COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers

Address 7540 NW ST Helens Rd.

Date [illegible]

[illegible]

By [illegible]

Date 7/23/84

no emissions [illegible]

By [illegible]

Date 8/13/84

no emissions or odor

By [illegible]

Date 9/3/84

no odor or emissions

By [illegible]

NWT 003485

To: ~~REGilbert~~, LDPatterson RHWixom Date: September 25, 1974

From: ~~TRBispham~~

Subject: AQ - Koppers - Multnomah County

On September 24, 1974, RJNichols and I met with the following representatives of Koppers to discuss their air and water permits:

Mr. Paul Guth, Plant Manager (Portland)
Mr. Jon M. Anderson, Coordinator Environmental Control (Pittsberg, PA)
Mr. Robert L. Shannon, Engineering Department (Pittsberg, PA)

I explained that my purpose was to discuss the pending air permit application which is deficient in several areas; specifically, products and amounts produced, control equipment data and process flow, etc. These representatives attributed these deficiencies to the lack of operation at this plant. We were informed that coal tar processing has not been conducted since December 1973. The facility has only been employed as a creosote blending and distributing point. Coal tar is not now an economically feasible raw material to process. With respect to the future operation of the plant, they have an interim and long-range plan.

The interim program calls for the processing of the remaining coal tar on site and a combination of petroleum (residual fuel). This program is dependent upon finding a consumer since the product will be somewhat off-spec. It is their desire to complete this by January 1975. In any event, it would require approximately three months to process once a buyer is found.

It is their long-range program to produce electrode binder material by basically the same process equipment using petroleum feed stock rather than coal tar. This project is in the experimental stages and customer approval has not been assured.

Considering the facts that the current application is not applicable, and the interim and long-range program, I suggested we take the following course of action;

1. Koppers submit a letter requesting cancellation of current application.

   a. Explain interim plan, including raw materials, products, quantities, projected completion date, request temporary permit to finish off materials on hand.

   b. Request new application and Notice of Construction for long-range plan.

September 25, 1974

REGilbert, LDPatterson, RHWixom

I confirmed that the Department ~~requested~~ required submission of engineering plans for the long-range program and approval must be granted prior to installation. In addition, I advised them that special emphasis must be devoted to odor control.

Mr. Anderson agreed to the above, and will submit a letter in approximately three weeks.

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers Company, Inc.
Address 7540 N.W. St. Helens Rd.

Date 3 Aug 73
11:25 am Detected strong H_2S odor while on St. Helens Rd.
11:45 am Observed 100% opacity (yellow) emission within the plant By Carter Webb

Date 22 Aug 73
10:50 am Detected faint H_2S odors. Threshold range below scentometer #0.
By Carter Webb

Date 10 Sept 73
F.C. 2:35 pm Observed no visible emissions nor detected any distinguishable odors
By Carter Webb

Date 25 Sept. 73
F.C. 3:40 pm Detected no odors or visible emissions from plant with exception of fumes from holding & storage tanks By Carter Webb

NWT 003488

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers Company, Inc

Address 7540 N.W. St. Helens Rd.

Date 12 Oct. 73

F.C. 2:55 p.m. Detected strong H_2S odor while on St. Helens Rd. & on approach to St. Johns Bridge. Observed heavy yellow opacity emissions from holding tank or open holding pond within plant.

By Carter Webb

Date 26 Oct. 73

F.C. 3:10 p.m. Detected strong H_2S odors while approaching plant on N.W. St. Helens Rd. Observed 10% opacity emissions from holding pond.

By

Date

By

NWT 003489

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers

Address

Date 5 Feb 73?

Fuel oil is causing an unusual amount of smoke - will take care of it as soon as possible

By Code-A-Phone (Sm)

Date 2 Apr 73

8:50 - Relay stuck open on boiler - lot of excess fuel. It has to be burned and is causing black smoke

By Suzy

Date 7 August 1973 1450 hrs.

valve problem causing oil to ~~[illegible]~~ flow into fire box; should be fixed in about 30 minutes

By [illegible]

Date

By

NWT 003490

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY COMPLAINT FORM

INDUSTRY, SOURCE OR AREA: Rows of Chimneys Smoking

ADDRESS: NW Side of St. Johns Bridge COUNTY: Mulco

TYPE: ODOR ☐ SMOKE ☒ FALLOUT ☐ OPEN BURNING ☐ OTHER ☐

NATURE OF COMPLAINT: Would like to know the name of the source and what's being done

COMPLAINANT: Mrs. Elliott PHONE: 286-5043

ADDRESS:

ACTION TAKEN: 8 January 1972 [illegible] conversation with the complainant it was learned that the most likely source of the problem was Kaiser Company. I [illegible] to her that [illegible] the

REFERRED TO: Carter Webb

TAKEN BY: Suzy DATE 5 Jan 72

PHD-85

NWT 003491

Sunday, October 31, 1971

Mr. Robert M. Jones
9009 N. New York St.
Portland, Oregon 97203

WH WH
JB TB
CW

Don't forget odor surveys on this source. If you want, I'll go out [illegible] up some sites for taking odor surveys
TB

Columbia Willamette Air Pollution Authority
1010 N. E. Couch
Portland, Oregon

Dear Sirs:

When I arose this morning the first thing that greeted my eye when I looked out the window was smoke. Yes smoke, smoke from a neighbor's open fire in a vacant lot across the way. I immediately checked with the Portland Fire Department and they informed me that the Air Quality Control Department had agreed to the issuance of burning permits within the City limits.

I understand that the major pollution factor in the Portland area is particulate matter, and when it rains, a lot of this pollution is washed out of the atmosphere and back to earth. What I do not understand is why we are not allowed the privilege of a few fresh air days. But no, the first clear day, and your department starts issuing burning permits. It appears to me that what you are doing is maintaining a certain level of pollution in this area.

I have been told that one of our County Commissioners said you can't just tell people they can't do any open burning. Well, if the city or state can tell us we have to use the sewer, and we have to pay Sewer Use Tax, and we have to pay to have our garbage dumped in certain areas, then they can also tell us not to burn.

Since your agency feels the need to issue permits, I might suggest that you impose a burning permit fee which would be assessed high enough to discourage private residents from purchasing them. Impose an even higher assessment for commercial or industrial use; the main goal being not to sell burning permits, but to keep the air clean.

Furthermore, I also wish to complain about the odor emission problem of Kopper Chemical Company, located on St. Helens Road, just below the St. Johns' bridge. In the summer of 1970 I was told by your agency that the company in mention did indeed have an emission problem and that they were working on it. Well, I want to state that their emission odors have worsened in the past year and a half, and I want to see some action to stop it, now!

Don't bother sending one of your representatives to talk to me. That has been done before. I simply want this letter of complaint on file and wish to see your agency taking more positive action against these offenders.

Sincerely,

Robert M. Jones

ROBERT M. JONES

RECEIVED
NOV 3 1971
COLUMBIA - WILLAMETTE

COLUMBIA -LAMETTE AIR POLLUTION AUTHORITY COM -INT FORM

INDUSTRY, SOURCE OR AREA: ~~N.W Nat Gas Pumping Station~~ Kapper

ADDRESS: S end of St. Johns Bridge COUNTY: Multco

TYPE: ODOR ☒ SMOKE ☐ FALLOUT ☐ OPEN BURNING ☐ OTHER ☐

NATURE OF COMPLAINT: Has been observed all times, day & night for every day this week. Extremely thick tonight & smells.

COMPLAINANT: Michael W. Shaffer PHONE: 289-0246

ADDRESS: 7417 N. Jordan

ACTION TAKEN: 13 Sept 71 9:45 AM. Attempted to contact the complainant by telephone to inform him of the status of this source, but received no answer.

Carter 71-66

REFERRED TO:

TAKEN BY: Code-A-Phone (Sm) DATE 9 Sep 71

PHD-85

NWT 003493

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers Company

Address 7540 NW St. Helens Road

Date 27 Oct 71 2:10 pm

[illegible]

By [illegible]

Date 16 Nov. 71

F.C. 11:30 AM What appeared to be and smelled like a pitch-sulfer fume was observed emanating from Koppers pitch cooling pans in excess of 60% opacity.

Carter Webb

Date

[illegible]

By

Date

[illegible]

By

NWT 003494

In closing we are requesting a written reply by 23 March 1971 sm notifying us what steps will be employed to comply with our Rules, and to avoid any future similar occurrences.

If additional information is needed, please do not hesitate to contact us.

Very truly yours,

Tom Bispham
Air Pollution Specialist

J. Carter Webb
Field Representative

JCW:sm
Enclosures

Organic Materials Division, Koppers Company, Inc.
7540 N.W. St. Helens Road, Portland, Ore. 97229
Telephone 503-286-3681

KOPPERS
Chemicals
and Coatings

March 11, 1971

Columbia-Willamette Air Pollution
Authority
1010 N.E. Couch Street
Portland, Oregon 97232

Re: Violation of Columbia-Willamette
Air Pollution Authority Rules

Gentlemen:

The problem developed when a line became partially plugged, due to a malfunctioning valve. The valve has been repaired, and the line cleared. The system is now functioning properly.

Very truly yours,

Paul W. Guth

Paul W. Guth

PWG/bw

RECEIVED
MAR 12 1971
COLUMBIA - WILLAMETTE
AIR POLLUTION AUTHORITY

ROUTING

To	Noted by
TB	-
WH	WH
	CW

NWT 003496

PLEASE FURNISH SERVICE(S) INDICATED BY CHECKED BLOCK(S).
REQUIRED FEE(S) PAID.

☐ Show to whom, date and address where delivered ☐ Deliver ONLY to addressee

RECEIPT

Received the numbered article described below.

REGISTERED NO. Koppers Co

CERTIFIED NO. 993408

INSURED NO.

DATE DELIVERED 3-10-71

SIGNATURE OR NAME OF ADDRESSEE (*Must always be filled in*)

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY Barbara Wood

SHOW WHERE DELIVERED (*only if requested*)

Kopper
7540 N
Portla

A

B

Gentlemen:

This letter is to confirm the Notice of Violation No. 1988 which we issued to Koppers Company Inc., 7540 N.W. St. Helens Road on 4 March 1971. A copy of this notice signed by Mr. Paul Guth is enclosed.

On the above mentioned date between 2:51 p.m. and 3:20 p.m., a representative of this agency observed and recorded a yellow smoke emission from the fan exhaust of the pitch fume scrubber system. This constitutes a violation of Section 7.2(1) of our Rules which prohibits the discharge of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity. The emissions we recorded in this instance exceeded 20% opacity for 30 minutes during our thirty minute reading.

Please be aware that this is a condition which we will not tolerate. Any future violations will leave us with no recourse but to take further enforcement action.

If at any time you should anticipate, or there should occur intermittent smoke from sources or from such conditions that are unusual and temporary in nature (gas curtailment, etc.), it is your responsibility to report such an occurrence to this office. In addition, to a bulletin regarding upset conditions left with you on 4 March 1971, we have enclosed further information concerning emission and ambient air standards. We feel this information is pertinent with your operation and will be of assistance to you in evaluating and answering any possible problems or questions.

ROUTING	
To	Noted by
YB	YB
WH	WH
From:	
Action:	

NWT 003497

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
104 S. W. 5th AVENUE – PORTLAND, OREGON (97204)
TELEPHONE: 228-6141, EXT. 466

NOTICE OF VIOLATION № 1988

1. Name of Facility _____

2. Address _____

3. A violation of Rule 2 of this Authority was observed on:

_____ at _____ am / pm

at the above address as follows:

a. ☐ Section 2-2.1 Visible Air Contaminants

Type _____

Source _____

b. ☐ Article 2-3 Open Burning

Source _____

_____

Violation of any provision of the rules of this Authority is a misdemeanor and is punishable upon conviction by a fine of not more than $1000 or by imprisonment in the county jail for not more than one year, or by both. Each day of violation constitutes a separate offense.

4. Issued by _____

on _____ at _____ am / pm

5. Signature of person receiving notice:

_____

(Signature for receipt is not admission of Rule violation)

6. Confirmation letter mailed _____ by _____

PHD-84

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
104 SW 5th Avenue, Portland, Oregon (97204)
Telephone: 228-6141, Ext. 466

FIELD OBSERVATION REPORT

Name of Facility Koppers Co. Inc Date 3 Mar. 71

Address 7540 N.W. St Helens Rd. Time 2:51 pm

Mailing Address if Other Than Above

Spoke To Mr Paul Guth, Plant Mngr.

Person in Charge Mr Paul Guth, Plant Mngr.

Source Pitch Fume Scrubber

Observations While on a surveillance check of the N.W. area a dense plume of yellow smoke was observed evolving from the exhaust fan of the pitch fume scrubber. A 30 minute reading was conducted off the south end of the property, and observed violation emissions totaled 30 minutes. The following morning, →

Code Violation 7.2 Visible Air Contaminants

Recommendations A follow up letter should be sent including Info. Bulletins #7 (emission standards) & #8 (ambient air standards — odors). Close surveillance should be maintained on this plant in order record all occurrances of odor emissions.

Carter Webb

I met with Mr. Paul Guth that informed me the emissions stemme from the hardening of pitch with in the lines leading to the cooling pans. I explained to him that an unreported breakdown was regarded as a violation of our Rules, and a Notice of Violation No. 1988 was issued with the understanding it was a warning. Mr. Guth was informed of our emission standards & in hopes to prevent other unreported breakdowns I left with him Information Bulletin No. 11. In addition two boiler data survey forms were left to be completed with the agreement that I could pick them up next week.

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Phone: 503--233-7176

Report of Visible Air Contaminants

Time	0	1/4	1/2	3/4	Time	0	1/4	1/2	3/4
1451	[illegible]	[illegible]	[illegible]	[illegible]					
52	[illegible]	[illegible]	[illegible]	[illegible]					
53	[illegible]	[illegible]	[illegible]	[illegible]					
54	[illegible]	[illegible]							
55		[illegible]	[illegible]	[illegible]					
56	25	[illegible]	[illegible]	[illegible]					
57	[illegible]	[illegible]	[illegible]	[illegible]					
58	[illegible]	[illegible]	[illegible]	[illegible]					
59	100	100	[illegible]	[illegible]					
1500	[illegible]	[illegible]	[illegible]	[illegible]					
1	100	25	[illegible]	[illegible]					
2	[illegible]	[illegible]	[illegible]	[illegible]					
3	[illegible]	[illegible]	[illegible]	[illegible]					
4	[illegible]	[illegible]	[illegible]	[illegible]					
5	[illegible]	[illegible]	[illegible]	[illegible]					
6	[illegible]	[illegible]	20	[illegible]					
7	[illegible]	[illegible]	[illegible]	[illegible]					
8	[illegible]	[illegible]	[illegible]	[illegible]					
9	[illegible]	[illegible]	[illegible]	[illegible]					
10		[illegible]	[illegible]	[illegible]					
11	[illegible]	[illegible]	[illegible]	[illegible]					
12	[illegible]	[illegible]	[illegible]	[illegible]					
13	[illegible]	[illegible]	[illegible]	[illegible]					
14	[illegible]	[illegible]	80	85					
15				[illegible]					
16	[illegible]			[illegible]					
17	[illegible]		[illegible]	[illegible]					
18	[illegible]		[illegible]						
19	[illegible]	[illegible]							
20		70	100	100					

Date [illegible] 1971

Name Koppers Company, Inc.

