:

Business License 100

Pumper Truck Inspection, Each Vehicle 25

(l) Experimental Systems:

Permit 100

(2) Contract County Fee Schedules.

Pursuant to ORS 454.745(4), fee schedules which exceed maximum fees in ORS 454.745(1), and Section (1) of this rule are established for Contract Counties as follows:

(a) Lane County (set forth in Appendix K).

(b) Clackamas County (set forth in Appendix L).

(c) Josephine County (set forth in Appendix M).

(d) Multnomah County (set forth in Appendix N).

(e) Columbia County (set forth in Appendix O).

(3) Contract County Fee Schedules, General.

(a) Each county having an agreement with the Department under ORS 454.725 shall adopt a fee schedule for services rendered and permits and licenses to be issued.

(b) A copy of the fee schedule and any subsequent amendments to the schedule shall be forwarded to the Department.

(c) Fees shall not:

(A) Exceed actual costs for efficiently conducted services; or

(B) Exceed the maximum established in Section (1) of this rule, unless approved by the Commission pursuant to ORS 454.745(4).

(4) Surcharge. In order to offset a portion of the administrative costs of the statewide on-site sewage disposal program, a surcharge for each activity, as set forth in the following schedule, shall be levied by the Department and by each Agreement County. Proceeds from surcharges collected by the Department and Agreement Counties shall be accounted for separately and forwarded to the Department on a monthly basis.

<u>Activity</u>	<u>Surcharge</u>
<u>(a) Site evaluation, per lot or</u> <u>for each 1,000 gallons projected</u> <u>daily sewage flow up to 5,000</u> <u>gallons for commercial facilities</u>	<u>\$14</u>
<u>(b) New construction permit, each standard</u> <u>system</u>	<u>\$ 5</u>
<u>(c) New Conservation Permit,</u> <u>Alternative Systems:</u>	

<u>(A) Sand Filter</u>	<u>\$13</u>
<u>(B) Capping Fill</u>	<u>9</u>
<u>(C) Holding Tank</u>	<u>9</u>
<u>(D) Pressure Distribution System</u>	<u>9</u>
<u>(E) Tile Dewatering System</u>	<u>9</u>
<u>(F) Other</u>	<u>5</u>

[3] (5) The Agent may refund a fee accompanying an application [for a construction-installation permit, site evaluation report, or variance], if the applicant withdraws the application before the agent has done any field work or other substantial review of the application.

NOTE: Underlined ___ material is new.

Bracketed [] material is deleted.

XA21 (1)

5/19/81

Amend OAR 340-71-290(3) as follows:

(3) Sites Approved for Sand Filter Systems. Sand filters may be permitted on any site meeting requirements for standard subsurface sewage disposal systems contained under OAR 340-71-220, or where disposal trenches (including shallow subsurface irrigation trenches) would be used, and all the following minimum site conditions can be met:

(a) The highest level attained by temporary water would be: [eighteen (18) inches or more below ground surface; or twelve (12) inches or more below the natural ground surface where slopes are twelve (12) percent or less, and either a pressurized distribution system or a capping fill constructed pursuant to Section 340-71-265(3) and Subsections 340-71-265(4) (a) through (c) is used. Temporary groundwater levels shall be determined pursuant to methods contained in Subsection 340-71-220(2) (b).]

(A) Twelve (12) inches or more below ground surface where gravity equal distribution trenches are used. Pressurized distribution trenches may be used to achieve equal distribution on slopes up to twelve (12) percent; or

(B) Twelve (12) inches or more below ground surface on sites requiring serial distribution where distribution trenches are covered by a capping fill; provided trenches are excavated twelve (12) inches into the original soil profile, slopes are twelve (12) percent or less, and the capping

fill is constructed according to provisions under Section 340-71-265(3) and Subsections 340-71-265(4) (a) through (c).
A construction-installation permit shall not be issued until the fill is in place and approved by the Agent, or

(C) Eighteen (18) inches or more below ground surface on sites requiring serial distribution where standard serial distribution trenches are used.

(b) The highest level attained by a permanent water table would be equal to or more than distances specified below:

XL351 (1)

5/4/81

Amend OAR 340-71-305(3) as follows:

- (3) No permit shall be issued for the installation of any other sand filter which in the judgment of the Department would require operation and maintenance significantly greater than the conventional sand filter unless [responsibility] arrangements for system operation and maintenance [is vested in a municipality as defined in ORS 454.010(3) which the Department determines to have adequate resources to carry out such responsibility, unless other arrangements] meeting the approval of the Director have been made which will ensure adequate operation and maintenance of the system. Each permitted installation may be inspected by the Agent [or responsible public entity] at least every twelve (12) months and checked for necessary corrective maintenance. An annual system evaluation fee shall be assessed.

NOTE: Underlined ___ material is new.

Bracketed [] material is deleted.

Amend OAR 340-71-325(1) and (2) as follows:

340-71-325 Gray Water Waste Disposal Sumps.

(Diagrams 14 and 15)

- (1) For the purpose of these rules "gray water waste disposal sump" means a series of receptacles designed to receive hand-carried gray water for disposal into the soil.
- (2) Criteria for Approval.
 - (a) Hand-carried gray water may be disposed of in gray water waste disposal sumps which serve facilities such as recreation parks, camp sites, seasonal dwellings, or construction sites [which do not have running water piped into the units] where the daily gray water flow does not exceed ten (10) gallons per unit. Gray water or other sewage shall not be piped to the gray water waste disposal sump. Where daily sewage flow exceeds ten (10) gallons per unit gray water shall be disposed of in facilities meeting requirements of OAR 340-71-320(2)(b).

NOTE: Underlined ___ material is new.

Bracketed [] material is deleted.

a

XA21 (1)

Amend OAR 340-71-160 by adding a new section (9) as follows:

(9) A permit issued pursuant to these rules shall be effective for one (1) year from the date of issuance and is not transferrable.

NOTE: Underlines __ material is new.
Bracketed [] material is deleted.

XL370 (1)

TABLE 4

Minimum length of disposal trench (linear feet) required per one hundred fifty (150) gallons projected daily sewage flow determined from soil texture versus effective soil depth.

<u>EFFECTIVE</u> <u>SOIL</u> <u>DEPTH</u>	<u>SOIL GROUP *</u>		
	A	B	C
18" to Less than 24"	125	150	175
24" to Less than 36"	100	125	150
36" to less than 48"	75	100	125
48" or more	[75] <u>50</u>	75	125

- * Soil Group A Sand, Loamy Sand, Sandy Loam
- Soil Group B Sandy Clay Loam, Loam, Silt Loam, Silt, Clay Loam
- Soil Group C Silty Clay Loam, Sandy Clay, Silty Clay, Clay

TABLE 5

Minimum length of disposal trench (linear feet) required per one hundred fifty (150) gallons projected daily sewage flow determined from soil texture versus depth to temporary groundwater.

<u>DEPTH</u>	24"			
<u>TO</u>	To Less Than 48"	100	125	150
<u>TEMPORARY</u>				
<u>GROUNDWATER</u>	48" or More	[75] <u>50</u>	100	125
		A	B	C
		<u>SOIL GROUP</u> *		

- * Soil Group A Sand, Loamy Sand, Sandy Loam
- Soil Group B Sandy Clay Loam, Loam, Silt Loam, Silt, Clay Loam
- Soil Group C Silty Clay Loam, Sandy Clay, Silty Clay, Clay

Amend OAR 340-71-275(5) (a) (A) (ii) as follows:

- (ii) Pipe friction shall be based upon a Hazen Williams coefficient of smoothness of [120] 150. All pressure lateral piping and fittings shall have a minimum diameter of two (2) inches unless submitted plans and specifications show a smaller diameter pipe is adequate. The head loss across a lateral with multiple evenly spaced orifices may be considered equal to one-third (1/3) of the head loss that would result if the entrance flow were to pass through the length of the lateral.

Amend OAR 340-71-290(3) (c) as follows:

- (c) Permanent water table levels shall be determined in accordance with methods contained in subsection 340-71-220(1) (d). Sand filters installed in soil as defined in Appendix A, 107, in areas with permanent water tables shall not discharge more than four hundred fifty (450) gallons of effluent per one-half (1/2) acre per day except where:

XG376 (1)

Josephine County Fee Schedule

(A)	New Site Evaluation - - - - -	\$75
(B)	Construction Installation Permit - - - - -	25
(C)	Repair Permit - - - - -	15
(D)	Alteration Permit - - - - -	40
(E)	Authorization Notice - - - - - (Hook Up)	15
(F)	Sand Filter Construction Permit - - - - -	120
(G)	Annual Evaluation of Sand Filter - - - - - (Where Required)	40
(H)	Capping Fill Construction Permit - - - - -	60

(I)	Holding Tank Construction Permit - - - - -	40
(J)	Plan Review - - - - -	25
(K)	Subdivision File Review - - - - -	15
(L)	Pumper Truck Inspection - - - - -	0
(M)	Annual Evaluation of Temporary Mobile Home - - - - -	25
(N)	Combined Domestic Water System Survey and Septic System Evaluation - - - - -	50
(O)	Individual Water Or Septic System Evaluation - - - - -	30

XA21 (1)

MULINOMAH COUNTY FEE SCHEDULE

(A) Septic Tank and Disposal Field's	
(i) New site evaluation, 1st lot	\$120.00
(ii) Each additional lot evaluation while on site	120.00
(B) Seepage Pits, Cesspools or Holding Tanks (New Site Evaluation)	
(i) Commercial site	120.00
(ii) Industrial site	120.00
(iii) Multiple residential site, 1st system	70.00
Each additional system	50.00
(iv) Single family residential site	70.00
(C) Construction Installation Permit	
(i) Standard septic tank/drainfield, with daily flow of 450 gallons per day maximum	65.00
(ii) Septic tank capping fill on disposal areas	75.00
(iii) Sand filter system	100.00
(iv) Septic tank/drainfield system in excess of 450 gallons per day Plus \$20.00 for each increment of 450 gal/day	65.00
(v) All alternative systems other than capping fill and sand filter systems	100.00
(vi) Cesspool	65.00
(vii) Cesspool excess of 20' of rings	100.00
(viii) Septic tank (maximum capacity 2500 gallons) and one 15' or 20' seepage pit	65.00
(ix) Septic tank (maximum capacity 2500 gallons) and two 15' x 20' seepage pits	100.00
(x) System with septic tank larger than 3000 gallons shall be prorated at increments of \$50.00/1000 gal. capacity. \$50.00 for each increment of 1000 gallons of capacity	100.00
(xi) Holding tank permits	100.00
(D) Alteration of septic tank and drainfield	40.00
(E) Extension of septic tank and drainfield	40.00
(F) Repair of septic tank and drainfield	40.00
(G) Inspection of sewage disposal pump truck	25.00
Each additional licensed truck on premises	10.00
(H) Evaluation of existing system adequacy	30.00
(I) Annual evaluation of alternative system (When required including holding tank)	40.00
(J) Annual evaluation of temporary mobile homes	25.00
(K) Abandonment of subsurface system	35.00

TJO:l
 XL349 ()
 April 17, 1981

340-71-140(2)(e)

COLUMBIA COUNTY FEE SCHEDULE

(A) New Site Evaluation:

First Lot - - - - -	\$ 120
East additional lot evaluated while on site- - - - -	100
Commercial Facility System, for each 1200 gallons projected daily sewage flow or part thereof - - - - -	120

(B) Construction Installation Permit:

Standard On-Site System- - - - -	65
Commercial Facility System, Plan Review, for each 1200 Gallon Daily Sewage Flow, of part thereof - - - - -	40
Commercial Facility System, Permit, for each 1200 Gallons Daily Sewage Flow, or part thereof - - - - -	40
Alternative Systems:	
Plan Review - - - - -	35
Sand Filter - - - - -	125
Capping Fill- - - - -	90
Holding Tank- - - - -	100
Low Pressure- - - - -	90

Construction Installation Permit Renewal:

If Field Visit Required - - - - -	25
No Field Visit Required - - - - -	10

(C) Alteration Permit- - - - - 40

(D) Repair - - - - - 25

(E) Authorization Notice

If Field Visit Required - - - - -	40
No Field Visit Required - - - - -	10

(F) Annual Evaluation of Alternative System (Where Required) - - - 40

(G) Annual Evaluation of Temporary Mobile Home - - - - - 25

(H) Rural Area Variance to Standard Subsurface Rules:

Site Evaluation - - - - -	120
Permit- - - - -	65

(I) Pumper Truck Inspection, Each Vehicle- - - - - 25

XL365 (1)
5/19/81

*by Young
Osborne***MULTNOMAH COUNTY OREGON**

OFFICE OF THE COUNTY EXECUTIVE
ROOM 136, COUNTY COURTHOUSE
PORTLAND, OREGON 97204
(503) 248-3308

DONALD E. CLARK
COUNTY EXECUTIVE

April 10, 1981

Mr. William H. Young, Director
Department of Environmental Quality
P. O. Box 1760
Portland, Oregon 97207

Dear Mr. Young:

Multnomah County, a contract county with the Department of Environmental Quality, in accordance with O.R.S. 454.745 (4), requests an amendment to current approved fees.

Multnomah County is performing minimum services efficiently and effectively, but has been unable to support service costs with existing fees. The extent of our inability to support service costs, since current fees were established, is evidenced in our quarterly reports.

Enclosed you will find the requested fee revisions along with statistical data and an explanatory narrative.

We will appreciate your forwarding this request to the Environmental Quality Commission for appropriate action.

Please advise Bill Whitfield, 248-3047, if any additional data is requested.

Sincerely,

Donald E. Clark
Donald E. Clark
County Executive

ljw

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
APR 14 1981

OFFICE OF THE DIRECTOR

MULTNOMAH COUNTY
DEPT. OF ENVIRONMENTAL SERVICES
PERMIT SECTION

SUBSURFACE SEWAGE PROGRAM
PERMIT FEE STATISTICAL DATA
APRIL 1981

NARRATIVE

- Page 1 & 2 : Provide a comparison between the existing and proposed subsurface permit fees. The requested fee increases reflect increases in installation and repair permits. This, we feel, is the area contributing most significantly to the program deficit.
- Page 3 : Provides the actual fees received from the existing fee schedule and fees anticipated from the proposed schedule. The period March 1980 to March 1981 was used because the existing fee schedule was put into effect in March of 1980.
- Page 4 : Sets forth the fiscal year program cost beginning July 1981. The program wage reflects a conservative break down of the percentage of total gross wage applicable to the subsurface program. Wages and direct services are derived from our 1981-82 budget. The direct materials and services comprise office supplies, communications, minor equipment, fuel, maintenance, etc. The indirect materials and service is established by the Office of County Management as a percentage of all direct budgeted items in the Department of Environmental Services. For this purpose we are using I.M.S. as a percentage of personnel costs only. The 19.6% I.M.S. covers the cost of space rental, automobile purchase, county counsel, payroll, insurance, etc.
- Page 5 : Indicates the subsurface activity volume for the last two years. Activity figures are obtained from in-house monthly reports, which contain information in more detail than required on quarterly reports. These figures should, however coincide with those activities shown on the D.E.Q. quarterly report form.

SUBSURFACE SEWAGE DISPOSAL
PERMIT FEE AMENDMENTS

<u>FEE SCHEDULE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
A. Septic Tank and Disposal Field's		
1. New site evaluation, 1st lot	\$120.00	\$120.00
2. Each additional lot evaluation while on site	120.00	120.00
B. Seepage Pits, Cesspools or Holding Tanks (New Site Evaluation)		
1. Commercial site	120.00	120.00
2. Industrial site	120.00	120.00
3. Multiple residential site, 1st system	70.00	70.00
Each additional system	50.00	50.00
4. Single family residential site	70.00	70.00
C. Construction Installation Permit		
1. Standard septic tank/drain field, with daily flow of 450 gallons per day maximum	40.00	65.00
2. Septic tank capping fill on disposal areas	40.00	75.00
3. Sand filter system	40.00	100.00
4. Septic tank/drain field system in excess of 450 gallons per day Plus \$20.00 for each increment of 450 gal/day	40.00	65.00
5. All alternative systems other than capping fill and sand filter systems	40.00	100.00
6. Cesspool	40.00	65.00
7. Cesspool excess of 20' of rings	40.00	100.00
8. Septic tank (maximum capacity 2500 gallons) and one 15' or 20' seepage pit	40.00	65.00
9. Septic tank (maximum capacity 2500 gallons) and two 15' X 20' seepage pits	40.00	100.00
10. System with septic tank larger than 3,000 gallons shall be pro-rated at increments of \$50.00/1000 gal. capacity. \$50.00 for each increment of 1,000 gallons of capacity.	40.00	100.00
11. Holding tank permits	40.00	100.00
D. Alteration of septic tank and drainfield	25.00	40.00
E. Extension of septic tank and drainfield	25.00	40.00
F. Repair of septic tank and drainfield	25.00	40.00
G. Inspection of sewage disposal pump truck	25.00	25.00
Each additional licensed truck on premises	10.00	10.00

H. Evaluation of existing system adequacy	30.00	30.00
I. Annual evaluation of alternative system (When required including holding tank)	40.00	40.00
J. Annual evaluation of temporary mobile homes	25.00	25.00
K. Abandonment of subsurface system	35.00	35.00

SUBSURFACE SEWAGE PERMIT REVENUE

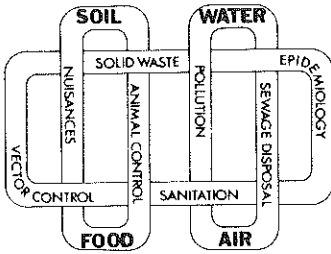
Activity	EXISTING FEE ACTUAL INCOME MAR. 80 to Mar. 81	PROPOSED FEE PROJECTED INCOME F.Y. 1981-82
Site evaluation	\$36,505	\$36,505
Construction permit (new)	38,175	62,034
Construction permit (Repl.)	1,300	2,080
F.H.A. - V.A.	10,770	10,770
Abandonment	15,380	15,380
Alternative systems	400	1,000
Holding tanks	0	(est.) 1,000
Pumper Truck inspection	400	400
Total	<u>\$102,930</u>	<u>\$129,169</u>

1981-82 F.Y. SUBSURFACE PROGRAM
FINANCIAL ANALYSIS

NAME	PERCENT OF TIME	GROSS ANNUAL WAGE	PROGRAM WAGE
Chinn	100	\$35,202.00	\$35,202.00
Stupey	100	29,024.88	29,024.88
Crawford	100	25,284.46	25,284.46
McVeigh	50	18,881.66	9,440.83
Baker	5	22,091.40	1,104.57
Schumacher	10	22,404.36	2,240.44
Whitfield	10	42,108.88	4,210.89
Total Gross Wages Paid			\$106,508.07
Direct Materials and Service 10% G.W.			10,650.81
Indirect Materials and Service 19.6% G.W.			20,875.56
Total Subsurface Program Operating Cost			\$138,034.44

SUBSURFACE PERMITS
TWO YEAR ACTIVITY RECORD

ACTIVITY	APR-JUN '79	JUL-SEP '79	OCT-DEC '79	JAN-MAR '80	APR-JUN '80	JUL-SEP '80	OCT-DEC '80	JAN-MAR '80
PERMITS ISSUED		Start Aug. 190	223	228	246	227	223	238
OFFICE CONSULT	2,437	2,245	2,083	2,203	2,136	1,418	2,118	2,430
S.T.& D.F. INSP	36	54	45	18	38	39	27	30
C.& S.P. INSP	282	288	180	201	232	127	242	279
RECHECK ON SYST	75	48	56	39	53	37	48	46
EVAL EXIST SYST	190	134	107	107	107	73	90	66
COMPLAINTS INVEST	109	74	44	54	70	62	47	54
SYST PLAN REVIEW	809	525	651	497	391	330	404	526
FEASIBILITY STUDY	62	68	39	55	35	39	36	56
ABANDONMENT INSP				Start Mar. 45	132	101	95	91
SUPPORT SERV MEET	241	208	110	139	182	87	144	142



JOSEPHINE COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH SERVICES

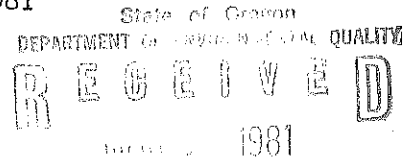
Mailing *Josephine County Court House*
 Address: *Grants Pass, Oregon 97526*

Telephone: **474-5431 or 474-5432**

Location: *317 N.W. "B" Street*

C. William Olson, M.P.H.
 Health Department Administrator

March 16, 1981



Jack Osborne
 P. O. Box 1760
 Portland, OR 97207

Re: Fee Revision Request

WATER QUALITY CONTROL

Dear Jack:

Enclosed please find justification and cost analysis for raising Sand Filter and Capping Fill fees above the statutory limitation of \$40.00. This justification was presented before the Josephine County Board of Health on Friday, February 27, 1981, and unanimous approval was given for the following fees:

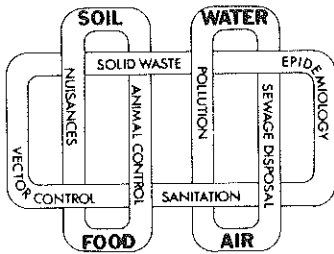
	<u>Current Fee</u>	<u>Proposed Fee</u>
Sand Filter	\$ 40.00	\$ 120.00
Capping Fill	40.00	60.00
Plan Review Fee	-0-	25.00
Subdivision File Review Fee	-0-	15.00
Alteration Permit	15.00	40.00

I understand the Environmental Quality Commission (EQC) must review these fees due to the fact that they exceed the legal limit. I respectfully submit these fees for EQC review.

Sincerely,

Charles D. Costanzo, R.S.
 Director
 Environmental Health Services

CDC:fa
 ENC.



JOSEPHINE COUNTY HEALTH DEPARTMENT
ENVIRONMENTAL HEALTH SERVICES

Mailing *Josephine County Court House*
 Address: *Grants Pass, Oregon 97526*

Telephone: 474-5431 or 474-5432

Location: 317 N.W. "B" Street

C. William Olson, M.P.H.
 Health Department Administrator

FEE REVISION REQUEST FOR SAND FILTER AND CAPPING FILL SEWAGE SYSTEMS

It has become evident that the \$40.00 alternative system fee now required by law does not come close to covering costs of doing inspections for Sand Filter and Capping Fill sewage disposal systems. At this time, our office recoups about 25 percent of the cost of inspecting the Sand Filter and 49 percent of the cost of the Capping Fill inspections.

The cost analysis (Pages 3,4,&5) shows the cost of a Sand Filter inspection to be \$163.94 and the Capping Fill costs to be \$81.30. The reason these costs are higher than a Conventional System inspection is due to the numerous construction inspections that are required. A conventional septic system usually requires only one inspection to approve the installed system. A completed Sand Filter system requires from six to ten inspections and a Capping Fill requires at least four inspections in order to insure correct construction.

In keeping with the philosophy of 75 percent reimbursement of the costs which the Board of Health agreed upon in setting fees in 1979, the costs for Sand Filter inspections would be \$121.22 and Capping Fill inspections \$60.98, therefore, I recommend the following fee adjustments:

Sand Filter	\$120.00 Permit Fee
Capping Fill.	\$ 60.00 Permit Fee

Additional alternative systems will be approved in February. We will continue to charge a \$40.00 fee for these systems until we have evidence that it costs the county more to do the inspections.

PLAN REVIEW FEE:

There are instances when an individual has a site approved for a Sand Filter or Capping Fill but does not want to buy a permit, however, this individual wants to guarantee a potential buyer that a site can be developed with a specific house, well, and driveway location approved.

Site Visit, Plan Review. . .	\$17.55 (data from pgs. 3 & 4 used)
Fringes (25 percent)	4.39
	21.94
Secretarial time	3.00
Travel time.	2.27
	\$27.21

I thus recommend a Plan Review fee of \$25.00.

Fee Revision Request - Continued:

OTHER COUNTIES:

Lane County has set their fees as follows:

Sand Filter \$125.00 Permit Fee
Capping Fill. . . . 90.00 Permit Fee
Plan Review : 35.00 Fee

In a questionnaire sent around the state, various counties responded as to time and cost required to perform Sand Filter and Capping Fill inspections:

	<u>Process Time Required</u> <u>(Survey)</u>	<u>Cost</u> <u>(Survey)</u>	<u>Process Time</u> <u>Josephine Co.</u>	<u>Cost</u> <u>Josephine Co.</u>
Sand Filter	6 - 9½ hours	\$120.25 - \$194.25	*9½ hours	\$163.94
Capping Fill	6 - 9½ hours	\$120.25 - \$130.25	5¼ hours	\$ 81.30

*Note: Josephine County Environmental Health Services office, rather than the Building Department, inspects the Sand Filter container and we are the only county in the state to do this. This inspection adds one hour to the total inspection time and allows the applicant to get by without buying an extra permit.

ENVIRONMENTAL QUALITY COMMISSION REVIEW (EQC):

If the county approves a fee in excess of the legal limit of \$40.00 established by ORS 454.745, the EQC must hold a public hearing and formally adopt these fees.

NUMBER OF PERMITS ISSUED - 1980

	<u>Permits Issued</u>	<u>Completed Systems Installed</u>
Sand Filters	18	2
Capping Fills (Since July)	13	2

- 1) Assumes site feasibility complete as a separate action.
- 2) Assume an average time of field efforts, including travel time.= 60 min.

Average Time For One (1) Field Visit = 60 min.

<u>Activity</u>	<u>SAND FILTER</u>		Personnel Involved (ie, San., Eng., Soil Sci., Sec., etc.)
	Time DEQ Office	Field	
1) Permit Application	20 min		Secretary
2) Permit Design Review (Secretary-5 min, San. 10 min)	15 min		Secretary, Sanitarian
3) Permit Issuance	20 min		Sanitarian
4) Construction Inspection			
(A) Structure for Filter		60 min	
(B) Piping, Dosing Chamber, Septic Tank, Pressure Dist., Filter Bed and Disposal Trenches (6 insp)		360 min	Sanitarian, Soil Scientist
(C) Final Cover Sand Filter and Disposal Trench		60 min	
5) Certificate of Completion Issued	0	---	Sanitarian
6) Record Filing, Capping Fill	25 min	120 min	Secretary, Sanitarian
<u>Total Time:</u>	Secretary	50 min	
	Sanitarian	10 hrs. 30 min	
	Soil Scientist	45 min	

<u>CAPPING FILL</u>			
1) Permit Application	15 min		Secretary
2) Application Design Review (Secretary 5 min, San 10 min)	15 min		Secretary, Sanitarian
3) Permit Issuance	20 min		Sanitarian
4) Construction Inspection			
(A) Site Preparation		60 min	Sanitarian, Soil Scientist
(B) Fill Construction, Disposal Trench Construction		60 min	
(C) Final Cover		60 min	
5) Certificate of Completion Issued		60 min	Sanitarian
6) Record Filing	25 min		Secretary
<u>Total Time:</u>	Secretary	45 min	
	Sanitarian	4 hrs. 30 min	

COST ANALYSIS

Personnel Time

SAND FILTER:

Secretarial Time	----- 50 min x \$6.85/hr	= \$ 5.71	5.71
Sanitarian Time	-----*=10 hrs 30 min x \$11.70/hr	=* \$122.85	**\$ 99.45
Soil Scientist Time	----- 45 min x \$13.84/hr	= \$ 11.49	11.49
		<u>\$140.05</u>	<u>\$116.65</u>
Add 25% for fringe benefits	-----	\$ 35.01	29.16
		* \$175.06	**\$145.81

- * Above assumes a capping fill system -- \$175.06 (10 hrs. 30 min)
- ** Without capping fill -----(\$145.81) (8 hrs. 30 min)

CAPPING FILL:

Secretarial Time	-----45 min x \$6.85/hr	= \$ 5.14
Sanitarian Time	----- 4 hrs, 30 min x \$11.70/hr	= <u>\$52.65</u>
		\$57.79
Add 25% for fringe benefits	-----	<u>\$14.45</u>
		\$72.24

VEHICLE EXPENSE

<u>VEHICLE</u>	<u>COST/MILE (1979-1980 FY)</u>
039	.11
595	.11 = Average \$.1133/mile
683	.12

Assume 20 miles average travel distance round trip.

SAND FILTER

Total Costs

20 mile round trip x 8 inspections = 160 miles x \$.1133 = \$18.13

\$145.81 (see page 4)

18.13

\$163.94 (Sand filter permit issuance and inspection costs)

*Total Costs SAND FILTER = \$163.94

CAPPING FILL

Total Costs

20 miles x 4.5 inspections = 90 miles x \$.1133 = \$9.06

\$72.24 x \$ 9.06 = * \$81.30 (Capping Fill permit issuance and inspection costs)

* Total Costs CAPPING FILL = \$81.30

*NOTE: Above costs do not include capital outlay costs such as trucks, equipment and other miscellaneous costs.

FEE REVISION REQUEST FOR ALTERATION PERMITS

Alteration Permits are for sewage systems that people want to alter to accommodate a larger sewage flow. For example, a small restaurant wants to expand, which requires additional septic system to accommodate the extra sewage load. To issue this permit requires at least one field visit to examine test holes and determine if the site is suitable for the proposed expansion. In addition, a field visit will be required to examine the installed system to insure construction compliance with codes.

Approximate Cost

Two field visits\$ 23.40	(data from pgs. 3 & 4 used)
Secretarial time	5.71	
Travel time.	4.53	(data from pg. 5 used)
Fringe benefits.	<u>7.20</u>	
	\$ 40.84	

I recommend we charge a \$40.00 Alteration Permit Fee which is the maximum allowed by law for this type of permit.

REQUEST FOR FILE REVIEW FEE

The Environmental Health Services office is constantly being requested to submit septic system information to the State Real Estate Division for current and past Land Partitionings that meet the Real Estate Division criteria for a subdivision. The secretaries and sanitarians must search the files for past septic installations and determine which system goes to each lot. This fee would not be used in cases where the applicant has already paid for Site Evaluations.

I recommend a \$15.00 File Review Fee. This fee is in keeping with the existing fee for Hook-up Permits where, in some cases, a field visit is not required.

SUMMARY

To summarize, the following fee adjustments are being recommended by the Environmental Health Services office:

	<u>Proposed Fee</u>	<u>Current Fee</u>
Sand Filter Permit Fee\$ 120.00	\$ 40.00
Capping Fill Permit Fee.	60.00	40.00
Plan Review Fee.	25.00	-0-
Alteration Permit Fee.	40.00	15.00
File Review Fee.	15.00	-0-

COLUMBIA COUNTY SUBSURFACE SEWAGE

COURTHOUSE - ROOM 130A

ST. HELENS, OREGON 97051

Phone 397-0592

April 29, 1981

Jack Osborne
Department of Environmental Quality
P.O. Box 1760
Portland, Oregon 97207

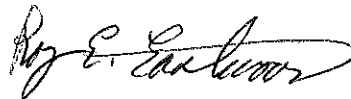
Re: SS - Fee Revision Request

Dear Jack:

Enclosed are justification and cost analysis for fees in excess of the statutory limitation of \$40.00 for permits. The enclosed fee schedule was presented to the Columbia County Board of Commissioners on April 21, 1981 and received unanimous approval to become effective upon receiving Environmental Quality Commission approval.

A separate plan review fee will be charged in the event a person desires a review without obtaining a permit. Otherwise the time required for plan reviews is included in the permit fees.

Sincerely,



Roy E. Eastwood, R.S.
Columbia County Sanitarian

REE:vjk
Enclosures

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAY 1 1981

WATER QUALITY CONTROL

COLUMBIA COUNTY SUBSURFACE SEWAGE

COURTHOUSE - ROOM 130A
ST. HELENS, OREGON 97051
Phone 397-0592

FEE SCHEDULE

The following nonrefundable fees are required to accompany applications for Site Evaluations, Permits, Licenses and Services.

ON SITE SEWAGE DISPOSAL SYSTEMS	FEE		
New Site Evaluation:	Present	Proposed	Increase
First Lot _____	120	120	0
Each additional lot evaluated while on site _____	100	100	0
Commercial Facility System, for each 1200 gallons projected daily sewage flow or part thereof _____	120	120	0

Each fee paid entitles the applicant to as many site inspections on a single parcel or lot as necessary to determine site suitability for a single system. The applicant may request additional site inspections within 90 days of the initial site evaluation, at no extra cost.

Separate fees shall be required if site inspections are to determine site suitability for more than one system on a single parcel of land.

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
R E C E I V E D
MAY 1 1981

Construction Installation Permit	WATER QUALITY CONTROL		
Standard On Site System _____	40	65	25
Commercial Facility System, Plan Review, for each 1200 Gallon Daily Sewage Flow, or part thereof _____	40	40	0
Commercial Facility System, Permit, for each 1200 Gallons Daily Sewage Flow, or Part thereof _____	40	40	0
Alternative Systems			
Plan Review _____	0	35	35
Sand Filter _____	40	125	85
Capping Fill _____	40	90	50
Holding Tank _____	40	100	60
Low Pressure _____	40	90	50
Construction Installation Permit Renewal			
If Field Visit Required _____	25	25	0
No Field Visit Required _____	10	10	0

ON SITE SEWAGE DISPOSAL SYSTEMS	FEE Present	Proposed	Increase
Alteration Permit _____	40	40	0
Repair _____	25	25	0
Authorization Notice			
If Field Visit Required _____	40	40	0
No Field Visit Required _____	10	10	0
Annual Evaluation of Alternative System (Where Required) _____	40	40	0
Annual Evaluation of Temporary Mobile Home _____	25	25	0
Rural Area Variance to Standard Subsurface Rules			
Site Evaluation _____	120	120	0
Permit _____	40	65	25
Pumper Truck Inspection, Each Vehicle _____	25	25	0

COLUMBIA COUNTY SUBSURFACE SEWAGE

COURTHOUSE - ROOM 130A

ST. HELENS, OREGON 97051

Phone 397-0592

STANDARD ON SITE SYSTEM PERMIT

Work Load Break Down

A. Secretary	Time
1. Recieve Application	5 min.
2. Search file for approved site evaluation	10 min.
3. Review application for all necessary documentation	5 min.
4. Copy all documents (2 of each page) for applicant and contractor after plan review and signing of permit by Sanitarian	5 min.
5. Record and file Certificate of Satisfactory Completion	25 min.
Total	50 min.
B. Sanitarian -	
1. Review all documentation provided with application for adequacy. Verify presence or absence of any encumberances which might affect on site system.	20 min.
2. Review plot plan for accuracy, inclusion of all necessary requirements: (i.e. set backs from wells, property lines, streams, escarpments etc.) Site visit may be required to verify conditions as scaled on construction plan prior to permit issuance.	30 min.
3. Prepare permit detailing all parameters necessary for installation of the standard system and sign.	15 min.
4. Site inspection of installed system made to determine whether or not installation complies with permit requirements and to determine quality of workmanship as it would effect system function.	60 min.
5. (a) If deficiency found prepare corrections detailing the corrections to be made . (50% of systems require rechecks therefore ½ of 60 min. is used)	45 min.
(b) Final inspection made to determine compliance.	
Total	170 min.

COLUMBIA COUNTY SUBSURFACE SEWAGE

COURTHOUSE -- ROOM 130A

ST. HELENS, OREGON 97051

Phone 397-0592

ALTERNATIVE SYSTEMS

These are systems installed in areas which have varying degrees of limitations to the site which prevent utilizing a standard on-site disposal system.

Plan Review - office

- | | |
|---|-----------------|
| 1. The plan review in addition to a drainfield requires | 120 min. |
| a. Net hydrology analysis | |
| b. Pump sizing where required | |
| c. Dosing tank specification review | |
| d. Electrical review for alarms, pumps and switches. | |
| e. Review of a materials list for adequacy and compliance with code. | |
| f. Pipe sizing | |
| 2. Review of specification made by Sanitarian on the plan with applicant. | 30 min. |
| 3. Review of any corrections made on plans | 20 min. |
| 4. Approval of plans by Sanitarian | 10 min. |
| Total | <u>180 min.</u> |

Sand Filter - field

- | | |
|---|-----------------|
| 1. A minimum of 4 site inspections are required prior to Certificate of Satisfactory Completion issuance. | |
| a. Inspect septic tank, dosing tank and pressure transport pipe to sand filter. Correction Notice completed by Sanitarian | 60 min. |
| b. Inspect sand filter under drain and drainfield. Correction notice completed by Sanitarian. | 60 min. |
| c. Inspect filter material, pressure distribution pipe evaluate pumping cycles and application rates. Inspect for completion of all required corrections. | 90 min. |
| d. Inspect final cover of filter and drainfield. Issue Certificate of Satisfactory Completion. | 45 min. |
| Total | <u>255 min.</u> |

COLUMBIA COUNTY SUBSURFACE SEWAGE

COURTHOUSE - ROOM 130A

ST. HELENS, OREGON 97051

Phone 397-0592

ALTERNATIVE SYSTEMS

Capping Fill - Field

- | | |
|---|-----------------|
| 1. Evaluate, approve soil for cap on site. | 60 min. |
| 2. Inspect and evaluate adequacy for site preparation prior to receiving cap. | 60 min. |
| 3. Inspect drainfield and compliance. | 60 min. |
| 4. Final inspection of finished Cap cover and issue Certificate of Satisfactory completion. | 60 min. |
| Total | <u>240 min.</u> |

Holding Tank - Field

- | | |
|--|----------------|
| 1. Inspect Holding Tank and plumbing connections, antibouncy devices and availability for pumping. | 90 min. |
| 2. Inspect both visual and audible alarms. | 45 min. |
| 3. Final inspection - All corrections made, Issue Certificate of Satisfactory Completion. | 45 min. |
| 4. (a) If deficiency found prepare correction notice detailing the corrections to be made. | |
| (b) Final inspection made to determine compliance. | Total 180 min. |

Low Pressure - Field

- | | |
|---|-----------------|
| 1. Site inspection prior to installation of filter fabric. | 60 min. |
| a. evaluate pump, fittings, switches, drawn down prior to installation of rock cover. | |
| 2. Final inspection | 60 min. |
| Total | <u>120 min.</u> |

COLUMBIA COUNTY SUBSURFACE SEWAGE

COURTHOUSE - ROOM 130A

ST. HELENS, OREGON 97051

Phone 397-0592

Standard System & Rural Area Variance

	<u>Time</u>	<u>cost/hr.</u>		<u>Total</u>
Secretary	= 50 min.	@ 6.95	=	\$5.77
Sanitarian	= 2.78 hrs.	@13.79	=	38.38
				\$44.15
12% inflation	=			5.30
				\$49.45
30% overhead	=			14.83
			Total	\$64.25

Sand Filter

Secretary	= 1hr.*	@ 6.95	=	6.95
Sanitarian	= 7.25 hr.	@13.79	=	99.98
				\$106.93
12% inflation	=			12.83
				\$119.76
30% overhead	=			35.93
			Total	\$155.69

Capping Fill

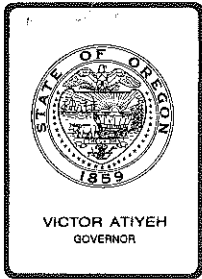
Secretary	= 1 hr.*	@ 6.95	=	6.95
Sanitarian	= 4 hr.	@ 13.79	=	55.16
				\$66.11
12% inflation	=			7.45
				\$73.86
30% overhead	=			22.16
			Total	\$96.02

* An additional 10 minutes has been allotted for Secretarial time due to a larger number of documents which must be duplicated.

<u>Holding Tank</u>		<u>Time</u>	<u>cost/hr.</u>		<u>Total</u>
Secretary	=	50 min.	@ 6.95	=	5.77
Sanitarian	=	3 hrs.	@ 13.79	=	41.37
					<u>\$48.37</u>
12% inflation	=				4.96
					<u>\$53.28</u>
30% overhead	=				15.98
				Total	<u>\$69.26</u>

Low Pressure

Secretary	=	50 min.	@ 6.95	=	5.77
Sanitarian	=	5 hrs.	@ 13.79	=	68.95
					<u>\$74.72</u>
12% inflation	=				8.96
					<u>\$83.68</u>
30% overhead	=				25.10
				Total	<u>\$108.78</u>



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. E, June 5, 1981, EQC Meeting

Request for Authorization to Hold a Public Hearing on
Housekeeping Modifications to Water Quality Related Rules,
OAR 340, Divisions 42, 43, 44, 45 and 52.

Background and Problem Statement

The Department is in the process of reviewing all rules pertaining to water quality control. Some are found to be out-of-date and redundant to other Department Rules. Others have housekeeping changes which need to be made in order for them to be consistent with other rules and policies.

The Department is desirous of cleaning up the rules and making as many of the changes that can logically fit into one rulemaking procedure. In addition to making minor modifications to Division 44, 45, and 52, two divisions, Divisions 42 and 43, need to be repealed since they are out-of-date and no longer applicable.

Discussion and Evaluation

The following rule changes are proposed. The exact changes are shown in Attachment 2.

Division 42 - Plant Operation

This entire division needs to be repealed. It was adopted in 1956 before we had a permit program. Now individual permits address all points covered by this regulation.

Division 43 - Disposal of Industrial Wastes

This entire division needs to be repealed. It was adopted in 1950. With the permit rules and the Confined Animal Feeding or Holding Operations rules, the Division 43 rules are unnecessary.

Division 44 - Construction and Use or Waste Disposal Rules

340-44-015(7) This section does not allow a structure which has been served by a waste disposal well and subsequently destroyed by fire or other calamity to be rebuilt, and continue the use of the waste disposal well. The Department proposes to allow for the continued use of a waste disposal well for a replacement structure under certain restrictive conditions.

Division 45 - Regulations Pertaining to NPDES and WPCF Permits

340-45-010(5) The definition of "Disposal System" presently excludes subsurface sewage disposal systems and alternate systems as defined in the subsurface rules. The definition will be changed to exclude only those on-site systems of 5,000 gallons per day or less. This will mean that those large systems over 5,000 gallons per day will be required to have a WPCF permit. This is consistent with the new On-Site Sewage Disposal Rules.

340-45-010 Add a definition of "General Permit". This is necessary since we now have a section on general permits in Division 45.

340-45-035(4) EPA's consolidated permit rules have redefined which facilities are required to have a fact sheet available as part of the public participation process. Our rules need to be revised to reflect these changes.

340-45-035(5) Our rules require a permit applicant to comment on a draft permit within 14 days. Provision needs to be made to allow the applicant to request more time or to waive all or part of the 14 day review.

340-45-60 Present rules require all permit revocations or suspensions to be handled by certified mail. It is proposed to waive that requirement when the suspension or revocation comes as a result of a request from the permittee.

340-45-030 (Table 1) This table, which describes which permit applications need to be used, should be revised to address present requirements. Some NPDES applications have been revised by EPA and others are in the process of being revised. Present table is confusing since it is out-of-date.

Division 52 Review of Plans and Specifications

340-52-010(3) In order to separate those systems covered by the On-Site Sewage Disposal Rules, the definition of disposal system should be revised to exclude those on-site disposal systems of 5,000 gallons per day or less. Otherwise detailed plans and specifications on all on-site disposal systems would have to be submitted to the Department for review and approval. This is contrary to the procedures established by the on-site disposal system rules.

The purpose of this being brought before the Commission at this time is to request authorization to hold a public hearing on the proposed rule changes.

Summation

1. ORS 468.020 grants the Commission authority to adopt rules and standards as it considers necessary in performing the functions vested by law.
2. Periodically rules need to be revised or repealed as they fail to address current policy and procedure.
3. The Department is proposing certain housekeeping changes in Chapter 340 Divisions 44, 45 and 52.
4. The Department recommends Divisions 42 and 43 be repealed because they are redundant, unnecessary and do not necessarily relate to current policy.
5. The Department is prepared to schedule a public hearing in order to receive input on the proposed rule modifications and revocations.

Director's Recommendation

Based on the summation, the Director recommends that the Commission authorize the Department to hold a public hearing on the proposed change in the Water Quality Rules.

Bill

William H. Young

- Attachment 1: Statement of Need & Fiscal Impact
Attachment 2: Draft Rule Modifications
Attachment 3: Draft Public Notice

CKAshbaker:o
229-5325
4/27/81
WO756 (2)

ATTACHMENT 1

Agenda Item No. E , June 5, 1981, EQC Meeting

Statement of Need for Rulemaking

Pursuant to ORS 183.335(7), this statement provides information on the Environmental Quality Commission's intended action to modify or revoke rules.

(1) Legal Authority

ORS 468.020 authorizes the Commission to adopt such rules and standards as it considers necessary and proper in performing the functions vested by law.

(2) Need for a Rule

Some of the Commission's rules relating to water quality are redundant, out-of-date, or need minor corrections in order to relate to current policy and procedure. In their present form they can be misunderstood. The Department of Environmental Quality is proposing housekeeping changes in OAR Chapter 340 Divisions 44, 45 and 52. It is proposed that Divisions 42 and 43 be revoked because they are no longer necessary.

(3) Principal Documents Relied Upon in this Rulemaking

- a. ORS 468
- b. OAR Chapter 340 Divisions 42, 43, 44, 45, 52 and 71
- c. 40 CFR Parts 122, 123 and 124

Fiscal Impact of Rulemaking

Most of the proposed rule modifications and revocations are minor in nature and do not change current policy. They will have very little fiscal impact either on the Department or the public.

The only proposed rule change which might have a fiscal impact is the proposed change to OAR 340-44-015. The present rule would not allow a building served by a waste disposal well, and subsequently destroyed by fire or other calamity, to be rebuilt unless an acceptable alternate to the waste disposal well could be used for sewage disposal. This could place a financial hardship on the owner of the facility if it couldn't be rebuilt. The proposed rule change would allow the Department to authorize continued use of the disposal well for the rebuilt structure if no acceptable alternatives were available.

Some savings in postage costs can be realized by the Department if OAR 340-45-060 is modified to remove the certified mail requirement when the Director revokes or suspends a permit upon the request of the permittee.

CKA:o
229-5325
4/27/81
WO755 (2)

Changes in OAR Chapter 340 Divisions 42, 43, 44, 45

Division 42

Entire Division to be repealed

Division 43

Entire Division to be repealed

Division 44 Changes

340-44-015 (7) and (8)

(7) Without first obtaining a permit issued by the Director or his authorized representative, no person shall modify any structure or change or expand any use of a structure or property that utilizes a waste disposal well. A permit shall be a written document and, except as allowed in Section(8) of this rule shall not be issued [if] unless :

- (a) The property cannot qualify for a standard subsurface sewage disposal system including the reserve area requirement; and
- (b) The property is inside a designated, municipal sewer service area; and
- (c) The owner of the property and the municipality having jurisdiction over the municipal sewer service area shall enter into a written agreement. The agreement shall include the owner's irrevocable consent to connect to the municipal sewerage service when it becomes available and to not remonstrate against formation of and inclusion into a local improvement district if such a district is deemed necessary by the municipality to finance sewer construction to the property; and

- (d) The property is a single family dwelling that is not closer than one hundred (100) feet to a municipal sewerage system. (The proposed changes or expansion of the use of the waste disposal serving the single family dwelling shall not be for the purpose of serving a commercial establishment or multiple-unit dwelling); or
- (e) The property is not a single family dwelling, is not closer than 300 feet from a municipal sewerage system, and the proposed change or expansion of the user of the waste disposal well would not create an increased waste flow; or
- (f) The property is not a single family dwelling; existing sewer is not deemed available based upon the criteria established in Oregon Administrative Rules 340-71-015(5) and based upon the total average daily flow estimated from the property after the proposed modification or expansion of the use of the waste disposal well and a municipality has committed in writing to provide sewers to the property within two (2) years.

(8) The Director shall issue a permit to connect a replacement structure to a waste disposal well if:

- (a) The waste disposal well previously served a structure that was unintentionally destroyed by fire or other calamity; and

- (b) The property cannot qualify for a standard on-site sewage disposal system, including the reserve area requirement; and

- (c) There is no evidence that the waste disposal well had been failing; and

- (d) The replacement structure is approximately the same size as the destroyed structure and the use has not been significantly changed.

Division 45 Changes

340-45-010 (5) through (24)

(5) "Disposal system" means a system for disposing of wastes either by surface or underground methods, and includes sewerage systems, treatment works, disposal wells and other systems but excludes [subsurface sewage disposal systems and alternate systems as defined in OAR 340-71-010] on-site sewage disposal systems of 5000 gallons per day or less , and systems which recirculate without discharge.

(7) "General permit" means a permit issued to a category of qualifying sources pursuant to 340-45-033, in lieu of individual permits being issued to each source.

[(7)] (8) "Industrial Waste" means any liquid, gaseous, radioactive, or solid waste substance or a combination thereof resulting from any process of industry, manufacturing, trade or business, or from the development or recovery of any natural resources.

[(8)] (9) "NPDES Permit" means a waste discharge permit issued in accordance with requirements and procedures of the National Pollutant Discharge Elimination System authorized by the Federal Act and of OAR Chapter 340, rules 340-45-005 through 340-45-065.

- [(9)] (10) "Navigable Waters" means all navigable waters of the United States and their tributaries; interstate waters; intrastate lakes, rivers, and streams which are used by interstate travelers for recreation or other purposes or from which fish or shellfish are taken and sold in interstate commerce or which are utilized for industrial purposes by industries in interstate commerce.
- [(10)] (11) "Person" means the United States and agencies thereof, any state, any individual, public or private corporation, political subdivision, governmental agency, municipality, copartnership, association, firm, trust, estate, or any other legal entity whatever.
- [(11)] (12) "Point Source" means any discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged
- [(12)] (13) "Pollutant" means dredged spoil, solid waste, incinerator residue, sewage, garbage, sewerage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water.

- [(13)] (14) "Pre-treatment" means the waste treatment which might take place prior to discharging to a sewerage system including, but not limited to pH adjustment, oil and grease removal, screening, and detoxification.
- [(14)] (15) "Process Waste Water" means waste water contaminated by industrial processes but not including non-contact cooling water or storm runoff.
- [(15)] (16) "Public Waters" or "waters of the state" include lakes, bays, ponds, impounding reservoirs, streams, creeks, estuaries, marshes, inlets, canals, the Pacific Ocean within the territorial limits of the State of Oregon, and all other bodies of surface or underground waters, natural or artificial, inland, or coastal, fresh or salt, public or private (except those private waters which do not combine or effect a junction with natural surface or underground waters) which are wholly or partially within or bordering the state or within its jurisdiction.
- [(16)] (17) "Regional Administrator" means the Regional Administrator of Region X of the U.S. Environmental Protection Agency.
- [(17)] (18) "Sewage" means the water-carried human or animal waste from residences, building, industrial establishments, or other places, together with such ground water infiltration and surface water as may be present. The mixture of sewage as above defined with wastes

or industrial wastes, as defined in sections [(7)] (8) and [(22)] (23) of this rule, shall also be considered "sewage" within the meaning of these regulations.

[(19)] (20) "State" means the State of Oregon.

[(20)] (21) "Toxic Waste" means any waste which will cause or can reasonably be expected to cause a hazard to fish or other aquatic life or to human or animal life in the environment.

[(21)] (22) "Treatment" or "waste treatment" means the alteration of the quality of waste waters by physical, chemical, or biological means or a combination thereof such that the tendency of said wastes to cause any degradation in water quality or other environmental conditions is reduced.

[(22)] (23) "Wastes" means sewage, industrial wastes, and all other liquid, gaseous, solid, radioactive, or other substances which will or may cause pollution or tend to cause pollution of any waters of the state.

[(23)] (24) "WPCF permit" means a Water Pollution Control Facilities permit to construct and operate a disposal system with no discharge to navigable waters. A WPCF permit is issued by the Department in accordance with the procedures of OAR Chapter 340, rules 340-14-005 through 340-14-050.

340-45-035 (4) and (5)

- (4) [For every discharge which has a total volume of more than 500,000 gallons on any day of the year, the Department shall prepare a fact sheet which contains the following:
- (a) A sketch or detailed description of the location of the discharge;
 - (b) A quantitative description of the discharge, including the rate or frequency of the discharge;
 - (c) The tentative determination required under section 340-45-035(2);
 - (d) An identification of the receiving stream with respect to beneficial uses, water quality standards, and effluent standards;
 - (e) A description of the procedures to be followed for finalizing the permit; and
 - (f) Procedures for requesting a public hearing and other procedures by which the public may participate.]

A fact sheet shall be prepared for each draft NPDES permit for a major industrial facility and each NPDES general permit. In addition, a fact sheet shall be prepared for every industrial NPDES permit which incorporates a variance and for every draft permit which the Director

finds is the subject of widespread public interest or raises major issues. Fact sheets shall contain the following, where applicable:

(a) A brief description of the type of facility or activity;

(b) The type and quantity of wastes to be discharged;

(c) Applicable standards and guidelines used as a basis for effluent limits;

(d) An explanation of any proposed variances;

(e) A sketch, map, or detailed location of the discharge, where appropriate; and

(f) Information spelling out procedures for finalizing the permit and providing additional public input, including opportunity for public hearing.

- (5) After the public notice has been drafted and the fact sheet and proposed NPDES permit provisions have been prepared by the Department, they will be forwarded to the applicant for review and comment. All comments must be submitted in writing with 14 days after mailing of the proposed materials if such comments are to receive consideration prior to final action on the application [.] , unless the applicant requests additional time. The applicant may also waive his right for the 14 day review time in the interest of accelerating the issuance procedures.

- (1) In the event that it becomes necessary for the Director to suspend or revoke a NPDES permit due to non-compliance with the terms of the NPDES permit, unapproved changes in operation, false information submitted in the application, or any other cause, the Director shall notify the permittee by registered or certified mail of his intent to suspend or revoke the NPDES permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective 20 days from the date of mailing of such notice unless within that time the permittee requests a hearing before the Commission or its authorized representative. Such request for a hearing shall be made in writing to the Director and shall state the grounds for the request. Any hearing held shall be conducted pursuant to the regulations of the Department. The Director may suspend or revoke an NPDES without notification by registered or certified mail if the suspension or revocation is in response to a request for such from the permittee.
- (2) If the Department finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may, pursuant to applicable statutes, suspend or revoke a NPDES permit effective immediately. Notice of such suspension or revocation must state the reasons for such action and advise the permittee that he may request a hearing before the Commission or its authorized representative. Such request for a hearing shall be made in writing

to the Director within 90 days of the date of suspension and shall state the grounds for the request. Any hearing shall be conducted pursuant to the regulations of the Department.

TABLE I
(340-45-030)

PERMIT APPLICATION FORMS

<u>Category of Applicant</u>	<u>Application Forms to be Filed</u>
I. New application to construct, and operate a Disposal System which Discharges to public waters.	
A. Domestic Sewage Treatment System -	Consolidate Application ^{1/} Forms 1 and 2A
B. Concentrated Animal Feeding or Aquatic Animal Production Facility -	Consolidated Application Forms 1 and 2B
C. Manufacturing, Commercial, Mining - or Silvicultural Operation	Consolidated Application ^{2/} Forms 1 and 2D
II. New Application to construct and Operate a Disposal System which has no discharge to public waters -	WPCF - N (DEQ-WQ-1)
III. Renewal NPDES Application for Facilities Discharging to Public Waters	.
A. Domestic Sewage Treatment System, Concentrated Animal Feeding Operation, Aquatic Animal Production Facility, or MINOR manufacturing, commercial, mining or Silvicultural Operation -	NPDES - R (DEQ-WQ-3)
B. MAJOR manufacturing, commercial, mining or Silvicultural Operation -	Consolidated Application Forms 1 and 2C
IV. Renewal of All WPCF permits	WPCF - R (DEQ-WQ-2)
V. Application for Modification of an NPDES or WPCF permit -	Submit a letter detailing the requested modification. The Department may require additional information, analysis and/or application forms.

^{1/}
Form 2A not yet available from EPA. Until Form is available use Standard Form A (EPA Form 7550-22).

^{2/}
Form 2D not yet available from EPA. Until Form is available use Standard Form C (EPA Form 7550-23A).

Division 52 Changes

340-52-010 (3)

- (3) "Disposal system" means a system for disposing of wastes, either by surface or underground methods, and includes municipal sewerage systems, domestic sewerage systems except on-site sewage disposal systems of 5000 gallons per day or less, industrial and agricultural waste systems, treatment works, disposal wells and other systems.

ORS 468.700(1)

WA790 (2)

A CHANCE TO BE HEARD ABOUT:

Minor Changes in Water Quality Control Rules

The Department of Environmental Quality has selected a public hearing for July 9, 1981, to receive testimony regarding modification and revocation of certain water quality control rules. The hearing will be held at 10 a.m. in Room No. 1400 of the Yeon Building, 522 S.W. Fifth Avenue, Portland, Oregon.

WHICH RULES WILL BE REVOKED?

OAR 340 DIVISION 42 - "PLANT OPERATION" will be revoked. All of the things addressed by the rule are addressed more flexibly in an individual permit.

OAR DIVISION 43 - DISPOSAL OF INDUSTRIAL WASTES" will be revoked. These provisions are also better addressed in individual permits.

WHICH RULES WILL BE MODIFIED?

OAR 340-44-015 - will be modified to allow the Department to consider continued use of a waste disposal well for a new building which replaces one destroyed by fire or other calamity.

OAR 340-45-010(5) - The definition of "Disposal System" would be changed to exclude only those on-site subsurface systems of 5000 gallons per day or less. This would allow a WPCF permit to be required for facilities over 5000 gallons per day as currently required in the On-Site Sewage Disposal Rules.

OAR 340-45-010 - A definition of "General Permit" would be added to the rules.

OAR 340-45-035(4) - Will be modified to change fact sheet requirements to correspond more closely with federal regulations.

OAR 340-45-035(5) - Will be modified to allow the applicant to request more than 14 days for reviewing a draft permit or to allow the applicant to waive all or part of the 14 day review.

OAR 340-45-060 - Will be modified to allow the Director to suspend or revoke a permit without a certified mail notice if the suspension or revocation comes pursuant to a request from the permittee.

OAR 340-52-010(3) - Will be modified to exclude on-site sewage disposal systems from the plan review rules.

Table 1 at the end of Division 45 will be modified to reflect current application requirements and policy.

WHO IS AFFECTED BY THESE PROPOSED CHANGES?

These changes are primarily housekeeping in nature and don't have much impact on anyone. They will be more consistent and easy to follow by those regulated and easier to administer by the Department.

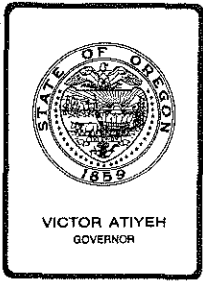
DOES THE PROPOSAL AFFECT LOCAL LAND USE PROGRAMS?

These rule changes will have no effect on local land use programs.

HOW TO PROVIDE YOUR INPUT

Testimony, either written or oral, will be accepted during the July 9 hearing. Written testimony will be accepted at any time between now and the close of the hearing record at 5 p.m., July 10, 1981. Written comments may be sent to Charles K. Ashbaker, Water Quality Division, P.O. Box 1760, Portland, Oregon 97207. He will also be happy to answer any questions or to provide you with a copy of the rule modifications.

WL762 (1)
4/28/81



Department of Environmental Quality

522 S.W. 5th AVENUE, BOX 1760, PORTLAND, OREGON 97207

MEMORANDUM

TO: Environmental Quality Commission

FROM: Director

SUBJECT: Agenda Item No. F, June 5, 1981, EQC Meeting

Vehicle Inspection Rules - Request for Authorization to Hold a Public Hearing to Amend Inspection Program Fee Structure.

Background and Problem Statement

Currently ORS 468.405 sets the maximum fee the department may charge to issue a Certificate of Compliance at \$5. This fee has been in effect since the vehicle inspection program first began issuing certificates in July, 1975. The EQC has not enacted any regulation establishing a fee structure for the vehicle inspection program.

On May 14, 1981, House Bill 2289 passed the Oregon House and was forwarded to the Senate for consideration. House Bill 2289 would amend ORS 468.405 to read, in part, as:

"The fee for the issuance of certificates shall be established by the commission in an amount based upon the costs of administering this program established in the current biennial budget. The fee for a certificate shall not exceed \$10."

An emergency clause is attached to the bill.

If this bill is enacted into statute, it will be necessary for the commission to hold a public hearing and set an inspection fee for the 1981-83 biennium. The existing \$5 certification fee will not be sufficient to support program operational cost during the 1981-83 biennium. The Governor's approved budget proposal provided for a \$6 fee. During House Committee considerations of the program budget, several additional cost factors were reviewed which would prudently require a \$7 certification fee if incorporated into the program budget.

The hearing proposed would be before the Commission. Copies of the proposed rule and the proposed Public Notice, Statement of Need and Fiscal Impact Statement are attached.

Evaluation and Alternatives

The following fiscal impact analysis has been prepared by the department.

FISCAL IMPACT ANALYSIS
MOTOR VEHICLE INSPECTION
1981-83 BUDGET

	<u>\$5 FEE</u>	<u>\$6 FEE</u>	<u>\$7 FEE</u>
Estimated Fund Balance 7-1-81	\$350,204	\$350,204	\$350,204
Certification Fee Revenue Forecast 81-83	\$2,685,950	\$3,223,140	\$3,760,330
Less: Exemption of 20-year-old cars	(104,165)	(125,000)	(145,831)
Indirect Cost Assessment 81-83	(431,921)	(431,921)	(431,921)
Indirect Cost Assessment Adjustment for 79-81 advance	(247,911)	(247,911)	(247,911)
Net Available Revenue	\$2,252,157	\$2,768,512	\$3,284,871
Operating Expenses	(\$2,649,146)	(\$2,649,146)	(\$2,649,146)
Motor Vehicle Division Reimbursement	(53,518)	(53,518)	(53,518)
Salary Increase Provision	(209,260)	(209,260)	(209,260)
Savings on exempt vehicles	<u>25,023</u>	<u>25,023</u>	<u>25,023</u>
Total Operating Expenses	(\$2,886,901)	(\$2,886,901)	(\$2,886,901)
End of Biennium Fund Balance/(Deficit)	(\$634,744)	(\$118,389)	\$397,970
Capital Construction/Beaverton Station	(\$212,900)	(\$212,900)	(\$212,900)
End of Biennium Fund Balance Carry Forward/(Deficit)	(\$847,644)	(\$331,289)	\$185,070

The forecasted certification fee revenue shown for the \$6 and \$7 fee structure is somewhat optimistic in that it is based upon any increase occurring at the start of the fiscal year. Approximately 15,000 certificates are projected to be issued each month during the July-September, 1981, time period. In anticipation of a fee increase, test volume may increase somewhat over these projections.