Address 7540 NW St Helens Rd

Source Pitch Fume Scrubber

Type Contaminant Smoke

Color Yellow

Ringelmann _____ Opacity ✓

Height of Stack 30 feet

Distance to Source 550 feet

Direction to Source [illegible]

Wind Velocity 8-12 mph

Cloud Cover _____

Stability Looping

Relative Humidity _____

No. 5 (100%)	Units	40	
No. 4 (80%)	Units	57	
No. 3 (60%)	Units	10	
No. 2 (40%)	Units	8	120
No. 1 (20%)	Units	5	
No. 0 (0%)	Units	0	0
	Total Units	120	120

Minutes of Observation 30 minutes

Minutes of Violation 30 minutes

Observer Carter Webb

Ringelmann and opacity numbers and percentages are as determined by Ringelmann Standard

Jan69

NWT 003501

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
104 SW 5th Avenue, Portland, Oregon (97204)
Telephone: 228-6141, Ext. 466

Report of Odor Intensity

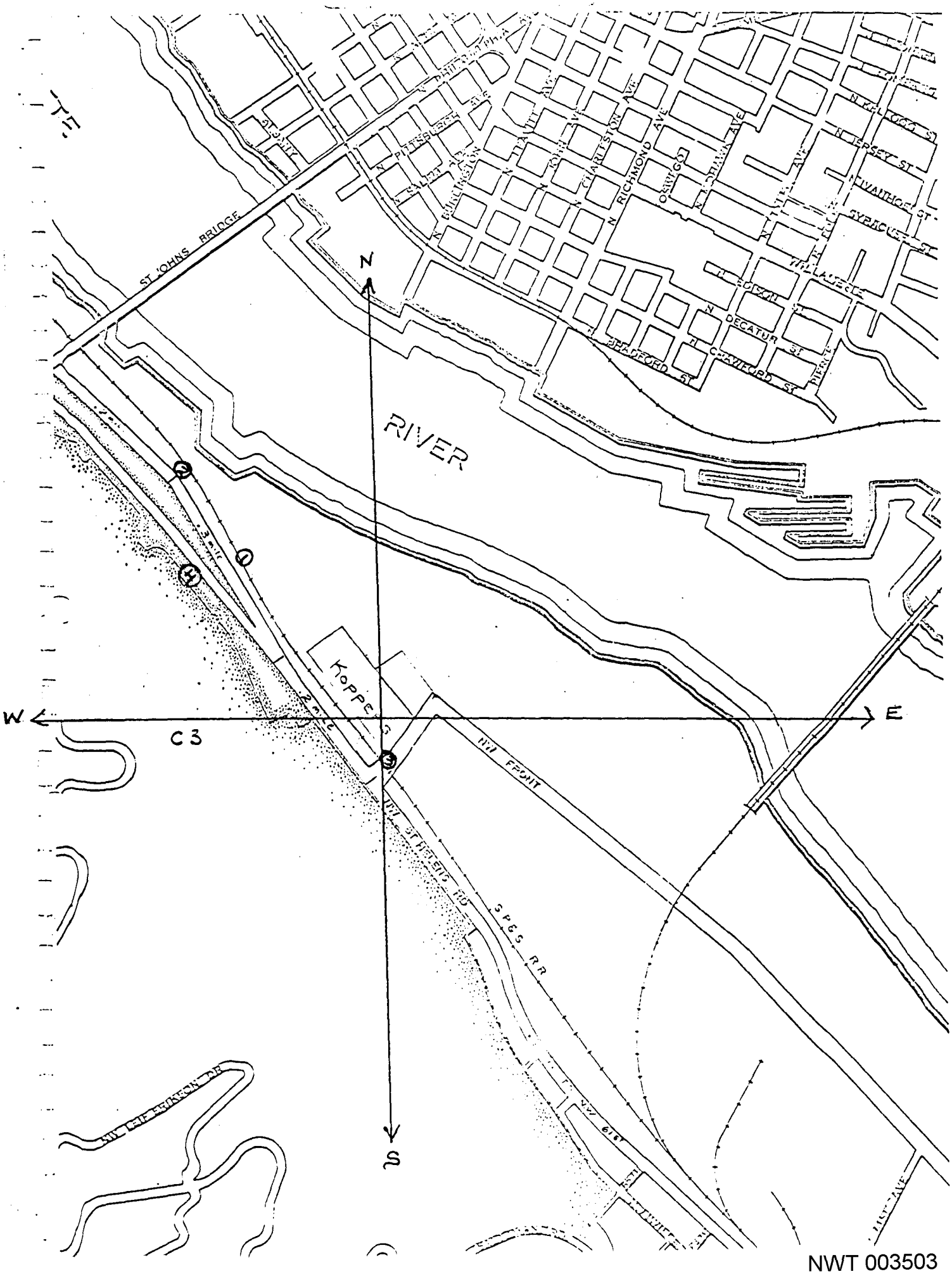
Area GUILDS LAKE Date 2 MARCH 1971

Suspected Source KOPPERS COMPANY INC. Observer CARTER WEBB

Location SEE MAP	Time	Intensity	Description	Wind	Remarks
#1 NW DOWNWIND	11:15 am	#2	H_2S	8-12 mph	
	11:16	0	↓	↓	
#2 NW DOWNWIND	11:19 am	#2	H_2S	8-12 mph	
	11:20	#1	↓	↓	
#3 S UPWIND	11:25 am	0		8-12 mph	
				↓	
#4 NW CROSS-WIND	11:30 am	0	H_2S	8-12 mph.	
	11:31	#1			
	11:32	#1	↓	↓	

Odor Intensity Scale

0 - No odor or no odor of the designated component
1 - Threshold level of the component
2 - Definite odor of the component
3 - Strong odor of the component
4 - Overpowering odor of the component



ST JOHNS BRIDGE
N
RIVER
W
E
S
C3
KOPPERS
NW FRONT
SP&S RR
N PITTSBURGH AVE
N BURLINGTON
N CHARLESTON AVE
N RICHMOND AVE
N DECATUR ST
N BRADFORD ST
N CRAWFORD ST
N JERSEY ST
N KELLOGG ST
N SYRACUSE ST

NWT 003503

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY COMPLAINT FORM

INDUSTRY, SOURCE OR AREA: Factories - Gilmore Steel, Chevron, Koppers

ADDRESS: St. Helens Road NW nat Gas COUNTY: Multno

TYPE: ODOR ☐ SMOKE ☐ FALLOUT ☐ OPEN BURNING ☐ OTHER ☐

NATURE OF COMPLAINT: Every time she drives by these sources fill up her car with pollution.

COMPLAINANT: Evelyn Smith PHONE: 286-0584

ADDRESS: 9426 N Edison

ACTION TAKEN: 24 Feb 71 In a telephone conversation with the complainant, I explained our current course of action with Koppers Chemical & our intended means to bring this plant into compliance

REFERRED TO: Carter Webb

TAKEN BY: Suzy - Code-A-Phone DATE 23 Feb 71 PM

PHD-85

NWT 003504

Koppers Co.

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY COMPLAINT FORM

INDUSTRY, SOURCE OR AREA: Gas + Coke Co.

ADDRESS: St. Helens Rd. COUNTY: Multco

TYPE: ODOR ☑ SMOKE ☐ FALLOUT ☐ OPEN BURNING ☐ OTHER ☐

NATURE OF COMPLAINT: By St. Johns - It's a gas + coke company. Past Chipman Gas fumes very strong. 2145 hour last night - 9 Feb 71

COMPLAINANT: Larry Kohler PHONE:

ADDRESS:

ACTION TAKEN: 10 Feb 71 In response to this complaint + some of my own, odor surveys will be conducted as soon as possible in order to bring this plant into compliance. Carter Webb

REFERRED TO: CW

TAKEN BY: dC. DATE 10 Feb. 71

PHD-85

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers Company Inc.

Address 7540 N.W. St. Helens Road

Date 18 Feb 71

3:30 pm Observed a #3½ Ringelmann from Koppers boiler stack

By Carter Webb

Date 24 Feb 71

F.C. 4:00 pm There were no detectable odors at this time from either the north, west or south boudaries of the plant that would have indicated the presence of Creosote or H_2S.

Carter Webb

Date 25 Feb 71

F.C. 3:00 pm As yesterday there were no detectable odors present within the same areas as described above

By Carter Webb

Date

By

NWT 003506

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY COMPLAINT FORM

INDUSTRY, SOURCE OR AREA: Odor - ~~Ex Koppers Chemical~~

ADDRESS: _____ COUNTY: Multo

TYPE: ODOR ☑ SMOKE ☐ FALLOUT ☐ OPEN BURNING ☐ OTHER ☐

NATURE OF COMPLAINT: Chemical odor, pervades entire house

COMPLAINANT: Mrs E A Jordan PHONE: _____

ADDRESS: 2606 S.W. Buckingham

ACTION TAKEN:

Investigation indicated definite chemical odor in the air. After consultation with C. Webb and T Bispham Chemical seems like the most likely source.

DB/21 Dec

REFERRED TO: DB

TAKEN BY: DTB DATE 21 Dec 70

PHD-85

NWT 003507

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 N.E. Couch Street, Portland, Oregon 97232

MEMORANDUM 14 December 1970

TO: Wayne Hanson, Control Director

FROM: Tom Bispham, Air Pollution Specialist

SUBJECT: Follow-up Survey - Koppers Company, Inc., 7540 N.W. St. Helens Road, Portland, Oregon

On 2 June 1970 Bob Harris and I met with Mr. Paul Guth, Plant Manager. The purpose of our visit was to acquire emission inventory data and to identify any possible sources of air pollution.

Due to the nature of this process, we were specifically looking for sources of creosote or like odors which are being sensed by residents along Willamette Boulevard between 0100 and 0500 hours.

This plant employs an average of 10 people, 24 hours/day, 365 days/year.

Process

Raw material - Coke oven tar - 700,000 gallons/mo. Raw materials arrive ship or tank car, the tar is heated for transporting to the storage tanks. When ready for use the tar is transported to a batch still. Heat is supplied by circulating the tar through a gas fired tube heater which consumes approximately 61.500 therms/mo. and when in use maintains a temperature range of 700°-900°. Distillation is continued until the still contents reach a desired softening point. Three categories of products are removed by distillation: chemical oil, creosote and pitch. Chemical oil is composed primarily of naphthalenes and phenols. It is a valuable source of other chemicals and is shipped to other plants for processing, namely for conversion to naphthalem, phenol, creosol, xylenol, pyredine, picoline as well as various solvent oils. Creosote and chemical oil are removed in a fractionating column and piped to storage tanks. Approximately 200,000 gallons of creosote are processed per month.

The pitch removed by distillation is piped to an elevated cooling tank (capacity of 20,000 gallons) and is either loaded directly into tank cars or cast into large rectangular pans that are 50 feet wide and 80 feet long. Pitch in the pans is cooled until solid, then dug by payloader and loaded into trucks or hopper cars. Approximately 2000 tons per month are produced. The pipeline from the still to the cooler is cleared after pumping by purging with steam. Fumes are generated during this pumping and purging procedures. A system has been installed to fully condense these fumes. Fumes are pulled by a fan into the scrubbing tower where they are contacted and condensed by relatively cool circulating oil. The oil and condensate then flows by gravity into the horizontal tank.

Air Pollution Aspects

Problems at this plant appear to be related primarily to odors and emanate from the following sources:

1. Vents on the heated storage tanks
2. Seals on pumps handling the hot process steam
3. Oil seal on the condensing system for the fractionation column
4. Spillage
5. Primary problem is likely to be a large volume fumes generated when pitch is pumped into the cooling tanks.

~~Promote~~ odors noted around this plant are that of creosote and hydrogen sulfide. The creosote odors generated at this plant may possibly be the cause of odor complaints on Williamette Boulevard.

Recommendations

Mr. Guth was informed that we would make periodic odor surveys and in the event of a violation, notify him of condition and request control.

Therefore, the N.W. Portland field representative should maintain close surveillance on this plant and record all occurrances of odor emissions and discuss with supervisor after sufficient evidence of violation has been recorded.

Tom Bispham

TB:sm

COLUMBIA WILLAMETTE AIR POLLUTION AUTHORITY COMPLAINT FORM

INDUSTRY, SOURCE OR AREA: Creosote Plant

ADDRESS: _____ COUNTY: Mulco

TYPE: ODOR ☒ SMOKE ☐ FALLOUT ☐ OPEN BURNING ☐ OTHER ☐

NATURE OF COMPLAINT: 10:00 - odor very strong.

COMPLAINANT: Mrs. Lockerson PHONE: 289-0417

ADDRESS: 7006 N. Portsmouth

ACTION TAKEN:

Believe [illegible]

REFERRED TO:

TAKEN BY: Code - A - Phone (Sm) DATE 5 Aug 70 PM

PHD-85

NWT 003510

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
1010 NE Couch Street, Portland, Oregon 97232
Telephone: 233-7176

FIELD OBSERVATION REPORT

Name of Facility Koppers Co

Address

Date 25 Apr 69 1550 hrs

Frank Spinola called to report breakdown ignition which is causing creosote odors to be emitted; should be corrected today

By Spinola

Date 4 Aug 70

TB Noted #2-3 odors of creosote @ 2215 from St Helens Road

7 Aug 70 JR Close

Noted #3 odors of creosote @ 1930 - from St Helens Road

By

Date

By

Date

By

NWT 003511

13 November 1969

Mr. M. G. Morris
Air Pollution Control Group
Koppers Company, Inc.
440 College Park Drive
Monroeville, Pa. 15146

Dear Mr. Morris:

In reply to your letter of 3 November, there is enclosed a copy of the rules of the Columbia-Willamette Air Pollution Authority and a copy of the proposed rules which have been considered at a public hearing on the 24th of October. The next public hearing on the rules is scheduled for 21 November.

We have placed your name on the mailing list to receive any changes in rules.

Very truly yours,

R. E. Hatchard
Program Director

REH:jl
Enclosures

ROUTING	
To	Noted by
From:	
Action:	

Research Department, Koppers Company, Inc.
440 College Park Drive, Monroeville, Pa. 15146
Telephone 412-327-3000

KOPPERS

November 3, 1969

Koppers Company, Inc.
440 College Park Drive
Monroeville, Pa. 15146

Columbia-Willamette Air Pollution Authority
1010 N. E. Couch Street
Portland, Oregon 97232

Gentlemen:

Koppers Company, Inc. has recently established an Air Pollution Control Group to assist their plants located in Multnomah County to comply with the control regulations presently in effect and with any future additions or changes to these regulations.

In order to be certain that our files are complete, would you please transmit one (1) copy of all present regulations covering air pollution to this office. We would also appreciate being placed on a mailing list to receive any changes or additions to the regulations.

Very truly yours,

M. G. Morris
Air Pollution Control Group

MGM:jd

ROUTING	
To	Noted by
REH	
From:	
Action:	

RECEIVED
NOV 10 1969
COLUMBIA - WILLAMETTE
AIR POLLUTION AUTHORITY

27 November 1968

Koppers Company, Inc.
7540 N.W. St. Helens Rd.
Portland, Oregon 97231

Attn: Mr. Lewis Cherrone, Superintendent

Re: Breakdown Conditions

Gentlemen:

On 22 November 1968, an investigation was made of an odor complaint in your vicinity. During an inspection with Mr. Frank Spinola, Plant Engineer, it became apparent that the odor might have been caused by breakdown of the scrubber fan on your creosote tank.

Section 2-4.4 of the Columbia-Willamette Air Pollution Authority Rules requires that any breakdown condition be reported to this office within four hours of its occurrence.

If further information is required, please phone this office at 233-7176.

Very truly yours,

R.E. Hatchard
Program Director

GS
George H. Sanderson Jr.
Field Representative

GHS:sm WS

ROUTING	
To	Noted by
WS	WS
JA	JH
GS	
From:	WS
Action:	JA

ITY OF PORTLAND BUREAU OF HE
Air Quality Control Division
1225 SW 3rd Avenue 97204

FIELD OBSERVATION REPORT

Name of Facility Koppers Co

Address

Date 4 Nov 66 (1530)

Drove out to identify odor reported by the complainant. At time of my arrival a #2 odor of a mercaptan was present. The odor could not be immediately associated with Koppers. Mrs Pettingill described the odor as a "pitch" odor and said it occurred frequently at all hours.

A check was then made at Koppers to try to identify the odor. No identification was made and it was determined that the odor was probably not from Koppers. An Engineer at Koppers also stated that they had not been running their process all week.

#2-#3 odor of Lite oil, Scrubber effluent and Anthracene were noticed.

Upon return to the Pettingill residence, no odor could be detected.

By

Date 26 April 68

Koppers called and said they had not been violating at all this week. Some woman complained about them. They told her it was not them. Person calling said that Koppers has been shut down this whole week.

NWT 003515

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

MR
→ FILE FILE KOPPERS

Report of Odor Intensity

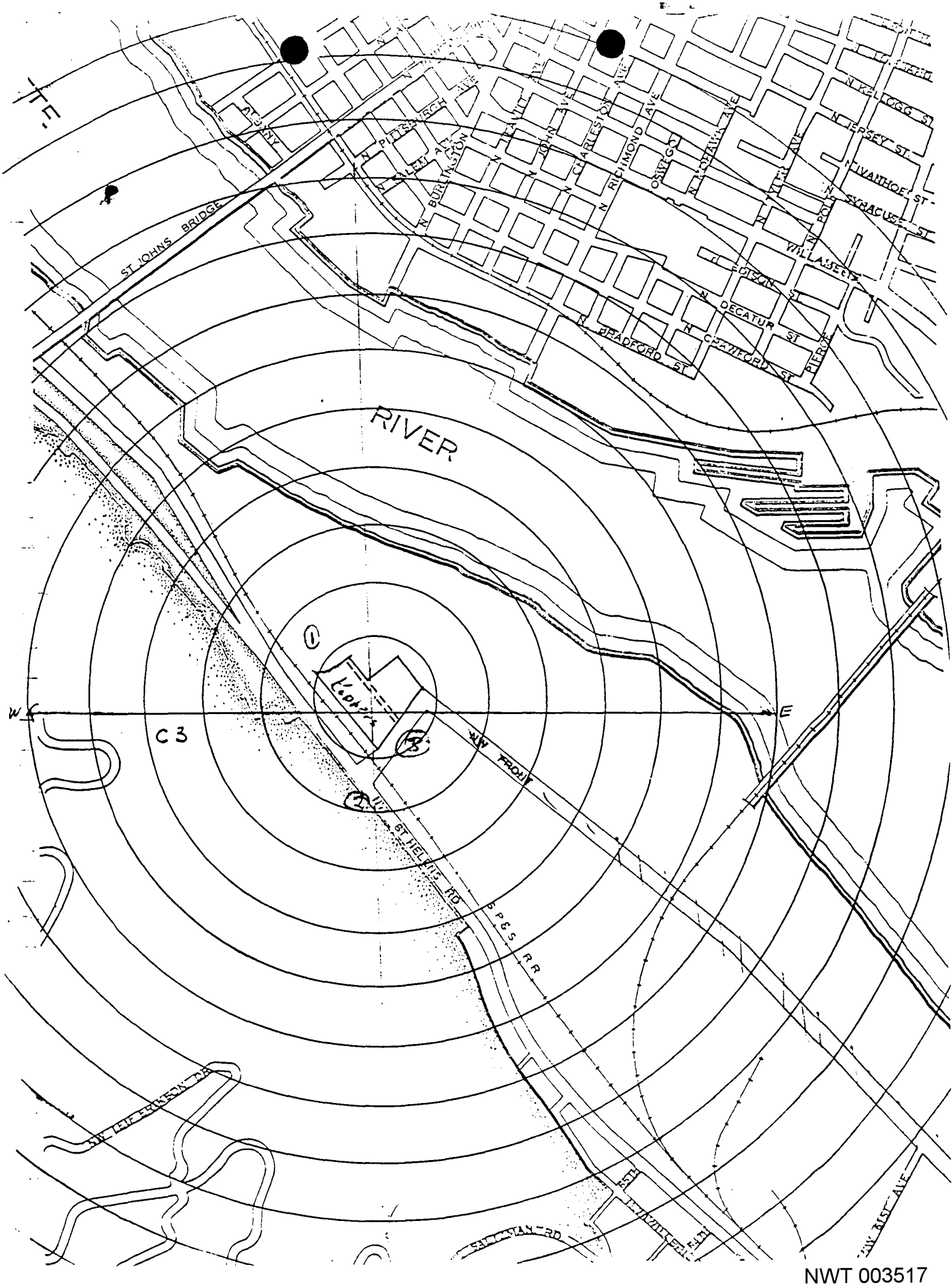
Area Guilds Lake Date 16 Feb. 1967

Suspected Source Koppers Chemical Observer J. Cole & Sells

Location	Time	Intensity	Description	Wind	Remarks
① North up-wind of Koppers Plant	1035	0	H_2S	4-7 mph	#2 odor of diesel oil from old Portland Gas and Coke Plant.
	1036	0	↓	↓	#2 odor of diesel oil from old Portland Gas + Coke Plant
	1037	0	↓	↓	unstable Atmosphere
② Cross wind to Koppers Plant.	1043	0	No odor	4-7 mph	#2 odor of Diesel exhaust from diesel transport
	1044	0	↓	↓	#2 odor of Diesel exhaust from diesel truck
	1045	0	↓	↓	
③ Downwind from Koppers Plant (S.E.)	1048	1	H_2S	4-7 mph	H_2S odor from water effluent from distillation tower scrubber
	1049	1	H_2S	↓	
	1050	1	H_2S		Had noticed #2 odor earlier
	1051	1	H_2S		odor like steam
	1052	1	H_2S		effluent from distillation tower scrubber
	1053	1	H_2S		
	1054	1	H_2S		
	1055	1	H_2S	↓	

Odor Intensity Scale

0 - No odor or no odor of the designated component
1 - Threshold level of the component
2 - Definite odor of the component
3 - Strong odor of the component
4 - Overpowering odor of the component



ST JOHNS BRIDGE
N PITTSBURGH AVE
N BURLINGTON
N JOHN AVE
N CHARLESTON AVE
N RICHMOND AVE
OSWEGO
N KELLOGG ST
N JERSEY ST
N IVANHOE ST
N SYRACUSE ST
WILLAMETTE
N EDISON ST
N DECATUR ST
N CRAWFORD ST
N BRADFORD ST
PIERCE
RIVER
W
E
C3
NW FRONT
ST HELENS RD
S P & S RR
SALTZMAN RD

NWT 003517

TB
GS

COLUMBIA-WILLAMETTE AIR POLLUTION AUTHORITY
104 SW 5th Avenue, Portland, Oregon (97204)
Telephone: 228-6141, Ext. 466

276-7681

FIELD OBSERVATION REPORT

Name of Facility Koppers Date 22 Nov 68

Address 7900 NW St Helens Rd Time 1000

Mailing Address if Other Than Above

Spoke To Mr Frank Spinola

Person in Charge

Source Complaint from Tom Bispham of H_2S odor in area, about 0845 while passing NW Nat. Gas Co below, west end of St Johns Bridge.

Observations Scrubber fan had shorted and burned out causing an initial output of odor while filling the creosote tank at about that time. I told Mr Spinola of the requirement to call us in case of a breakdown condition

Code Violation None

Recommendations Letter notifying them to contact us in case of breakdown condition

By G. Sanderson

NWT 003518

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

ER-MR

PRE-REGISTRATION INFORMATION SHEET *

Address of Structure 7540 NW ST HELENS RD

Type of Occupancy: Industrl ✓ Commrcl _____ Housing _____ Government _____

Indicate which: New construction _____ Alteration to existing structure ✓

Name of Occupant KOPPERS CO

Nature of Business COAL TAR DISTALATION

Name of Owner KOPPERS CO

Address KOPPERS BLDG PITSBURG PA.

Plans by KOPPERS CO

Address SAME

* In conformity with requirements of the Portland Air Quality Control Code, this form is to be completed by applicants for Building Permits for:

a. All new hotels, motels, apartment houses and other dwellings for five or more families except those which are all-electric or use commercial (PP&L) steam and have no incinerator;

b. All other new structures to be used for business, industrial, commercial, philanthropic or governmental purposes in which other than electric or commercial (PP&L) steam space heating is involved, or in which any operation is conducted resulting in emission to outside atmosphere of any air contaminants. Such operations include, but are not necessarily limited to, those shown below;

c. Alterations to existing structures involving major changes in heating or incinerator equipment or incorporating such operations as those listed below;

Office Buildings
Schools
Apartment houses
Motels - Hotels
Hospitals - Clinics
Brake debonding
Chemical manufacturing plants
Fertilizer plants
Food products plants
Incineration of all types
Lumber mills and wood products
Metallurgical plants
Petroleum industry
Mineral processing industrial plants
Paint and varnish manufacturing
Pharmaceutical manufacturing
Plating, anodizing and surface preparation
Pulp and paper manufacturing plants
Radiological sources
Refuse and liquid waste disposal plants
Rendering plants
Salvage operations
Sand and gravel plants
Steam power plants, oil or wood fired
Synthetic resin manufacturing

- For AQC Use -

Plans received —

Building permit application No. 3543

Approved 15 NOV. 1966 By WJH

Letter No. — Sent _____

NWT 003519

ITY OF PORTLAND BUREAU OF HEAL
Air Quality Control Division
1225 SW 3rd Avenue 97204

FIELD OBSERVATION REPORT

Name of Facility Koppers Co

Address 7900 NW St. Helens Road.

Date 25 Oct 66

A visit was made ~~at~~ to obtain samples of different products and to check the small "scrubber" on the distillation column vacuum. The gases are run through a single water spray into a seal pot. Initially there was a 1" seal but this caused operational problems so they are going to try 1/4" seal. This does not look like it will do the job and should be first place investigated if H_2S is detected. I feel a more adequate unit will be required. Mr. Cherrone will call us when samples are obtained MR.

Date By

Date By

Date By

NWT 003520

ITY OF PORTLAND BUREAU OF HEAL
Air Quality Control Division
1225 SW 3rd Avenue 97204

286-3631

FIELD OBSERVATION REPORT

Name of Facility Koppers Company

Address 7900 NW St. Road.

Date 23 Sept-66

Odors of pitch strong on St. Helens Road - (SSW wind) but none were picked up across the river on N. Tyler St. (1900 hrs)

By MDR

Date 26 Sept 66

Called L. Cherrone, Plt Mgr. on complaint of 23 Sept 66. He was a little evasive on cause. I suggested relief valve on cooler and he said yes that this might be problem and was going to put relief on scrubber tank instead next week. Asked about any other plans - he informed me that they were going to put a scrubber on vacuum relief system within the week using water as scrubbing liquid. I questioned him on feasibility of H_2O to knock out H_2S and suggested he look into caustic as scrubber liquid. He was informed of ACC requirements on notification of upset conditions. I omitted (forgot) telling him requirements of submitting plans for ACC devices. This should probably be formally stated in a letter to Cherrone -

By MR

26 Sept 66 (@ 1100 hrs)

Mr. Cherrone called back to say he checked around and found they had a congealed line and used little more steam than they should have to purge the lines causing pressure to increase, and by pass the scrubber. Informed him of need to submit plans. MR.

NWT 003521

CITY OF PORTLAND BUREAU OF HEA
Air Quality Control Division
1225 SW 3rd Avenue 97204

FIELD OBSERVATION REPORT

Name of Facility Koppers Co, Inc

Address 7900 NW St Helens Road

Date ~~23~~ 18 AUG 66

MR & BF made shake down inspection of plant (MR)

1 Sept 66 - See MR odor survey

By

Date 6 Sept.

Phoned D. Douglas Ch Eng. SBH Occup. Health Sect re Dr Leon's pl Can 2 Sept. Set survey of situation to 0900 7 Sept.

By REH

Date 20 Sept 66

See MD odor survey @ 0900-1000 —

MR & BF odor survey @ 1445-1515 hrs -

Odors during this survey would not by MR&BF be considered offensive and not By of a wide area

Date coverage. The most significant observation from a problem standpoint was prevalence of H_2S odor downwind. The hot pitch odor was quite noticible on release of the relief valve with the parcel of vented By gas being carried quickly down wind. This parcel lost its visible idenity 1000-1500' downstream from relief standpoint. If the odors are no greater than during this survey problems are not anticipated. Plume from pitch vapor scrubbers is in excess of opacity limits. MR

See complaint of 22 Sep 66

NWT 003522

~~REH~~ REH

AUG 26 1966

Referring back to your B.S. of 12 Aug, last para, please see last para of MR's survey of 23 Aug.

Further action?

To J.L.I. - Jim C available to assist J —
~~MR~~ MR

Yes — AQC must determine if the various releases are within code requirements —

Preferably by Sept 15th.

Recommend field observations upwind + downwind during an inversion — Should organize several stations + staff - concurrent obs

REH

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

Report of Odor Intensity

Area Guilds Lake Area Date 20 Sept 66

Suspected Source Koppers Co. Inc Observer M.D. Roach

Location	Time	Intensity	Description	Wind	Remarks
#1 (see map)	1446	2	Coal Tar	NNW	Next Koppers Coal
"	1447	2	Naphtha	8-12	Tar Carriers)
"	1448	0	Coal Tar	"	"
"	1449	1	"		
	1450	0			
#2	1455	2	Napt-a & Coal Tar	NNW 8-12	Spraying Loading Area with Tar Base Paint.
	56	1	"		
	57	1	"		
	58	2			
	59	0			
# 3	1502	2	H_2S	NNW 8-12	Scrubber emission visible
	03	2	"		
	04	2	H_2S	"	
	05	1	Coal Tar	"	
	06	2	"	"	
	07	0		"	
	10	3	Pitch [illegible]		Release [illegible] — large
	11	2	[illegible]		[illegible]

Odor Intensity Scale

0 - No odor or no odor of the designated component
1 - Threshold level of the component
2 - Definite odor of the component
3 - Strong odor of the component
4 - Overpowering odor of the component

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

Report of Odor Intensity

Area GUILDS LAKE AREA Date 20 SEPT 1966

Suspected Source KOPPERS CO INC Observer WM FULLER

Location	Time	Intensity	Description	Wind	Remarks
#3	1512	2	Hot Pitch	NW 12-15	Scrubber plume very visible
	13	0	–		
	14	1	Pitch		
	15				

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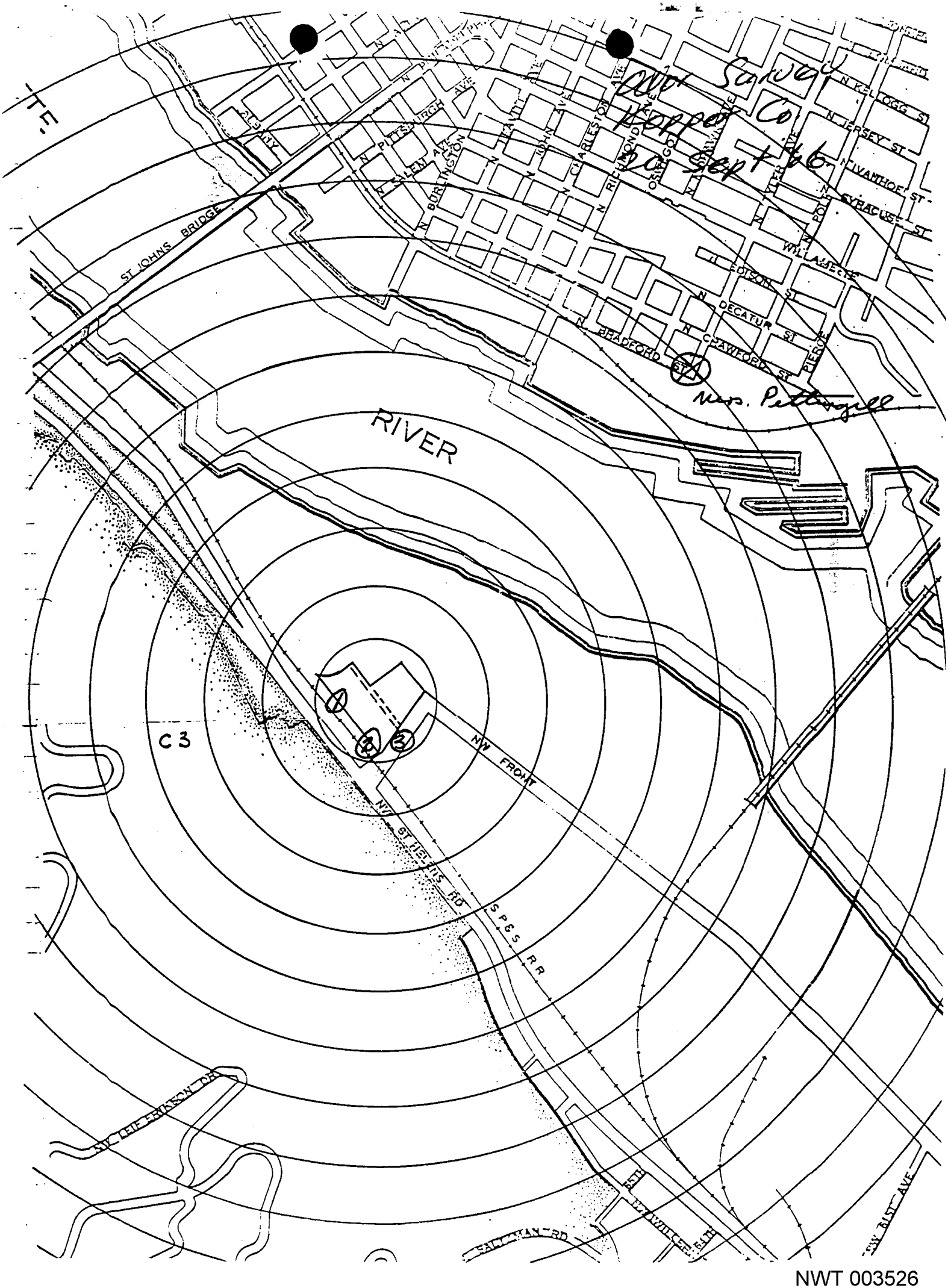
2 - Definite odor of the component
3 - Strong odor of the component
4 - Overpowering odor of the component


Oil Survey
Hopper Co
20 Sept 66
N KELLOGG ST
N JERSEY ST
N IVANHOE ST
N SYRACUSE ST
N WILLAMETTE
N EDISON ST
N DECATUR ST
N CRAWFORD ST
N BRADFORD ST
PIERCE
N PITTSBURGH AVE
N SALEM AVE
N BURLINGTON
N JOHN AVE
N CHARLESTON AVE
N RICHMOND AVE
OSWEGO
ST JOHNS BRIDGE
RIVER
C3
NW FRONT
NW ST HELENS RD
S P & S RR
SW LEIF ERIKSON DR
SW 61ST AVE
SALTZMAN RD

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

Report of Odor Intensity

Area Guilds Lake Date 9-20

Suspected Source Koppers Observer M J Dick

Location	Time	Intensity	Description	Wind	Remarks
#1 (DOWNWIND) (See Map for Sta. Loc.)	0931	2+	UNKNOWN	NNE A-7 G 8-12	ODOR OF LANDFILL OR RIVER
	0932	2+			
	0933	2+			
	0934	2+			
	0935	2+			
#2 (DOWNWIND)	0941	2	"	N-NNE A-7	" "
	0942	2			
	0943	2			
	0944	2			
	0945	2			
#3 (UPWIND)	0951	0			NO ODOR NOTED
	0952	0			

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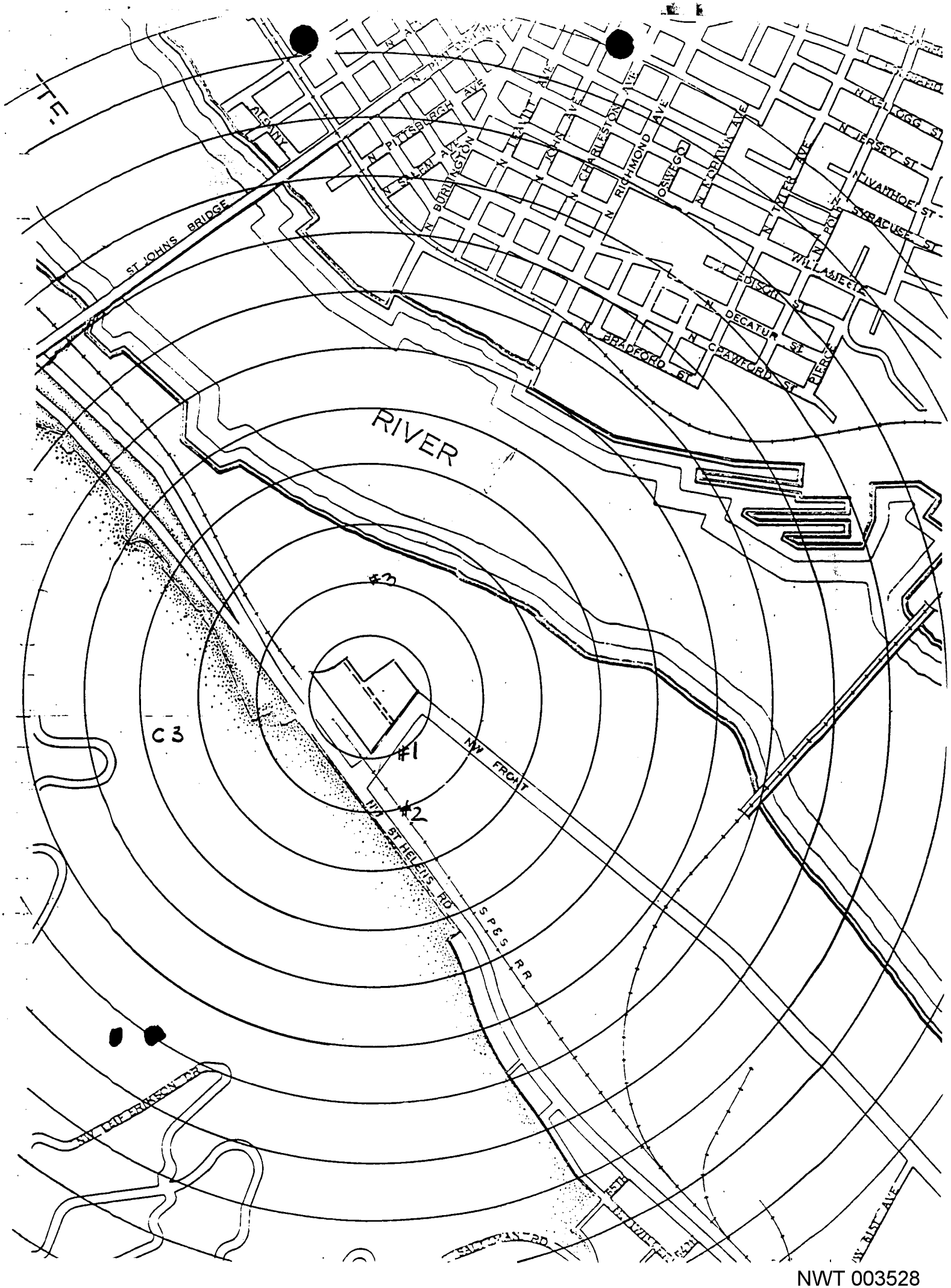
3 - Strong odor of the component
4 - Overpowering odor of the component