The bill to exempt 20-year-old vehicles from the testing requirements has passed both houses. Air quality impacts are very small due, in part, to the low annual mileage accumulated by such vehicles. The fiscal impact of the \$6 and \$7 fee structure is based upon any increase occurring at the start of the fiscal year.

The indirect cost assessment for FY 1981-83 is based upon the standard agency-wide rate. The FY 1979-81 assessment was based upon a lower rate. This funding advance for indirect cost assessments is shown as being repaid during FY 1981-83.

The reimbursement for the Motor Vehicle Division is for cost which they incur as a result of handling the certificates of compliance. This cost has not previously been assessed. The salary increase provision contains funds deemed prudent by the department's fiscal analyst to provide for salary increases during the biennium. The savings on exempt vehicles is that savings seen possible as a result of the 20-year-old vehicle exemption.


The inspection program service level in central Washington County is not acceptable and improvements need to be made. The City of Beaverton has provided a site for an acceptable facility. The construction cost for this facility is shown in the fiscal impact analysis.

Summation

1. House Bill 2289, if enacted, will require the Commission to establish the vehicle inspection program certification fee.
2. The existing \$5 certification fee is not sufficient to support program operational cost during the 1981-83 biennium.
3. There has been no certification fee change since 1975.
4. A \$7 certification fee provides sufficient funds to cover program operational cost and capital construction needs during the 1981-83 biennium.

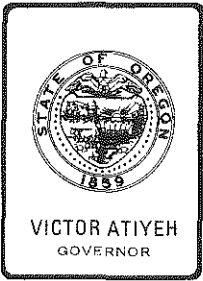
Director's Recommendation

Based upon the summation, the Director recommends that the Commission authorize the Department to schedule a public hearing before the Commission at the July 17, 1981, meeting to amend the vehicle inspection program rules to establish a fee structure which includes a \$7 certification fee.


for
William H. Young

- Attachment 1: Proposed motor vehicle inspection program fee schedule.
- Attachment 2: Proposed Notice of Public Hearing.
- Attachment 3: Statement of Need and Fiscal Impact Statement.

Ron Householder
229-6200
5/22/81



Department of Environmental Quality

522 SOUTHWEST 5TH AVE. PORTLAND, OREGON

MAILING ADDRESS: P.O. BOX 1760, PORTLAND, OREGON 97207

Prepared: 5/20/81
Hearing Date: 7/17/81

PROPOSED NOTICE OF PUBLIC HEARING

A CHANCE TO BE HEARD ABOUT:

Proposed Increase in Motor Vehicle Inspection Fees, OAR Chapter 340 Section 24-307 for the Inspection Program operating in the Portland Metropolitan Area.

WHAT IS THE DEQ PROPOSING?

Interested parties should request a copy of the complete proposed rule package. Some highlights are:

- ** Increase Certificate of Compliance fee from \$5 to \$7, contingent upon enactment of HB2239 by the 1981 Legislative session.
- ** Listing of Motor Vehicle fleet operation Certificate of Compliance fees and licensing schedule

WHO IS AFFECTED BY THIS PROPOSAL:

Motor Vehicle owners

HOW TO PROVIDE YOUR INFORMATION:

Written comments should be sent to the Department of Environmental Quality, Vehicle Inspection, Box 1760, Portland, Oregon 97207, and should be received by 5:00 p.m. July 16, 1981.

Oral and written comments may be offered at the following public hearing before the Environmental Quality Commission.

<u>City</u>	<u>Time</u>	<u>Date</u>	<u>Location</u>
Portland		July 17, 1981	date & time to be announced

Notice of Public Hearing
Page 2

WHERE TO OBTAIN ADDITIONAL INFORMATION:

Copies of the proposed rules may be obtained from:

DEQ Vehicle Inspection Program
Box 1760
Portland, Oregon 97207

LEGAL REFERENCES FOR THIS PROPOSAL:

This proposal adds OAR Chapter 340 Section 24-307, contingent upon enactment of HB2239 by the 1981 Legislative session. It is proposed under authority of ORS 468.370.

This proposal does not affect land use as defined in the Department's coordination program with the Department of Land Conservation and Development.

FURTHER PROCEEDINGS:

After public hearing the Commission may adopt rule amendments identical to the proposed amendments, adopt modified rule amendments on the same subject matter, or decline to act. The adopted regulations may be submitted to the Environmental Protection Agency as part of the State Clean Air Act Implementation Plan. The Commission's deliberation should come after the public hearing as part of the agenda of its regularly scheduled Commission meeting on July 17, 1981.

A Statement of Need and Fiscal Impact Statement are attached to this notice.

STATEMENT OF NEED FOR RULEMAKING

Pursuant to ORS 183.335(2), this statement provides information on the intended action to amend a rule.

Legal Authority

Legal Authority for this action is ORS 468.370, ORS 183.341 and HB 2239-1981 Legislative Session.

Need for the Rule

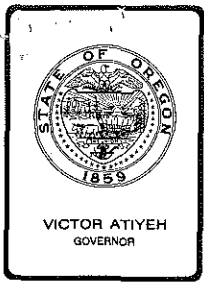
Legislation (HB 2239) if enacted requires the establishment of a fee schedule. The proposed rule is the fee schedule.

Principle Documents Relied Upon

HB 2239 - 1981 Oregon Legislative Session

Fiscal Impact Statement

Vehicle Owners in the Portland Metropolitan Area will experience a fee increase from \$5 to \$7.



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission
From: Director
Subject: Agenda Item G, June 5, 1981, EQC Meeting

Draft Response to Program Assessment Report

Attached is the Department's proposed response to the recommendations contained in the report "Program Assessment of the Department of Environmental Quality" prepared by the Executive Department.

This draft response is offered for Commission review and comment prior to formally responding to the report as requested by the Executive Department.

Staff proposes to revise the draft response upon Commission input and return the final response to the Commission for approval at its July 1981 meeting.

William H. Young

MJDowns:cs
229-6485
May 18, 1981
Attachment



Contains
Recycled
Materials

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
I-1 DEQ should announce its objections to any new enforcement requirements imposed by EPA.	DEQ will continue to evaluate proposed new federal requirements and advise EPA of concerns.	
III-1 Review training programs to see why cities, particularly smaller cities, participate at such a low level.	Our records suggest much better participation of sewage treatment plant operators in training programs than the survey results suggest. We will continue to encourage cities to allow employees to participate, and DEQ will pay travel expenses for such participation. (Regional training sessions are periodically held to minimize travel costs.)	
III-2 Review rules and regulations, particularly local government perceptions, about their clearness, availability, and reasonableness.	Review of rules has just been completed for subsurface sewage disposal and is underway in other water quality areas.	
III-3 Consider the establishment of an intra-agency group to act as a clearinghouse or other method to ease dealing with local governments on overlapping or mutual problems.	The Department has a staff member who acts as intergovernmental coordinator. In addition, we make it a practice to keep in close contact with other state agencies and often draw upon their expertise when dealing with a complex problem. It is felt that working with other state agencies on overlapping, or mutual problems is better accomplished on an ad hoc basis than with the formation of a permanent standing committee or committees.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
III-4 Review program information on Pollution Control Bond Fund moneys, its degree distribution, and consider providing cities with more information on the program.	The financing study report soon to be completed will provide some information. As soon as decision on future bond fund money use is made, descriptive materials will be prepared.	
III-5 Consider evaluating whether management of subsurface sewer permit program by DEQ limits county one-stop permit programs or hinders coordination of land use issues.	This requires evaluation and discussion on a county by county basis. It may be possible to improve coordination if DEQ subsurface staff in Coos, Douglas and Klamath counties could be located at county facilities in close proximity to building permit issuance operations.	
IV-1 Abolish an existing position and reclassify to use as a staff economist with responsibility to analyze all current and future programs and projects for economic impact. Lacking a full-time budgeted position, the Department may want to accomplish this on a contract basis.	Agency requested a staff economist position in 1979-81 budget. Legislature did not fund. In face of current reductions in force due to general fund shortfall an economist position does not rank as high in priority as other positions we would like to restore to continue the primary mission of the agency. We do not propose to follow this recommendation until adequate resources become available.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

AIR QUALITY PROGRAM

- | | | |
|---|---|--|
| V-1 Establish priorities of studies being planned for in the future | An annual priority list will be developed in conjunction with the SEA. Such a list is necessary, annually, for submission to EPA in the event supplemental federal funds are available. In the past such lists have been developed after consultation with subprograms including Laboratory staff, Regions and LRAPA. Study needs have also been discussed at the Goals and Objective review conference where industry and the public are participants. | |
| V-2 Give priorities to studies or research grants that will address a practical problem in lieu of a theoretical problem. | Our studies should for the most part continue to be directed toward identifying ambient impacts in nonattainment areas such as Portland, Eugene and Medford, and determining what overall emissions controls are required to attain/maintain standards. For the most part, industries have to develop their own control technologies. The Department is participating in some applied research in control of wood heat emissions, road dust and other so-called "Area Source" emissions. Past studies quantifying the impact of field burning and slash burning to determine regulatory control needs and most recently studying methods to control road dust are practicable problems. Such studies have received strong support from the public, legislators, and industry. | |

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

- | | | |
|---|--|--|
| <p>V-3 Reduce the number of studies and research grants being conducted and concentrate on a fewer number which can be managed by existing staff.</p> | <p>Legislatively approved Professional Services for the 79-81 biennium were \$156,648. The Governor's Recommended 81-83 biennium Budget is \$40,000. An additional \$20,000 reduction is anticipated by the G.F. reduction or by Legislative Fiscal Officer. Even if the Governor's Recommended Budget is approved, studies will be significantly reduced. An existing staff member will be project officer for each study undertaken.</p> | |
| <p>V-4 Determine if information does not already exist in the agency prior to initiating a study.</p> | <p>The Department will review existing information available to the agency prior to initiating a particular study. The Department believes this has always been done in the past including research of EPA references.</p> | |
| <p>V-5 Conduct an analysis of the approximate 1,000 boilers under minimal permit classification to determine the total emission tonnage towards the possibility of transferring its regulations responsibility to the Department of Commerce.</p> | <p>The Department plans to review permit program for permitting space heating boilers. Discontinuing these minimal sources is consistent with reducing workload because of staff reductions. Transferring regulation of space heating boilers to the Department of Commerce is concluded not to be practicable. These boilers would continue to be subject to emission limitation regulations and general surveillance by inspectors in the field.</p> | |

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EOC Comments

V-6 Locate all source related permits within the Program Operations unit, whether new or existing.

All routine functions of industrial source permit processing (logging, tracking, public notice, issuance, etc.) are centralized in Program Operations. It still makes sense to have certain permits drafted in the Regions where the manpower and source contacts are. Major sources need to be drafted by Program Planning and Development where modeling expertise and knowledge about new rules and policies exists and where control strategies and new rules are currently being promulgated, such as PSD, Visibility Degradation, Upset Conditions, Emission Reduction Credit (banking and offsets) and where significant EPA interface is needed for SIP conformity. Eventually more of these activities could reasonably be consolidated in the Program Operations section. Currently, only approximately 5 major new sources reviews per year are being reviewed by Program Planning and Development and these are coordinated with Program Operations and the pertinent Region.

V-7 Establish a task force to completely evaluate the emissions inventory for value, utilization to the air program, accuracy of the data, and, in general, how it can be improved or possibly eliminated.

The emission inventory is a major element in air program management. Submittal of the EI to EPA is required. The EI system is being improved to better serve users, i.e. modeling, Reasonable Further Progress reports, etc.

Maintain a record as to when all emission factors and standards are changed, which would provide improved integrity of emissions inventory data summary.

Records of emission factors are being maintained.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

V-8 Establish a policy (within a rule) that prohibits marketing of emission offsets by a closed-down facility.

The NSR rule would prohibit banking emissions from a permanently closed down facility and would also prohibit "marketing" such emission reduction unless done "contemporaneously" (within 1 year prior to a proposed new use). This proposal has received severe criticism.

V-9 Include in the State-EPA agreement that a specific time period will be allowed for EPA review of DEQ rules, revisions, or other material. If no concern is raised by EPA when the time period elapses, DEQ should then take appropriate action.

EPA has maintained that this is not legally possible. It has agreed to give timely review of DEQ proposed actions (rules, etc.) "subject to resource availability."

In the current SEA, EPA has committed to "provide feed-back on proposed rules no later than the end of the public comment period, where other EPA priorities and available time permit."

An alternative which the Department has considered but not adopted is to make the new rules "effective only after EPA approval."

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

Develop a plan toward integrating the field burning subprogram with other ongoing regional programs to include the following:

Benefits to this are not completely clear unless we assume 1) industry takes complete control of operating with performance standards established for all populated areas and monitoring in place, and 2) need for annual program improvement through rule-making/SIP revision is eliminated. The research efforts would still have to be centrally coordinated.

The controversial and seasonal nature of field burning smoke management requires a level of administrative independence and flexibility to respond to needs quickly.

Moving office to Salem makes some sense operationally primarily from standpoint of reducing travel and duplication of S&S related to technical and communication equipment and DAS. An association with Forestry fire weather office in Salem would be a more logical move.

V-10

Continue the trend of transferring administration of the program to industry.

Before becoming too committed to this (i.e., eliminate our staff training, expertise and capability to run program if necessary), there is a need to evaluate industry's performance over several seasons and determine their own interest in assuming control. Industry interest in assuming control is unclear and it is suspected that a satisfactory arrangement beyond their current involvement is not forthcoming in the next 2 to 3 years. EPA has indicated that if industry totally conducted a daily smoke management plan, it would constitute a "dispersion technique" and would be in violation of Section 123 of the CAA. This issue needs to be resolved.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

V-11

Determine the feasibility of a reduced fee schedule for registration and burning fields. This could be accomplished by a reduction of research projects.

Good. In order to give some revenue stability for planning and reducing future immense carryover's, it may be best to 1) eliminate the \$2.50/acre burn fee since it may be a disincentive to accurately report burned acreage and present accounting problems or improprieties, and 2) increase the registration fee from \$1/acre to some higher figure (about \$2-\$2.50) sufficient to provide adequate revenue. Not only is registered acreage a virtual constant from year to year, but all the program's costs are too and not so dependent on acreage burned. As it is now the accumulation of contingency monies is due to burn fees revenues in excess of amounts projected.

A non-burning solution is still no doubt ultimately needed for this source. The Department must continue to conduct a vigorous R&D program to this end, at least as long as monies are beneficially spent.

V-12

Review the feasibility and possibility of a reduced budget in resources for the subprogram.

See first entry related to moving office to share with State Forestry facilities. Reduced budget not feasible until industry assumes complete control of operations and even then, increased expenditures on monitoring should be made. Based upon past seasons, increased resources in the area of public information, relations, and in compliance assurance are warranted.

V-13

Review the need for the number of positions currently allocated to this subprogram for possible reallocation to other high priority efforts in the Department.

Must resolve this with need to develop and keep FB expertise available if necessary. Some seasonal sharing with other sub-programs may be feasible. See response to V-12 for needed increases in resources. While FTE are reallocable, field burning fees could not be allocated to non-field burning programs.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

V-14

Plan to eliminate the preparation of a written and documented report to the Legislative Committee on Trade and Economic Development in 1980. Make an oral summary report in lieu of a written report.

An oral report is fine, but detailed written report is necessary as record and documentation of pertinent data and impacts and is requested frequently by public and others. We have already eliminated the annual "Willamette Valley Field Burning Report" series we used to prepare.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

V-15

Cooperate with the Motor Vehicles Division to provide more information to the public about expected waiting times at various times during the day and various stations. Explore the idea of providing suggested times and stations indicating when and where the waiting time would be expected to be the least.

Motor Vehicle Division has arranged to mail registration renewal reminders during the middle of the month, thus reducing the end-of-month and first-of-month peak work-load and waiting times. Waiting time information is available by calling the Vehicle Inspection Program information numbers. Motor Vehicle Division field offices can also provide general waiting time information.

V-16

Change internal reporting by each station, which indicates the waiting times to include the maximum waiting time during the day as well as the average.

This has been done.

V-17

Periodically inspect gas analyzers used by fleet inspection programs.

Fleet inspection program gas analyzers have always been inspected. A change has been made to use Department span gas rather than fleet supplied span gas during these inspections.

V-18

Establish measures of performance for inspection stations on which goals and evaluations can be based.

The current workplans of all inspection station staff now provides a mechanism for measuring the performance of their tasks related to the program's goals and objectives.

V-19(a)

Issue a request for proposal for private operation of inspection stations.

Preparing, responding to, and evaluating responses for a RFP to operate the program is a very time consuming and expensive process. Current indications are that there would still be a very low success for a RFP without legislative changes.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

V-19(a) Cont.

The State of Washington is currently preparing to implement a contractor operated I/M program. Discussions with DOE staff indicate that their process to bring the contractor program to this final state has required 2-3 FTE per year for the past two years. There is, in addition, the legal and other support services that were required. No dollar estimate is available on the actual costs.

V-19(b)

Examine the economic benefits of automating the gas analyzers and inspection stations.

Preliminary discussions have been made with a potential supplier to develop a pilot lane. It is estimated that equipment costs would be in the neighborhood of approximately \$10,000 for a single lane pilot study. The vendor does allow a lease/purchase plan for this type of equipment. Mr. Mike Stone of Data Services Division, indicated that this application may or may not require Data Services review. Because of the potential pilot nature there may be only a cursory review. He indicated that he would check out the policy.

The benefits of automating the inspection process would be improving the level of service rather than in reducing positions. The quality of the service in terms of accuracy, accounting and documentation would be improved.

Other inspection programs which use automated equipment or have the entire system automated have similar staffing requirements. Further exploration of pilot lane automation is on "hold" pending comment from Data Services Division and finalization of the program budget.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comments

V-20

Analyze the number of stations and their locations from an economic viewpoint when considering the number of customers inspected.

During program development and policy decisions on station sizing and locations, economic considerations were taken into account. An updating of the analysis will be included in any new station proposal.

V-21

Calculate the cost and benefits of low volume stations.

This has been done in the past, but will be formalized and updated as part of any new station proposal.

V-22

Discuss with the MSD the possibility of transferring the entire administration of the I&M program to that jurisdiction.

Informal discussions between MSD and DEQ have been made. Little interest has been expressed by MSD in the proposal. Such a change would require legislative authorization.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VI-1 Develop and publish a brochure providing necessary information to the public regarding septic tank installation, variances, experimental systems, etc.	We concur that such a brochure is needed. Support assistance is needed in layout, graphics and editing of staff developed materials.	
VI-2 Continue county audit program to ensure proper and equitable application of Oregon's subsurface program regulations in all counties.	Audit program will continue. However, reduced staffing in the 81-83 biennium will result in reduced frequency and extent of audits.	
VI-3 Obtain data processing capability to facilitate future assessment of water quality on a biennial basis.	Data storage and retrieval system planning is proceeding with existing staff. Resources for continued effort are included in 81-83 budget.	
VI-4 Do not accept primacy of the Safe Drinking Water Act from EPA.	Governor's proposal for expanded state effort in drinking water area does not include state assumption of primacy.	
VI-5 The DEQ should begin to explore alternative strategies to help local governments finance their own sewage treatment facilities in the future.	Consultant's report will be available shortly.	
VI-6 The DEQ should examine the possibility of a limited job rotation program with industry counterparts.	Current problems resulting from staff reductions make this undesirable to pursue at this time.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VI-7 The DEQ should attempt to implement a coordinated water basin evaluation and update schedule with Water Resources Department.	This has been discussed with Water Resources Department staff on several occasions. Shortage of funding for the Water Resources Department apparently will preclude any review and update activities during the 81-83 biennium. DEQ will continue to pursue such coordination as opportunities exist.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VII-1 Accelerate development of a statewide solid waste data base including volumes, wastestream composition, and rates of increase or decrease.	<p>The text of the report places emphasis on the lack of a data base within the Division. From the discussion, it is apparent that there is a misunderstanding of what a data base is intended to do. We visualize the data base as a series of figures in categories that can be used as performance indicators to gauge the progress of the program. In contrast, the Union County situation discussed in the report is not a data base related problem.</p> <p>The annual report for 1980 (to be distributed in June) is our first attempt to establish a data base. Data requisition is continuing and expanding to add much more information in future reports. From preliminary discussions with EPA regarding the 1982 SEA, we may be working with them to develop meaningful performance indicators. Nationally, there is much room for work in this area.</p>	
VII-2 Determine what program direction the Solid Waste Division should pursue for the 1980's within existing resources. Make that direction known and clear to local government and private collectors.	<p>Solid waste management history at all levels of government and the private sector can give an appearance of lack of direction as workable solutions have been pursued. As a society, we have not been working on the solid waste "problem" for long. The effort to get the disposal of solid wastes under proper environmental control has made major progress in the last 10 years, but there are loose ends to be dealt with. The solution tends to be more in the area of waste reduction and recovery, which is a new frontier, perhaps impacting every individual directly. This takes time and trial and error experience.</p>	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VII-2 cont.	Solid Waste Program Goals and Objectives were re-established and prioritized in 1980 using resources outside the agency as well as Division staff. Work plans generally reflect those priorities. Goals and objectives have been distributed widely. Waste reduction is emphasized. Identification and implementation of workable incentives are beginning.	
VII-3 Consider developing a technical assistance unit, using existing staff resources, of three to four positions, which will provide: <ul data-bbox="191 781 625 1343" style="list-style-type: none">- Engineering technical assistance on centralized processing, landfilling, and source separation;- Financial planning;- Current and accurate information on secondary recycling markets;- Current information to local jurisdictions on new technology and developments on a consistent basis rather than piecemeal;- Training for regional staff.	The concept of a separately identified technical assistance unit is attractive, but appears impractical for the relatively small number of staff available. All staff give technical assistance in varying degrees. At the time of the program assessment, the Division was without a land disposal engineer. That position has since been filled and the capability to assist and train regional DEQ staff and operators has improved. Development and distribution of technical information bulletins is included in Program goals and objectives for the near future. Some technical program guidelines are available now.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
<p>VII-4 Consider designating full-time solid waste positions in the regions rather than full-time equivalent positions.</p> <p>Alternatively, centralize solid waste enforcement and monitoring positions within the Solid Waste Division Headquarters.</p>	<p>DEQ field staff have traditionally been generalists. This has led to some frustration on the part of the program divisions that would prefer to have specialists in the field; particularly, specialists who answer directly to the programs.</p> <p>The real issue of course is how best to get the work done. It should be noted that this "frustration" on the part of the Solid Waste Division has been greatly reduced in recent months as a result of better defining our goals and objectives, regional agreements, improved budget tracking and better region-headquarters communication.</p> <p>The generalist vs. specialist issue is currently being studied. The Regional Operations Division is preparing an evaluation and recommendations for the Director. While the report is not yet complete, it appears that the specialist approach is more costly and may not be practical in view of our current fiscal limitations.</p>	
<p>VII-5 Allow longer disposal permit lives for sites not scheduled to close in the near future.</p> <p>Alternatively, develop a permit fee system which covers the direct and indirect costs of processing disposal permit applications.</p>	<p>The concern here seems to be the amount of staff time spent processing permit applications. This is a valid concern. We believe the best solution to this problem, however, is making the permit document more brief (See VII-6).</p> <p>Many disposal sites are dynamic, constantly changing entities. The progressive development of a landfill across many acres of property must be planned. A permittee's site operational plan, on which the permit is based,</p>	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VII-5 cont.	<p>frequently needs updating. Typically, permits are issued for 3 - 5 years. However, if an applicant can provide detailed plans covering periods greater than 5 years, the Department would be prepared to issue correspondingly longer permits. The solid waste management rules are now being amended to provide for this.</p> <p>The Department has introduced a bill authorizing solid waste permit fees to this legislative session. The bill is currently tabled in the House Energy and Environment Committee.</p>	
VII-6 Consider including fewer conditions in disposal permits and instead reference DEQ standards and the operating plan for the site.	<p>This idea actually came from one of the Solid Waste Division staff. As indicated in VII-5, it is intended to reduce the amount of staff time spent on permit processing. We have obtained tentative approval of this concept from the enforcement section and are now seeking a legal opinion from the Department of Justice. If possible, we will begin issuing such permits about July 1, 1981.</p>	
VII-7 Develop and implement minimum performance standards for solid waste disposal sites.	<p>The Department of course currently has minimum performance standards for solid waste disposal sites. However, the rules were written in 1971 and have become somewhat dated. Some sections of the current rules have also been criticized as being vague or unclear.</p> <p>Major amendments to the rules have been drafted and were presented to the Commission in April 1981, in a request for authorization to conduct a hearing. The Department plans to seek adoption of the rules at the July 1981 Commission meeting.</p>	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VII-8 Develop a strategy on how to handle enforcement activities for permittees being placed on the open dump list currently licensed as sanitary landfills.	<p>The "open dump list" referred to is a list that EPA is proposing to publish as a result of a nationwide inventory of disposal sites under the Resource Conservation and Recovery Act (RCRA). The inventory is based on criteria for sanitary landfills developed by EPA. The criteria have been adopted as rules by EPA, but EPA has no authority to enforce them. Any enforcement is to be by the states or by citizen suit in federal court.</p> <p>The criteria are more restrictive than DEQ's current rules. Therefore, a few (about 12) domestic waste sites in Oregon comply with DEQ rules, yet may be on EPA's open dump list.</p> <p>The Department may only take enforcement action against permittees who violate DEQ rules. As noted in VII-6, the Department is proposing to amend its rules and these amendments closely parallel the RCRA criteria. After adoption, enforcement would be in accordance with these new existing procedures, including provisions for phased compliance, variances, etc.</p>	
VII-9 Develop a periodic evaluation component on Pollution Control Fund grants and loans.	<p>All grant and loan projects are assigned to a project officer during the application phase. The project officer tracks the expenditure of funds during the project period and, in addition, the local government books are audited prior to final payment. Once the project is closed, loans are monitored by the fiscal section of Agency Management to assure repayment.</p>	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VII-10 Centralize implementation of local solid waste management plans into one section within the Division.	<p>Following the Solid Waste Division's 1980-81 Goals and Objectives planning activities, a realignment or minor reorganization occurred. Coordination of local plan implementation is now essentially managed by one section-- Solid Waste Operations. One of the reasons for this move is because the Solid Waste Disposal Permit is the only real authority the Department has to apply to ensure that plans are properly implemented. Solid Waste Operations is the section which manages the permit program.</p>	
	<p>The only exception to this approach occurs when plan implementation includes resource recovery. This is a specialized area that requires the technical assistance of staff who are involved in planning activities (i.e., staff of the Program Development and Support Section). (Refer to VII-3 for a related recommendation and response).</p>	
VII-11 Centralize the tax credit certification review into one section within the Division.	<p>Tax credit certification is being centralized in one section--Program Development and Support. Tax credits are given for waste utilization activities. This section is responsible for resource recovery technical assistance and has some natural involvement with most tax credit eligible projects.</p>	
VII-12 Consider promotional campaigns which target a specific material for recycling based on seasonal market demands.	<p>Market demands for the normally recycled products (glass, newsprint, corrugated, ferrous and aluminum) are fairly stable. Demand is controlled mainly by price. We do intend to target specific items, beginning with waste oil, for promotional campaigns as outlined in the Solid Waste goals and objectives. As market demands increase for specific materials, we intend to "get the word out."</p>	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
VII-13 Retain strong state control over the Hazardous Waste Program following a two-step cooperative agreement approach to final authorization under RCRA.	This recommendation is based on a DEQ staff analysis prepared after reviewing EPA's <u>preliminary</u> guidance on the Interim and Final Authorization Application Procedures. Upon receipt of EPA's <u>final</u> guidance on Interim Authorization, as well as guidance for Fiscal Year '81 program grant support, it became clear that a cooperative agreement might result in temporary loss of funding support since the federal program would need to be implemented under a cooperative agreement. To prevent possible loss of program funding, and to try to avoid duplicate programs being effective in Oregon, DEQ opted to apply for Phase I Interim Authorization. We are currently awaiting word on our application.	
VII-14 Open and maintain lines of communication with agencies of other states having hazardous waste jurisdiction.	The Division is involved in a number of activities in accordance with this recommendation. <ul style="list-style-type: none">- Active participation in activities of the Association of State and Territorial Solid Waste Management Officials, and National Governors' Association.- DEQ staff has met with staff in Idaho and Washington to compare program notes. Several phone calls and exchanges of written information have occurred with Alaska, Nevada and California.- DEQ has sent technical staff to visit disposal sites in Idaho, Nevada and California; treatment facilities in California; and incineration facilities in Texas and Arkansas.- DEQ is considering sending a proposal to Alaska, Washington and Idaho which	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations

Agency Response

EQC Comment

VII-14
cont.

suggests the formation of a staff level task force to routinely meet to share information and insure open communication.

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

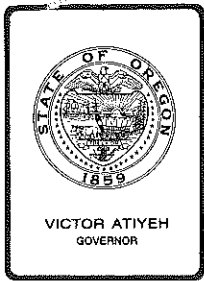
Study Team Recommendations	Agency Response	EQC Comment
IX-1 Consider an indepth study by Department of Environmental Quality, Department of Revenue, and/or the Management Section of Budget and Management Division on tax credit programs for the purpose of establishing a mechanism by which biennial review of the revenue and program effects of such credits could be accomplished, tying together actual figures and projections based on uniform and consistent data.	Agency agrees this study is needed. Should be initiated and coordinated by Executive Department.	
IX-2 Consider having the Department of Revenue as the lead agency on pollution control facility tax credits, consulting with DEQ and requesting signoff on devices.	Agency does not object to this recommendation if determined to be administratively more efficient than present method.	
IX-3 Evaluate the impact of having a dollar or percentage of cost limitation placed on the credit to limit its impact on general fund revenue.	Agency, at Governor's request, introduced bill this Session to reduce tax credits available by 20% for all facilities certified after January 1, 1982.	
IX-4 Request Department of Revenue to program data to provide for actual figures on credits taken for analyses purposes. The tax form already provides space for the taxpayer to show this separately.	Agency made such a request in December 1980. Revenue has responded and indicates they will be tracking this information on a continuous basis.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
IX-5 Ask the Economic Development Department to determine how much effect pollution control facilities tax credit has on whether or not industries stay or establish in Oregon.	Agency will make such a request during 1981-83 biennium.	
IX-6 Consider whether a review of Department of Revenue decentralized approach on this tax credit program, and/or others, prevents collection of good information upon which to base analysis of such programs.	This recommendation is more appropriately addressed by the Executive Department.	
IX-7 Consider establishing a policy that requires a written report by a program manager to the Department Director identifying any positions left vacant over five months and the reasons therefore.	Personnel Section will notify Division Administrators every six months of positions they have had vacant. Division Administrators will respond back to Personnel Section, and Personnel Section will submit a summary report of those vacancies to the Director.	
IX-8 Resolve positions classified as being "red circled" by the Personnel Division as soon as possible if such a categorization is affecting the recruitment for that position.	On 2/18/81 Personnel Division was provided with an explanation and proposed disposition or request to clear the "freeze". The "freeze" has been removed from 24 positions, Personnel Division asked for more information on one position, and four positions require further action on the part of the Personnel Division. Those four remaining positions may require some reorganization in the Air Quality Division before the "freeze" can be removed.	

DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PROGRAM ASSESSMENT REPORT RECOMMENDATIONS

Study Team Recommendations	Agency Response	EQC Comment
IX-9 Continue the preparation and planning for the centralization and realignment of data processing functions within the Department.	Agency is committed to centralizing the data processing functions during 1981-83 biennium. Competitive bidding process currently underway to acquire equipment to improve efficiency of current data processing operations and provide for expansion to serve all agency programs.	
IX-10 Identify existing positions for abolishment and reclassification to support data processing function.	Agency is committed to preparing long-range data processing plan for entire agency in 1981-83 biennium. One recommendation of plan will be appropriate staffing level to provide adequate data processing support to agency.	



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. I(1), June 5, 1981, EQC Meeting

Status Report and Discussion of Medford Area Attainment Strategies; Total Suspended Particulate

Background

The Medford area is recognized as one of the two areas in the continental United States with the highest potential for air pollution due to its poor ventilation and restrictive topography. Air pollution in Medford has exceeded the State standard for Total Suspended Particulates (TSP) in every year since monitoring began in 1961. Particulate levels also exceeded the Federal health standard of 75 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) in every year except 1973 and 1975. Levels in 1979 reached 99 $\mu\text{g}/\text{m}^3$.

The particulate control strategy adopted by the Commission in 1978 will not be adequate to meet air quality standards in the Medford area, primarily because of growth in area sources (notably wood heating). Oregon is required to revise its State Implementation Plan by adopting and obtaining EPA approval of a TSP attainment strategy for Medford by July, 1981. This plan must contain enforceable measures which will result in meeting Federal health standards by July, 1984. Federal prohibition of construction of major new and modified sources, (sources of 100 tons/yr and 25 tons/yr emission increases respectively), would apply until a health standard plan is approved. A plan to meet the federal welfare standard of 60 $\mu\text{g}/\text{m}^3$ as expeditiously as possible is also needed.

Evaluation

MACS

The Medford Aerosol Characterization Study (MACS) began in 1979 as an effort by the Department of Environmental Quality to more precisely identify the sources of suspended particulate in the Medford area so that a new control strategy would be based on the most accurate information possible. The study was similar to the Portland Aerosol Characterization

Study completed in 1979 and was conducted under contract with the Oregon Graduate Center. Source samples (from sources of particulates such as wood stoves and industry and special ambient air samples from existing monitoring sites) were collected from April, 1979 through March, 1980. The samples were analyzed to determine their unique chemical "fingerprints". Using a method called Chemical Mass Balance, the "fingerprints" were matched with a computer to determine the specific source contributions to the particulate levels in Medford.

Study results indicate that the major sources of total suspended particulates are vegetative burning 31% (primarily residential wood heating), soil & road dust 30%, and wood products industrial emissions 20%. Source contributions for the MACS sampling period are detailed in Attachment 1.

Vegetative burning was also the major source of respirable particulate, contributing about 66% to this category. Respirable particulates are those particulates that are less than 2 microns in diameter and are of greater concern because of their deleterious effect on health and visibility. Respirable particulate concentrations in Medford have been the highest in the state: 46 ug/m³ during the MACS period (1978 - 80) and 40 ug/m³ in calendar year 1980.

The MACS results were completed and released in February, 1981. These results are being used by the Department and the Jackson County Air Quality Committee to determine the most effective methods of reducing particulate air pollution in Medford.

Air Quality Advisory Committee

The Jackson County Commissioners reorganized and reappointed a local Air Quality Committee in February, 1981. The Committee consists of 26 members. Its responsibilities include the evaluation and recommendation of particulate and carbon monoxide control strategies. A DEQ report on Development of a TSP Control Strategy was presented to the Committee in February. The report contained a recommended strategy and alternatives (Attachment 2). Recently the Committee subdivided into three particulate subcommittees and two transportation subcommittees. The particulate subcommittees are split into these subjects: Vegetative Burning, Soil & Road Dust and Industrial Controls. The full Committee will review the subcommittee reports and make recommendations to the County Commissioners during its June Committee meetings.

Control Strategy

If no additional control measures are implemented, vegetative burning emissions are expected to increase in the Medford area due to increased use of firewood as a residential heating fuel. Soil & Road Dust emissions are expected to remain relatively constant in the next few years. Industrial emissions are expected to decrease significantly due to controls required

by the 1978 strategy. The net effect, however, would be that in 1984 TSP levels would average 93 ug/m^3 , well above the health standard. The Department's list of recommended strategies to achieve a 18 ug/m^3 improvement to meet the health standard is shown in Figure 1.

The Department's recommended control measures were selected after careful consideration of: major source contributions as identified by MACS, available control technology, cost-effectiveness, energy impacts and anticipated social acceptability.

The Department also outlined additional control measures as alternatives to the recommended measures which are shown in Figure 2. In the Department's opinion the alternatives are less desirable or more difficult to implement than the recommended measures or are premature due to yet undeveloped technology.

The proposed new particulate strategy is a major departure from the strategy adopted in 1978. The 1978 strategy focused primarily on industrial control in the wood products industry and resulted in specific State rules for the Medford area. In contrast, the proposed 1981 strategy focuses primarily on area sources and many of the control measures would require local ordinances or commitments for implementation. Some of the key control measures address the increased use of firewood as a residential heating fuel. The single most effective and likely acceptable control measure appears to be an aggressive retrofit weatherization program to reduce wood stove and fireplace emissions. In essence, since wood heating is the major source of both TSP and respirable particulates, this source must be effectively controlled if Medford is ever to have a chance to meet air quality standards.

The Air Quality Committee is expected to recommend a particulate strategy to the Jackson County Commissioners during June, 1981. The Department intends to request the Environmental Quality Commission at its July or August meeting to authorize a public hearing on the Medford Particulate Control Strategy. This is an extremely tight schedule and may necessitate concurrent DEQ and local ordinance hearings. The success of the effort will heavily depend on local support of the program and EQC concurrence with the strategy elements. A clear understanding of the recommended strategy and alternatives is needed as is a timely expression of problems and desirable changes if this tight schedule is to be met.

Summation

1. Particulate Air Pollution in the Medford area exceeds the Federal health standard of 75 ug/m^3 and the State standard of 60 ug/m^3 . Particulate air pollution is expected to continue to exceed standards unless additional control measures are implemented. Levels would average about 93 ug/m^3 by 1984.

2. The major sources of particulates in the Medford area are vegetative burning - 31% (primarily wood stove and fireplace emissions), soil & road dust - 30%, and the wood products industry - 20%. Vegetative burning emissions are increasing, soil & road dust will remain relatively constant and industrial emissions are decreasing (due to controls required by the 1978 strategy).
3. The major source of respirable particulates, those having the greatest effect on health and visibility in the Medford area, is vegetative burning emissions, primarily from firewood use in stoves and fireplaces. Any control strategy to meet air quality standards will have to rely heavily on effective control of the source of emissions.
4. DEQ has recommended several control measures to reduce particulate emissions. The single most effective measure appears to be an aggressive retrofit weatherization program to reduce wood stove and fireplace emissions.
5. The Jackson County Air Quality Committee is currently evaluating the DEQ recommended control measures as well as several alternative measures. The implementation of several control measures, including a weatherization program, would require local ordinances.
6. The Air Quality Committee is expected to recommend a particulate strategy to the Jackson County Commissioners during June, 1981.
7. The Department intends to request the Environmental Quality Commission at its July or August meeting to authorize a public hearing on the Medford Particulate Control Strategy.

Director's Recommendation

It is recommended that the Commission review the proposed TSP strategies and alternatives and provide the Department with some feedback as to their acceptability. Discussion with local officials and advisory committee members at the lunch meeting should be directed toward broadly identifying the best mix of strategies that can be supported by each entity and which might be most acceptable to the community. Any possible problems with implementing the strategies should also be discussed.

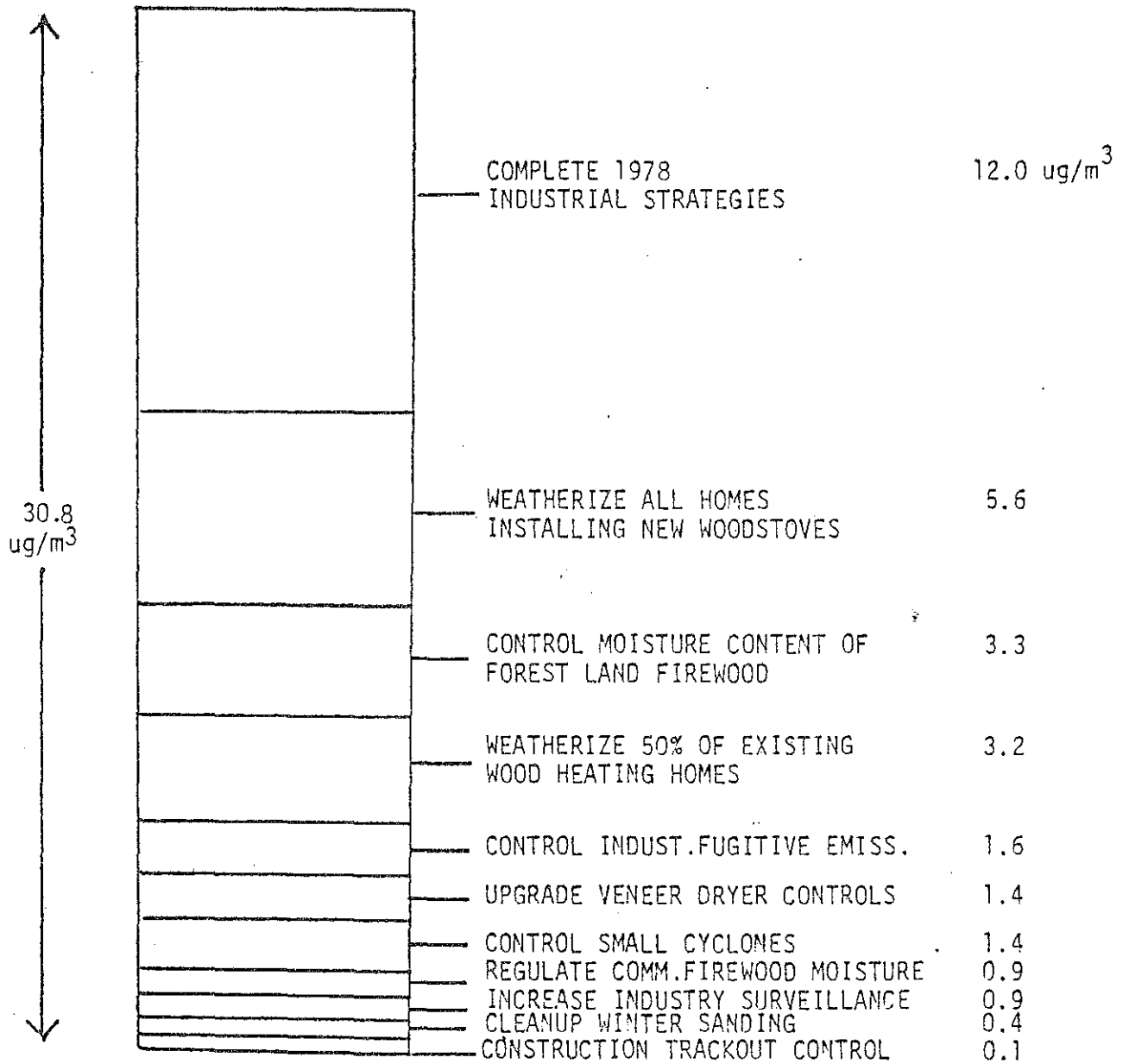
Bill

William H. Young

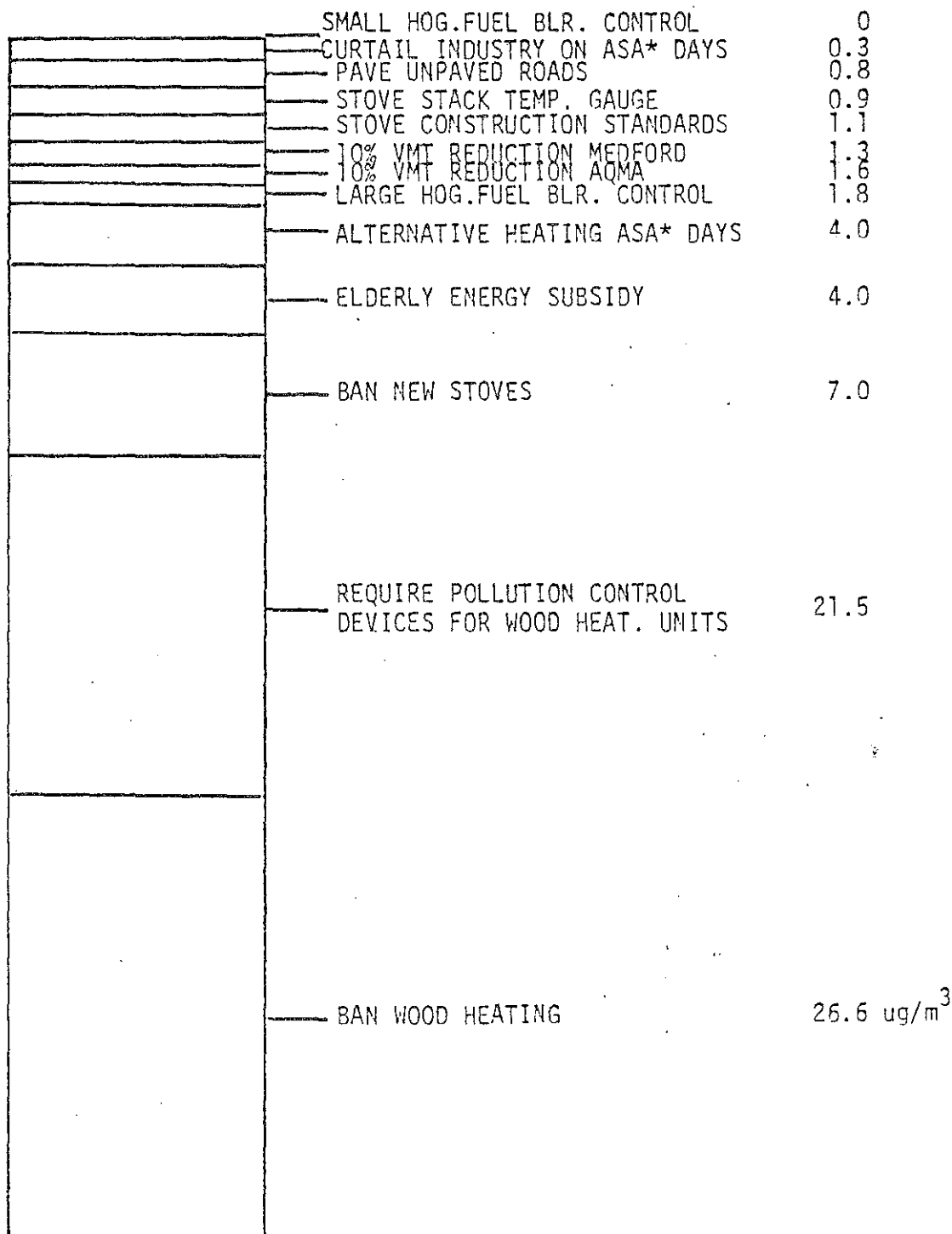
- Attachments
1. Annual Average Source Contributions for the MACS Sampling Period
 2. TSP Strategy Report to the Air Quality Advisory Committee
 3. Figure 1 - Recommended Strategies
 4. Figure 2 - Alternative Strategies

John F. Kowalczyk:a
229-6459
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DEQ RECOMMENDED CONTROL STRATEGIES



ALTERNATIVE CONTROL STRATEGIES

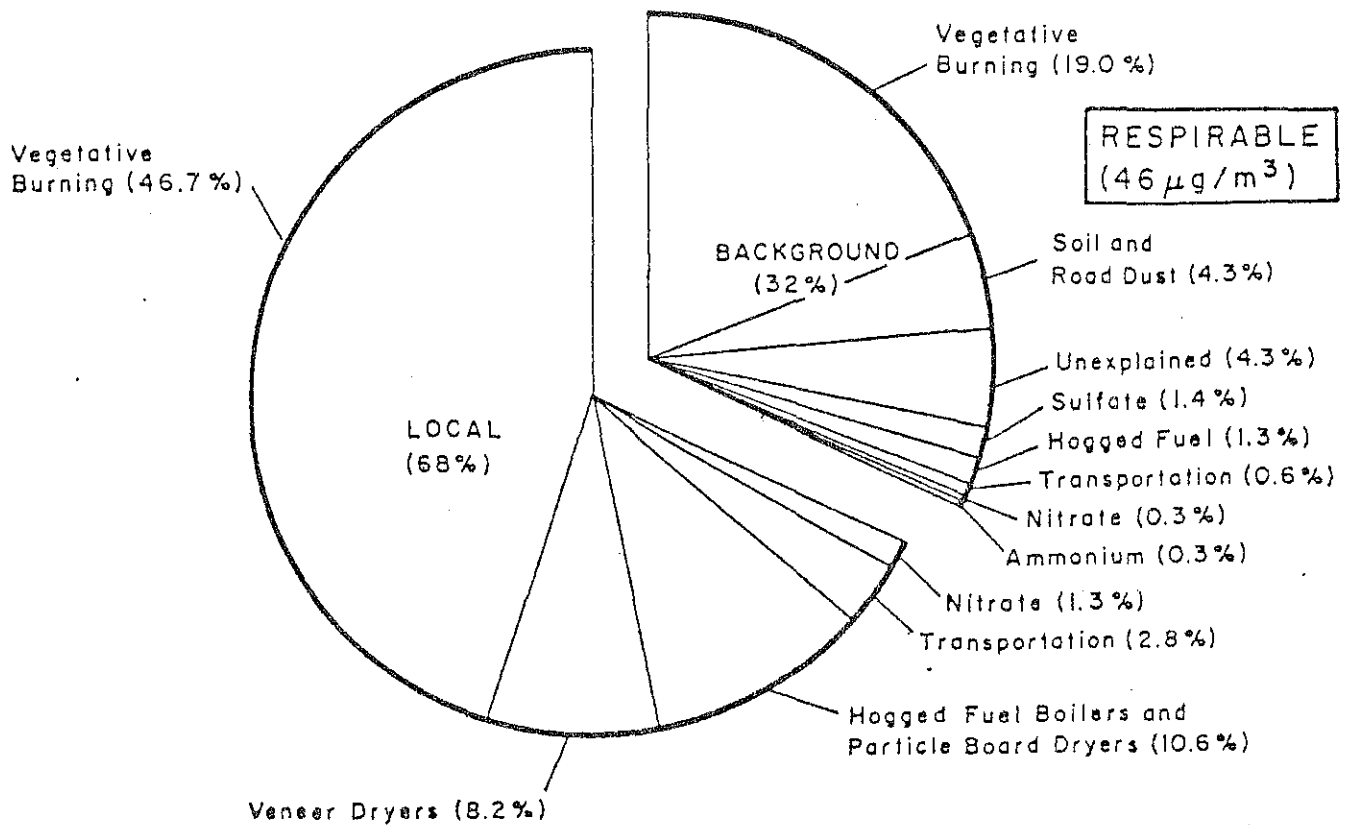
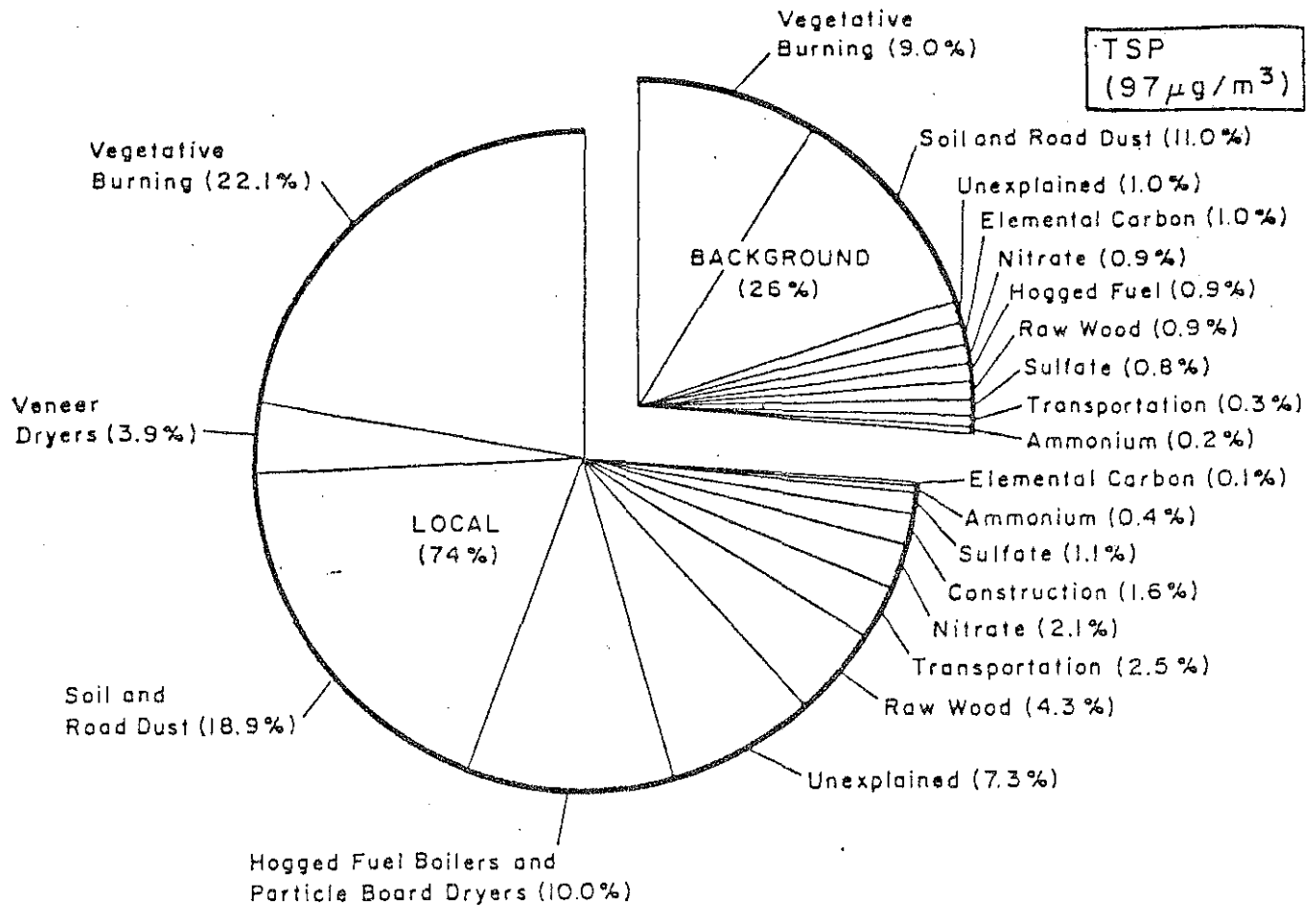


MANY OF THESE STRATEGIES ARE NOT ADDITIVE AND NOT TECHNICALLY OR SOCIALLY ACHIEVABLE AT THIS TIME.

* AIR STAGNATION ADVISORY

ANNUAL AVERAGE SOURCE CONTRIBUTIONS
FOR THE MACS SAMPLING PERIOD

Medford Justice Building TSP



STATE OF OREGONDEPARTMENT OF ENVIRONMENTAL QUALITYINTEROFFICE MEMO

TO: Jackson County Air Quality Committee DATE: February 13, 1981

FROM: Department of Environmental Quality

SUBJECT: Development of Total Suspended Particulate State
Implementation Plan

I. Introduction

The purpose of this memorandum is to summarize briefly the air quality planning activities for Total Suspended Particulate (TSP) and to propose actions directed at bringing the airshed into attainment with the State and Federal air quality standards. The air quality planning activities have consisted of the following:

1. Continued monitoring of particulate pollution levels,
2. Completion of the Medford Aerosol Characterization Study (MACS),
3. Refinement of the Medford Airshed model,
4. Identification of control strategies to reduce particulate levels.

II. Air Quality in the Medford-Ashland AQMA

The Medford-Ashland Air Quality Maintenance Area (AQMA) was designated nonattainment in 1974 because of measured exceedances of the National Secondary Ambient Air Quality Standard for Total Suspended Particulate (TSP). Over the period 1976 to 1979 air quality in the AQMA deteriorated particularly in the Medford and White City areas as shown in Figures 1 and 2. In 1978 the Department developed a State Implementation Plan (SIP) designed to improve air quality and meet the Secondary standard. Before this plan could be implemented, air quality worsened and in January 1979 the AQMA was designated to nonattainment with the primary particulate standard.

The Department has determined that the higher particulate levels were caused primarily by:

1. Increased production levels in the wood products industry,
2. Increased use of wood for home space heating,
3. More adverse meteorological conditions.

The 1978 SIP, which has been partially implemented at this time, has contributed to the air quality improvements recorded during 1980. While these improvements appear to be significant, the Medford and White City areas remain in exceedance of the primary standards and are projected to remain in exceedance even with full implementation of the 1978 SIP. It is therefore necessary to develop a new SIP containing the additional

FIGURE 1
AIR QUALITY TRENDS
IN THE MEMPHIS
ASHLAND AREA

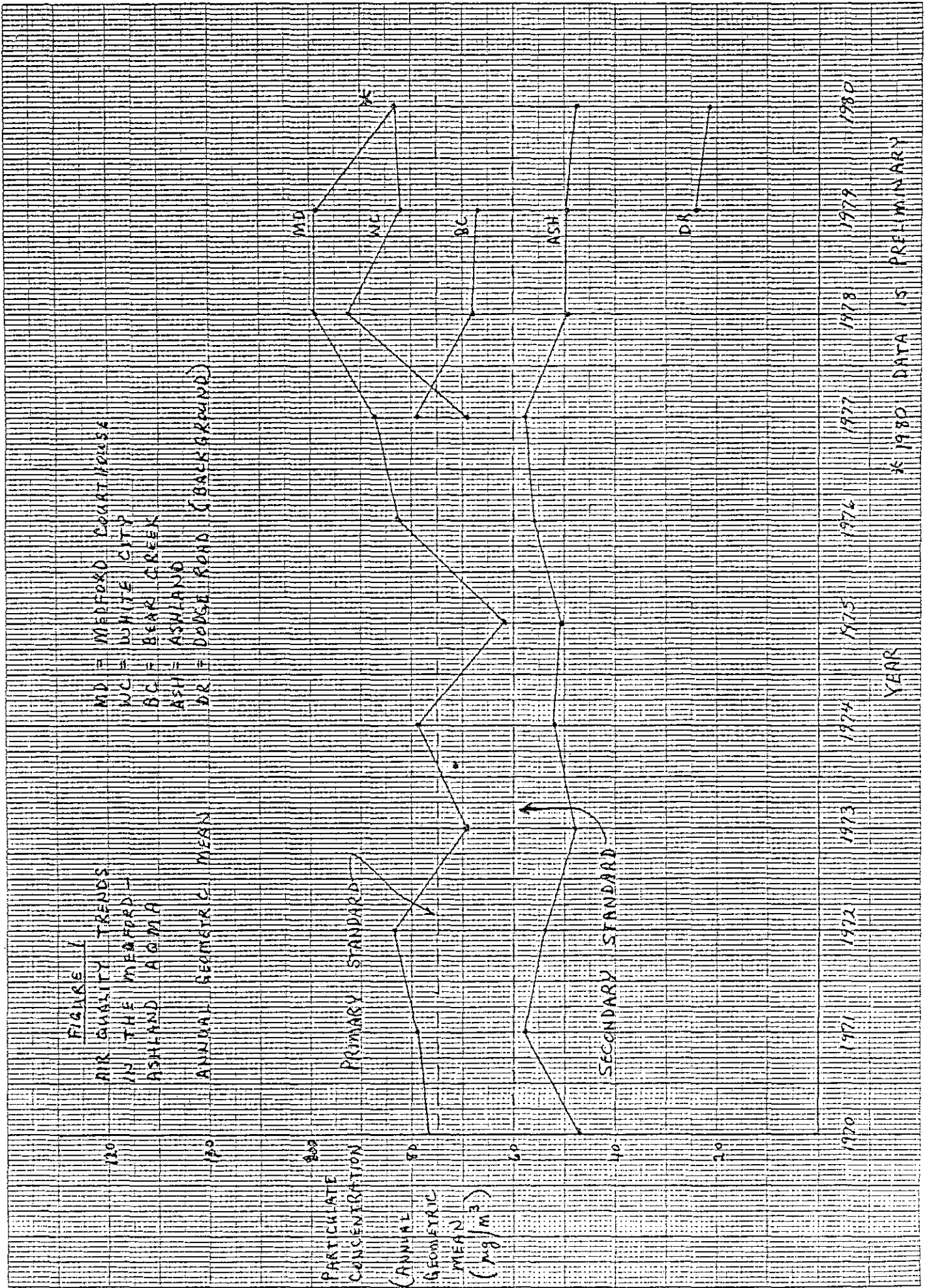
MD = MEMPHIS COURT HOUSE
WC = WHITE CITY
BC = BEAR CREEK
ASH = ASHLAND
DR = DODGE ROAD (BACKGROUND)

ANNUAL GEOMETRIC MEAN

PARTICULATE
CONCENTRATION
(ANNUAL
GEOMETRIC
MEAN)
($\mu\text{g}/\text{m}^3$)

PRIMARY STANDARD

SECONDARY STANDARD



* 1980 DATA IS PRELIMINARY

YEAR

FIGURE 2
AIR QUALITY TRENDS
IN THE MEDFORD-
ASHLAND AREA

MD = MEADOW COURTHOUSE
WC = WHITE CITY
BC = BEAR CREEK
ASH = ASHLAND
DR = DODGE ROAD (BACKGROUND)

2ND HIGHEST 24 HOUR

PRIMARY STANDARD

SECONDARY STANDARD

PARTICULATE
CONCENTRATION
2ND HIGHEST
24 HOUR
($\mu\text{g}/\text{m}^3$)

YEAR	MD	WC	BC	ASH	DR
1970	100	100	100	100	100
1971	150	150	150	150	150
1972	200	200	200	200	200
1973	250	250	250	250	250
1974	300	300	300	300	300
1975	350	350	350	350	350
1976	300	300	300	300	300
1977	250	250	250	250	250
1978	200	200	200	200	200
1979	150	150	150	150	150
1980	100	100	100	100	100

* 1980 DATA IS PRELIMINARY

control measures necessary to improve air quality to meet the Primary and Secondary TSP standards.