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N SALEM AVE
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N CHARLESTON AVE
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OSWEGO
N MOHAWK AVE
N TYLER AVE
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N JERSEY ST
N IVANHOE ST
N SYRACUSE ST
WILLAMETTE
N EDISON ST
N DECATUR ST
N CRAWFORD ST
N BRADFORD ST
PIERCE
ST JOHNS BRIDGE
RIVER
#3
#1
#2
C3
NW FRONT
NW ST HELENS RD
S P & S RR
NW LEIF ERIKSON DR
SALTZMAN RD
NW 61ST AVE

NWT 003528

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

Report of Odor Intensity

Area GUILDS LAKE AREA Date 1 SEPT 66

Suspected Source KOPPERS COMPANY, INC Observer M. A. ROALH

Location	Time	Intensity	Description	Wind	Remarks
① KOPPER'S NW BOUNDRY & RR	1510	0		NW 8-12	UPWIND
	1511	0		"	
	1512	0			
② KOPPER'S NW BOUNDRY & CENTER ROAD WAY	1514	1	NAPHTHALENE (SWEETISH)	WEST 3-5	CROSSWIND - VAPORS SEE COMING FROM COAL TAR TANK (T-1)
	1515	0			
	1516	0			
③ FAR NORTH CORNER KOPPER'S	1518	0		NW 8-12	
	19	0			
	20	0			
④ MIDDLE NNE BOUNDRY	1521	2	TAR (PUNGENT)	NW 8-12	CROSSWIND - VAPORS FROM COAL TAR TANKCARS AND STORAGE TANK (T-1)
	22	1			
	23	1			
⑤ EAST BOUNDRY & HAUL ROAD	1524	0		N 8-12	
	1525	0			
	1526	0			
⑥ MIDDLE SE KOPPER'S BOUNDRY	1530	2	NAPHTHALENE	NW 8-12	"
	31	2			
	32	2			
⑦ SOUTH CORNER	38	2	"	NW 5-7	"
	39	1			
	40	1			

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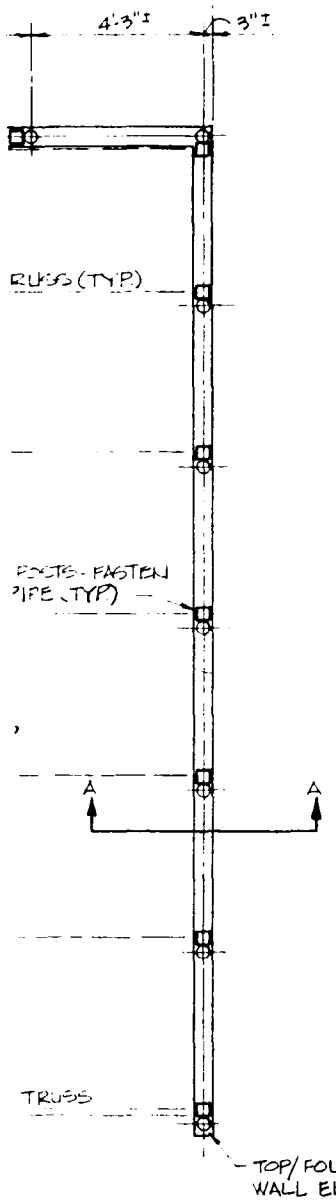
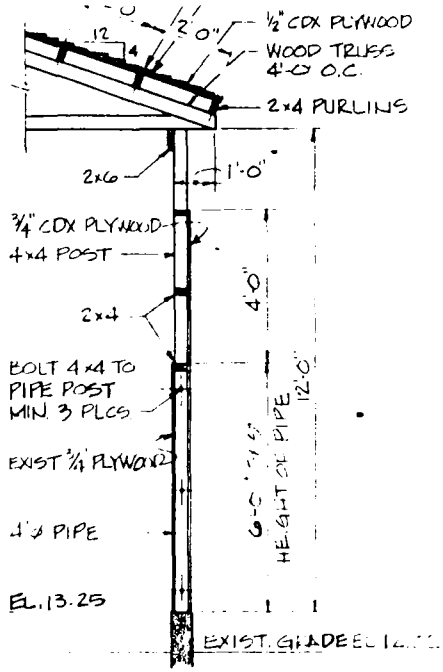




SECTION A-A

1.0 The contractor is to install 12' long 4 x 4 post at each of the existing 4" ø pipe posts.

1.1 The posts are to be fastened with a minimum of three (3) 3/4" bolts.

1.2 2" x 4" stringers will be run horizontal between posts so that 3/4" CDX plywood can be fastened on the inside.

1.3 Wood roof trusses at 4'-ø" o/c will be used to span the width of the area with a minimum of 1'-ø" over-hang on both sides. There will be a double truss at the East end (open) to support a tarp. Each end truss will be closed-in, using 1/2" CDX plywood.

1.4 2" x 4" purlins at 2'-ø" o/c will be installed on the trusses and covered with 1/2" CDX plywood.

1.5 3 tab self seal shingles (240# min.) will be used as roofing.

1.6 The top section above the existing plywood will be covered with 3/4" CDX plywood on 3 sides.

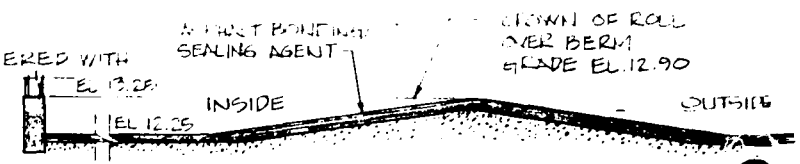
2.0 DRAWINGS

B21-15514 Waste Graphite Storage Building

3.0 The dimension on the drawings are approximate and shall be checked by the Contractor.

NOTES:

1. END TRUSSES TO BE COVERED WITH ½" CDX PLYWOOD
2. ALL ELEVATIONS ARE FEET ABOVE NATIONAL GEODETIC VERTICAL DATUM (NGVD)



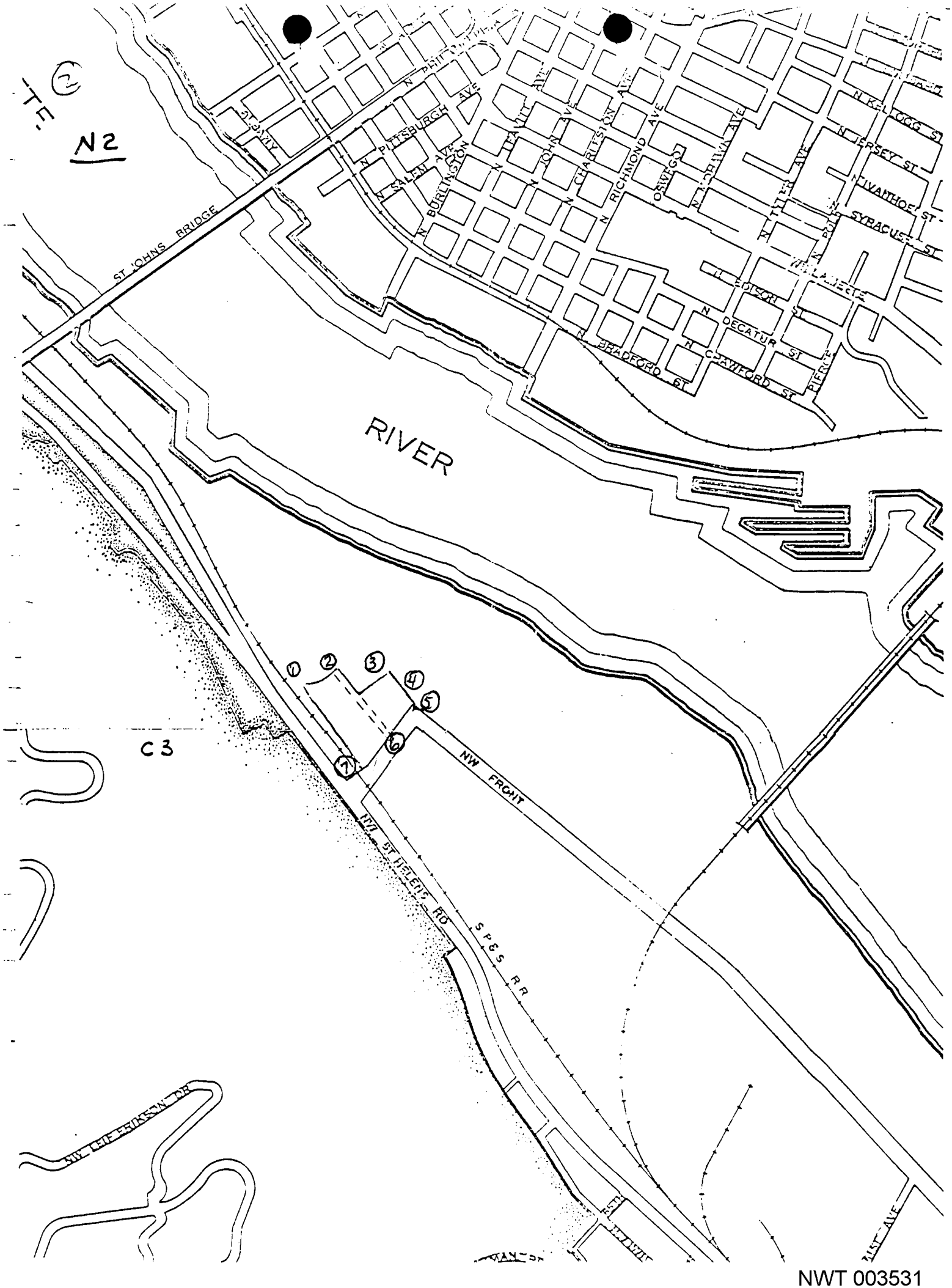
SECTION B-B

SCALE 3/8" = 1'-0"

REFERENCE: O.C.C. PL. ENG. FILE 61-G-3 FOR NAVD DATA DEVELOPED BY CH2M HILL, OCT., 1985.

REVISED JUNE 1986

FIGURE 5
WASTE GRAPHITE STORAGE BUILDING
Occidental Chemical Corporation
Tacoma, WA


N2
ST JOHNS BRIDGE
N PITTSBURGH AVE
N SALEM AVE
N BURLINGTON
N FAVITT AVE
N JOHN AVE
N CHARLESTON AVE
N RICHMOND AVE
OSWEGO
N MOHAWK AVE
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N EDISON ST
N DECATUR ST
N CRAWFORD ST
N BRADFORD ST
PIERCE
RIVER
C3
NW FRONT
NW ST HELENS RD
SP&S RR
NW LEIF ERIKSON DR

NWT 003531

FORM S-

OREGON STATE BOARD OF HEALTH
STATE OFFICE BUILDING
1400 S. W. 5TH AVENUE
PORTLAND, OREGON 97201

TELEPHONE:
AREA CODE 503
DAYS—226-2161
AFTER HOURS—222-1500

MAILING ADDRESS:
P. O. BOX 231
PORTLAND, OREGON 97207

September 13, 1966

ROUTING	
To	Noted by
From:	
Action:	

Mr. Lewis M. Cherrone
Plant Superintendent
Kopper's Chemical Company
Tar Processing Plant
7540 N.W. St. Helens Road
Portland, Oregon

Dear Mr. Cherrone:

On September 6, 1966 an occupational health survey was made of your pitch loading operation in the company of Richard Hatchard, Director of Air Quality, City of Portland. This survey was made at the request of a local physician who believed one of his patients had symptoms which may have originated at your plant. Later information concerning several men who sought medical treatment after assisting in the pitch loading came to our attention.

Since you were aware of this situation and are very cognizant of the problems in handling pitch, there is little need for explaining the operation at this time. It is sufficient to state that pitch dust is a photo-sensitive material; that it is probable that high concentrations of pitch dust did arise during the loading of the barge through the use of the open conveyor belt, and it is understood that the employees used little or no personal protective equipment to prevent the pitch dust from reaching their skin.

Since the barge loading operation is scheduled to take place once a month for two days, it is important that measures be taken to prevent the exposure of employees to pitch dust when future barges are loaded. With this in mind, it is suggested that employees be required to wear clothing which covers the arms, legs, and neck and that airline hoods be provided and worn by employees attending the hopper, conveyor belt, and barge. It is understood that employees running the skip loaders will have filtered air supplied respirators furnished to them. Whatever protective measures

RECEIVED
SEP 14 1966
AIR QUALITY CONTROL
Portland, Oregon

COPY

are utilized, it is mandatory that skin contact with this pitch dust be kept at a minimum.

There are possibly several ways to prevent skin contact with employees and pitch dust during the loading operation and we have suggested only one. We will be glad to discuss any other measures you have in mind. In any event we would appreciate an answer on the protective measures to be used before September 22, 1966.

Sincerely,

Darrel D. Douglas
Chief Industrial Hygiene Engineer
Occupational Health Section

DDD:mh
CC: Workmen's Compensation Board
Portland Bureau of Health
Richard Hatchard

FORM S-27

OREGON STATE BOARD OF HEALTH
STATE OFFICE BUILDING
1400 S. W. 5TH AVENUE
PORTLAND, OREGON 97201

TELEPHONE:
AREA CODE 503
DAYS—226-2161
AFTER HOURS—222-1500

MAILING ADDRESS:
P. O. BOX 231
PORTLAND, OREGON 97207

September 13, 1966

Mr. Lewis M. Cherrone
Plant Superintendent
Kopper's Chemical Company
Tar Processing Plant
7540 N.W. St. Helens Road
Portland, Oregon

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COPY

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Sincerely,

Darrel D. Douglas
Chief Industrial Hygiene Engineer
Occupational Health Section

DDD:mh
CC: Workmen's Compensation Board
Portland Bureau of Health
Richard Hatchard

RECEIVED
SEP 14 1966
AIR QUALITY CONTROL
Portland, Oregon

A. Folder

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

OK-1412

PRE-REGISTRATION INFORMATION SHEET *

Address of Structure 7540 NW St Helens Road

Type of Occupancy: Industrl ✓ Commrcl _____ Housing _____ Government _____

Indicate which: New construction ✓ Alteration to existing structure _____

Name of Occupant Tappers Company

Nature of Business This permit: Service Building

Name of Owner Portland Gas & Coke Co

Address _____

Plans by The Jacks Company

Address 2530 NE 82nd Ave

* In conformity with requirements of the Portland Air Quality Control Code, this form is to be completed by applicants for Building Permits for:

a. All new hotels, motels, apartment houses and other dwellings for five or more families except those which are all-electric or use commercial (PP&L) steam and have no incinerator;

b. All other new structures to be used for business, industrial, commercial, philanthropic or governmental purposes in which other than electric or commercial (PP&L) steam space heating is involved, or in which any operation is conducted resulting in emission to outside atmosphere of any air contaminants. Such operations include, but are not necessarily limited to, those shown below;

c. Alterations to existing structures involving major changes in heating or incinerator equipment or incorporating such operations as those listed below;

Office Buildings
Schools
Apartment houses
Motels - Hotels
Hospitals - Clinics
Brake debonding
Chemical manufacturing plants
Fertilizer plants
Food products plants
Incineration of all types
Lumber mills and wood products
Metallurgical plants
Petroleum industry
Mineral processing industrial plants
Paint and varnish manufacturing
Pharmaceutical manufacturing
Plating, anodizing and surface preparation
Pulp and paper manufacturing plants
Radiological sources
Refuse and liquid waste disposal plants
Rendering plants
Salvage operations
Sand and gravel plants
Steam power plants, oil or wood fired
Synthetic resin manufacturing

- For AQC Use -

Plans received —

Building permit application No. 2824

Approved 31 Aug 66 By WJF

Letter No. ~~Sent~~

Rg 5813
Sic 2814

NWT 003536

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
104 SW 5th Avenue (97204)

Date 24 Aug 66

From: R. E. Hatchard, Director

To: JL: J- JEC JEC Return to REH
~~MR~~ MR. JEC GRC ~~(See~~ (See MR's survey below)
FT FT
~~B.F.~~ B.F. MO MO

Requested MR to make survey to check compliance with plans & specs approved by AQC & check prelim operation to establish probability that code compliance will be accomplished from the start — the Co. & the City has no acceptable alternative other than creating no AP condition.

If the survey shows AP problems that cannot be eliminated immediately, the H.O. will effect action forthwith ~~—~~ probably an immediate H.O conf & an order.

REH.

(See clipping below)
(See MR's survey report below)

NWT 003537

CITY OF PORTLAND

INTER-OFFICE CORRESPONDENCE

(NOT FOR MAILING)

ROUTING	
To	Noted by
AR	HL
BF	B.F.
JEC	JEC
JRC	JRC
FT	FT
MD	MD
From:	
Action:	

13 August 1966

From Mike D. Roach

To Air Quality Control Division

Addressed to Mr. D. Matchett, Director

Subject Koppers Co., Inc., Portland Tar and Chemical Plant
Plant Inspection of New Plant, 13 August 1966

Bill Fuller and Mike Roach made a plant inspection of Koppers Company, Inc. , tar and chemical plant. The plant was beginning shake down production at approximately two-thirds daily capacity for seven days per week. Normal production will be for five days per week with a maximum daily capacity of three, eight-hour batches. Each batch will produce around 20 tons of pitch.

D. L. O'Dell, Manager Engineering Dept., Pittsburgh and Louis Cherrone, Plant Manager, Portland Plant, conducted the inspection, which included the dumping of a batch of pitch. The plant layout is quite similar to the one reviewed by this office with some modifications. On the pitch pumping a cooling trough and hooding arrangement has been tried for the first time at any of Koppers tar plants. The hooding is used to remove the fumes from the hot tar as it flows out into the pan while the cooling is employed to reduce the generation of fumes. The fumes are sent to the tray tower for scrubbing. This appears to be a feasible modification as long as the scrubber is adequately sized. In comparing the plans for the vapor condensing system with the installed equipment it appears as if a vent pot has been omitted between the time of preliminary plans and final construction.

In the survey of the plant, particular emphasis was placed on any releases that might occur. The vents from the storage tanks could be seen emitting a visible vapor that according to Mr. O'Dell and Mr. Cherrone did contain odorous constituents peculiar to the type of distillate pumped. It is interesting to note that in a letter from John Fairweather of San Bernardino Air Pollution Control District that the Koppers tar plant there employs an oil-seal fume control system for the tank vents. It is not known how far downwind the odor from these chemical oil and creosote tanks carry.

The second source of odor release noted is the vent from the seal oil tank on the distillation column. Fumes from this source was quite noticeable on arrival at the plant and changes nature dependent upon which stage the distillation process is in. An initial odor that was noted was a strong penetrating odor that could have been a mixture of naphthalene and some other chemical. Another still odor was also noted from the oil seal vent at an odor intensity of 4.

NWT 003538

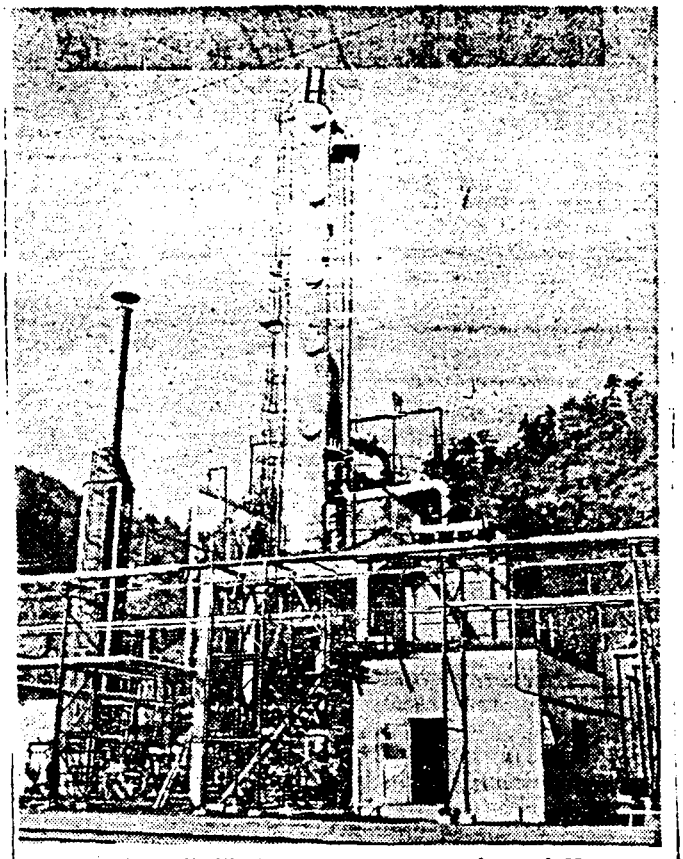
When the pitch was pumped into the pans an odor very similar to that encountered in an aluminum reduction mill was noted. This was noted. This was not an exceedingly disagreeable or intense odor and should have been at its strongest since the pitch was pumped at a higher temperature than normal so that we could observe the operation. The fumes pulled from the cooling tower were passed through the scrubber into the circulating oil storage tank with the scrubbed gas stream being exhausted to the atmosphere through the fan. Creosote is used as the scrubbing oil. The emissions from this stack were of a #2-#3 opacity and had a strong odor of cresol that presisted some distance downwind.

The plant appears to have major sources of odor emissions that are quite strong in the process area. It is not known at this time what these odors will be like beyond the fence of the plant, some of the odors such as H_2S, Cresol and distillate odors are disagreeable. It is felt there is a need to make odor surveys on the plant periodically to see if further controls might be needed. These controls might evolve as oil seals on the tank vents, a scrubber on the column vent, and a revised scrubbing oil for the pitch vapor control system or an after scrubber on the exhaust from this scrubber.

M. D. Roach.

Mike D. Roach
Associate Engineer

MDR:al



COAL TAR distillation tower at new plant of Koppers Co., Inc., Tar and Chemical Division, Portland, is the heart of the process in which Koppers produces carbon pitch for the aluminum industry and creosote for the wood preserving industry.

Koppers' Portland Plant Starts Initial Production

Initial production of carbon pitch for the aluminum industry and creosote for the wood preserving industry was started during the past week at the new Portland plant of Koppers Co., Inc., Tar and Chemical Division.

Construction of the new plant in Portland's Linnton area was started last August on ground leased from Northwest Natural Gas Company at 7900 NW St. Helen's Road.

Louis M. Cherrone, plant superintendent, said that coal tar, the raw material for Koppers production in Portland, has been brought in by boat to the Willamette River docks at the plant site.

Carbon electrode pitch produced in Koppers Portland operations is made into electrodes used by the aluminum industry in ore reduction. Creosote, also produced in the distillation of coal tar, will go to a number of wood preserving plants in the Pacific Northwest.

At startup, the plant is employing 12 persons.

The new plant centers around a large distillation tower which is the heart of the process. From it, creosote and hot pitch are produced. The products may be shipped out by water, rail or truck.

The new plant also has a modern boiler building, an air-conditioned office building with employe locker rooms, a machine shop, a tank farm, pitch cooling facilities, and thousands of feet of piping for transferring raw and finished materials to and from transportation facilities or to holding tanks.

Cherrone said it was expected that the plant will be in full operation within 30 days.

THE OREGONIAN, THURSDAY, AUGUST 11, 1966

ROUTING	
To	Noted by
MR	MR
BF	B.F.
JEC	JEC
JPC	JPC
FT	FT
MD	MD
From:	
Action:	

30. Cascade Steel Rolling Mills

a. Preliminary plan reviews were discussed with representatives of N.C. Corporation regarding air pollution controls for proposed new rolling mills.

b. Preliminary suspended particulate sampling was done at proposed site location of the rolling mills.

c. Nothing has been heard of this proposed project since August 18, 1965.

31. Koppers Company Inc.

a. Preliminary plans were reviewed for the proposed coal tar processing plant and building permit plans approved on February 7, 1966.

b. A resume of the proposed project was made on February 11, 1966.

c. Preliminary odor surveys will be made in the area before production starts.

d. It is estimated that air pollution controls @ $15,000.

→ Bill 7.

Y OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

256-1037

PRE-REGISTRATION INFORMATION SHEET *

Address of Structure 7540 NW St Helens Road.

Type of Occupancy: Industrl ✓ Commrcl ____ Housing ____ Government ____

Indicate which: New construction ✓ Alteration to existing structure ____

Name of Occupant Koppers Co.

Nature of Business Boiler Room & Lab. (this permit)

Name of Owner Northwest Natural Gas

Address 123 NW Flanders

Plans by The Jucho Co. 255-5511

Address 2530 NE 82nd

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Food products plants
Incineration of all types
Lumber mills and wood products
Metallurgical plants
Petroleum industry
Mineral processing industrial plants
Paint and varnish manufacturing
Pharmaceutical manufacturing
Plating, anodizing and surface preparation
Pulp and paper manufacturing plants
Radiological sources
Refuse and liquid waste disposal plants
Rendering plants
Salvage operations
Sand and gravel plants
Steam power plants, oil or wood fired
Synthetic resin manufacturing

- For AQC Use -

Plans received ____ Building permit application No. 728 A&B

Approved 3-10-6 By WJT Letter No. ____ Sent ____

NWT 003542

KOPPERS COMPANY, INC.
TAR & CHEMICAL DIVISION
PITTSBURGH, PA. 15219

TELEPHONE
AREA CODE 412
391-3300

February 16, 1966

Mr. R. E. Hatchard
Director, Air Quality Control Division
Department of Public Safety
1225 S.W. 3rd Avenue
Portland, Oregon

RE: Koppers Company Tar Processing Plant
7540 N.W. St. Helen's Road

Dear Mr. Hatchard:

I am returning the completed air quality registration form as requested in your letter. A check for $10.00 has also been enclosed to cover the cost of the registration.

Thank you for your time during my recent visit, and if you should require additional information please advise.

Yours very truly,

KOPPERS COMPANY, INC.
Tar and Chemical Division

D. L. O'Dell
Manager - Engineering Department

ROUTING	
To	Noted by
MR	MR
From:	
Action:	

DLO:dw

RECEIVED
FEB 17 1966
AIR QUALITY CONTROL
Portland, Oregon

COPY

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

SIC: _____

AQC: _____

AIR QUALITY CONTROL REGISTRATION - Commercial

1. Name of Firm: Koppers Co., Inc., Tar & Chemical Division Date: 2/15/66

   a. Address: 7540 N.W. St. Helen's Road Zip No: 97229

2. Owner's Name or Person Responsible for Compliance with Code: Mr. Louis Cherrone for Koppers Co., Inc., Tar and Chemical Division

   a. Address: (If other than above) Koppers Bldg., Pittsburgh, Pa. Zip No: 15219

3. Registrant is Individual _____ ; Partnership _____ ; or Corporation X

   a. If a Business, is it licensed by City of Portland? Yes

      (1) Under what name? Koppers Co., Inc.

4. Normal Operating Schedule: 24 hrs per day; 5-7 days per week; 52 weeks per yr

5. Description of Nature of Business: Processing of coke oven tar to pitch, such as electrode pitch and creosote

6. Process Emissions
   (Include all operations which result in emission of air contaminants)
   Tube Heater and steam boiler
   a. Space Heating and/or Water Heating

      (1) Heat Source: Fuel oil 5-10% Gas 90-95% Electricity _____ Other _____ None _____

         (a) If "Other", specify _____
         (Central steam, wood waste, etc.) Max. rate 300 therms/hr.
         Est./yr. 2 MM therms

      (2) Quantity of fuel used in 1963: None
         (Gallons and grade of oil, therms of gas, etc.)

      (3) Identify any special equipment for Smoke or Fly Ash control: Both units equipped with complete North American Combustion and Temperature controls

- - - - - - - - - - - - - - - - - - Do not write in spaces below - - - - - - - - - - - - - -

Mailed [redacted] Rec'd _____ Fee paid _____ Reg. No. _____

FEB 8 1966

ORIGINAL IN FILE

NWT 003544

b. Waste and Salvage Combustion on Premises

(1) Materials burned: _____
(Paper, cardboard, lumber, oil, solvents, rubber, tar paper, etc.)

(2) Estimated Amount: _____
(Pounds, bushels, cubic feet per day, tons per month, etc.)

(3) Method: _____
(Incinerator, salvage process burner, boiler, etc.)

(4) Identify any special equipment for Smoke or Fly Ash control: _____

c. Emissions from other General Operations

(1) (a) Type of Operation: Tar distillation
(Product cleaning, spray painting, degreasing, metal melting, drying, etc.)

(b) Estimated Amount of Emissions Exhausted to Outside Air:

Cu.Ft./Min. 10-20 ; Hrs./Day 24 ; Days/Year 250-350

(c) Specific Nature of Exhaust Material: air and methane gas
(Metallic oxides, dusts, solvents, formaldehyde, sulfur dioxide, etc.)

(d) Basis for Estimate: vacuum pump capacity
(Material balance, tests by plant personnel, consultant, etc.)

(e) Indicate type of air quality control equipment now installed:
(Baghouse, wet scrubber, vapor recovery, cyclone, etc.)

air cooled condenser and wet vacuum pump

(2) (a) Type of Operation: pitch cooling area

(b) Estimated Amount of Emissions Exhausted to Outside Air:

Cu.Ft./Min. 500 ; Hrs./Day 0-8 ; Days/Year 250-350

(c) Specific Nature of Exhaust Material: 99% water vapor & 1% creosote

(d) Basis for Estimate: Design calculations (volume based on 90% condensation)

(e) Indicate type of air quality control equipment now installed:

wet condensing scrubber column per Dwg. L-7248

7. Remarks and/or Additional Information

If space provided above is not sufficient, attach additional sheets as necessary. Any supplemental material or data considered pertinent may be attached and would be appreciated, including plans for additional or improved air quality control equipment. Also, if this registration is for a building in which there are other tenants, please list on additional sheets, or below, the names of firms and the persons in charge, if there is any discharge into the outside air from their operations.

_____

_____

February 14, 1966

H. M. Patterson, Chief
Air Quality Control
Oregon State Sanitary Authority
1400 Southwest 5th Avenue
Portland, Oregon 97201

Dear Mr. Patterson:

Attached is a copy of our letter to Mr. D. L. O'Dell, Manager of the Engineering Department, Tar and Chemical Division, Koppers Company. On January 24, 1966, Mr. D. J. Armstrong, Construction Superintendent, delivered the Koppers Company's plans and specifications for their tar plant to the Air Quality Control Division for review and approval. Accompanying the plans were very complete process description and related information. On February 1st, D. L. O'Dell and D. G. Armstrong conferred in the AQC Division Office to answer our questions following review of the plans. Koppers Company is providing air quality control facilities that have been successful in eliminating air pollution problems in other tar distillation plants. Also enclosed is a copy of our letter to John H. Fairweather, Air Pollution Control Officer, County of San Bernardino, where Koppers operates a similar plant, and Mr. Fairweather's reply of January 7, 1966.

We are completing the collection of basic data and odor surveys to establish the conditions in the area before the Koppers' plant starts production. We will repeat the surveys and sampling after the tar plant starts production.

If you desire additional information about Koppers Company's air quality control facilities, we will be glad to provide a summary, or if you prefer, you or your representative may wish to review our file information.

Very truly yours,

THOMAS L. MEADOR, M. D.
City Health Officer

R. E. Hatchard, Director
Air Quality Control Division

ROUTING	
To	Noted by
MR	MR.
JC	[illegible]
J.L.	[illegible]
From: [illegible]	
Action: [illegible]	

2 letters to MR's [illegible]

REH:jl
cc: Francis Ivancie
Emory Crofoot
Thomas L. Meador, M. D.

NWT 003546

February 14, 1966

Mr. D. L. O'Dell
Manager Engineering Department
Koppers Company, Inc.
Tar & Chemical Division
Pittsburgh, Pa. 15219

Dear Mr. O'Dell:

It was a pleasure to meet with you and Mr. D. G. Armstrong, Construction Supt., on February 1, 1966, and discuss the plans for Koppers' Northwest Tar Plant, 7900 NW St. Helens Road. The thorough preliminary presentation of the process description, pertinent plans and air pollution control methods, plus your patience in answering our questions facilitated approval of your application for a building permit.

Final evaluation, of course, must wait until the plant is in operation. When the plant starts production, we will need to check such potential air pollution sources as the vapor condensing system for the pitch coolers, tank vents, seal oil tank vents, seals on pumps handling a hot product stream, the discharge of pitch from the cooling tank to the pans, etc., for emissions of odorous fume and vapors. The boiler and tube heater will also be observed for the discharge of any excessive smoke.

Existing ordinances prevent the open burning of combustible refuse at the plant site during the construction period or subsequently when the plant is operating. If you decide to install an incinerator, the plans and specifications must be reviewed and approved by the Air Quality Control Division before the building permit is issued by the Bureau of Buildings.

Odor surveys will be made in the area before the tar plant starts production to establish the existing conditions. Suspended particulate samples for the area have already been obtained adjacent to the plant property. After the tar plant is in production these surveys and tests will be repeated.

We wish to emphasize again the importance of odor control in this particular area. If there are any additional steps that can reasonably be taken at present to prevent the escape of odorous emissions, this will be money well spent to avoid creating conditions that might generate complaints. The community is very aware of industrial air pollution problems,

and we can be certain that a new production process has already aroused their interest. It would be desirable to consider ways to acquaint the residents in the vicinity and the general public regarding your plant's production and your Company's operating policies.

Will you please advise us when production begins at your Northwest Tar Plant. If we can be of any assistance or answer any questions, please contact us.

Very truly yours,

THOMAS L. MEADOR, M. D.
City Health Officer

R. E. Hatchard, Director
Air Quality Control Division

REH:jlr
cc: D. G. Armstrong
7900 NW St. Helens Road

H. M. Patterson
Oregon State Sanitary Authority

bc: Thomas L. Meador, M. D.
Emory Crofoot
Francis Ivancie

CITY OF PORTLAND

INTER-OFFICE CORRESPONDENCE

(NOT FOR MAILING)

February 11, 1966

From M. D. Roach, Associate Engineer

To Air Quality Control Division

Addressed to R. E. Hatchard, Director

Subject Resume of Koppers Company, Inc. Northwest Tar Plant

I. Location

The proposed plant will be situated at 7900 NW St. Helens Road within the City limits of Portland, Oregon, on the plant property leased from Northwest Natural Gas Company.