III. State Implementation Plan (SIP) Requirements

The Clean Air Act requires that a SIP containing additional control measures for the AQMA be adopted and submitted to EPA by July 1981. This SIP must contain implementable and enforceable measures which provide for attainment of the Primary TSP standard as soon as practicable but not later than July 1984. If this schedule is not met, a federal prohibition on construction of new major sources and major modifications would apply to the nonattainment area even if offsets are provided. Under Federal definitions, a major source would emit 100 tons/year or more of particulate and a major modification would emit 25 tons/year or more.

The Department proposes that the new TSP SIP contain the following:

1. Adopted control measures which will provide for attainment of the Primary standard before July 1984,
2. Commitments to study candidate control measures which will maintain compliance with the Primary standards and attain and maintain compliance with Secondary standards. The selected measures would be adopted by July, 1982.

This two step schedule will allow for expeditious implementation of control measures to meet the Primary TSP standard while giving maximum consideration to new information that may become available from ongoing studies.

IV. Medford Aerosol Characterization Study (MACS) and the Medford Climatological Dispersion Model (CDM)

The Department has analyzed the air quality problem in the AQMA by two different methods. These methods, namely MACS and CDM, begin at opposite ends of the air quality problem and attempt to analyze by scientific methods the sources of air pollution and the impacts on the community.

The MACS analysis was performed by the Oregon Graduate Center under the direction of Dr. John Cooper, and is discussed in detail in the attached report (Attachment 1).

Basically MACS involved analyzing air quality samples gathered at monitoring stations in the community and tracing back to the sources of pollutants by the Chemical Mass Balance (CMB) technique. This "chemical fingerprinting" makes it possible to identify the source categories responsible for particular pollutant impacts. The results of the MACS analysis for Medford, show that the source categories having the highest impacts are vegetative burning (30%), geological dust (30%), and wood products industrial emissions (20%).

The CDM analysis was performed by the Department staff and involves modeling source emissions to trace forward to the pollutant impacts on the community. CDM has the advantage of predicting impacts both present and future at many receptor points in addition to the sampling sites.

The original CDM emission factors for paved road dust and wood space heating were found during the MACS analysis to be low. These emission factors were accordingly corrected upward in CDM to more accurately reflect the impacts of those source categories.

A comparison of CDM and MACS results is shown in Table 1. The results obtained by the two approaches compare quite well within the uncertainties of the methods. Table 2 shows that the CDM method generally predicted lower results than MACS. Table 3 provides an explanation of the 17.7 ug/m³ of underprediction at the Medford Justice Building monitoring site.

Table 1: Comparison of CDM and MACS Results

Category	Medford Justice Building		White City Lay Residence	
	CDM	MACS	CDM	MACS
Wood Space Heating	19.4 ug/m ³	21.4 ug/m ³	6.5 ug/m ³	5.8 ug/m ³
Soil Dust	18.7	18.3	20.4	19.7
Motor Vehicle Tailpipe Exhaust	1.6	2.4	0.5	1.7
Hogged Fuel Boilers and Particle Board Dryers	7.5	9.7	3.7	8.0
Cyclones	2.5	4.2	6.4	2.2
Charcoal Mfg.	0.9	-	0.4	-
Veneer Dryers	3.8	-	3.5	-

Table 2: CDM results compared to Hi-Vol Measurements

Receptor	CDM Prediction (ug/m ³)	Hi-Vol (ug/m ³)	Difference (ug/m ³)
Medford Justice Building	79	97	18
White City	67	94	27
Ashland	36	52	16
Bear Creek	68	82	14

Table 3: Explanation of CDM Underprediction at Medford Justice Building:

Category	Impacts (ug/m ³)		Difference (ug/m ³)	% Difference
	CMB	CDM		
Wood Space Htg.	21.4	19.4	2.0	11%
Unexplained (1)	7.1	-	7.1	40%
Particle Board Dryers and Hogged Fuel Boilers (2)	9.7	7.5	2.2	12%
Nitrates (3)	2.0	-	2.0	11%
Raw Wood (2)	4.2	2.5	1.7	10%
Sulfates (3)	1.0	-	1.0	6%
Motor Vehicles	2.4	1.6	0.8	5%
Ammonia	0.4	-	0.4	2%
Misc. (includes rounding error)			<u>0.5</u> 17.7	<u>3%</u> 100%

- 1) The "unexplained" category is caused by differences in air quality measurement instrumentation. Based on optical microscopy, the above unexplained 7.1 ug/m³ may be subdivided as follows: Coarse Raw Wood (3.0 ug/m³), Coarse Soil Dust (0.9 ug/m³), Coarse Combustion Products (2.6 ug/m³), Biotics (0.2 ug/m³), Misc. (0.2 ug/m³).
- 2) The differences in CDM Compared to MACS are likely due to greater or lesser actual industrial emissions compared to inventoried data. Also differences in local meteorological data at the monitoring sites compared to the airport may account for some of the difference.
- 3) Nitrates and Sulfates are formed by the reaction of gases in the atmosphere and cannot be modeled.

V. Control Strategies

The control strategies adopted in the 1978 SIP are listed in Table 4 followed by the strategies proposed by the Department staff for the 1981 SIP in Table 5. Other strategies that might be considered are shown in Table 6. The air quality improvement that would be gained by each strategy is listed in the Tables. Figures 3, 4, and 5 present a simplified summary of the strategies. Details of the candidate control measures are described in Attachment 2.

Table 5 shows the amount of air quality improvement required from the end of the MACS period (January 1, 1980) to the primary standards attainment date of 1984. A credit for the 1978 SIP control measures that had not been implemented by January 1, 1980, is listed along with the additional recommended measures. The recommended measures show improvements which are adequate to meet the primary standards.

More specific information on the control strategies, the selection of final strategies, and the development of specific rules, ordinances and agreements to implement the strategies will be completed during the advisory committee consultation process.

VI. Conclusion

The Air Quality Committee is requested to review the proposed strategies for attaining the primary particulate standard and recommend adoption of those strategies which can provide for attainment by 1984. The committee is also requested to recommend further study of those strategies which seem most promising for attainment of the secondary standard.

Table 4. Suspended Particulate Air Quality Improvement from Individual Control Measures Adopted in 1978
(micrograms per cubic meter, ($\mu\text{g}/\text{m}^3$) annual geometric mean)

	Net Reductions in Emissions <u>Ton/Yr</u>	Air Quality Improvement		<u>Implementation Date</u>	<u>Anticipated Social Acceptability</u>
		<u>Medford</u> ($\mu\text{g}/\text{m}^3$)	<u>White City</u> ($\mu\text{g}/\text{m}^3$)		
Primary Std. Attainment Plan - Adopted Measures					
1. Particle Board Dryers (to 0.35 lbs/1000 ft ²)	1082	5.5	1.4	1/1/81	High
2. Large Hogged Fuel Boilers to 0.050 gr/SCF	561	1.4	0.3	1/1/80	High
3. Eliminate Wigwam Burner	210	0.2	0.1	1/1/80	High
4. Charcoal Plant	410	0.6	0.2	1/1/82	High
5. Large Cyclones to baghouse control	1165	6.4	14.9	1/1/82	High
6. Veneer dryers, 10% average opacity	143	1.1	0.7	1/1/80	High
7. Backyard Burning limited to spring burning season	23	0.6	0	1980	Mixed
TOTAL	3594	15.8	17.6		
Reductions Occurring after January 1, 1980, (MACS period)	2832	12.0	9.3		

Table 5. Suspended Particulate Air Quality Improvement from Recommended Control Measures
(micrograms per cubic meter, (ug/m³) annual geometric mean)

	Net Reductions in Emissions Ton/Yr	Air Quality Improvement		\$/Yr/T	\$/Yr/ug/m ³	HP/ug/m ³	Imple- mentation Date	Anticipated Social Acceptability
		Medford (ug/m ³)	White City (ug/m ³)					
-Recommended Measures								
1. Small Drywood Cyclones	189	1.4	0.9	\$1,000	130,000	350	1/1/84	Good
2. Upgrade Veneer Dryer Controls	226	1.4	1.4	\$2,000	320,000	450	1/1/83	Good
3. Industry Fugitive Emissions Control	87	1.6	0.5	\$1,800	120,000	Negl.	1/1/84	High
4. Commercial Firewood Sales Moisture Regulation	53	0.9	0.2	\$200	25,000	Negl.	1/1/82	Good
5. Moisture Control of Firewood obtained on Forest Lands	308	3.3	1.1	\$11,000	2,200	Negl.		Fair
6. Medford Winter Sanding Cleanup	61	0.4	0.1	\$35	2,200	Negl.	1/1/82	Good
7. Trackout Controls	25	0.1	0	\$1,800	120,000	Negl.	1/1/83	Good
8. Home Weatherization (50% of existing home burning wood)	299	3.2	1.1	Net cost zero		savings		Fair
9. Home Weatherization (all homes that install new stoves)	492	5.6	2.1	Net cost zero		savings		Good
10. Operation and Maintenance Program	100	0.9	0.9	-	-	-		Fair
SUB-TOTAL	1840	18.8	8.3		967,000/Yr.	800 HP		
Credit from 1978 SIP	2832	12.0	9.3					
TOTAL	4672	30.8	17.6					
Required for Attainment of Primary TSP Standard by July 1984		30.3	15.1					

Table 6. Suspended Particulate Air Quality Improvement from Alternative Control Measures
(micrograms per cubic meter, (ug/m³) annual geometric mean)

	Net Reductions in Emissions <u>Ton/Yr</u>	Air Quality Improvement		<u>\$/Yr/T</u>	<u>\$/Yr/ug/m³</u>	<u>HP/ug/m³</u>	Anticipated Social <u>Acceptability</u>
		<u>Medford</u> (ug/m ³)	<u>White City</u> (ug/m ³)				
Industrial Measures							
1. Small Hogged Fuel Boilers to 0.10 gr/SCF	27	0	0.6	\$17,000	130,000	350	Poor
2. Large Hogged Fuel Boilers to 0.010 gr/SCF	266	1.8	0.3	\$3,400	120,000	Negl.	Poor
3. Energy subsidy (elderly only)	375	4.0	1.4	\$6,000	1,000,000	encourage waste or use of more fossil fuel	Poor
4. Stove Const. Stds.*	82	1.1	0.2	unknown	unknown	savings	Fair
5. Catalytic AB wood stove or other stack control devices * (Retrofit on existing stoves)	1876	21.5	7.5	300	50,000	unknown	Poor
6. Stack Temp. Gauge	58	0.9	0.2	4000	570,000	savings	Fair
7. Ban New Stoves	614	7.0	1.4	8900	1,400,000	more fossil fuel use	Unacceptabl
8. Ban use of existing and new stoves	2345	26.6	5.6	6600	970,000	more fossil fuel use	Unacceptabl
9. VMT Reductions Medford Only							
5%	17	0.7	0	22500	560,000	Possible net	Fair
10%	34	1.3	0.1	15000	390,000	Savings from VMT	Poor
20%	69	2.7	0.1	12500	320,000	Reduction Strategies	Poor

Table 6. Continued.

	Net Reductions in Emissions <u>Ton/Yr</u>	<u>Medford</u>	<u>White City</u>	<u>\$/Yr/T</u>	<u>\$/Yr/ug/m³</u>	<u>HP/ug/m³</u>	<u>Anticipated Social Acceptability</u>
VMT Reductions AQMA Wide							
5%	91	0.8	0.3	9500	1,050,000	Possible net	Poor
10%	181	1.6	0.5	6500	720,000	Savings from VMT	Poor
20%	363	3.3	1.0	5800	640,000	Reduction Strategies	Poor
10. Paving Unpaved Roads (Medford)	26	0.8	0	1100	36,000	Negl.	Poor
11. Alternative Heating on ASA Days	175	4.0	1.0	-	-	-	Poor
12. Curtailment of Industry on ASA days	37	0.3	0.6	-	-	-	Poor

*The technology does not exist at this time to implement these strategies but may become available in the next 2 to 5 years.

Figure 3

PARTICULATE STRATEGY NEEDS

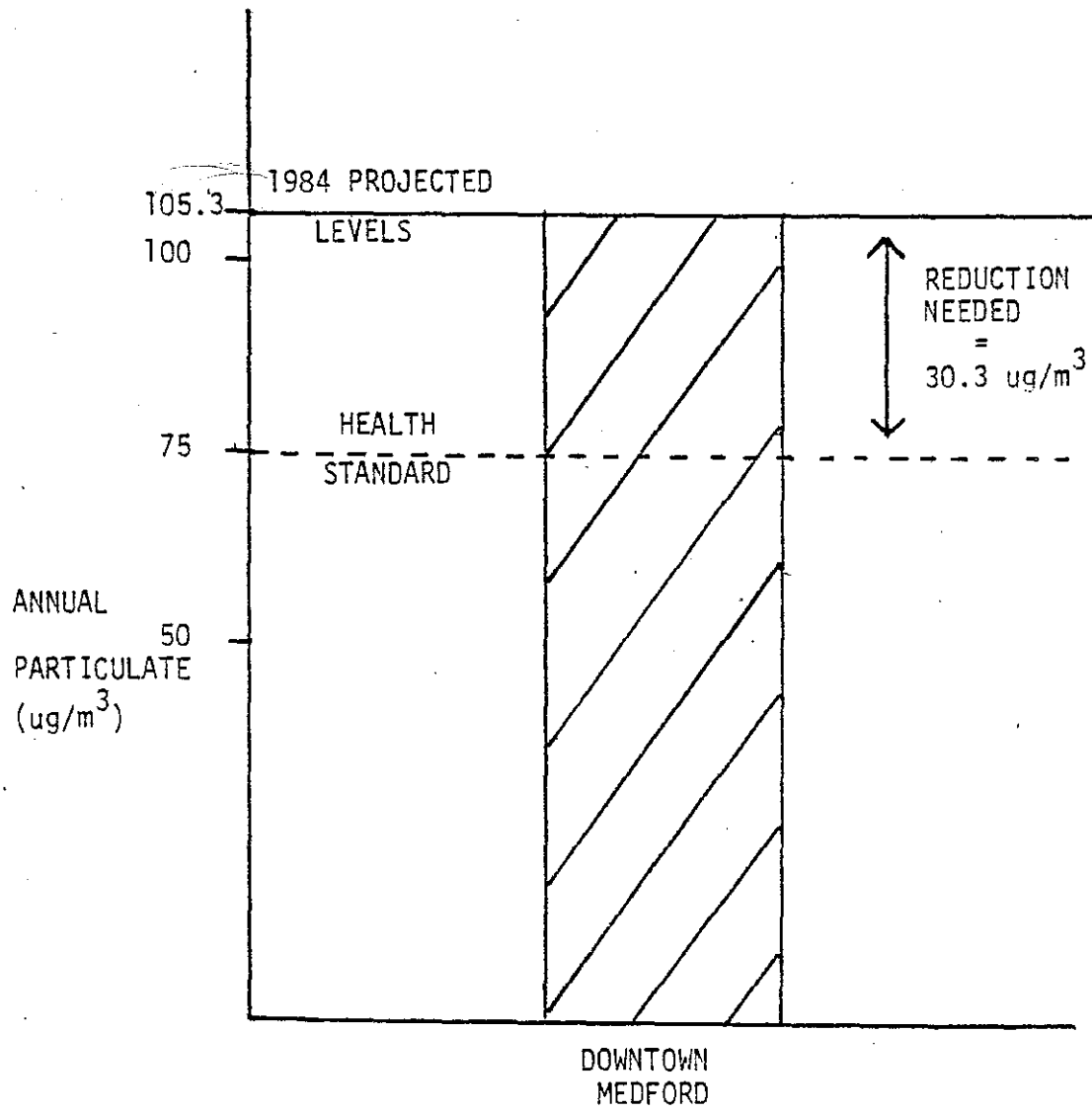


Figure 4

DEQ RECOMMENDED CONTROL STRATEGIES

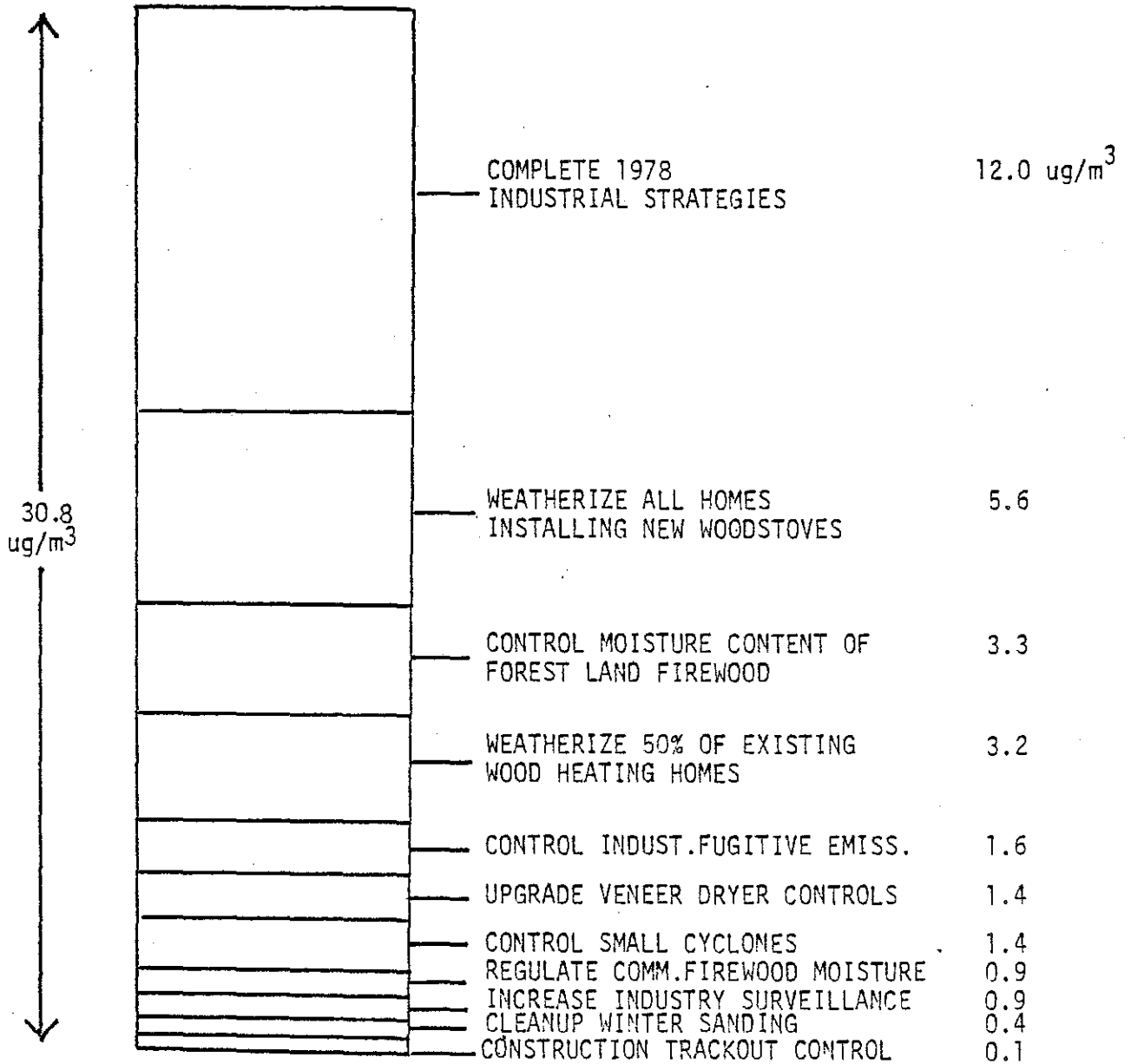
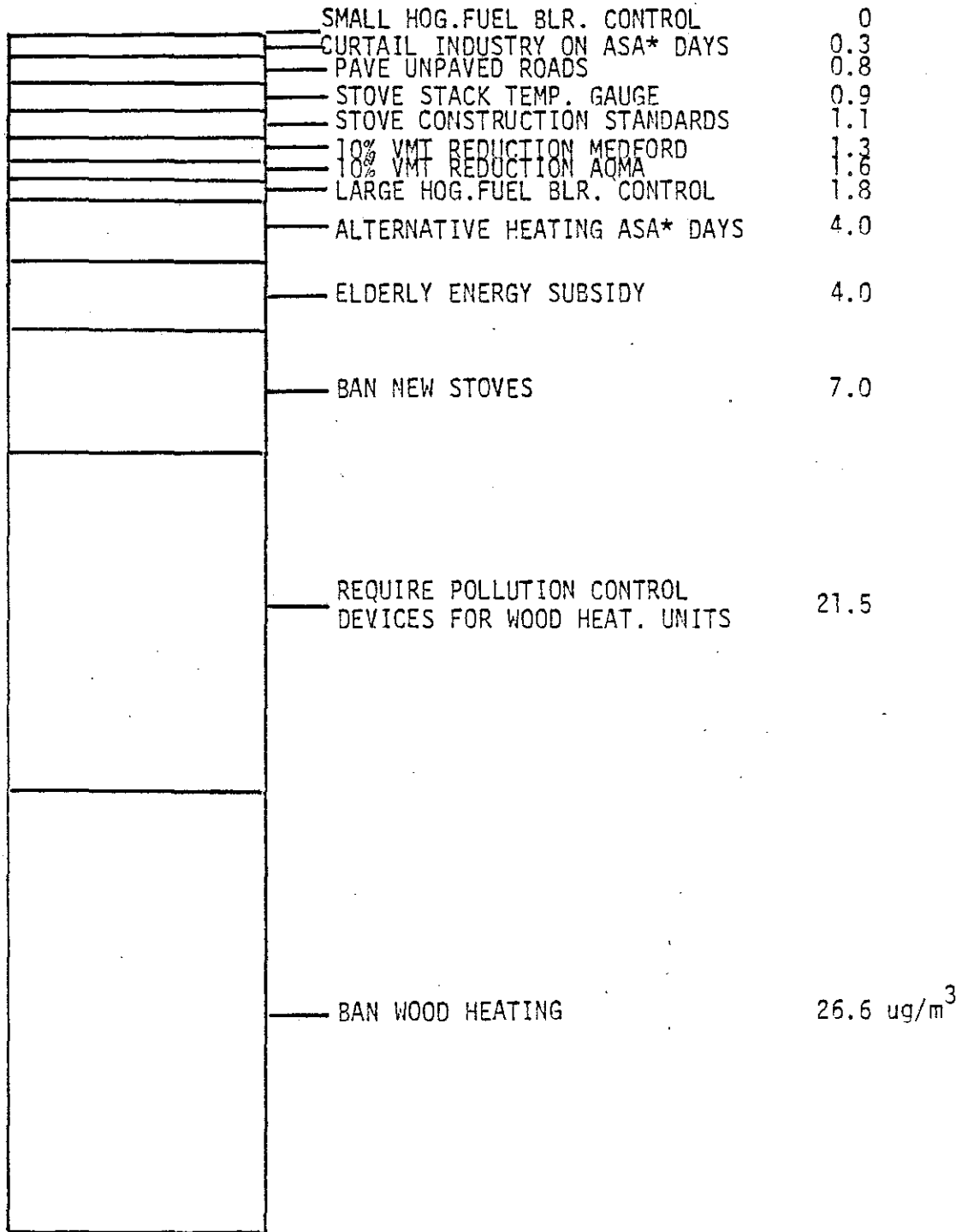


Figure 5

ALTERNATIVE CONTROL STRATEGIES



MANY OF THESE STRATEGIES ARE NOT ADDITIVE AND NOT TECHNICALLY OR SOCIALLY ACHIEVABLE AT THIS TIME.

* AIR STAGNATION ADVISORY

ATTACHMENT 2

Recommended Suspended Particulate Control Measures

1. Small Drywood Cyclones

Small air conveying systems could be required to install a baghouse or equivalent if handling dry chips, shavings or dust. No air conveying system would be allowed to emit more than 1 ton/year. This control strategy could reduce annual emissions by 189 tons and improve quality by 1.4 ug/m³ annual basis at Medford. The reduction would cost \$6300 per ton as initial investment cost. The annualized costs would be \$130,000 per year per ug/m³ or \$1000 per ton per year.

2. Upgrade Veneer Dryer Controls

Veneer dryer controls could be upgraded as provided for in the 1978 SIP to include a mass emission limit and maximum 10 percent opacity emissions. This level of reduction could be achieved by an afterburner, scrubber followed by a mist eliminator, or a scrubber with electrostatic enhancement of particulate collection. This control strategy could reduce annual emissions by 226 tons and improve air quality at Medford an additional 1.4 ug/m³ annual basis over the present control level. The annualized costs would be \$1.6 million or \$2000 per ton per year.

3. Industry Fugitive Emissions

Fugitive Emissions will be more stringently controlled to reduce by 75 percent the fugitive emissions from industrial areas such as access roads and log decks. Other fugitive materials from the plant site will be identified and controlled. The area of highest priority is the north Medford industrial complex. Industries would be required by rules or permit conditions to control such emissions.

4. Programs to Reduce the Wood Moisture Content of Commercial Firewood

There are two effects of burning wet wood rather than dry wood:

1. The heating value of the wet wood is less and thus more wood must be burned to achieve the same heating.
2. More particulate per pound of wood burned is emitted from wetter wood.

The heating value of wetter wood is less because more energy must be used to vaporize the water in the wood. More particulate per pound burned is emitted because the additional steam in the combustion area reduces the firebox temperature, resulting in less complete combustion of the wood tars and hydrocarbons given off as the wood breaks down

in the combustion process. The table below illustrates these two effects:

Table 1

Impact of Moisture on Wood Net Heat Content and Particulate Emission

Wood Moisture* Content (%)	Relative Energy Content	Relative Particulate Emissions Per Pound Wood Burned	Relative Particulate Emission Per Net BTU Content of Wood Burned
10%	1.00	1.0	1.0
20%	.88	1.2	1.36
30%	.67	1.5	2.25
40%	.59	1.9	3.22
50%	.47	2.4	5.10

* Wet basis, i.e. 10% moisture content = $\frac{10 \text{ lb. water}}{10 \text{ lb. water} + 90 \text{ lb. wood}}$

Well-seasoned wood stored in a very dry location contains 15 percent to 20 percent moisture. Conversely fresh cut wood will typically have a moisture content in the 40 to 50 percent range. Douglas fir slash in the forest exposed to heavy moisture during the rainy winter season, even if downed for six months and partially cut up, would typically have a moisture content of about 35 percent or greater.

A sample comparison from the table shows the impact of moisture content. An equal amount of wood with 40 percent moisture content has only 67 percent of the heating value of 20 percent moisture content wood. Thus, about 1-1/2 times as much of the 40 percent moisture wood allowed must be burned to produce equivalent heat. However, the particulate emissions per unit of heat output are 2.4 times higher because the gases and tars are burned less completely.

Individuals should seek to burn drier wood for these reasons:

1. The heat content is higher.
2. The creosote emissions would be cut in half, resulting in safer stove operation and reduced cleaning requirements, and
3. Air pollution emissions are less.

Although information is not available to determine precisely the average moisture content of wood burned in the area, moisture probably averages in the 25 percent to 30 percent range. Assuming an average moisture content of 30 percent, significant reductions in particulate emissions could be obtained if the average moisture content were reduced to 20 percent. Assuming that all stove owners and one-fourth of the fireplace owners would burn less wood with higher heat content, particulate emissions would be reduced by 26 percent.

Regulations to reduce the average moisture content of commercial firewood include the following:

1. Requiring commercial suppliers to specify the average moisture content of the wood they sell;
2. Requiring suppliers to specify how long the wood has been cut and split and where it was stored;
3. Prohibiting the sale of inadequately seasoned wood or wood with a moisture content above a certain level, say 30 percent.

These regulations could be adopted and implemented through local

ordinances or through measures adopted by the EQC. Enabling legislation may be required, however.

5. Moisture Control of Firewood Obtained on Forest Lands

Agreements could be made with the National forest Service and the State Department of Forestry of allow cutting of firewood during the spring and summer months only. In addition, specific seasoning times or moisture content could be required for down wood before cutting is allowed. It is estimated that this strategy could reduce emissions by 176 tons/year from wood space heating.

6. Modification of Street Sanding Programs

Measures to reduce particulate emissions due to reentrainment of sanding materials must be developed such that there is little or no decrease in public safety.

No accurate estimates of emission rates from sanded streets are available, however a review of air quality data at Medford suggests that sanding practices can have a significant impact on particulate air quality. A careful evaluation of existing sanding practices can be made to reduce particulate emissions while still allowing for road safety.

Road sanding is conducted by the Medford Public Works Department on local streets and by the Oregon Department of Transportation on state and federal highways. Both City and State should be requested to

evaluate their street sanding programs to determine 1) whether sanding materials with reduced fines content can be used as an alternative, 2) whether the volume applied is optimum, or whether less material could be distributed under snowy or icy conditions without a penalty in reduced safety, 3) the length of time normally taken for streets to be swept after sanding occurs and whether street cleaning could be done sooner after sanding.

7. Control Trackout from Industry and Construction Sites

This control measure for fugitive emission sources would be directed primarily at sources that are privately owned. This includes construction sites, sand and gravel operations, truck terminals, log storage yards, asphalt and ready-mix plants, and other commercial operations that indirectly contribute a significant amount of traffic-related fugitive dust as a result of mud and dirt tracked from their premises. Sources not affected by this proposed control strategy are municipally owned unpaved roads and road shoulders, as well as sources such as unpaved driveways, private parking areas, and small storage areas.

DEQ does have a regulation which addresses fugitive emissions, however the enforcement of this regulation is primarily limited to large spills. Effective control of trackout sources and other fugitive emissions basically requires improved maintenance practices.

The following procedures could be adopted to reduce trackout from industrial and construction sites:

1. Use temporary or permanent barricades to keep traffic off of unpaved areas.
2. Require wheel washers at exits of major construction sites.
3. Assign sweepers on access roads once or twice per day.
4. Assign manual laborer to clean tracked material near site.
5. Require graveling on access roads on site so less dirt is entrained.
6. Pave unpaved areas.
7. Oil or apply stabilizing chemicals to unpaved areas.
8. Issue stop work order if trackout occurs and is not promptly corrected.
9. Require construction facilities to put up bond. If trackout occurs, inspectors (city, county or DEQ) would notify the contractor, and either the contractor cleans up trackout or bond money is used to pay for clean-up.
10. Enforce existing regulations more vigorously.
11. Develop more stringent regulations for trackout either at city, county or DEQ level.