Not all the existing plant site will be utilized. The tar plant will occupy only the southwest corner of the property. The remaining land will be retained by Northwest Natural Gas Company.

II. Products and Raw Materials

The raw material for the proposed plant is coke oven tar, which is produced during the carbonization of coal in coke ovens. It is a black, viscous liquid heavier than water. Physically it resembles asphalt, but chemically is quite different because of its coal origin.

There are three broad catagories of products recovered from coal tar by distillation: chemical oil, creosote, and pitch. Chemical oil derives its name from the fact that it is an oily substance containing various chemicals, mainly naphthalenes and phenols. Chemical oil is solid at room temperature, but melts at about 130° F. into a light, brown liquid. It is valuable as a source for the various chemicals it contains, and is shipped to another plant for further processing. Some of the major chemicals recovered from chemical oil are naphthalene, phenol, cresol, xylenol, pyridine, picoline, as well as various solvent oils. These have a wide range of uses, including plastizers, resins, adhesives, pharmaceuticals, and antioxidants.

Chemical oil has a flash point of 140° F. which is well above that of other commonly used liquids such as kerosene (100°F.) and gasoline (-45°F.).

Creosote is well known as a wood preservative used in railroad ties, electrical poles, piling, etc. It is not a single chemical, but instead is a non-homogenous mixture of many components. It also has a relatively high flash point ranging from 140°F. to 190°F.

A review of the plans and a discussion with Koppers' personnel revealed the following information with regard to control of the above sources of pollution. The storage tanks are presently shown vented to the atmosphere, but if they become a defined problem, they can be vented through an oil seal to condense and trap the fumes. The pumps use mechanical seals and have not given problems in comparable service for Koppers at other plants. Since the fractionating tower is under vacuum, fume emission should not be encountered, while the oil seal on the condensing system vent has apparently proved its adequacy on other like installations. According to the Koppers' personnel, the boiler and tube heater will be fired primarily by gas. Oil will not be used unless gas service is discontinued for more than four to six hours.

A system has been proposed to condense and entrap the fumes from the pitch pumping and line purging. This system consists of a fume scrubbing column six feet in diameter by 25 feet, a 400 gpm circulating pump, a 5000 gallon horizontal tank for scrubbing-oil storage and a 6000 scfm fan. Fumes from the process will be pulled by the fan into the scrubbing tower where they will be contacted and condensed by the relatively cool circulating oil. The oil and condensate then flow by gravity into the horizontal tank. Any untrapped moisture will decant from the oil in this tank and overflow into the effluent system. The remaining condensate from the fumes will be absorbed by the scrubbing-oil.

The Portland Air Quality Control Division staff will conduct odor surveys in the area prior to start up of the plant. Suspended particulate data has previously been obtained on U. S. Army Corps of Engineering buildings to the northwest of the proposed plant. After the plant has been put into operation (approximately June, 1966) further odor surveys and particulate sampling will be accomplished. With the information provided by the Koppers Company and correspondence from the San Bernardino Air Pollution Control District regarding a similar Koppers' operation, it is probable that the Portland plant with the proposed controls will not create excessive air pollution. However, if the plant's initial operations prove to be otherwise, there are additional odor controls that may be required which can be installed without great difficulty.

M. D. Roach

M. D. Roach, Associate Engineer

MDR:jl

File Koppers Co. Folder

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

PRE-REGISTRATION INFORMATION SHEET *

Address of Structure 7540 NW St Helens Rd.

Type of Occupancy: Industrl _____ Commrcl ✓ Housing _____ Government _____

Indicate which: New construction ✓ Alteration to existing structure _____

Name of Occupant Koppers Co. Leased from Northwest Natural Gas Co.

Nature of Business Tar process + distillation

Name of Owner Same

Address Koppers Bldg, Pittsburg, Penn.

Plans by Same

Address _____

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b. All other new structures to be used for business, industrial, commercial, philanthropic or governmental purposes in which other than electric or commercial (PP&L) steam space heating is involved, or in which any operation is conducted resulting in emission to outside atmosphere of any air contaminants. Such operations include, but are not necessarily limited to, those shown below;

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Food products plants
Incineration of all types
Lumber mills and wood products
Metallurgical plants
Petroleum industry
Mineral processing industrial plants
Paint and varnish manufacturing
Pharmaceutical manufacturing
Plating, anodizing and surface preparation
Pulp and paper manufacturing plants
Radiological sources
Refuse and liquid waste disposal plants
Rendering plants
Salvage operations
Sand and gravel plants
Steam power plants, oil or wood fired
Synthetic resin manufacturing

- For AQC Use -

Plans received _____ Building permit application No. 334 A, B,

Approved 7 Feb 66 By MW Rand. Letter No. 1 Sent FEB 8 1966

NWT 003551

Pitches have a variety of uses. Hard pitches that soften at 200°F. or above are used as binding materials in electrodes and various carbon products. The pitch is mixed with petroleum coke, lamp black, carbon black, or combinations of such materials. The mixtures are pressed, extruded, or molded to obtain the desired shape. Hard pitches are also used in making clay pigeons for skeet shooting, and in core compounds used in foundry molds and cores.

Softer pitches are used in protective enamels and coating where their strong resistance to corrosion has given coal tar enamels success in such places as lock gates, dry docks, water lines, gas lines, underground tanks, sheet piling, structural steel, etc. Larger quantities of soft pitch are also used to impregnate fibre pipe and conduit. One of the largest uses of soft pitch is as a roofing material for flat roofs on buildings. Here the waterproofing and self-healing characteristics of coal tar pitch make a superior roof.

In addition to the products listed above, coal tar is used extensively as a road material.

III. Processing Facilities

In the proposed plant, tar is pumped from storage to a large batch still. Heat is supplied to the process by circulating tar from the still through a gas fired heater. The distillation is continued under relatively high temperatures and vacuum until the still contents reach a desired softening point. Oil from the tar is separated in a fractionating column, condensed and subsequently pumped to storage. The pitch is pumped to an elevated cooling tank. The pipeline from the still to the cooler is cleaned after pumping by purging with steam. Fumes are generated during this pumping and purging procedure. From the elevated cooler the pitch is either loaded directly into tank cars or cast into large rectangular pans that are fifty feet wide and eighty feet long. Pitch in the pans is cooled until solid, then dug out by a pay-loader and loaded into trucks or hopper cars.

IV. Air Quality Control

From the plans and the process description there are potential air pollution sources. The vents on the heated storage tanks may release some fumes as may the seals on the pumps handling the hot product stream. Further, fumes may escape from the oil seal on the condensing system for the fractionation column or from spills. But the greatest volume of fumes to be controlled is that generated during the pumping of pitch to the cooling tank and the subsequent purging of the transport line with steam. Products-of-combustion emissions will be emitted from the boiler and the tube heater.

.ITY OF PORTLAND BUREAU OF HEAL
Air Quality Control Division
1225 SW 3rd Avenue (97204)

1/3

From: R. E. Hatchard, Director

To: MR

Will reply to O.L. Dell ltr 1/21/06 + Suggest he contact us on Jan 31, when he is in Portland to arrange an appointment. By then we will know what AQC problem & additional information is needed.

WEH

January 25, 1966

N/M

Mr. D. L. O'Dell
Manager Engineering Department
Koppers Company, Inc.
Tar & Chemical Division
Pittsburgh, Pa 15219

Dear Mr. O'Dell:

Mr. D. G. Armstrong delivered your letter of January 21, and the enclosures to our office on January 24th. We will look forward to conferring with you during your visit to Portland the week of January 31st.

I suggest that you phone our office (228-6141, Ext. 466) sometime on January 31st, and that we set a time to discuss plans and specifications of the air quality control features of the tar processing plant.

We appreciate very much receiving the descriptive information regarding the production process and the background concerning the Koppers Company.

Very truly yours,

THOMAS L. MEADOR, M. D.
City Health Officer

R. E. Hatchard, Director
Air Quality Control Division

REH:jl

cc: D. G. Armstrong
7900 NW St. Helens Road

Koppers Co.

SEP 26 1966

Mr. Hatchard

STATE OF OREGON
BOARD OF HEALTH
PORTLAND, OREGON 97201

DARREL D. DOUGLAS
CHIEF INDUSTRIAL HYGIENE ENGINEER, OCCUPATIONAL HEALTH SECTION

~~609~~ 713 STATE OFFICE BLDG.
1400 S. W. 5TH AVENUE
PORTLAND, OREGON
PHONE 226-2161, EXT. 234

[illegible]
[illegible]
[illegible]

Portland, Oregon
September 26, 1966

Mr. Darrel D. Douglas
Chief Industrial Hygiene Engineer
State of Oregon
State Office Building
Portland, Oregon

Dear Mr. Douglas:

It was a pleasure to have you and Mr. Richard Hatchard visit our plant on September 6 and appreciated the comments you had to offer.

Your letter of this same date pointed out certain problems relative to dust conditions experienced during a barge loading operation at our plant. As discussed with you, all employees were furnished with approved dust respirators, eye protection and various brands of quality protective creams. However, even after much insistence and policing on the employers part, some of the employees were quite reluctant to wear the equipment on a full time basis which resulted in medical treatment for a few.

The company has made necessary arrangements to provide each employee with approved Bullard hoods for future loadings. These hoods will be fed with a constant flow of filtered fresh air. Mobile operators will be furnished with the same hood except that breathing air will be supplied from compressed cylinders. An ample supply of protective creams will be on hand as provided during the first shipment.

In addition to the above, our plant engineer is currently making equipment changes to help minimize the pitch dust at the two main sources. Another mechanical change will eliminate the need for the two operators on the barge proper.

We appreciate the assistance and suggestions submitted by your department on this survey.

RECEIVED
SEP 27 1966
AIR QUALITY CONTROL
Portland, Oregon

Sincerely,

L. A. Cherrone

[illegible]

cc: [illegible] Melville
[illegible] Bauer
File

Copy

NWT 003555

KOPPERS COMPANY, INC.
TAR & CHEMICAL DIVISION
PITTSBURGH, PA. 15219

TELEPHONE
AREA CODE 412
391-3300

January 21, 1966

Mr. R. E. Hatchard
Director, Air Quality Control Division
Department of Public Safety
1225 S.W. 3rd Avenue
Portland, Oregon

Re: Koppers Company
Tar Processing Plant

Dear Mr. Hatchard:

Back in October I had the pleasure of meeting with you and discussing Koppers' plans for construction and operation of a tar processing plant on property leased from the Northwest Natural Gas Company at 7900 N.W. St. Helen's Road.

A description of the proposed plant is attached for your reference in reviewing our drawings. The description covers location, products, raw materials, processing facilities, storage facilities, buildings, structures, air quality control, effluent treatment, and fire protection facilities. Koppers' guide to fire prevention and fire protection is included in the description along with a list of drawings.

The above information has been included so that you will have full knowledge of our plans for this location.

Detail drawings and specifications are included on our vapor condensing system to prevent air pollution by vapors from hot pitch residue produced into the cooling tanks.

Will you kindly review the attached information as my present plans are to be in Portland during the week of January 31. If the plans are satisfactory I will make formal application for air quality control permits.

I have also attached a copy of "Manpower in Motion" as an introduction to Koppers.

Thank you for your cooperation.

Very truly yours,

D. L. O'Dell
Manager Engineering Dept.

DLO:em
Attachments

RECEIVED
JAN 24 1966
AIR QUALITY CONTROL
Portland, Oregon

DESCRIPTION
NORTHWEST WAR PLANT

KOPPERS COMPANY, INC.

RECEIVED
JAN 24 1966
AIR QUALITY CONTROL
Portland, Oregon

LIST OF DRAWINGS

DWG. NO.	TITLE
L-7106	Tar Plant Layout
L-7227	V-207, Pitch Cooling Tank, 15'-0" OD X 13'-0" High 19,870 Gal.
L-7238	General Arrangement Lease Agreement with Portland Gas & Coke Co.
L-7248	Vapor Condensing System Pitch Cooler
L-7259	Boiler House General Arrangement
L-7262	Distillation Process Block Flow Diagram
L-7265	Elevation of Tar Plant Layout
M-3317	Scrubbing Column

I. Location

The proposed plant will be situated at 7900 N.W. St. Helen's Road within the City limits of Portland, Oregon on the plant property of the Northwest Natural Gas Company.

Not all the existing plant site will be utilized. The tar plant will occupy only the southwest corner of the property. The remaining land will be retained by Northwest Natural Gas Company.

II. Products and Raw Materials

The raw material for the proposed plant is coke oven tar, which is produced during the carbonization of coal in coke ovens. It is a black, viscous liquid heavier than water. Physically it resembles asphalt, but chemically is quite different because of its coal origin.

There are three broad catagories of products recovered from coal tar by distillation: chemical oil, creosote, and pitch. Chemical oil derives its name from the fact that it is an oily substance containing various chemicals, mainly naphthalenes and phenols. Chemical oil is solid at room temperature, but melts at about 130°F. into a light, brown liquid. It is valuable as a source for the various chemicals it contains, and is shipped to another plant for further processing. Some of the major chemicals recovered from chemical oil are naphthalene, phenol, cresol, xylenol, pyridine, picoline, as well as various solvent oils. These have a wide range of uses, including plastizers, resins, adhesives, pharmaceuticals, and antioxidants.

Despite its name, chemical oil is not a highly dangerous material. Its flash point of 140°F. is well above that of other commonly used liquids such as kerosene (100°F.) and gasoline (-45°F.).

Creosote is well known as a wood preservative used in railroad ties, electrical poles, piling, etc. It is not a single chemical, but instead is a non-homogenous mixture of many components. It also has a relatively high flash point ranging from 140°F. to 190°F.

Pitches have a variety of uses. Hard pitches that soften at 200°F. or above are used as binding materials in electrodes and various carbon products. The pitch is mixed with petroleum coke, lamp black, carbon black, or combinations of such materials. The mixtures are pressed, extruded, or molded to obtain the desired shape. Hard pitches are also used in making clay pigeons for skeet shooting, and in core compounds used in foundry molds and cores.

Softer pitches are used in protective enamels and coatings where their strong resistance to corrosion has given coal tar enamels outstanding success in such places as lock gates, dry docks, water lines, gas lines, underground tanks, sheet piling, structural steel, etc. Larger quantities of soft pitch are also used to impregnate fibre pipe and conduit. One of the largest uses of soft pitch is as a roofing material for flat roofs on buildings. Here the waterproofing and self-healing characteristics of coal tar pitch make a superior roof.

[illegible]

III. Processing Facilities

In the proposed plant, tar is pumped from storage to a large batch still. Heat is supplied to the process by circulating tar from the still through a gas fired heater. The distillation is continued until the still contents reach a desired softening point. Oil from the tar is separated in a fractionation column, condensed and subsequently pumped to storage. The pitch is pumped to an elevated cooling tank and is either loaded directly into tank cars or cast into large rectangular pans that are 50 feet wide and 80 ft. long. Pitch in the pans is cooled until solid, then dug by a payloader and loaded into trucks or hopper cars.

The process flow is shown on the attached diagram.

IV. Storage Facilities

Tankage will be used as follows: -

Product	Flash Point °F., Closed Cup	Tanks Used	Max. Storage Temp. °F.
Tar	200 to 250°F.	T-1, T-2 T-11, T-65	100°F.
Creosote	160 to 210°F.	T-51, T-19 T-23, T-4, T-42 T-33, T-34, T-99	150°F.
Chem. Oil	140 to 190°F.	T-17, T-18 T-3	175°F.
Fuel Oil	150 +/- °F.	T-39	125°F.
Pitch	550°F.	V-207	525°F.

Tanks T-29, T-35, T-36, T-13, T-20, T-68, T-67, T-52, T-74, and T-53 will not be used.

Tanks T-66 and T-101 are leased to Hercules for storage of Tall Oil.

In the future it is planned to use tanks T-29, T-35, T-36, T-20, T-68, T-66, and T-101 for creosote or chemical oil storage. T-12 will be used for tar or pitch service. T-52, T-74 and T-53 will be used for pitch and creosote service.

With the exception of pitch and fuel oil the tar and oil tanks will normally contain from 0 to 5% water. This normally forms as a water cap on top of tar, creosote, and chemical oil. Normally tar is stored at 100°F., however, higher specific gravity tar sometimes obtained requires storage at temperatures to 150°F.

For a preliminary period of about six months it may be necessary to store creosote in the tar tanks, while the plant is placed in operation.

V. Buildings and Structures

Two new buildings will be erected. One will serve as an office and laboratory, the other as a boiler house. Both will be prefabricated sheet metal buildings on concrete slabs. The office and laboratory will be separated by a fire wall.

One existing building will be remodeled to serve as a combination maintenance shop and locker room. This is also a sheet metal building on a concrete slab.

There will be several new structures. Largest is the structure supporting the still and fractionation column. One section of this will be enclosed with aluminum siding to serve as a pump room. The second structure is the one supporting the pitch cooling tank. All main structural columns and beams in both structures will be fireproofed.

VI. Air Quality Control

Considerable attention has been given to any possible source of atmospheric contamination, and to the abatement of fumes or smoke in accordance with the City of Portland air quality control program.

All fired equipment will have highly efficient combustion equipment and controls designed to give complete oxidation and thus eliminate smoke.

An elaborate fume elimination system will be installed to abate fumes from the process.

VII. Effluent Treatment

Effluent water from the process will be treated using a method developed by Koppers' Research Department. The water will be collected in a surge tank adjacent to a drain field. The field will have three equally spaced furrows running its entire length, and each furrow will have a slide gate at the end closest to the tank. Every day a different slide gate will be opened and a different furrow flooded. The effluent water will percolate through the soil and the biochemical oxygen demanding compounds will be consumed by soil bacteria. The reduction is greater than 95%.

Sanitary wastes will be treated in two 1000 gallon septic tanks.

Detailed specifications on effluent facilities were submitted to the Oregon State Sanitary Authority early in December.

The main fire protection facilities and fire lines are shown on the attached drawing. Since this is an existing plant, some existing hydrants will be re-used. When completed, the fire hydrant system will look like this: -

a. The source of water is the City water main at St. Helen's Road. A new 8" line will tap into this main and run across the plant to an existing 6" fire line.

b. The existing 6" line feeds five existing fire hydrants along the main north-south plant road.

c. An existing 4" line will be tied into the new 8" line and will feed two existing hydrants.

d. An existing 4" line runs from the existing 6" line to a hydrant beside tank T-1.

e. A new hydrant will be installed in the corner of the boiler house.

The two hydrants located near the office building and inside the boiler house will each have 150 feet of 2-1/2" hose, 100 feet of 2-1/2" hose, 2 nozzles, 1 valve wrench, and 2 spanner wrenches. The remaining nine hydrants will have 250 feet of 2-1/2" hose plus, of course, the necessary nozzles and wrenches. This equipment will be stored adjacent to each hydrant, under suitable cover, available for immediate use.

An existing foamite system for the tank farm will be renovated. This system has foam delivery chambers at tanks T-99, T-68, T-4, T-3, and T-20. It also has seven foam hydrants, three along the east dike wall, 3 along the west wall, and one at the north wall. The foam system is tied into the fire loop through an existing 4" line. The foam generating station is inside a concrete block building between tanks T-1 and T-65.

Appropriate fire extinguishers will be located at each building as well as other areas in the plant as follows:

1.	Office & Laboratory Building	1 - 2-1/2 Gal Water Pressurized 1 - 5# CO_2
2.	Boiler House	1 - 20# Dry Chemical
3.	Maintenance Building	1 - 5# CO_2 1 - 20# Dry Chemical
4.	Service Room	1 - 2-1/2 Water Pressurized
5.	Pump Room	1 - 5# CO_2
6.	Still Area	3 - 20# Dry Chemical
7.	Pitch Pan Area	1 - 25# Dry Chemical
8.	Tank Truck & Tank Car Loading Area	1 - 25# Dry Chemical
9.	Foam House	1 - 25# Dry Chemical

As a fire prevention measure, all process equipment, vessels, tanks and loading stands will be electrically grounded.

KOPPERS COMPANY, INC.
SINCLAIR-KOPPERS COMPANY
JANUARY 1966

I. GENERAL FIRE PROTECTION POLICY

Marsh and McLennan Inspections

1.1 Standards of Protection

National Fire Protection Association standards shall form the basis of most protection. However, these are to be used with discretion and modified as necessary to suit local conditions after full consideration of the particular problem at hand and following discussion with M&M representative.

NFPA address:
60 Batterymarch St.
Boston, Mass. 02110

1.2 Loss Prevention Supervision

Koppers' loss prevention program is being supervised by Marsh & McLennan. On occasion special situations may arise or consultations may be desired in which case please refer the matter to Insurance Section.
M&M should be addressed as follows:

Marsh & McLennan, Inc.
Property Loss Prevention Department
1850 Koppers Building
Pittsburgh, Pennsylvania 15219

Regular company mail can be used for this purpose, if desired. When urgent communication is necessary use regular Koppers' telephone or teletype facilities, (M&M has tie line to our switchboard) or call them direct at 412-391-2530.

1.3 Impairments of Major Fire Protection Equipment

(Sprinkler shut-offs, broken water mains, water tank empty, etc.)
If a serious nature, such as affecting the entire plant or a major operation of the plant, phone or wire Marsh & McLennan at once.

Efforts should be made to restore service as soon as possible by means of temporary connections while repairs are being made. Do not have total impairments overnight.

Preparations for planned impairments should be as complete as possible.

NFPA No. 13A, 26

2.2 Rubbish Containers

Combustible rubbish shall be kept in metal containers only. Cardboard cartons, wood boxes, fibreboard drums, etc. shall not be used for this purpose.

NFPA No. 82A

2.3 Combustible Rubbish

Shall be removed from the premises as frequently as is practical. There should be no appreciable storage of rubbish within a building overnight and certainly not over week-ends. If necessary outside storage facilities should be provided.

NFPA No. 82A

2.4 Rubbish Burning

Rubbish should not be burned in yard areas unless an adequate incinerator is provided or unless burning area is well detached from the plant property.

NFPA No. 82, 46

2.5 Oil Absorbent

Sawdust or rags should not be used for this purpose. Instead, use a non-combustible oil absorbent, preferably of type listed by Underwriters' Laboratories. Chronic oil leaks should be corrected where possible.

2.6 Wiping Rags

Used wiping rags (paint or oil) should be kept in Underwriters' Laboratories Listed containers with self-closing lids and shall not be mixed with ordinary combustible rubbish. Main supply of clean wiping rags should be kept in a metal container with lid.

2.7 Smoking

Control of smoking will vary from plant to plant. In general smoking should be prohibited in the following areas and signs posted to that effect:

Flammable liquid storage rooms.
Areas where flammable liquids are used extensively.
In areas of otherwise hazardous operation.
Warehouses containing combustible materials.
Compressed gas tank storage areas.
Tank farms.
Around woodworking operations.

(Cardboard "No Smoking" signs are available from Marsh & McLennan.)

2.8 Fire Doors

The specific function of fire doors is to prevent the passage of fire through the opening in a fire wall or fire partition. Fire doors should therefore be maintained in good condition including especially the automatic closing apparatus. All inoperative fire doors should be repaired to function properly.

NFPA No. 80

2.9 Welding and Cutting

Insurance company experience records over the years show a preponderence of fires caused by welding and cutting. To combat this a tag system has been developed which should be adopted wherever possible. Important features of this system are:

Permission to weld or burn.
Preparation of the area.
Inspection of the area before welding.
Physical protection of the area during welding (sweeping, covering, moving combustible materials, etc.)
Presence of a fire watch and portable extinguisher.
Inspection of the area after welding.

Outside contractors shall be informed that similar safe procedures are expected and that periodic inspection by plant personnel will be made to enforce safe practice.

NFPA No. 51

2.10 Compressed Gases

Portable tanks of combustible gases should preferably be stored outside of buildings and be protected from the weather, particularly the direct rays of the sun. Oxygen tanks should be separated from storage of other combustible gases.

All compressed gas tanks (inert gas or combustible gas) other than empty tanks shall be adequately supported by pipe racks, chain, heavy wire, metal straps or other means whether inside or outside of buildings.

NFPA No. 51, 58

2.11 Industrial Trucks

There shall be no refueling of either gasoline lift trucks or propane fueled trucks inside of a building. Propane fuel tanks shall not be stored inside of a building unless building is designed for that specific purpose, but they may be stored on an outside deck, if necessary.

Industrial trucks should not operate in areas containing hazardous liquid vapor or dust unless truck is specifically designed for such service.

Each industrial truck should be equipped with one Underwriters' Laboratories 5 lb. dry chemical or CO_2 extinguisher.

NFPA No. 505

2.12 Flammable Liquids

In any appreciable quantity, should be stored in a detached incombustible building or in an interior room of fire resistive construction. Small quantities of flammable liquids at work areas should be kept in Underwriters' Laboratories Listed safety cans. No more than the quantity necessary for an eight hour shift should be kept at the point of use.

NFPA No. 30

2.13 Stock Piling

In sprinklered buildings a clearance of 18" to 36", depending upon storage conditions, should be maintained between top of stock pile and sprinkler heads.

NFPA No. 13

2.14 Electrical Installations

All electrical work whether repairing, adding to existing or new installation shall be in strict accordance with the National Electric Code. Article 500 may require modification for specific installations, for which consult with Marsh and McLennan.

(a) All temporary wiring and flexible cords to be reviewed as to permanency of the unit being serviced. Reinstall to code requirements on permanent basis.

(b) Replace cover plates on junction boxes, switch and fuse boxes wherever missing.

(c) All circuits are to be properly fused and/or other adequate over-current protection is to be in service.

NFPA No. 70

2.15 Combustion Controls on Boilers, Furnaces, Etc.

If necessary to replace, convert or exchange the firing equipment of any heat unit, as well as any new unit, a full complement of acceptable combustion controls shall be provided. Refer to Marsh and McLennan.

Tanks: (Aboveground)

(a) For new installations tanks containing flammable liquids shall be spaced and diked, either individually or in groups according to National Fire Protection Association standards. Existing installation to conform when required by Marsh and McLennan. after full consultation.

(b) In addition to normal venting, emergency relief venting and flame arrestors where needed shall be provided.

(c) Depending upon conditions, fixed system of foam protection may be necessary for either the diked area or the tank itself.

(d) No combustible materials, no trash (empty or full) to be permitted within diked areas.

2.16 Weed Control

Weeds shall be kept under control either by cutting or by use of chemicals, particularly at diked areas, near lumber piles, pole yards, tie yards, etc.

III. PROTECTION FEATURES

3.1 Portable Fire Protection Equipment

Generally, Koppers' plants are adequately equipped. Where occasional deficiencies may exist as found by Marsh and McLennan inspection procedure these should be corrected according to the need.

(a) All extinguishers are to be serviced manually or as indicated by instructions on the unit. Tags shall be attached showing date serviced and initials of person who performed the work.

(b) If extinguishers of the soda-acid, foam, water (stored pressure of cartridge operated) types have not been hydrostatically tested within the last five years steps should be taken to complete this important test.

NFPA No. 10, 10A

3.2 Automatic Sprinklers

(a) Automatic sprinkler protection shall be provided wherever combustible construction and/or combustible contents prevail, weighed against the importance of the particular situation to the plant and the importance of the plant to overall Koppers operation. Automatic water spray or other protection for hazardous chemical processes may be advisable in some instances.

(b) Automatic sprinkler systems shall be given regular maintenance attention to assure proper operation when needed.

NFPA Nos. 13, 13A, 15, 16

3.3 Hose Outlets

1-1/2" hose connections are advisable in manufacturing, warehouse, laboratory and some of the larger office areas.

NFPA No. 14

3.4 Watchman and Clock

Where this service exists it should not be discontinued without full consultation with Insurance Section and Marsh and McLennan. Clock records should be kept for review by MMI representative. Watchmen should not have access to the key of the portable clock.

3.5 Fire Alarm

In larger plants an audible fire alarm shall be provided, generally in conjunction with a local alarm system. In any event instructions should be issued by notice, placard at phones, or otherwise, of procedure for notifying fire department keeping in mind that any delay can be disastrous.

Where major portions of a plant are sprinklered consideration should be given to providing waterflow alarm to a constantly attended point in the plant or direct to the fire department or to an acceptable central station.

Automatic fire alarm as a substitute for automatic sprinklers is not acceptable.

NFPA Nos. 72, 72A, 72C

3.6 Fire Brigade

Size of this organization depends somewhat upon the size of plant and the manpower available. It can be either a formal or informal organization. Brigade should be staffed for each shift operating. Regardless of the size of the brigade the main purpose is to generate pre-fire planning as to what steps will be taken for reporting and fighting a fire. A fore knowledge of "what to do" in event of a fire can mean the difference between a small or a large loss.

NFPA No. 27

3.7 Hose Houses

(a) Check each hose house for the following minimum equipment:

At lease 150' of 2-1/2" rubber lined hose, coupled and attached to hydrant, neatly stored.

An additional 100' of 2-1/2" rubber lined hose stored on shelf.

2 - Underwriters' playpipes or combination nozzles.

1 - Hydrant wrench.

4 - Coupling spanner wrenches.

(b) Hose houses to be in good repair, with particular emphasis on doors (not sagging and easy to open).

(c) For protection against tempering the door latch may be equipped with a wire seal.

NFPA No. 24

3.8 Public Fire Department

It is suggested that the local fire chief be invited to inspect the plant and thus become familiar with it. Sometimes this results in a tour by the entire fire department and enables them to do a certain amount of pre-fire planning.

3.9 Sealing of Fire Protection Equipment

Manually operated control valves on fixed systems of fire protection as well as the locking pin on certain types of portable extinguishers should be equipped with a metal wire and seal to indicate that the unit has not been tampered with. If a seal is found broken, the cause should be investigated, restored to proper condition and the unit resealed.

NFPA No. 13A, 26

3.10 Shut-in Winter Valves

(Otherwise known as cold weather valves)

(a) Valves controlling sprinklers for minor areas where freezing may occur should be shut prior to freezing weather. The exposed piping should be drained and the drain valve left slightly open. The control valve should be prominently tagged to indicate that it is shut.

(b) It is important to again open this valve as soon as the likelihood of freezing is past.

NFPA No. 13A

IV. MISCELLANEOUS

4.1 Fire Retardant Lumber

U.L. Listed "Non-Com" lumber is acceptable for most construction purposes, except for exterior surfaces subject to weathering. Automatic sprinklers would not be required unless dictated by the occupancy of the surrounding area.

4.2 "Dycon" Panels

These reinforced lightweight concrete units are U.L. Listed and are considered non-combustible. Small outbuildings, interior offices, etc. constructed of these panels will be acceptable. Before using "Dycon" panels for construction of oil rooms or for use where other combustibles are involved, consult with Marsh and McLennan.

4.3 Roof Deck Constructions

(a) Underwriters' Laboratories Listed Non-Metallic Deck Assemblies, Constructions [illegible] and [illegible] (Hoppers Non-Com) are acceptable for use as one-story masonry walled buildings. For use with other types of structure consult Marsh & McLennan.

IV. Miscellaneous (Continued)

4.3

(b) Metal Deck Assemblies not conform to Underwriters' Laboratories Construction Nos. 1, 2 or 3 unless automatic sprinkler protection is provided.

(c) In any case above, combustible occupancy will require the installation of automatic sprinkler protection.

ADDENDA

AIR QUALITY CONTROL

A Brief Description of the
Fume Abatement System and
the Fired Equipment.

FUME ABSORBER SYSTEM

Pitch is produced by a batch distillation process at relatively high temperatures, then pumped to an elevated pitch cooling tank. The pipeline from the still to the cooler is cleared after pumping by purging with steam. Fumes are generated during this pumping and purging procedure.

A system will be installed to fully condense these fumes. Basically it consists of a fume scrubbing column, 6'-0" diameter by 25'-0" high, a 400 gpm circulating pump, a 5,000 gallon horizontal tank for scrubbing oil storage, and a 6000 scfm fan. Fumes from the process will be pulled by the fan into the scrubbing tower where they will be contacted and condensed by the relatively cool circulating oil. The oil and condensate then flows by gravity into the horizontal tank. Any untrapped moisture will decant from the oil in this tank and overflow into the effluent system. The remaining condensate from the fumes will be absorbed by the scrubbing oil.

[illegible]

1 North American Series [illegible]-1500-[illegible] Boiler

Type:	Fire tube, packaged 17250#/hr. of steam, dry and saturated when supplied with feedwater from and at 212°F.
Operating:	150 psig
Pressure:	
Design Pressure:	175 psig
Code:	ASME Boiler code and laws and regulations of State of Oregon
Fuel:	Natural gas at 5 psig and for #6 fuel oil
Controls:	Prewired controls to meet FIA requirements.
Steam Injector:	None
Water Regulation:	Off-on control. Modulating water control not required.
Soot Blowers:	Not required
Low Water Shut-off:	Provide auxiliary probe type
Blow-off valves:	Two (2)
Relief Valves:	To meet ASME Code
Steam Trim:	Water column with low level alarm, low level cut-off steam gauge 0 to 300 psig.
High Level Alarm:	Yes
Burner:	Dual fuel air atomizing with blower; gas regulator; gas shut-off valve; pilot regulator and shut-off air butterfly valve; oil solenoid; oil flow valve; air compressor; electric oil heater; oil relief valve; oil pressure regulator; oil strainer.
Electric Power:	440 volt, 3 phase, 60 cycle
Control Circuits	115 volt, 60 cycle single phase

TAR STILL REBOILER

1 Helical coil heater completely pre-fabricated and pre-assembled to provide 6,000,000 Btu's/hr. and to be built in accordance with Koppers standard specifications for tar still reboilers. Heater to be in accordance with the following general specifications:

External Diameter of Shell	7'-10"
Tube Circle Diameter	6'-0"
Height to Furnace Floor	4'-0"
Height to Base of Stack	39'-0"
Height to Top of Stack	75'-0"
Radiant Surface	565 sq. ft.
Convection Surface	537 sq. ft.
Total Surface	1,102 sq. ft.
Number of Turns	
Radiant Section	25-1/2
Convection Section	24
Tube Length	
Radiant Section	486 lin. ft.
Convection Section	455 lin. ft.
Effective Tube Length	935 lin. ft.
Tube O.D.	4.5 inches
Tube wall	0.1875 inches min.
Tube Centers	8-1/4 inches
Tube Specifications	Type 304 SS, welded, redrawn and annealed
Burner:	North American Series 214 Dual fuel burner

Burner Controls: Flame failure and burner controls to be to F.I.A. requirements as shown on Koppers standard drawing L-6946

SAN BERNARDINO COUNTY
AIR POLLUTION CONTROL DISTRICT

172 WEST THIRD STREET • SAN BERNARDINO, CALIFORNIA

Telephone TUrner 9-0111
Extensions 376 - 456 - 549

January 7,1966

ROUTING	
To	Noted by
Mr.	MR.
J.L.	
From:	
Action:	

Mr. R.E. Hatchard, Director
Air Quality Control Division
City of Portland, Oregon
Department of Public Safety
1225 S.W. 3rd Avenue
Portland, Oregon 97204

Dear Dick:

The Koppers Company here controls their emissions from coal tar distillation by a process known as an "oil seal".

Basically the tar is pumped from Kaiser Steel Co. to storage tanks where it is heated by steam coils. It is then pumped to a gas fired still where under heat and a low pressure of 60 pounds, various fractions, such as creosote and chemical oil are distilled off and pumped to storage tanks where a fume control system (oil seal) insures no escape of fumes to the atmpsphere.