8. Home Weatherization Programs -Existing Homes Burning Wood

Improved residential insulation and weatherization could reduce particulate emissions by reducing the amount of space heating required to maintain comfortable temperatures. A typical home requires about 121 million BTUs per year for space heating. If each home were

retrofitted with adequate weatherization, the amount of energy required would drop to 49 million BTUs, a reduction of 60 percent.

If the conservative assumption is made that all of the burning in wood stoves and one-fourth of the burning in fireplaces is for space heating purposes (some is for recreational) and that 25 percent of the homes now burning wood will be retrofitted, then a reduction in particulate emissions of 85 tons would occur.

Air quality for home weatherization programs being conducted by the utility companies and from new building codes should be claimed. The Department has included as a recommended strategy weatherization of 25% of existing homes. Weatherization of up to 50% of existing homes is included as an alternative strategy.

9. Home Weatherization Programs - Homes Installing New Stoves

Wood burning particulate emissions are projected to increase by 400 tons between 1980 and 1984. If the entire increase is assumed to occur for the purpose of heating with wood (rather than ornamental purposes) and a requirement were to be imposed that new stoves can only be installed if homes are insulated to proposed standards, then the 400 ton projected increase could be reduced to a 120 ton increase.

10. Operating and Maintenance Program for Industry

An Operating and Maintenance Program for Industry could provide emission reductions below the allowable level for sources. Industries would be required to optimize process and pollution control equipment

to minimize emissions. A decrease in industrial emissions of 10 percent would provide an air quality improvement of 0.9 ug/m^3 .

Alternative Suspended Particulate Control Measures

1. Small Hogged Fuel Boilers

Operators of small wood fired boilers could be required to reduce emissions to no more than 0.1 grains per SCF corrected to 12 CO₂. This level of reduction could be achieved by a low energy scrubber. This control strategy would produce an annual reduction of 27 tons in the AQMA but modeling does not show an improvement at the Medford receptor. This result occurs because the small boilers are located away from Medford in Ashland, Tolo and White City. The reduction would cost \$330,000 per year or \$12,000 per ton per year. Energy requirements would be 4.6 million kw per year at a cost of \$137,000 per year at 3 cents per kwhr.

2. Large Hogged Fuel fired Boilers

Operators of large woodfired boilers would be required to reduce emissions to no more than 0.010 grains per SCF, corrected to 12% CO₂. This level of reduction could be achieved by a baghouse filter or equivalent. This control strategy would produce an annual reduction of 266 tons and improve air quality an additional 1.8 ug/m^3 annual basis over the present control level. The reduction would cost \$23,000 per ton in initial investment cost. The annualized costs would be one

million kw per year at a cost of \$176,000 per year at 3 cents per kwhr. Existing controls would probably not be compatible with the technology needed to achieve 0.010 grains per SCF.

3. Energy Subsidies

The State of Oregon has authorized the expenditure of funds to provide relief for low income or elderly residents who cannot afford to pay their space heating bills and have not received assistance from any other programs. While the effects of this program are not quantifiable, it may help to lessen the rush of lower income homeowners to utilize wood space heating to reduce home heating costs.

About 20 percent of the area population is over 65 years of age. Energy subsidies in the amount of 50 percent of fuel bills could be supplied on the condition that people not burn wood for space heat. Assuming that wood burning would be reduced by 80 percent in 20 percent of the households (some ornamental burning would still occur), 1982 emissions would be reduced by 16 percent or 180 tons. Assuming 1982 typical heating requirements (120 million BTUs/house/year) and costs of \$6/million BTUs, costs would be about \$14 million/year.

The primary disadvantages of such a program would be the high cost, and the fact that it would tend to support high levels of energy consumption rather than conservation.

4. Stove Construction Standards

Work is being done under U.S. Department of Energy funding to examine the effect of wood stove design on particulate emissions and energy efficiency. Unfortunately, results of this work are not yet available and it is not clear how much emissions can vary with different stove designs. Some experts, believe that stove operating characteristics (such as moisture, air supply rate, or the way the wood is stacked in the firebox) would likely have a much bigger influence on emissions than actual stove design.

If this work indicates a big difference in emissions from different types of stoves, then it would be appropriate to seriously consider a stove certification program.

Some stove vendors are introducing clean-burning wood furnaces into the area, now. These designs need to be evaluated regarding their emission characteristics.

5.1. Catalytic Afterburners or Other Stack Control Devices

Some companies and inventors are working to develop catalytic afterburners and other stack control devices that could be installed in wood stove stacks to more completely burn the wood tars and gases. Such devices could reduce emissions by up to 80 percent. Such a device could potentially produce net fuel savings by recovering heat from the hydrocarbons that previously would have been emitted unburned from the stack.

Assuming 80 percent control efficiency such a device could reduce 1984 projected total emissions of 1200 tons to 230 tons.

6.1. Stack Temperature Gauge

Temperature gauges are currently available at about \$10 cost. Such gauges can help reduce emissions because they provide feedback to the stove owner on the approximate temperature of the existing stack gases. If the owner is so motivated, he can then regulate the amount of wood and air supplied to the stove such that reasonably good air-fuel ratios are maintained. Such devices are marked to indicate that creosote forms at low temperatures and that the stove is operating inefficiently (due to excess heat loss) if stack temperatures are too high. An owner can reduce the amount of creosote emissions and stove deposits by determining the temperature of his stove when smoke density from the stack is minimal (by visual observation), and then maintaining stove operation near that temperature level.

7. Prohibition of Future Stove and Fireplace Installation

A decision could be made that wood burning emissions are increasing at too rapid a rate and that new stove and fireplace installation should be prohibited. Such a policy would require new authority from the State Legislature, because home space heating equipment is presently exempted from DEQ regulation. In addition, such a policy would probably encounter significant public opposition. Assuming 90% compliance, the growth in emissions of 400 tons projected between 1980 and 1982 could be reduced to 40 tons.

8. Prohibition of all Stove/Fireplace Usage

This potential strategy represents the most severe of all possible control strategies. As discussed above, new legislative authority would be needed since DEQ has no authority to regulate home space heating. Although a significant emission reduction could theoretically be achieved, there would be significant public opposition. Assuming 100 percent compliance, the projected emissions for 1982 of 1145 tons would be reduced to zero tons.

9. Reductions in Vehicle Miles Travelled (VMT)

A control measure that reduces VMT by 1% in an area reduces road dust emissions by 1%. The Parking and Traffic Circulation Study estimated that VMT had reduced by 10% in the Medford area since 1978 because of conservation efforts, higher gasoline prices, and the economic recession. If it can be demonstrated that this reduction is permanent and air quality credit can be claimed for reductions of particulate emissions. The amount of reduction of particulate from the Parking and Traffic Circulation Plan has not yet been determined, but any reductions in emissions resulting from this strategy should be credited.

10. Paving Unpaved Roads and Unpaved Shoulders in Medford

Unpaved areas increase particulate emissions in two ways. First there are direct emissions as vehicles drive on the unpaved areas. Even more significant is the trackout from these areas onto higher traffic roads.

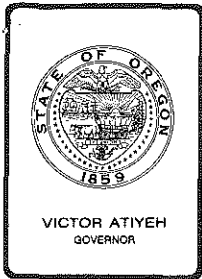
Estimates of traffic levels on unpaved roads and shoulders are needed to prioritize which areas have the greatest reduction potential.

11. Alternative Heating on Air Stagnation Advisory Days

Wood burning homes which have alternative heating systems could be required to curtail wood stove and fireplace use on Air Stagnation Advisory (ASA) days. An average of 17 ASA days occur per year mostly during the winter. It is estimated that the amount of wood burned on those days could be reduced by 85% resulting in a 4 ug/m³ improvement at Medford and a 1 ug/m³ improvement at White City.

12. Curtailment of Industry on Air Stagnation Advisory Days

Industry could be required to shutdown or curtail emissions on ASA days. These reductions would be calculated from the controlled emission levels of the particular sources. A complete shutdown of industry on ASA days would result in a 0.3 ug/m³ improvement at Medford.



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. I(2), June 5, 1981, EQC Meeting

Status Report and Discussion of Medford Area Attainment Strategies; Carbon Monoxide

Background

Carbon monoxide (CO) levels in Medford frequently exceed the air quality standard for this pollutant. In fact it is one of the most severe CO problems in the country. Oregon is required to revise the State Implementation Plan (SIP) to include an attainment plan for carbon monoxide in Medford. The plan is due to EPA by July 1, 1982. Compliance with the carbon monoxide standard is required by December 31, 1987.

Evaluation

Problem

The Medford non-attainment area for carbon monoxide covers approximately 1.5 square miles of the central city area. The Medford CO monitor recorded violations of the 8-hour CO standard (10 mg/m³) on 176 days in 1977, 184 days in 1978, 121 days in 1979 and 68 days in 1980. The major drop in violations in 1980 may be somewhat due to meteorology. Highest levels in 1980, however, were as severe as in previous years. Alert levels (17 mg/m³) were reached in each of these years, normally during December. Motor vehicles contribute approximately 75% of the carbon monoxide in the Medford/Ashland AQMA and more than 90% in the downtown Medford problem area. The remainder of the CO comes from residential fuel burning and other miscellaneous combustion sources.

Based on modeling done by the Oregon Department of Transportation in 1978, it is estimated that CO emissions must be reduced by 62% by 1987 in order to meet the CO standard in Medford. The model estimated CO emissions at 7,500 tons per year in 1976 and projected emissions of 5,700 tons per year in 1987. The projected reduction is based on lower automobile emissions due to the Federal Motor New Vehicle Control Program. CO emissions must be reduced to less than 2,200 tons per year in order to meet the CO standard.

Lead Agency Work

Jackson County has been designated the lead agency for developing a plan to reduce transportation - related air pollution problems in the Medford - Ashland area. In July, 1980, the County prepared a preliminary analysis of transportation control measures to reduce carbon monoxide levels. Of the 18 transportation control measures outlined in the Clean Air Act, the single most effective measure for reducing carbon monoxide is an inspection/maintenance (I/M) program. Several of the other transportation control measures, such as carpool/vanpool programs, public transit improvements, traffic flow improvements, and parking restrictions, were to have been analyzed in a parking and traffic circulation plan. Jackson County contracted with the City of Medford in August, 1979 to prepare a parking and traffic circulation plan for the Medford area. The City agreed to include this work in its overall transportation plan.

Medford Area Transportation Study (MATS)

In October, 1979, the City of Medford contracted with Alan M. Voorhees and Associates, Inc. to prepare the Medford Area Transportation Study (MATS). It was to be completed by June 30, 1980. The study experienced several delays and the draft final report was submitted in December, 1980 and the final report in March, 1981.

The budget for MATS was \$115,000. Of this budget, \$50,000 came from the Medford Arterial Street Fund, \$35,000 came from EPA/DEQ through Jackson County, and \$30,000 came from Rogue Valley Mall through Jackson County. The study was to focus on 4 principal issues;

1. The highway system;
2. The transit system;
3. Bicycle facilities;
4. Air quality conditions.

The study recognized significant problems with traffic congestion, poor transit system funding, uncoordinated bikeway systems and carbon monoxide air pollution. The plan recommended that \$22 million be spent over the next 20 years to improve the problem situations. Of the \$22 million, approximately 62% is for upgraded and new highways, 32% is for operating costs to maintain the existing level of transit system, and 6% is for bikeway improvements. The recommended plan is summarized in Figure I-1 and Table I-1. The arterial and collector road network is outlined in Figure I-2.

MATS indicated that compliance with the CO standard cannot be achieved by 1982 with any realistic policy. Most of Medford will attain the CO standard by 1987 if an annual inspection/maintenance program is implemented in 1982. Even with an annual I/M program, the study indicates that the intersections of McAndrews at Riverside and McAndrews at Court will NOT be IN compliance with the CO standard in 1987.

Relatively minor air quality improvements are expected from the recommended highway projects. The major projected air quality improvement would be due to an inspection and maintenance program. Estimated relative effectiveness of carbon monoxide reduction measures in Medford for 1987 based on Vorhees work and the latest data from EPA on biennial I/M follows. Note that the percentages under the column If Annual I/M add to 100%. This is not quite correct since two CO hot spots would remain beyond 1987, even though the bulk of the presently projected nonattainment area would meet the 8-hour CO standard by 1987.

<u>Measure</u>	<u>% of the Needed</u>	
	<u>Reduction in CO to Meet</u>	<u>CO Standard</u>
	<u>If Annual I/M</u>	<u>If Biennial I/M</u>
Inspection/Maintenance	85%	43%
Roadway Improvements	12%	12%
Bus, Bikeway, Parking Controls	03%	03%
	<u>100%</u>	<u>58%</u>

The above table shows that a biennial I/M program would leave a shortfall of greater than 40% in the needed CO emission reduction to attain the 8-hour CO standard by 1987. In July, 1980, Jackson County produced a report on transportation control measures which showed biennial I/M as being much closer in effectiveness to annual I/M (see Attachment 2, Chart 1: Medford CO Emissions Projection) than the above table indicates. The latest information from EPA, contrary to the Department's previous understanding, indicates that a biennial I/M program would be only about one-half as effective as an annual I/M program.

A considerable amount of work remains to be done by the City of Medford, Jackson County and the Department in order to finalize the carbon monoxide attainment plan for the Medford area and complete the State Implementation Plan by July 1, 1982. An annual I/M program may be required due to the severity of Medford's CO problem and lack of any viable alternatives. This would have some difficult enforcement problem considering the biennial state license system which would likely be relied on for primary enforcement. Also a more detailed assessment of parking emissions is needed and additional traffic information is required in order to accurately project future air quality.

Air Quality Advisory Committee

The Jackson County Commissioners reorganized and reappointed a local Air Quality Committee in February, 1981. Two transportation subcommittees have been formed to evaluate carbon monoxide control measures. One of the subcommittees will make recommendations to the Commissioners on an I/M program and the other subcommittee will review MATS and other CO control measures. These control measures will be evaluated:

1. Traffic flow improvements (per MATS);
2. Carpool and vanpool programs;
3. Employer programs (i.e. carpool, vanpool, transit);
4. Staggered work hours;
5. Parking management plan or parking restrictions;
6. Programs to minimize cold start emissions; and
7. Bicycle programs.

I/M

The Department submitted Senate Bill 141 to the 1981 Legislative Session which would have allowed the Environmental Quality Commission to contract with local governments for the operation of inspection/maintenance programs. SB 141 would have provided a tie-in to the State Motor Vehicle Registration Program to insure uniform compliance. Representative Lombard of Jackson County submitted House Bill 2395 which would allow local governments to adopt an emission inspection program and would provide a tie-in to the Motor Vehicle Registration Program. HB 2395 was passed by the House and is currently being considered by the Senate Local Government Committee. There appears to be significant support for putting the I/M measure to a vote of the people. The chairman of the Advisory Committee has expressed his desire that if a vote is needed it should occur after a year of I/M operation so people will "know" what they are voting on.

Schedule

The Air Quality Committee is scheduled to provide recommendations on I/M, MATS and other transportation control measures to the Jackson County Commissioners in July, 1981. The Medford Planning Department has requested comments on MATS from affected agencies by June 5, 1981. The Medford Planning Commission and City Council will hold public hearings on MATS in July and August, 1981. Adopted portions of MATS will be included in the transportation element of the Medford Comprehensive Plan. Jackson County plans to have the necessary transportation control measures analyzed, selected and adopted by January, 1982. The Department intends to request the Commission to authorize a public hearing on the Medford carbon monoxide portion of the SIP by early 1982 in order to adopt a revised SIP by July 1, 1982.

Summation

1. Carbon monoxide (CO) levels in Medford frequently exceed the air quality standard for this pollutant. In fact, these exceedances are among the most frequent of any urban area in the country.
2. Motor vehicles contribute about 75% of the CO in the Medford area and over 90% in the identified problem area.
3. CO levels are expected to decrease about 1800 t/y by 1987 based on the Federal new vehicle automobile emission control program, however, another 3500 t/y reduction is needed to meet health standards
4. Jackson County has been designated lead agency for developing a CO attainment plan required by the Clean Air Act for the Medford area. This plan must demonstrate how the CO health standard can be met by 1987.
5. The Medford Area Transportation Study (MATS) was completed in March, 1981. MATS includes roadway, transit and bicycle recommendations. Public hearings on MATS will be held in July and August, 1981.
6. The most effective CO control measure by far for Medford appears to be an inspection/ maintenance (I/M) program. An annual I/M program may be needed due to the severity of Medford's CO problem and the lack of other viable alternatives.
7. Other control measures under consideration include roadway improvements, a parking and traffic circulation plan and carpool/vanpool programs.
8. Jackson County plans to have the necessary transportation control measures analyzed, selected and adopted by January, 1982.
9. The Department intends to request the Commission to authorize a public hearing on the Medford CO attainment plan in early 1982 in order for the Commission to revise the State Implementation Plan by July 1, 1982.

Director's Recommendation

It is recommended that the Commission discuss the various elements being considered for the CO SIP with local officials and the Advisory Committee at the lunch meeting and in particular discuss the options and local concerns associated with implementation of an I/M program.

Bill

William H. Young

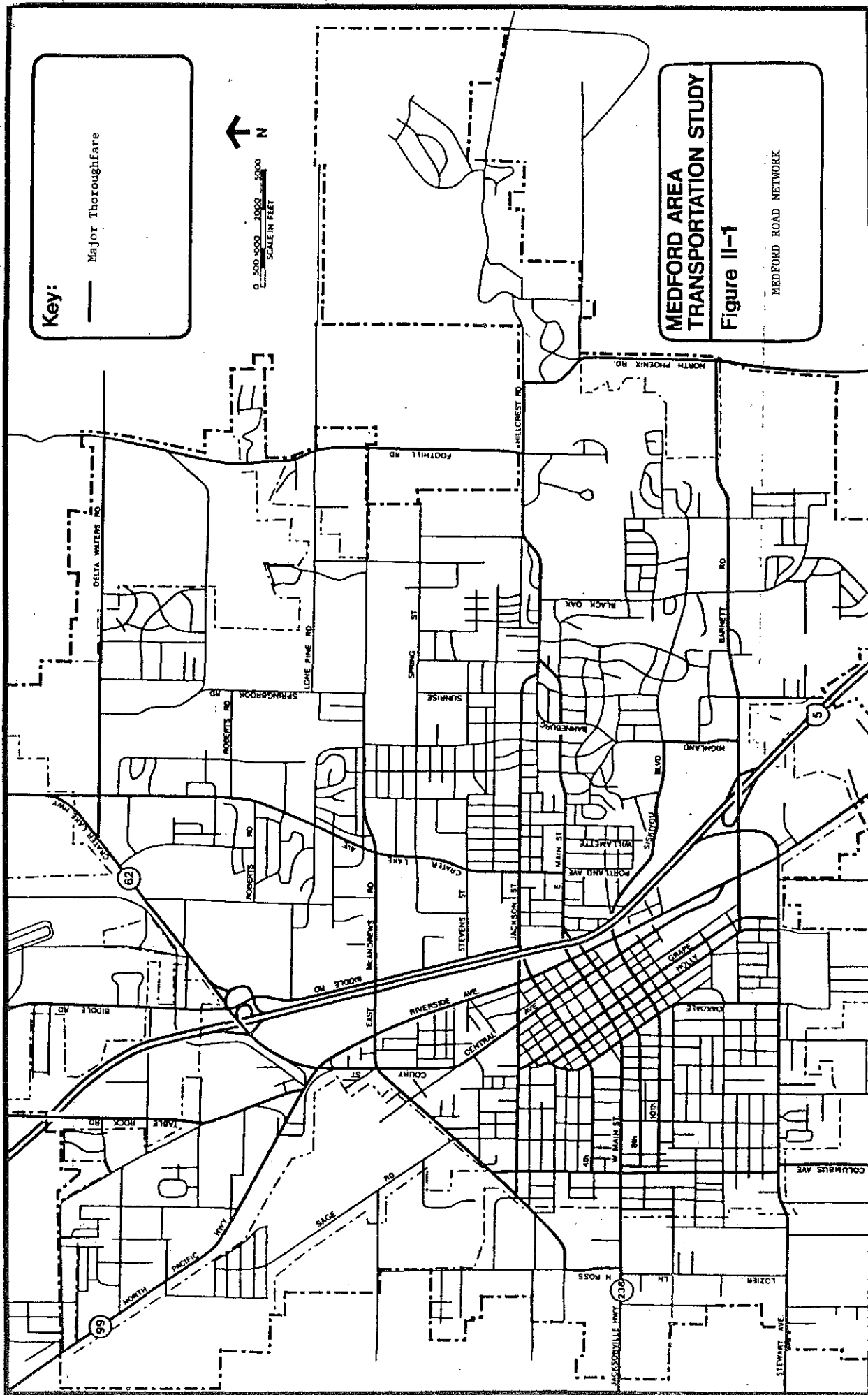
- Attachments: 1. From Medford Area Transportation Study:
- Table I-1: Range of Transportation Investments
 - Figure II -1: Medford Road Network
 - Figure I-1: Recommended Roadway Plan
 - Figure I-2: Arterial and Collector Road Network
 - Figure II-8 : CO Nonattainment Area
2. From Jackson County Analysis of Transportation Control Measures:
- Section XII: Summary
 - Map 2: Medford CO Screenline Analysis
 - Chart 1: Medford CO Emissions Projection

J.F. Kowalczyk:t
AAD97 (1)
229-6459
May 18, 1981

TABLE I-1

RANGE OF TRANSPORTATION INVESTMENTS (\$ 1980)

	Roadway	Transit	Bicycle
Minimum Level-- Recommended Plan.	<ul style="list-style-type: none"> • Address critical capacity problems, downtown, and air quality. • \$12 million capital program. • Approximately 40 lane-miles upgraded/new roadways. 	<ul style="list-style-type: none"> • Maintain existing levels of transit expenditure. Aim for increased productivity. • \$7 million program (equivalent to \$0.7m per year). 	<ul style="list-style-type: none"> • Basic bicycle network, focusing on bike-lanes and signed bike-routes. • \$1.1 million capital program. • Approximately 14 miles bike lane, and 57 miles bike route.
Maximum Level-- Desirable Goals not Fundable by 2000	<ul style="list-style-type: none"> • Address all capacity problems, plus accessibility issues. • \$21 million capital program. • 55-60 lane-miles upgraded/new roadways. 	<ul style="list-style-type: none"> • Scenario I type transit system. Extend route coverage to 10-12 Medford routes. Average 1-hour headways. • Up to about \$12.5 million program (equivalent to \$1.25m per year). 	<ul style="list-style-type: none"> • Develop bicycle network based on bike lanes. Take additional ROW where necessary, and add bike-lanes to all new arterial roadway reconstruction. • \$5+ million order-of-magnitude investment (exc. ROW costs)

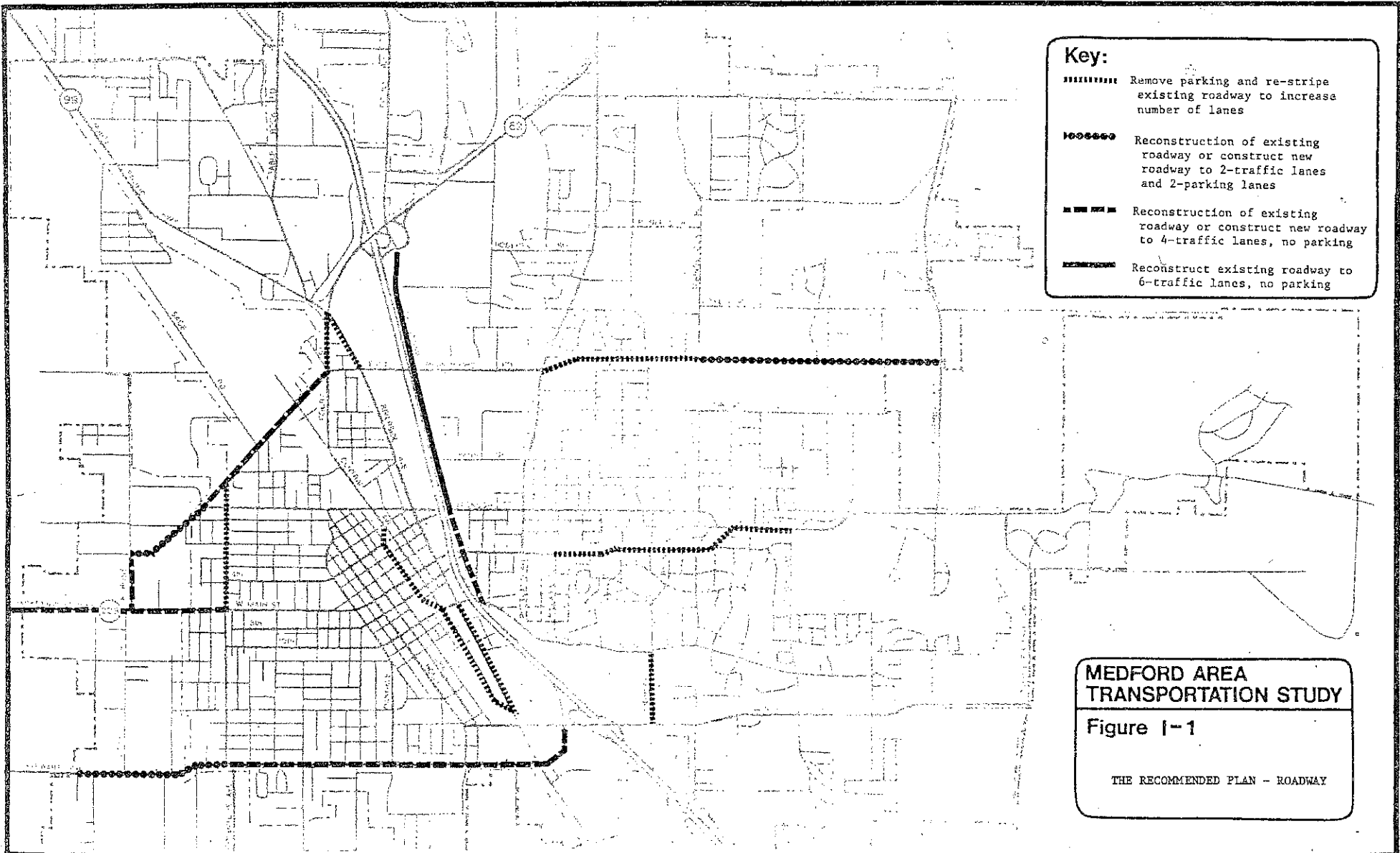


Key:
 — Major Thoroughfare



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 SCALE IN FEET

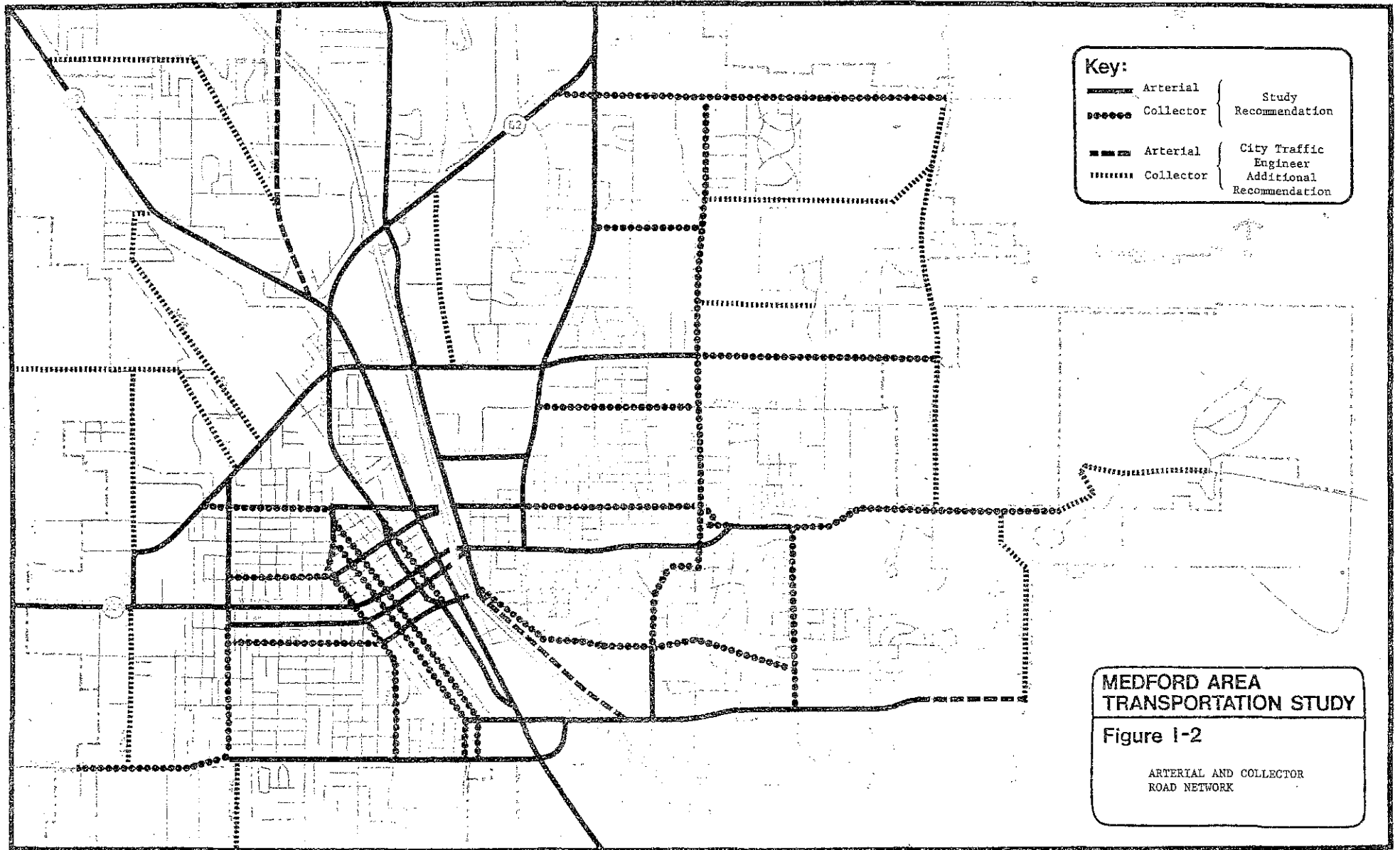
**MEDFORD AREA
 TRANSPORTATION STUDY**
Figure II-1
 MEDFORD ROAD NETWORK



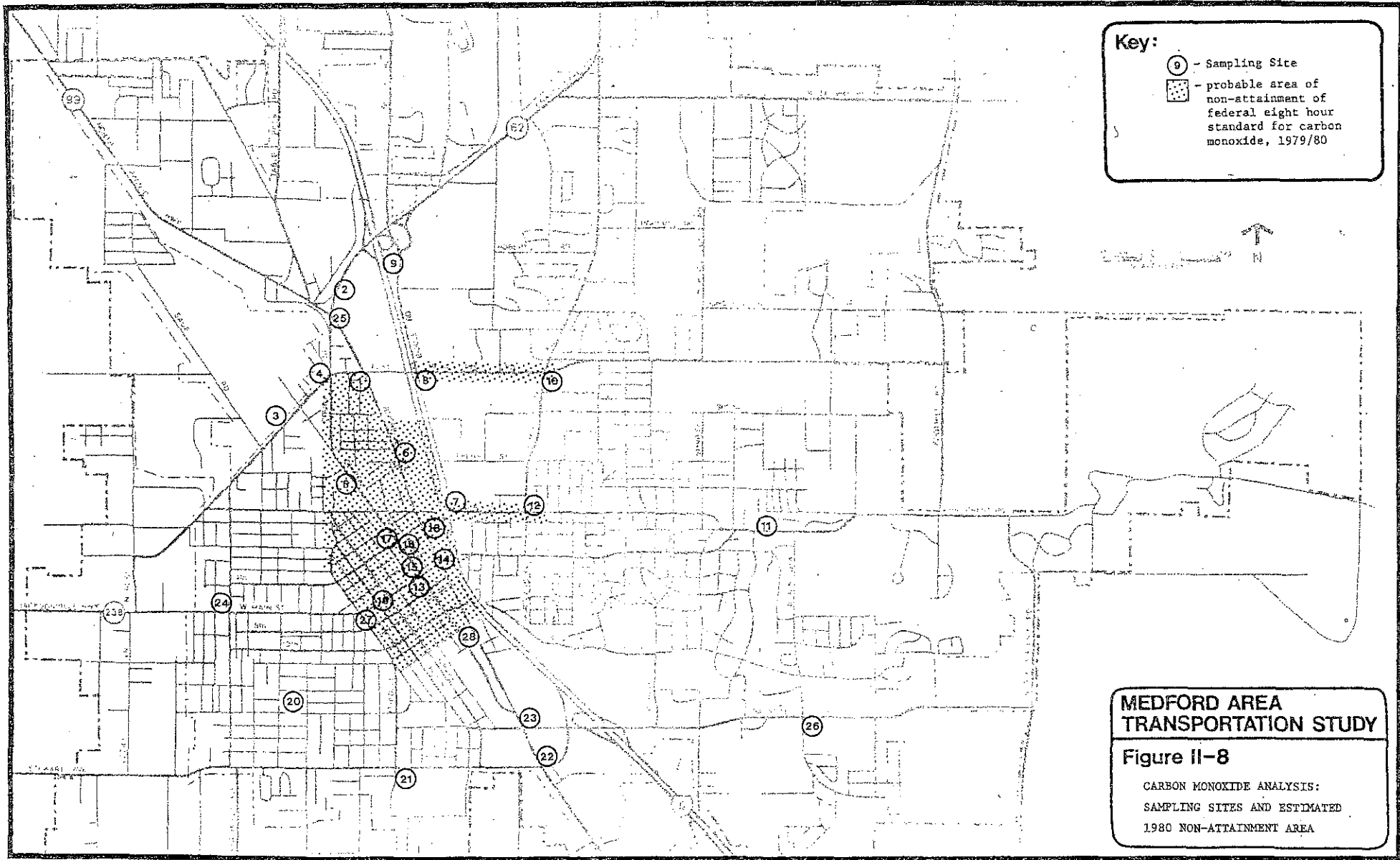
Key:

- Remove parking and re-stripe existing roadway to increase number of lanes
- Reconstruction of existing roadway or construct new roadway to 2-traffic lanes and 2-parking lanes
- Reconstruction of existing roadway or construct new roadway to 4-traffic lanes, no parking
- Reconstruct existing roadway to 6-traffic lanes, no parking

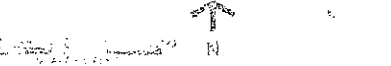
MEDFORD AREA TRANSPORTATION STUDY
Figure 1-1
THE RECOMMENDED PLAN - ROADWAY



1-5



Key:
① - Sampling Site
▣ - probable area of non-attainment of federal eight hour standard for carbon monoxide, 1979/80



MEDFORD AREA TRANSPORTATION STUDY
Figure II-8
CARBON MONOXIDE ANALYSIS:
SAMPLING SITES AND ESTIMATED
1980 NON-ATTAINMENT AREA

(from Jackson County Analysis of Transportation Control Measures, July 1980)

SECTION XII: SUMMARY

Local government has the responsibility for developing a plan to reduce transportation related air pollution in the Medford-Ashland airshed. The two transportation related pollutants of concern are ozone and carbon monoxide.

The Oregon Department of Environmental Quality reports that the Medford-Ashland area will attain the federal health related ozone standard by December 1982, but will not attain the state ozone standard by that date. A combination of industrial and motor vehicle pollution control strategies will be needed to attain the state ozone standard by 1992.

The state and federal carbon monoxide health standard will not be attained in Medford by December 1982. The Oregon Department of Environmental Quality has requested an extension of up to five years. Attainment of the carbon monoxide standard in Medford by 1987 will require the implementation of several transportation control measures such as a vehicle inspection and maintenance program, improved public transit, fleet conversion to cleaner engines, and a major improvement in parking management and traffic circulation in Medford. The air quality, health, welfare, economic, energy, and social effects of these transportation control measures must be analyzed by September 1980, at which time the analysis will be submitted to the Department of Environmental Quality. Jackson County must also develop and submit the final SIP revision by July 1, 1982, that demonstrates attainment with the carbon monoxide standards.

Alan M. Voorhees and Associates, Inc., a transportation and environmental consulting firm, is currently preparing a parking and traffic circulation plan for Medford. It is specified that in developing this plan the consultant will research the potential traffic, air quality, health, welfare, social, economic, and energy impacts of the following measures: street improvements; parking management; pedestrian malls; park and ride lots; bicycle programs; common carrier (truck) restrictions; improved public transit; carpool programs; staggered work hours (flextime); and, employer programs to promote carpools, public transit, bicycles and walking. This plan will be submitted to Jackson County and the city of Medford by September 30, 1980.

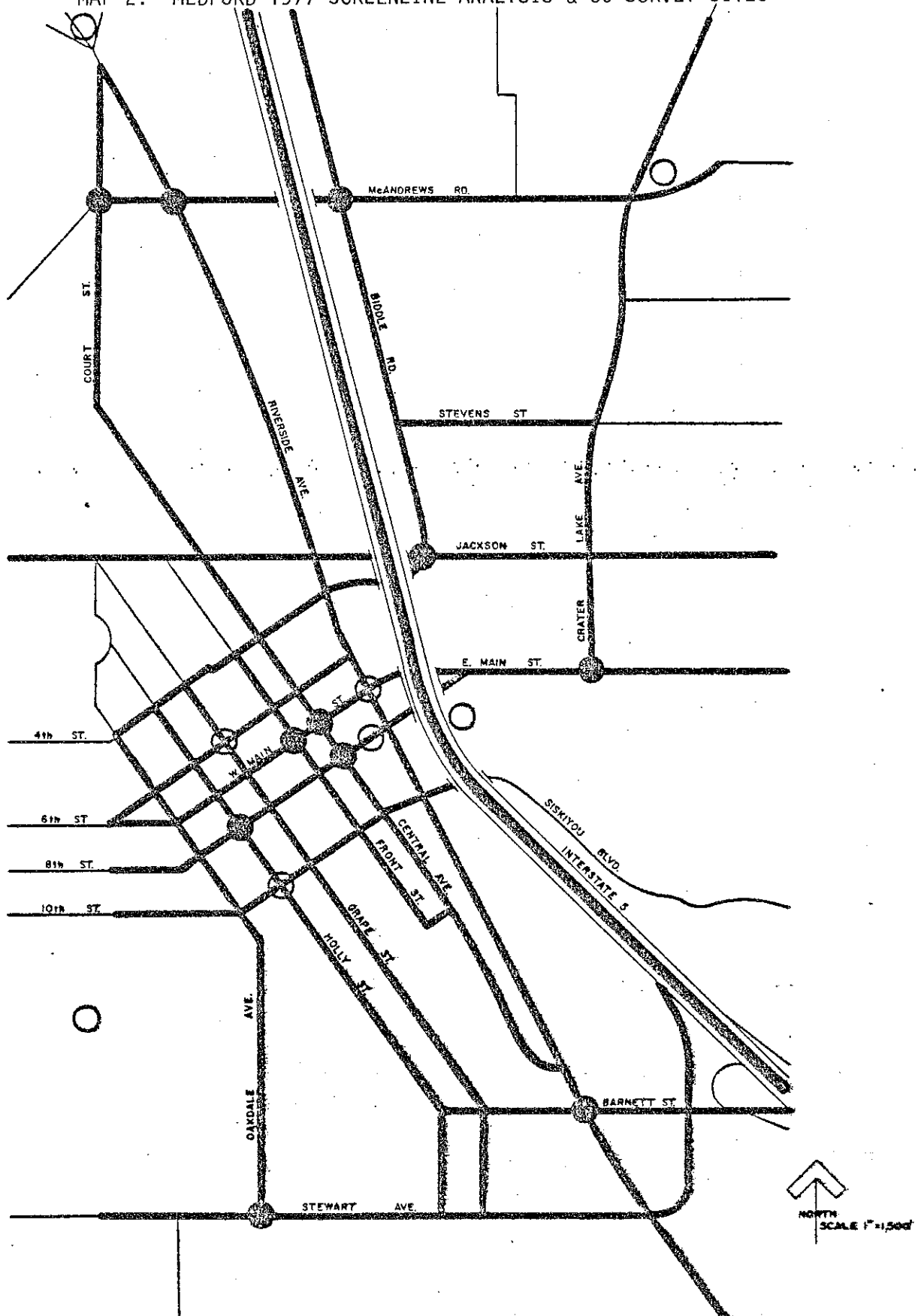
In order for Medford to attain the carbon monoxide standard, a 62 percent emission reduction or 3,500 tons per year is necessary. A mandatory motor vehicle emission inspection and maintenance program could achieve about 60 percent of the needed reduction.

The remaining 40 percent would need to come from Medford's Parking and Traffic Circulation Plan, improved public transit, and fleet conversion to cleaner engines. In most major urban areas only 5-7 percent emission reduction can be obtained from transportation control measures other than vehicle inspection and maintenance. However, it might be possible to achieve greater emission reductions in Medford due to the large volume of vehicle emissions attributed to through traffic and downtown employee parking.

Congress and the Environmental Protection Agency are serious about reducing air pollution because of the adverse health effects that can be experienced by sensitive people when the air quality standards are exceeded. The carbon monoxide standard must be attained in Medford by 1987. The measures needed to attain the carbon monoxide standard must be adopted in a legally enforceable manner by July of 1982. If this deadline is not met, economic sanctions may be placed upon the Medford-Ashland area by the Environmental Protection agency. The undesirable sanctions might consist of a ban on all major new industrial construction, and a halt to federal highway and sewage treatment funds.

This report is preliminary in nature. The purpose of this preliminary analysis is to acquaint you with the alternative transportation control measures and to assess their potential for the Medford-Ashland area.

MAP 2: MEDFORD 1977 SCREENLINE ANALYSIS & CO SURVEY SITES



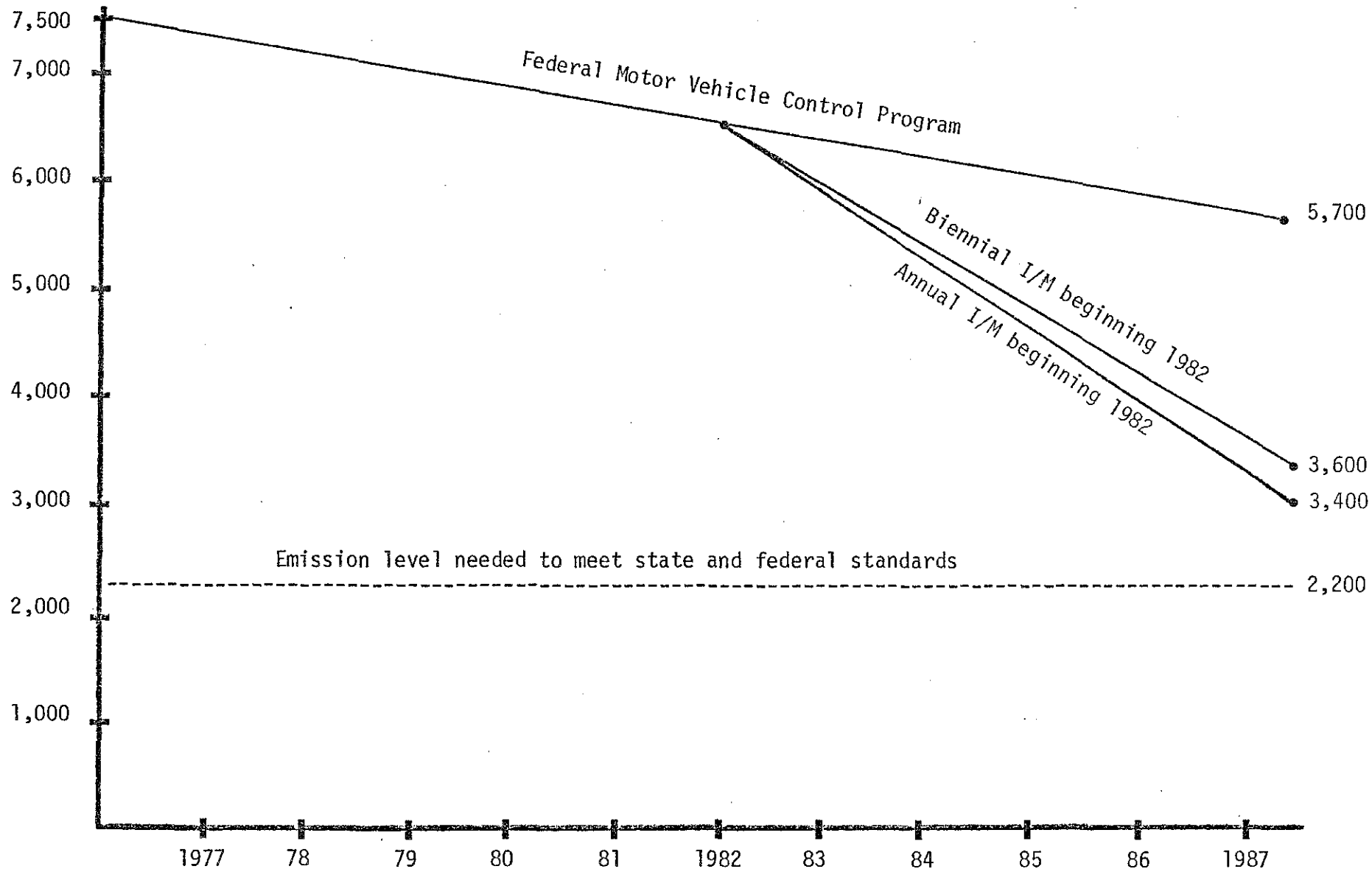
- INDICATE STREETS WITH POTENTIAL FOR EXCEEDING CO STATE AND FEDERAL STANDARDS BASED ON MODELING.
- CO SURVEY SITES EXPERIENCING LEVELS ABOVE STATE AND FEDERAL STANDARDS IN DECEMBER, 1978 AND JANUARY, 1979
- CO SURVEY SITES EXPERIENCING LEVELS BELOW STATE AND FEDERAL STANDARDS IN DECEMBER, 1978 AND JANUARY, 1979

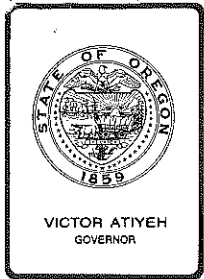
CHART I

CARBON MONOXIDE EMISSIONS IN THE
MEDFORD NONATTAINMENT AREA

TONS
PER
YEAR

2-4





Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. J, June 5, 1981, EQC Meeting

Informational Report: Status of Hood River County Landfill

Background

This matter is presented to the Environmental Quality Commission on the staff's initiative. The Department has issued a solid waste disposal permit that calls for closure of the Hood River County Landfill on July 1, 1981.

The staff desires to inform the Commission of the situation at the Hood River disposal site and requests Commission concurrence with the Department's approach regarding Hood River County.

The Department has been working with Hood River County for several years to close the landfill. The site is located in a natural drainage way and is discharging leachate to public waters below the site. While the county has attempted to collect and treat the leachate, the results have not been effective. Due to the geologic and groundwater situation at the site, it is not possible to intercept all of the leachate leaving the landfill. The Department believes the solution is to restrict leachate production by stopping the disposal of garbage in the landfill.

Hood River County has not opposed closure of the site and has, in fact, cooperated with staff in several lengthy studies to evaluate alternatives to the landfill. The recommended alternative is to construct a transfer facility and to haul solid waste out of the county, most likely to the landfill at The Dalles. The county is also considering the future option of an incineration/energy recovery facility.

While the county has evaluated alternatives and possible site locations, no firm decision has yet been made on which direction to proceed. In the meantime, the existing site has reached design capacity.

The county could begin an additional lift on the top of the present site, which could extend the landfill life up to two more years. The Department opposes this plan because it will only add to the existing leachate problems, it would require expensive importation of cover material, and it does not commit the county to any definite time schedule for implementing a long-term alternative. While we believe that the county is cooperating in attempting to find a solution to the problem, there is no assurance that the county will move any closer to a decision if a two-year extension is allowed.

The Commission should also note that Hood River County presently has the opportunity to enter into a contractual agreement with the operator of the Northern Wasco Landfill at The Dalles for disposal of solid waste transferred from Hood River. With the passage of time this situation could change, leaving Hood River County with greatly limited alternatives.

Staff believes that the county could install and arrange for the operation (contractually or otherwise) of a temporary transfer facility by July 1, 1981. While this option may prove somewhat expensive, so would expansion of the existing site. Initiation of a transfer operation would move the county out of the existing landfill and toward an ultimate solution.

Summary

The Hood River County Landfill is almost full unless the Department allows the county to add one more lift. The Department has been trying to close the site for several years because of leachate problems. The county has been trying to find an alternative to the landfill, but progress has been slow. No specific alternative has been chosen nor is there a schedule for developing an alternative. The Department has issued a solid waste disposal permit that will close the site on July 1, 1981. The county will then have to use a temporary transfer site until a permanent solution is implemented.

Director's Recommendation

It is recommended that the Commission concur with the Department's issuance of a permit to close the Hood River Sanitary Landfill on July 1, 1981.

Bill
William H. Young

Richard J. Nichols:c
SC336
382-6446
May 21, 1981

In the CIRCUIT Court of the State of Oregon

for the County of HOOD RIVER

GLENN ALBERT BLEVINS and ROSIE MAE BLEVINS, husband and wife,

HOOD RIVER COUNTY and STATE OF OREGON, THE DEPARTMENT OF ENVIRONMENTAL QUALITY, vs. Plaintiff S

No. 8762

SUMMONS

To HOOD RIVER COUNTY and STATE OF OREGON, THE DEPARTMENT OF ENVIRONMENTAL QUALITY, Defendant S

Defendant S

You are hereby required to appear and defend the complaint filed against you in the above entitled action within thirty (30) days from the date of service of this summons upon you, and in case of your failure to do so, for want thereof, plaintiff(s) will apply to the court for the relief demanded in the complaint.

NOTICE TO THE DEFENDANT: READ THESE PAPERS CAREFULLY!

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service upon the plaintiff.

If you have any questions, you should see an attorney immediately.

/s/ Teunis Wyers

SIGNATURE OF OREGON RESIDENT ATTORNEY

TEUNIS WYERS

Attorney for Plaintiffs

P. O. Box 417

Hood River, Oregon 97031

(503) 386-2221

STATE OF OREGON;

County of Hood River

ss.

I, the undersigned attorney of record for the plaintiff, certify that the foregoing is an exact and complete copy of the original summons in the above entitled action.

Teunis Wyers
ATTORNEY OF RECORD FOR PLAINTIFF(S)

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.

Post office address at which papers in the above entitled action may be served by mail.

Wm. H. Young, Director

THE STATE OF OREGON

THE DEPARTMENT OF ENVIRONMENTAL QUALITY

522 SW 5th

Portland, Oregon 97204

NAME, POST OFFICE ADDRESS AND TELEPHONE NUMBER

/s/ Teunis Wyers

ATTORNEY(S) FOR PLAINTIFF(S)

State of Oregon DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED

MAY 22 1981

OFFICE OF THE DIRECTOR

served by mail. Jan Shaw

1 IN THE CIRCUIT COURT OF THE STATE OF OREGON
2 FOR THE COUNTY OF HOOD RIVER

FILED

HOOD RIVER COUNTY

MAY 18 4 56 PM '81

DEPARTMENT OF
RECORDS AND ASSESSMENT
DEPUTY

3 GLENN ALBERT BLEVINS and ROSIE)
4 MAE BLEVINS, husband and wife,)

4 Plaintiffs,)

5 vs.)

No. 8762

6 HOOD RIVER COUNTY and STATE OF)
7 OREGON, THE DEPARTMENT OF ENVI-)
8 RONMENTAL QUALITY,)

COMPLAINT

8 Defendants.)

9 NUISANCE

10 For a First Cause of Action, plaintiffs allege:

11 I.

12
13 At all times material hereto, plaintiffs claim ownership of
14 the real property described in Exhibit A, hereinafter referred to
15 as "plaintiffs' property". Upon plaintiffs' property is situated
16 plaintiffs' home, various outbuildings and a spring or springs
17 used by plaintiffs as a source of drinking water and for other
18 purposes.

19 II.

20 At all times material hereto, defendant HOOD RIVER COUNTY was
21 a duly existing county formed under the laws of the State of
22 Oregon. Defendant HOOD RIVER COUNTY owned adjacent real property
23 to the South of plaintiffs' property, consisting of parcels lying
24 in Section 10, Township 1 North, Range 10 East of the Willamette
25 Meridian.

26 ///

Page 1.

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III.

In or about February 1976, defendant HOOD RIVER COUNTY constructed and commenced the operation of an open garbage dump or sanitary landfill. Since that time defendant HOOD RIVER COUNTY has operated said dump, or caused it to be operated, on a continuous basis, and is doing so at the present time.

IV.

Said dump has running from it and onto plaintiffs' property, a certain effluent or leachate, which is offensive in smell and appearance and contains various substances of a toxic, rotten, filthy and foul nature. Defendant HOOD RIVER COUNTY has allowed this condition to exist since shortly after the opening of this dump, and has failed to take corrective measures to mitigate or eliminate damage caused thereby to the plaintiffs. This condition continues unchanged, is causing further damage on a daily basis, and is expected to continue indefinitely.

V.

The water and filth comprising this leachate has come upon plaintiffs' property in such quantities as to render portions thereof unfit for use, and also to contaminate plaintiffs' source of domestic and livestock water, and to create such a stink and smell as to deprive plaintiffs of the use of a portion of their property. Plaintiffs have in consequence thereof sustained damage in the amount hereafter alleged.

NEGLIGENCE

For a Second Cause of Action, Plaintiffs allege:

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VI.

Paragraphs I through III of the First Cause of Action are incorporated by reference.

VII.

At all times material hereto defendant THE DEPARTMENT OF ENVIRONMENTAL QUALITY was an existing administrative agency, duly formed under the laws of the State of Oregon, charged with monitoring compliance with and enforcement of regulations affecting solid waste disposal sites in the State of Oregon.

VIII.

Defendants were negligent in one or more of the following particulars, causing damage to the plaintiffs as hereinafter alleged:

- A. In selecting a dump site with characteristics which does not protect contiguous land from leachate runoff;
- B. In situating the sump on the site in such a manner that contiguous properties were not protected from leachate runoff;
- C. In selecting a dump operational design which was inadequate in its failure to prevent a leachate problem;
- D. In operating the dump in a manner which cause the emission of the leachate as alleged above;
- E. In failing to detect the leachate problems early enough to take measures to correct the problem;
- F. In failing to take measures to correct the leachate problem when placed on notice of its existence, or to take any measures to minimize its effect on plaintiffs.

1 G. In failing to instruct dump operators properly regarding
2 methods to prevent or minimize leachate problems and in failing to
3 properly supervise dump operators who may not have employed those
4 methods;

5 H. In failing to operate said dump in compliance within ap-
6 plicable clean water and solid waste regulations.

7 IX.

8 As a result of the negligence of the defendants, plaintiffs'
9 property has become polluted and contaminated, and a portion
10 thereof has been rendered unfit for use by plaintiffs.

11 X.

12 Since a short time after the opening of the dump, defendants
13 knew or should have known that a nuisance would be created thereby
14 and that the plaintiffs' property would be contaminated and
15 polluted.

16 XI.

17 As a result of said contamination and pollution, plaintiffs
18 have been damaged in an amount which is undetermined at the
19 present time, but which does not exceed the fair market value of
20 the plaintiffs' property, \$110,000.00.

21 INVERSE CONDEMNATION

22 For a Third Cause of Action, plaintiffs allege:

23 XII.

24 Paragraphs I through IV of the First Cause of Action are
25 incorporated by reference.

26 ///

Page 4 - COMPLAINT

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XIII.

The contamination and pollution suffered by plaintiffs as a result of the leachate from the aforementioned dump has restricted and interfered substantially and unreasonably with the common and necessary use and enjoyment of plaintiffs' property and has destroyed a portion thereof.

XIV.

As a result thereof the fair market value of plaintiffs' property has been substantially diminished in an as yet undetermined amount not exceeding \$110,000.00.

XV.

Plaintiffs' property has thereby been taken for a public use without just compensation.

XVI.

It has been necessary for plaintiffs to retain the services of an attorney to assert their rights in this matter, and if successful, they are entitled to a reasonable attorney fee award under ORS 20.085.

WHEREFORE, plaintiffs pray:

- A. For judgment against defendants for damages in an amount to be determined, not exceeding \$110,000.00,
- B. For an injunction against defendants requiring them to take what measures are necessary to abate the nuisance and prohibit further damage,
- C. For judgment against defendants for their attorney's fees, costs and disbursements incurred herein, and

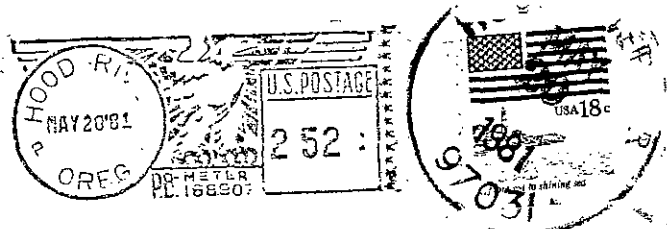
1 D. For such other relief as the Court may deem just.

2
3 /s/ Teunis Wyers
4 TEUNIS WYERS OSB #76387
5 Attorney for Plaintiffs
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PLAINTIFFS' REAL PROPERTY

The Southeast quarter of Government Lot 12, and all of Government Lot 13, Section 3, Township 1 North, Range 10 East of the Willamette Meridian, in the County of Hood River and State of Oregon, EXCEPTING THEREFROM that portion conveyed to J. Arlie Bryant et ux., recorded June 23, 1977, as Recorder's Fee No. 771450, Film Records.

CES OF
WYERS
BOX 417
REGON 97031



Box 1760

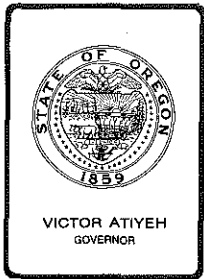
CERTIFIED MAIL RESTRICTED DELIVERY
RETURN RECEIPT REQUESTED

RESTRICTED DELIVERY

Mr. William H. Young, Director
State of Oregon
Dept. of Environmental Quality
522 SW 5th
Portland, Or. 97204

RETURN RECEIPT
REQUESTED

CERTIFIED
No. 320721
MAIL



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. K, June 5, 1981, EQC Meeting
Mr. and Mrs. Allen Forrette
Appeal of Subsurface Variance Denial

Background

The pertinent legal authorities are summarized in Attachment "A".

Town & Rural Properties, Inc., originally submitted a site evaluation application to the Jackson County Planning Department on August 20, 1975. Mr. David K. Maurer, Senior Soil Scientist, examined the three (3) acre parcel on August 29, 1975, and determined that a restrictive soil horizon was present at depths ranging from twenty-six (26) to thirty-six (36) inches below the ground surface, with a natural ground slope ranging from five (5) to twelve (12) percent. Mottling, an indicator used to estimate seasonal water levels, was observed at depths of fifteen (15) to sixteen (16) inches. The site was found unsuitable for installation of a standard subsurface sewage disposal system.

Mr. and Mrs. Forrette applied for a preliminary site inspection on August 6, 1979. Mr. Ken Cote, Soil Scientist, reexamined the property and noted that the areas not previously evaluated are steep hillslopes, with slopes greater than twenty-five (25) percent, and with suspected shallow soils. Mr. Cote recommended that Mr. and Mrs. Forrette consider applying for a variance in the area previously examined by Mr. Maurer.



Contains
Recycled
Materials

An application for variance from the subsurface rules [OAR340-71-020(3)(a); 71-020(1)(b); and 71-030(1)(d)] was received by Water Quality Division on October 2, 1979. It was found to be complete on October 24 and assigned to Mr. Ron E. Baker, Variance officer, on October 25, 1979. Mr. Baker scheduled a visit to the site and public information gathering hearing to take place on November 20, 1979.

After closing the hearing on November 26, 1979, Mr. Baker found the site he could consider for drainfield placement to be very limited in usable area, all other locations were ruled to be worse. A twenty (20) foot wide utility easement cuts through the proposed site. Mr. Baker observed the depths to restrictive soil horizons and mottling to be shallower than indicated by Mr. Maurer, as close as eighteen (18) inches and thirteen (13) inches, respectively. Mr. Baker considered modifications of the proposal that included increasing the capping fill depth to nine (9) inches, and relocating a portion of the proposed curtain drain. In his analysis of the site limitations and proposed subsurface system, Mr. Baker determined the system was undersized, and that if it were installed and put into service it could fail by discharging sewage effluent to the ground surface. He further found that additional usable area to allow for installation of a larger system was not available. As Mr. Baker was not convinced that a subsurface sewage disposal system could be installed at the proposed site without creating a health hazard, he denied the variance request on January 10, 1980. (Attachment "B")

Mr. Forrette's letter dated January 17, 1980, (Attachment "C") in conjunction with the letter from his consultant, Mr. Daniel R. Frank, dated February 2, 1980, (Attachment "D") constitutes his appeal of the variance officer's decision.

Evaluation

Pursuant to ORS 454.660, decisions of the variance officer to grant variances may be appealed to the Environmental Quality Commission. Mr. Forrette made such an appeal. The Commission must determine if a subsurface sewage disposal system of either standard or modified construction can reasonably be expected to function in a satisfactory manner at Mr. and Mrs. Forrette's site.

After evaluating the site and after holding a public information type hearing to gather testimony relevant to the requested variance, Mr. Baker was not able to find that a subsurface sewage disposal system, of either standard or modified construction, would function in a satisfactory manner so as not to create a public health hazard. Mr. Baker was unable to modify the proposal to overcome his concerns about the proposed site.

Summation

1. The pertinent legal authorities are summarized in Attachment "A".
2. Town & Rural Properties, Inc., submitted an application for a site evaluation to Jackson County on August 20, 1975.
3. Mr. David Maurer examined the property on August 29, 1975, to determine if a standard subsurface sewage disposal system could be installed. Restrictive soil horizons were observed at depths ranging from twenty-six (26) to thirty-six (36) inches below the ground surface. Based on the presence of mottling, a seasonally perched water table was expected to rise as close as fifteen (15) inches. The site was denied for standard drainfield placement because a temporarily perched water table was expected to rise closer than twenty-four (24) inches from the ground surface, and because of the presence of restrictive soil horizons closer than thirty (30) inches.
4. Mr. and Mrs. Forrette applied for a preliminary site inspection on August 6, 1979.
5. On August 9, 1979, Mr. Ken Cote reviewed those areas not previously examined and found the natural ground slope to be greater than twenty-five (25) percent, and speculated the hillslope soils were shallow to restrictive horizons. He recommended the Forrettes consider applying for a variance in the area previously examined by Mr. Maurer.
6. Mr. and Mrs. Forrette submitted a variance application to the Department, which was assigned to Mr. Ron Baker on October 25, 1979.
7. On November 20, 1979, Mr. Baker examined the proposed drainfield site and found the soils to be mottled as close as thirteen (13) inches, and with restrictive soil horizons

as close as eighteen (18) inches from the ground surface. He observed that a utility easement ran through the designated drainfield site, and that although the property was three (3) acres, the area where a drainfield could be reasonably considered for installation was limited to the site proposed.

8. On November 20, 1979, Mr. Baker conducted a public information type hearing so as to allow Mr. and Mrs. Forrette and others the opportunity to supply the facts and reasons to support the variance request. The hearing was closed on November 26, 1979.
9. Mr. Baker reviewed the variance record and found the testimony provided did not support a favorable decision. He was unable to modify the variance proposal to overcome the site limitations.
10. Mr. Baker notified Mr. Forrette by letter dated January 10, 1980, that their variance request was denied.
11. Mr. Forrette filed for appeal of the decision by letter dated January 17, 1980, with additional information provided by letter dated February 2, 1980, prepared by his consultant.

Director's Recommendation

Based upon the findings in the summation, it is recommended that the Commission adopt the findings of the variance officer as the Commission's findings and uphold the decision to deny the variance.



William H. Young

Attachments: 4
Attachment "A"
Attachment "B"
Attachment "C"
Attachment "D"

Sherman O. Olson, Jr.:1
229-6443
May 28, 1980
XL18

ATTACHMENT "A"

1. Administrative rules governing subsurface sewage disposal are provided for by Statute: ORS 454.625.
2. The Environmental Quality Commission has been given statutory authority to grant variances from the particular requirements of any rule or standard pertaining to subsurface sewage disposal systems if after hearing, it finds that strict compliance with the rule or standard is inappropriate for cause or because special physical conditions render strict compliance unreasonable, burdensome or impractical: ORS 454.657.
3. The Commission has been given statutory authority to delegate the power to grant variances to special variance officers appointed by the Director of the Department of Environmental Quality: ORS 454.660.
4. Decisions of the variance officers to grant variances may be appealed to the Commission: ORS 454.660.
5. Mr. Baker was appointed as a variance officer pursuant to the Oregon Administrative Rules: OAR 340-75-030.

XL18.A
SOO:1

*Department of Environmental Quality*

SOUTHWEST REGION

1937 W. HARVARD BLVD., ROSEBURG, OREGON 97470

January 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDMr. Allen Forrette
839 East Jackson
Medford, Oregon 97501RE: WQ-SS-Jackson County
Variance Hearing
Twp. 35S, R. 2W, Sec. 20
Tax Lot 600
Denied

Dear Mr. Forrette:

This correspondence will serve to verify that your requested Variance Hearing, provided for in Oregon Administrative Rules, Chapter 340, Section 75-045 was held at 32 W. 6th Street, in Medford, Oregon at 1:00 PM, November 20, 1979. Persons present at the hearing were: yourself, applicant; Mr. Daniel R. Frank, Consultant; and Mr. Bradley W. H. Prior, Supervisor, Jackson County Subsurface Program. Prior to the hearing, at 10:00 AM on November 20, 1979, an on-site inspection of the property in question was conducted by the Variance Officer for the purpose of gathering soils and topographic information with regard to your request. Other persons present during the inspection were Mr. Frank and Mr. Prior.

Your request was for a variance of the following rules:

OREGON ADMINISTRATIVE RULES, CHAPTER 340

- 71-020(3)(a) Requires full replacement area meeting all applicable rules.
- 71-030(1)(b) Requires minimum depth to restrictive layer.
- 71-030(1)(d) Requires minimum depth to temporarily perched water table.

The property in question is described as Township 35 South, Range 2 West, Section 20, Tax Lot 600 of Jackson County, Oregon. Said property is approximately three and four hundredths (3.04) acres in size.

All exhibits provided to the Variance Officer before the hearing were entered into the record by number, those provided during the hearing by capital letter and those provided after the hearing by small letter. For exhibit verification refer to hearing record.

To overcome the site development limitations you proposed to install disposal trenches at fifteen (15) inches and place a three (3) inch capping fill over the disposal area.

Verbal testimony was given by yourself, Mr. Frank and Mr. Prior. For verification of testimony refer to hearing record.

Variances from particular requirements of the rules or standards pertaining to subsurface sewage disposal systems may be granted if it is found that the proposed subsurface sewage disposal system will function in a satisfactory manner so as not to create a public health hazard or to cause pollution of public waters, and special physical conditions exist which render strict compliance unreasonable, burdensome, or impractical.

Your proposal, although well prepared, does not give assurance that it will overcome the limitations present at the site. Your system design provided for less effective sidewall than is considered necessary, to provide for the proper disposal and treatment of the volume of sewage expected from an average three (3) bedroom residence, when suitable soil conditions are present. That is thirty-three (33) percent better than the soil available on this site. (Exhibit XII and Mr. Prior's testimony)

In addition, your design was based on the assumption that the on-site soils were less restrictive (Exhibit VIII) than they were observed to be during the above referenced site inspection. (Exhibit A and Mr. Prior's testimony)

It is also noted that an easement "Right-of-Way" exists upon the property which cuts a twenty (20) foot wide path through the proposed disposal area. (Exhibits B and c) A power pole is now located within the easement and within the proposed installation area. (Exhibit XIII and Mr. Frank's testimony)

The proposed change in the curtain drain installation places it dangerously close to and down slope of the proposed repair area. (Mr. Frank's testimony)

Lastly, no better area exists upon this property for consideration. (Mr. Frank's and Mr. Prior's testimony)

Due to soil conditions the proposed installation should not be moved from the proposed installation site. (Mr. Frank's and Mr. Prior's testimony)

Therefore, based on the verbal and written testimony contained in the record, I am not convinced that the proposed drainfield will function in a satisfactory manner so as not to prevent the discharge of septic effluent to the natural ground surface. Your variance request is regretfully denied.

Pursuant to OAR 340, 75-050, my decision to deny your variance requests may be appealed to the Environmental Quality Commission. Requests for appeal must be made by letter, stating the grounds for appeal, and addressed to the Environmental Quality Commission, in care of Mr. William H. Young, Director, Department of Environmental Quality, P. O. Box 1760, Portland, OR. 97207, within twenty (20) days of the date of the certified mailing of this letter.

Please feel free to contact me at 440-3338, if you have any questions regarding this decision.

Sincerely,



R. E. Baker, R. S.
Variance Officer

RECEIVED
JAN 11 1980

REB:ml
Enc.

cc: T. Jack Osborne, WQ-SS-Portland; Jackson County Planning Dept.;
Medford D.E.Q. Office; Dan Frank, PO Box 900, Jacksonville, OR 97530

January 17, 1980

Department of Environmental Quality
 P.O. Box 1760
 Portland, OR 97207

RECEIVED
 DEPARTMENT OF ENVIRONMENTAL QUALITY

Mr. William H. Young, Director

In August of 1979, I applied for a re-evaluation for a septic tank permit on 3.04 acres I own on Duggan Road, Jackson County, Oregon.

I met on the site with Ken Cody, County Sanitarian, who looked at the original test holes dug in 1975 and he stated that one of the holes was within an inch of meeting requirements for a permit. Mr. Cody then suggested I have three more test holes dug and we met again at the site. He said my chances were very good for an engineered system. I hired Daniel Frank, R.S. Environmental Specialists, P.O. Box 900, 937 N. Fifth St., Jacksonville, Oregon, to design a septic system that would work on my land.

I then applied for a variance hearing. Hearing was held on November 20, 1979. After much verbage, Mr. Baker - Variance officer - stated that the curtain drain should be lengthened to the S.E. corner of property and also more top soil should be added and he requested three items all of which I answered and are negligible for putting in the proposed system. Mr. Baker led me to believe when he expanded on Engineer Daniel Frank's system that this system would be approved if I complied with his recommended curtain drain extension and more top soil.

A variance in my understanding is the soil didn't meet exact standards and an engineered system by a licensed engineer with added features to an ordinary system should work.

Mr. Baker also stated he was over worked and understaffed and was doing four variances a week. I understand it is easier to say no and close the files; however a licensed engineer designed a system that will work and I am requesting a permit for my 3.04 acres.

Thank you,

Allen W. Forrette

Allen W. Forrette
 839 E. Jackson
 Medford, Oregon 97501

State of Oregon
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 RECEIVED
 JAN 22 1980

T. FLATEBO AND ASSOCIATES, INC.

CIVIL ENGINEERS AND LAND SURVEYORS

(503) 899-8267

P. O. BOX 900

937 NORTH FIFTH STREET
JACKSONVILLE, OREGON 97530

ATTACHMENT D
T. FLATEBO, P. E.
899-9000
KURT C. WEAVER, P. L. S.
899-7843
DANIEL R. FRANK, R. S.
855-7593

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED

FEB 22 1980

WATER QUALITY CONTROL

February 2, 1980

Mr. Allen Forrette
839 East Jackson
Medford, Oregon 97501

RE: variance appeal
sec 20 of T35S-R2W-600

Dear Mr. Forrette:

The purpose of this letter is to provide grounds for appeal of the denial of your variance request. I will specifically address the reasons the variance officer (Mr. Baker) identified as the basis of his decision.

1) Mr. Baker contends the drainfield sizing was undersized even if soil conditions met standards. However, by my calculations he is mistaken:

3 bdrm residence = 375 gal/day
soil texture is clay loam (conseratively) which
requires 275 sq. ft./150 gal flow
Therefor 342 lin. ft. is required - the site plan
shows excess footage.

He adds that the soil conditions are thirty three (33) percent deficient in this respect. Mr. Baker does not explain how he arrived at such a definite percentage. It certainly is not obvious to me. He does cite Exhibit XII (his field notes I believe) and Mr. Prior's testimony. I doubt Mr. Prior would be comfortable with Mr. Baker's statement and inferred support.

2) Mr. Baker should be more candid. His statement that "...your design was based on the assumption that on site soils were less restrictive..." implies it was my error or oversight. Actually, Mr. Baker's evaluation differed from Mr. Maurer (County Soils Scientist) original report & subsequent recent on site evaluation work performed by Mr. Cote (County Sanitarian).

Mr. Baker did not elaborate on the extent of the conflict between his evaluation and the County Staff Reports, or for that matter which restriction(s) were involved. I find it incredible that he can be so capricious; Consider the questions that are left unanswered:

a) Did Mr. Baker discuss the discrepancy with Mr. Maurer or Mr. Cote? To my knowledge he did not. Mr Cote was in concurrence with Mr. Maurer's earlier work to the extent that he suggested the applicant consider a variance

request.

b) My experience with Jackson County Staff is that they are competent and reliable and that it is reasonable to assume their work is high quality. Does this mean I cannot rely on their professional competency?

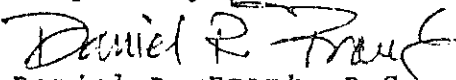
c) On behalf of the applicant why should not the least restrictive evaluation apply when a County has demonstrated responsible program administration? The program is audited by the DEQ. What is the DEQ evaluation of Jackson County administration of the program?

3) What is the relevance of pointing out the existence of an easement, unless the letter sent to Mr. Baker was inadequate?

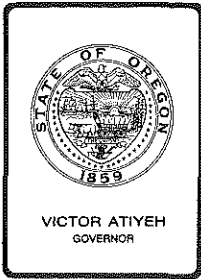
4) The proposed change in the curtain drain layout does not pose the threat indicated by Mr. Baker. Also, the layout shown in the proposal would be effective and does not violate any rule that I am aware of.

5) It should be noted that it took Mr. Baker fifty one (51) days to respond (a violation of 340-75-035 which states "A decision shall be made in writing by the Variance Officer within forty five (45) days after completion of the hearing on the variance request"). The fact that a letter regarding the power line easement was sent to him later should not have stalled the response since it would not have affected a change in the decision.

Very truly yours,


Daniel R. Frank, R.S.
Environmental Specialist

DF:vjc



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. L, June 5, 1981, EQC Meeting

Mr. and Mrs. Daniel J. Walsh - Appeal of Subsurface
Variance Denial

Background

The pertinent legal authorities are summarized in Attachment "A".

On September 9, 1977, Mr. E. L. Shaw applied to Tillamook County for a site evaluation report on property he was purchasing. The property (50 feet by 100 feet) is identified as Lot 26, Block 10, Oceanview, also identified as Tax Lot 8400, in Section 7 DB, Township 1 South, Range 10 West, in Tillamook County. The property was evaluated on April 5, 1978 by Mr. James L. Seabrandt, the Supervising Sanitarian for Tillamook County. Mr. Seabrandt issued a Certificate of Favorable Site Evaluation on April 7, 1978, with the following conditions:

1. Lot size will limit site to one (1) bedroom or sleeping area.
2. Corner lot must meet Tillamook County Planning Commission as well as Department of Environmental Quality (rules).
3. One hundred seventy (170) square feet of drainfield and replacement area must be provided on this property.

Mr. Seabrandt issued Mr. Shaw another Certificate of Favorable Site Evaluation, dated September 21, 1979, based on the initial evaluation of April 5, 1978.

On March 2, 1980, the Environmental Quality Commission adopted a temporary rule that voided all Certificates of Favorable Site Evaluation issued in Tillamook County from January 1, 1974 through December 31, 1979. The temporary rule provided that each property owner may request the property be reevaluated without fee.

Mr. and Mrs. Daniel Walsh submitted a request for reevaluation to the Department's North Coast Branch Office. On September 24, 1980, Department staff examined the property and determined it did not comply with the Department's minimum standards for installation of either a standard or alternative sewage disposal system. Due to the small lot size, there was not sufficient area to install a system, with room for future replacement, while maintaining minimum setbacks from property lines. Mr. and Mrs. Walsh were notified of the reevaluation denial by letter dated September 26, 1980.

An application for a variance from the subsurface rules was received by the Department, and was assigned to Mr. Michael G. Ebeling, variance officer. On December 17, 1980, Mr. Ebeling examined the proposed site and held a public information gathering hearing. After closing the hearing, Mr. Ebeling evaluated the information provided. He observed the property in the vicinity of the test pits had been filled with wood waste material at depths ranging from thirty-two (32) to forty-eight (48) inches. Water levels were measured at sixty-two (62) and seventy-two (72) inches from the ground surface, and could be expected to rise as close as thirty-four (34) inches. Mr. Ebeling found the property to be too limited in area for installation of a subsurface sewage disposal system with room for future replacement. Further, he was concerned that the wood waste fill would continue to decompose, thus offering the potential for channelized flow of sewage effluent into the groundwater. As Mr. Ebeling was not convinced that a subsurface sewage disposal system could be installed at the site, or that a system could be expected to function properly without causing pollution of public waters or creating a public health hazard, he denied the variance request by letter dated December 30, 1980 (Attachment "B").

On January 26, 1981, the Department received a letter from Mr. and Mrs. Walsh appealing the variance officer's decision (Attachment "C").

Evaluation

Pursuant to ORS 454.660, decisions of the variance officer to grant variances may be appealed to the Environmental Quality Commission. Such an appeal was made. The Commission must determine if a subsurface sewage disposal system of either standard or modified construction can be expected to function in a satisfactory manner at the proposed site.

After evaluating the site and after holding a public information gathering hearing, Mr. Ebeling was not able to find that a subsurface sewage disposal system would function in a satisfactory manner.

Summation

1. The pertinent legal authorities are summarized in Attachment "A".
2. On April 5, 1978, Mr. James Seabrandt evaluated the 50 foot by 100 foot lot identified as Tax Lot 8400, in Section 7 DB, Township 1 South, Range 10 West, to determine if a standard subsurface sewage disposal system could be installed. Mr. Seabrandt issued a Certificate of Favorable Site Evaluation, subject to conditions.
3. Mr. Seabrandt issued another Certificate of Favorable Site Evaluation on September 21, 1979, for the same property, based on the original evaluation of April 5, 1978.
4. The Environmental Quality Commission adopted a temporary rule on March 21, 1980, that voided all Certificates of Favorable Site Evaluation issued in Tillamook County from January 1, 1974 through December 31, 1979.
5. At the request of Mr. and Mrs. Walsh, the property was reevaluated on September 24, 1980 by Department staff. It was found that the site did not meet the Department's minimum standards to install a subsurface sewage disposal system because of insufficient area on the small lot to locate a system and its replacement. The lot size also prevents a system from being installed that maintains the minimum setbacks from property lines. Mr. and Mrs. Walsh were notified of the reevaluation denial by letter.
6. Mr. and Mrs. Walsh submitted a variance application to the Department, which was assigned to Mr. Michael Ebeling.
7. On December 17, 1980, Mr. Ebeling examined the proposed drainfield site and found it had been filled with wood waste to depths ranging from thirty-two (32) to forty-eight (48) inches. He expected water levels would rise to within thirty-four (34) inches of the ground surface. He also found the lot to be very limited in area.
8. A public information gathering hearing was conducted by Mr. Ebeling on December 17, 1980, so as to allow Mr. and Mrs. Walsh and others the opportunity to supply the facts and reasons to support the granting of the variance.
9. Mr. Ebeling reviewed the variance record and found the testimony did not support a favorable decision. Mr. and Mrs. Walsh were notified by letter that the variance request was denied.
10. A letter from Mr. and Mrs. Walsh appealing the Variance Officer's decision was received by the Department on January 26, 1981.


EQC Agenda Item No. L

June 5, 1981

Page 4

Director's Recommendation

Based upon the findings in the Summation, it is recommended that the Commission adopt the findings of the variance officer as the Commission's findings, and uphold the decision to deny the variance.



William H. Young

Attachments: Attachment "A"
Attachment "B"
Attachment "C"

SOO:s(2)
XS328
229-6443
April 3, 1981

ATTACHMENT "A"

1. Administrative rules governing subsurface sewage disposal are provided for by Statute: ORS 454.625.
2. The Environmental Quality Commission has been given statutory authority to grant variances from the particular requirements of any rule or standard pertaining to subsurface sewage disposal systems if after hearing, it finds that strict compliance with the rule or standard is inappropriate for cause or because special physical conditions render strict compliance unreasonable, burdensome or impractical: ORS 454.657.
3. The Commission has been given statutory authority to delegate the power to grant variances to special variance officers appointed by the Director of the Department of Environmental Quality: ORS 454.660.
4. Decisions of the variance officers to grant variances may be appealed to the Commission: ORS 454.660.
5. Mr. Ebeling was appointed as a variance officer pursuant to the Oregon Administrative Rules: OAR 340-75-030.

XS328



Department of Environmental Quality

522 SOUTHWEST 5TH AVE. PORTLAND, OREGON

MAILING ADDRESS: P.O. BOX 1760, PORTLAND, OREGON 97207

December 31, 1980

CERTIFIED MAIL

• Daniel J. & Karen S. Walsh
6390 S. E. Cavalier Way
Milwaukie, OR 97222

Re: WQ-SSS-Variance Denial
T.L. 8400; Sec. 7 DB;
T. 1 S.; R. 10 W., W.M.;
Tillamook County

Dear Mr. & Mrs. Walsh:

This correspondence will serve to verify that your requested variance hearing, as provided for in Oregon Administrative Rules, Chapter 340, Section 75-045 was held December 17, 1980, and held open until December 26, 1980.

You have requested variance from the Oregon Administrative Rules, Chapter 340, Sections 71-020(1)(b); 71-020(2)(a); 71-020(3)(a); and 71-030(1)(h).

Just prior to the public information gathering hearing I visited the proposed site to gather soils and topographical information relevant to your variance proposal. Your property, fifty (50) by one hundred (100) feet, and drainfield site is located on an old wood waste fill. The two test pits provided exhibited thirty-two (32) to forty-eight (48) inches of wood waste fill material over marine sedimentation. Water was observed at sixty-two (62) and seventy-two (72) inches below ground surface. The natural ground slope of the property was nearly level. The landscape position of this property suggests that a permanent water table may come as close as thirty-four (34) inches from ground surface.

To overcome the site development limitations you have proposed to install as much disposal trench (initial and future replacement) as would fit into an area thirty (30) feet by forty (40) feet. I assume the system was designed to serve a maximum daily sewage flow of three hundred (300) gallons. Your plan shows the proposed dwelling has dimensions of approximately twenty-five (25) feet by thirty (30) feet. I have considered the use of a modified low pressure distribution system with narrow trenches, with variation from the ten (10) foot setback from property lines and dwelling. Pressurized disposal systems would provide better distribution of effluent throughout the drainfield area, which would allow for better treatment of sewage effluent.

Daniel J. & Karen S. Walsh
December 30, 1980
Page 2

Variance from particular requirements of the rules or standards pertaining to subsurface sewage disposal systems may be granted if it is found that the proposed subsurface sewage disposal system will function in a satisfactory manner so as not to create a public health hazard or to cause pollution of public waters, and special physical conditions exist which render strict compliance unreasonable, burdensome, or impractical.

Your proposal, although well prepared, does not give assurance that it will overcome the limitations present at the site. Further decomposition of the wood waste fill would enhance the settling process and would be expected to cause channelized flow of untreated sewage effluent, which could be expected to cause surface ponding or come in contact with the permanently perched water table below. Your property is not adequate in size to accommodate a modified sewage disposal system and provide sufficient space for a replacement disposal area.

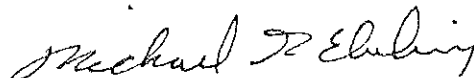
Therefore, based on my evaluation of the verbal and written testimony contained in the record, I am not convinced that the proposed drainfield will function in a satisfactory manner so as not to cause pollution of public waters of the state or create a public health hazard.

Your variance request is regretfully denied.

Pursuant to OAR 340-75-050, my decision to deny your variance request may be appealed to the Environmental Quality Commission. Requests for appeal must be made by letter, stating the grounds for appeal, and addressed to the Environmental Quality Commission, in care of Mr. William H. Young, Director, Department of Environmental Quality, Box 1760, Portland, Oregon 97207, within twenty (20) days of the date of the certified mailing of this letter.

Please feel free to contact me at 229-5289 if you have questions regarding this decision.

Sincerely,



Michael G. Ebeling
Subsurface Sewage Systems Specialist
Subsurface and Alternative
Sewage Systems Section
Water Quality Division

ME:d
XDD90

cc: Douglas Marshall, Tillamook County
John Smits, North Coast Branch Office, DEQ
Northwest Region, DEQ

January 18, 1981

Environmental Quality Commission
C/O William H. Young, Director
Department of Environmental Quality
Box 1760
Portland, OR 97207

Re: WQ-SSS-Variance Denial
T.L. 8400; Sec 7 DB;
T. 1 S.; R. 10 W.; W.M.;
Tillamook County

Dear Mr. Young:

After careful consideration, we feel that we must appeal the decision of Mr. Michael G. Ebeling to deny our variance request for a septic tank approval to be issued on the above described property.

Before purchasing this property in 1979, we took the precaution of requesting that the original approval, which was issued by a Mr. Seabrandt of Tillamook County in 1978, be up-dated. We encountered no problems in obtaining this updated approval. Then, in 1980, we were informed that our property is not adequate to accommodate a sewage disposal system.

Considering the fact that no changes occurred to the property between the time of Mr. Seabrandt's inspections in 1978 and 1979 and the inspection done in 1980, we do not feel that we can except Mr. Ebeling's opinion that our variance request be denied as the final decision.

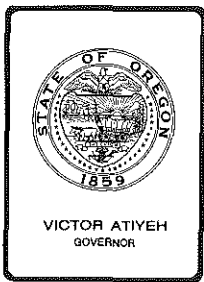
We will be waiting to hear from you on this matter.

Sincerely,

Mr and Mrs Daniel J Walsh
Mr. & Mrs. Daniel J. Walsh

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JAN 26 1981
WATER QUALITY CONTROL

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JAN 26 1981
OFFICE OF THE DIRECTOR



Environmental Quality Commission

Mailing Address: BOX 1760, PORTLAND, OR 97207

522 SOUTHWEST 5th AVENUE, PORTLAND, OR 97204 PHONE (503) 229-5696

MEMORANDUM

To: Environmental Quality Commission

From: Director

Subject: Agenda Item No. M , June 5, 1981, EQC Meeting

Request for a Variance from General Emission Standards for Volatile Organic Compounds at Bulk Gasoline Plants, OAR 340-22-120(2) for the Rogue Valley Oil Co., Medford

Background

The Rogue Valley Oil Co. leases a bulk gasoline plant on 1024 S. Riverside in Medford from Texaco. Texaco has not installed a vapor recovery system. The Rogue Valley Oil Co. has requested a variance until October 1, 1981, to allow time to build a new plant or purchase an existing plant and install control equipment

The Commission is authorized by ORS 468.345 to grant a variance from the Department's rules if it finds that strict compliance would result in curtailment or closing down of a plant.

Evaluation

The Rogue Valley Oil Co. has requested a variance to operate the plant it leases from Texaco without controls until October 1, 1981. Texaco has not installed the controls and will not deliver gas after July 31, 1981, unless the plant complies with Department rules. This would force closure of the plant unless a variance is granted.

The variance was requested to allow time to build a new plant, including controls, or purchase an existing plant and install controls. The current plant is leased from Texaco on a monthly basis. Significant expenditures by the applicant, such as control systems, are not practical on such a short-term lease arrangement. At the end of the variance period, this plant would no longer be allowed to operate until VOC controls are installed.

The Department supports the variance request. Strict enforcement of the deadline (July 31, 1981) would result in closure of the plant. Emissions from this plant would be approximately 5 tons during the 2-month variance

period. Total VOC emissions in the AQMA during the same period would be approximately 2100 tons. During 1979 and 1980, there were no violations of the ozone standard and only 15 violations per year of the state standard. This variance would not cause violations of the state or federal ozone standard.

Summation

1. Rogue Valley Oil Co. leases a bulk gasoline storage plant from Texaco. Rogue Valley Oil Co. has requested a variance to allow operation of this plant without controls until October 1, 1981. This variance would enable the company to remain in business while building a new facility with controls or purchasing an existing facility and installing controls.
2. The Department supports this variance request. This variance would result in 5 tons of emissions during the variance period. Failure to grant a variance would result in closure of the plant.
3. The Commission is authorized by ORS 468.345 to grant variances if it finds that strict compliance would result in the closing down of a plant.

Recommendation

Based upon the findings in the Summation, it is recommended that the Commission grant a variance from OAR 340-22-120(2) from July 31 until October 1, 1981 to Rogue Valley Oil Co. for operation of the bulk gasoline plant at 1024 S. Riverside in Medford.

Bill

William H. Young

Attachments: Variance Request from Rogue Valley Oil Co.
F. A. SKIRVIN:o
229-6414
5-12-81
AO935(2)

Rogue Valley Oil Co.

Distributor of

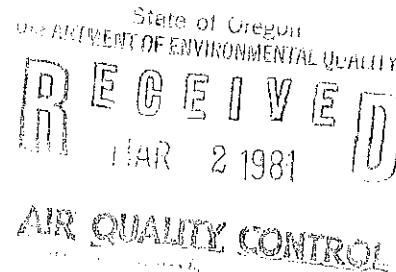
1024 S. Riverside
P.O. Box 1328
Medford, Oregon 97501



Telephone
(503) 772-6181

February 27, 1981

Peter B. Bosserman, P.E.
Senior Environmental Engineer
Department of Environmental Quality
P.O. Box 1760
Portland, Or. 97207



Gentlemen:

For your information, I am a Texaco Wholesaler (Jobber) in Medford, Oregon. My Bulk Plant is owned by Texaco Inc. I lease the Bulk Plant from Texaco on a month to month basis. My incoming Refined Products are received via Truck & Trailer, from Terminals, mainly from Eugene.

To date, Texaco Inc. has not replied to my questions regarding their intentions to either install or not install a Vapor Recovery System in the Medford Bulk Plant.

If Texaco does not install the Vapor Recovery System, it will be necessary that I relocate my business. Relocating this type of business is not the easiest thing to do. I will have to locate property, zoned properly, obtain the necessary permits, build Tank Farm, Warehouse, Office Space, etc. For your information, I am and have been looking for a new location.

If Texaco Inc. does not install a Vapor Recovery System by April 1, 1981, I will automatically be forced out of business. Texaco Inc. will not make deliveries after April 1, 1981, into this Bulk Plant if the Vapor Recovery System is not installed or a Variance is not in force. This will automatically force me to close my business, and undoubtedly lose everything I have worked for these many years. I do not know what Texaco's decision will be, however, I am of the opinion that it will be a negative one.

Due to the fact that Texaco has not made known their intentions regarding Vapor Recovery in this Bulk Plant and the time necessary to relocate and build, I am presented with a serious problem. I am asking for your help.

I am respectfully requesting a six month variance for the installation of a Vapor Recovery System in this Bulk Plant. This will alleviate my problem and allow time for me to relocate if necessary.

Your consideration and approval of my request will be appreciated. If I can be of any assistance, please advise.

Yours truly,

A handwritten signature in cursive script, appearing to read "Robert D. George".

Robert D. George

Rogue Valley Oil Co.

Distributor of

1024 S. Riverside
P.O. Box 1328
Medford, Oregon 97501



Telephone
(503) 772-6181

March 17, 1981

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

RECEIVED
MAR 24 1981

AIR QUALITY CONTROL

F.A. Skirvin
Supervisor, Program Operations
Air Quality Division

Dear Mr. Skirvin:

We have received your letter asking for additional information concerning our request for variance.

At this time we are finalizing our search for a piece of property in White City. Upon purchase or lease of this land, we will build a bulk plant, starting construction approximately May 1, 1981, with a completion date on or before September 30, 1981. At the time of completion, our plant will be in full compliance of all D.E.Q. requirements. We are obtaining bids now for this construction, and we can furnish you these upon request.

To bring you up to date with our current problem, Texaco has decided not to install a Vapor Recovery System. They will deliver product into the plant only if a variance is granted. If our variance request is approved, we will be able to stay in business, and at the same time satisfy the compliance of the D.E.Q. with the construction and completion of our new bulk plant.

Please contact me if you have any questions. Your help in this request is appreciated.

Sincerely,

Handwritten signature of Jeremy P. Gulliano in cursive script.

Jeremy P. Gulliano
Office Manager
For Robert D. George, Owner.