The oil seal consists of a creosoted liquid with a high boiling point, thus insuring the capture of fumes which arise from the warm fractions coming from the still.

The light fractions in the tar are more valuable than the tar itself, making it an economic as well as air control system.

The company meets fully the county air pollution control regulations by use of this system of recovery and control.

Best regards in the new year.

In all sincerity,

JOHN H. FAIRWEATHER
Air Pollution Control Officer
JHF:r

RECEIVED
JAN 10 1966
AIR QUALITY CONTROL
Portland, Oregon

NWT 003575

December 29, 1965

John H. Fairweather, Officer
Air Pollution Control District
County of San Bernardino
172 West Third Street
San Bernardino, California

Dear John:

The Koppers Company, Inc. is installing a coal tar distillation process in Portland and expects to be in production in spring of 1966. In our discussion with the plant representative it was mentioned that the firm has a similar operation in Fontane, Calif. on Cherry Street and that there are no air pollution problems affecting the residential community located within one-half mile distance.

We are not familiar with the coal tar distillation process since there is no other plant in Oregon. I would appreciate any information you could provide regarding the control facilities that were necessary to meet the San Bernardino Air Quality Control District regulations.

May we extend our Holiday greetings.

Sincerely yours,

THOMAS L. MEADOR, M. D.
City Health Officer

R. E. Hatchard, Director
Air Quality Control Division

REH:jl

BC: To Mr. H
for asst

CITY OF PORTLAND

INTER-OFFICE CORRESPONDENCE

(NOT FOR MAILING)

December 29, 1965

From R. E. Hatchard, Director

To Air Quality Control Division

Addressed to Jack Lowe

Subject Koppers Company, Inc. Chemical Plant
7900 NW St. Helens Road

On October 13th, Mr. D. L. O'Dell called at the Air Quality Control office to discuss the Koppers Company's plans for installing a coal tar processing plant at the site of the former NW Natural Gas Company's manufacturing plant, in response to our letter of October 7th. The following summarizes the discussion:

1. The company will be producing hot liquid pitch. It will be transported in tank trucks and tank cars for immediate delivery to aluminum manufacturers. The pitch is used for forming the carbon electrode. The second product is the production of creosote, widely used as a preservative for wood products. Both products are produced in the distillation of coal tar.

2. The Koppers Company has leased eight acres from the NW Natural Gas Company and expects to have the plans for the production plant completed in about two months. REH advised him of the Air Quality Control Code requirements, and requested that the proposed plan be submitted to the Air Quality Control office as soon as possible. REH inquired about the points in the production process that may produce discharges to the atmosphere. Mr. O'Dell was quite confident that at the location in NW Portland no air pollution problems would be created. He explained that the company has identical coal tar distillation plants in several locations in the U.S., including Fontana, California; Chicago, Illinois (Cicero); Follansbee, W. Va; Houston, Texas and Seaboard, N. J. He stated that the distillation process includes some controls through use of condensers, etc. He referred to the Fontana, California plant which is located within one-half mile of a built-up residential neighborhood and there are no air pollution problems present. Fontana, California is in the San Bernardino Air Pollution Control District and has continued an intensive air quality control program for a number of years. Their regulation requirements are similar to the LA County Air Pollution Control District. I will write John Fairweather, AQC Officer of San Bernardino, to obtain information.

ROUTING	
To	Noted by
[illegible]	MR
[illegible]	
From: [illegible]	
Action:	

NWT 003577

3. I advised Mr. O'Dell that we would need process description information when the plans are submitted. Also advised him that we had received several letters from citizens in NW Portland expressing concern of the possibility of air pollution resulting from the new plant installation. I explained that the community's air quality control program required that appropriate controls be installed with the initial plant to be certain that no air pollution problems occur. He replied that there are some cycles in the process where there is a visible discharge, but this is quickly dissipated. He did not expect it would be noticeable beyond the plant acreage.

4. Mr. O'Dell advised that Koppers Company, Inc. has a staff member who handles all air and water pollution problems company-wide. His name is Clarence Fisher. If there are control problems, R. S. Shannon usually handles these.

Future Action:

1. REH send a letter to John Fairweather;
2. MR review the coal tar distillation process in reference books or reports;
3. When this information is on hand, review the probable Portland AQC requirements as far as air pollution control is concerned;
4. * Request the Portland Building Bureau to withhold issuance of the building permit until AQC approval has been received;
5. MR review the need for area air sampling before the Koppers plant becomes productive.

REH

R. E. Hatchard

REH:jl

* I spoke to Pat McCann, Dec 31, 1965, no bldg permit application since a prelim submission a year or so ago.
Jan 4, 1966. Clare informed Koppers had not been in for 6-8 weeks, about time O'Dell spoke to REH.
Later, Koppers today inquired re Codes, etc. Clare says his people informed them also to keep in touch with AQC

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4. Request the Portland Building Bureau to withhold issuance of the building permit until AQC approval has been received;
5. MR review the need for area air sampling before the Koppers plant becomes productive.

R. E. Hatchard

REH:jl

Bc: to Mr. H
for OSSA

December 29, 1965

R. E. Hatchard, Director

Air Quality Control Division

Jack Lowe

Koppers Company, Inc. Chemical Plant
7900 NW St. Helens Road

On October 13th, Mr. D. L. O'Dell called at the Air Quality Control office to discuss the Koppers Company's plans for installing a coal tar processing plant at the site of the former NW Natural Gas Company's manufacturing plant, in response to our letter of October 7th. The following summarizes the discussion:

1. The company will be producing hot liquid pitch. It will be transported in tank trucks and tank cars for immediate delivery to aluminum manufacturers. The pitch is used for forming the carbon electrode. The second product is the production of creosote, widely used as a preservative for wood products. Both products are produced in the distillation of coal tar.

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KOPPERS COMPANY, INC.
TAR & CHEMICAL DIVISION
PITTSBURGH, PA. 15219

WILLIAM B. JACKSON
VICE PRESIDENT AND
MANAGER OF OPERATIONS

TELEPHONE
AREA CODE 412
391-3300

October 12, 1965

Mr. R. E. Hatchard, Director
Air Quality Control Division
City of Portland Department of Public Safety
1225 S. W. 3rd Avenue
Portland, Oregon 97204

Dear Mr. Hatchard:

Thank you for your letter of October 7 outlining the Portland Air Quality Control Program.

Mr. D. L. O'Dell, manager of our Engineering Department, will be in contact with you for the complete copy of the Code and to set up a meeting.

Very truly yours,

W. B. Jackson

WBJ:mew

ROUTING	
To	Noted by
From: REH.	
Action:	

D.L. O'Dell cont'd in AQC Office Oct 13 - discussed Process + Agc Code - will prepare memo for file

RECEIVED
OCT 14 1965
AIR QUALITY CONTROL
Portland, Oregon

October 7, 1965

W. P. Jackson, Vice President
Tar and Chemical Division
Koppers Company, Inc.
3440 Wilshire Blvd.
Los Angeles, California

Dear Mr. Jackson:

In a recent news announcement we note that the Koppers Company will be establishing a coal tar processing plant in Portland at the Northwest Natural Gas standby plant, 7900 NW St. Helens Road, Portland. The Air Quality Control Code of the City of Portland, Ordinance 118114, includes several provisions of interest to firms constructing new industrial plants or expanding existing facilities. The objective of these Code provisions is to insure that the installation will include adequate facilities to avoid the release of excessive quantities of any air contaminant that would create an air pollution problem.

We recommend that a meeting be arranged with your representatives and the Air Quality Control staff members to become familiar with the production process that will be used at the Portland plant and your preliminary plans for controlling discharges into the atmosphere. The time for the suggested meeting should be scheduled early enough within the time that preliminary plans are being formulated. We have found that it is mutually desirable to arrive at the preliminary agreement before final working plans are completed.

Enclosed are information bulletins which explain some features of the City's requirements. A complete copy of the Code may be obtained from the City Auditor, Room 202, City Hall, Portland, Oregon 97204, at a cost of $1.00 plus postage. We look forward to meeting with your representatives.

Very truly yours,

THOMAS L. MEADOR, M. D.
City Health Officer

R. E. Hatchard, Director
Air Quality Control Division

REH:jl
Enclosures
IB 1-8
Except 5

July 28, 1970

Gentlemen:

I write to bring to your attention another trespass upon the citizenry of Portland by one of the city's N.W. industrial area plants. I refer to the odious, daily presence of Koppers Co., Inc., Organic Materials Division, which is located at 7540 N.W. St. Helens Road.

Daily I drive past the above address, and daily I experience a nausea the likes of which I can only describe as, perhaps, plunging my face into the abdominal cavity of a freshly slain, freshly eviscerated ungulate. The stench is overpowering. The rolling up of windows serves naught, for the apprehension is sufficiently great to sorely traumatize. The Koppers area has so imprinted itself upon my psyche that I would surely recognize its yellow-vaporous earmark were I to encounter same on the Plains of Abraham.

Actually, I wonder how many travelers to the salmon grounds this time of year will most remember N.W. Portland for the beauteousness of Koppers stacks. Why no action from you? Don't the steams etc. emitted from said stacks register on your little punch-card pollution-haze indexes? Surely I'm not the first to wag a finger (when I can safely take it from under my nose)!

K.R. Bents

9685 N.W. St. Helens Rd.

RECEIVED
JUL 30 1970
SWAPA
COLUMBIA - WILLAMETTE
AIR POLLUTION AUTHORITY

ROUTING	
To	Noted by
WH	WH
GB	
Action	

NWT 003583

CITY OF PORTLAND BUREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue 97204

RECORD OF COMPLAINTS

286-3681

Name of Facility Koppers Co

Address

1. Complainant Mrs Ann Pettingill Date 26 Sept 66

Address 6605 N. Tyler St Letter Phone In person

Nature of complaint @ 1900 hrs 23 Sept 66 there was yellow haze over at Koppers. She called Plant Mgr. and he admitted they had problems

Action taken Call Plant Mgr. - See F.O. (Spinola @ residence 223-7611) may be man she talked too.

By MR

2. Complainant Date

Address Letter Phone In person

Nature of complaint

Action taken

By

3. Complainant Date

Address Letter Phone In person

Nature of complaint

Action taken

By

NWT 003584

CITY OF PORTLAND BUREAU OF HEA
Air Quality Control Division
1225 SW 3rd Avenue 97204

RECORD OF COMPLAINTS

Name of Facility Koppers Co. Inc.

Address

1. Complainant Date Oct 14 1965

Address Letter Phone In person

Nature of complaint As of this date numerous citizen inquiries relative air pollution controls to be required of new plant - JL.

Action taken

By

2. Complainant Dr. F. Leon Date 2 SEPT 66

Address PHONE 228-5478 Letter Phone In person

Nature of complaint Has patient (Pioneer Constr) who has been vomiting last week, respiratory problems - X-Ray shows some pneumonia (chemical caused apparently) one lung. Patient claims from driving pitch for Koppers - others effected.

Action taken

Informed Dr. of process and had him contact Industrial Hygiene @ State By MDR.

3. Complainant Mrs. Ann Pettingill Date 22 Sep 66 1258

Address 6605 N. Tyler St 286-1815 Letter Phone In person

Nature of complaint Today with wind coming from Koppers Co, there is a strong offensive odor of creosote. Frequently also an odor of tree pitch which is very strong & burns nose & throat

~~Action taken~~ Last nite had to close bedroom windows. I requested to call when occurs again & referred to MR

By D-

NWT 003585

DRS. MYERS AND WIEBE
PHYSICIANS AND SURGEONS

GORDON C. MYERS, M. D.
ALTON E. WIEBE, M. D.

5825 N. GREELEY AVENUE
PORTLAND, OREGON 97217
285-6607

November 13, 1965

Bureau of Health
R.E. Hatchard, Director
Air Quality Control Division
Portland, Oregon

Dear Mr. Hatchard:

I appreciate the courtesy, promptness and completeness of your letter of November 5, 1965 concerning the creosote plant to be built on NW St. Helens Road.

Thank you.

Sincerely,

Gordon C. Myers, M.D.

GCM:ga
cc: Mayor Schrunk

ROUTING	
To	Noted by
From:	
Action:	

RECEIVED
NOV 1 1965
AIR QUALITY CONTROL
Portland, Oregon

November 5, 1965

ROUTING	
To	Noted by
MR	MR
JC	JC
CC	
JL	JL
From: REH	
Action: Info -	

Gordon C. Myers, M.D.
5825 N. Greeley Avenue
Portland, Oregon 97217

Dear Dr. Myers:

Your letter of October 6 to Mayor Schrunk expressing concern over possible odorous fumes from the proposed creosote plant to be located on the gas company property on NW St. Helens Road was referred to this office for reply. Please excuse our delay in replying.

We, too, noticed in the press that Koppers Company was planning to establish a coal tar processing plant in Portland, but we were unable to locate anyone in Portland who could furnish details. Consequently, we wrote to the Koppers Company Los Angeles office informing them of Portland's new Air Quality Control Code and its provisions to assure that their proposed installation will include adequate facilities to avoid the release of excessive quantities of any air contaminant that would create an air pollution problem. We also suggested a meeting to acquaint us with their production processes and their preliminary plans for controlling discharges into the atmosphere.

Shortly thereafter a representative of Koppers Company called on us and we had a thorough discussion of their processes and the controls needed to prevent air pollution. The Koppers Company representative assured us their operation would be in compliance with requirements of the Air Quality Control Code. I am satisfied they are sincere in this assurance; however, we shall review their plans to check adequacy of air quality control equipment.

I trust this is the information you desire. If you have any further questions, please do not hesitate to telephone.

Very truly yours,

THOMAS L. MEADOR, M. D.
City Health Officer

R. E. Hatchard, Director
Air Quality Control Division

REH:jjt
cc: Mayor Schrunk

CITY OF PORTLANI UREAU OF HEALTH
Air Quality Control Division
1225 SW 3rd Avenue (97204)

10/30

From: R. E. Hatchard, Director

To: J.L.

Please advise Dr Meyers re actions taken -

Notified Co re AQC Code

Back ground sampling -?

Prelim. Conf with Co's engineers held.

REH

This had attached ~~[illegible]~~ JC's report on downwind HV sampling on Cascade Steel Rolling Mills

Is he ~~not~~ referring to Koppers? Have you ~~[illegible]~~ a memo to prepare on your discussion with Mr. O'Dell of Koppers?

From the office of
TERRY D. SCHRUNK, Mayor
Rm. 303, City Hall
Portland 4, Oregon

Date October 7, 1965

To: 1. Richard Hatchard
2.
3.

Check:

_____ Approval	_____ Investigate and Report	_____ Note and Comment
_____ Necessary Action	_____ Answer or Arrange	_____ Note and Confer
_____ Prepare Ordinance	_____ Prepare Answer for	_____ Note and File
_____ Proc. - Resolution	_____ Mayor's Signature	_____ Note and Return

Comments: Please answer and furnish necessary information regarding Dr. Myers' questions.

FJI.m

SCOPE OF WORK

GRAPHITE STORAGE AREA COVERING

GENERAL

Contractor is to supply all labor, materials, tools, and supervision to install a cover over the existing Graphite Storage area.

SCOPE

1.0 The contractor is to install 12' long 4 x 4 post at each of the existing 4" ø pipe posts.

1.1 The posts are to be fastened with a minimum of three (3) 3/4" bolts.

1.2 2" x 4" stringers will be run horizontal between posts so that 3/4" CDX plywood can be fastened on the inside.

1.3 Wood roof trusses at 4'-0" o/c will be used to span the width of the area with a minimum of 1'-0" over-hang on both sides. There will be a double truss at the East end (open) to support a tarp. Each end truss will be closed-in, using 1/2" CDX plywood.

1.4 2" x 4" purlins at 2'-0" o/c will be installed on the trusses and covered with 1/2" CDX plywood.

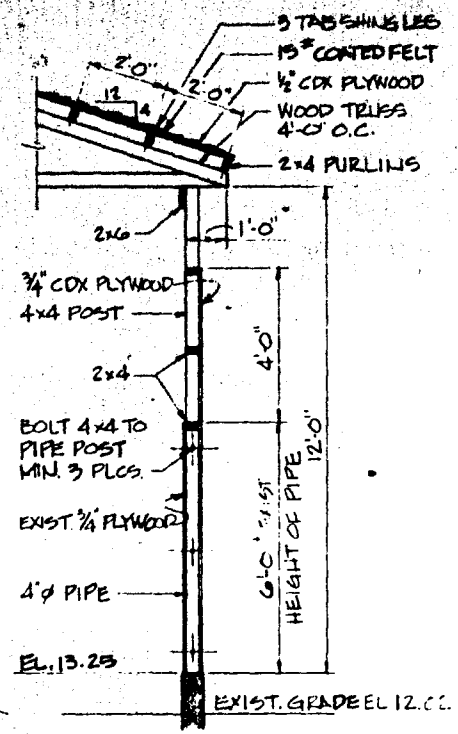
1.5 3 tab self seal shingles (240# min.) will be used as roofing.

1.6 The top section above the existing plywood will be covered with 3/4" CDX plywood on 3 sides.

2.0 DRAWINGS

B21-15514 Waste Graphite Storage Building

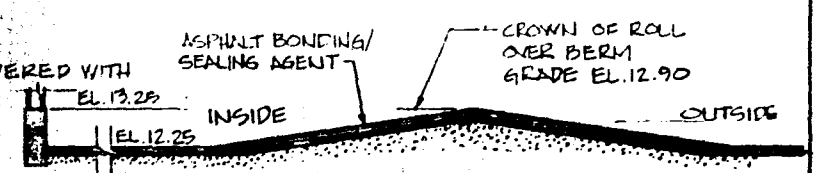
3.0 The dimension on the drawings are approximate and shall be checked by the Contractor.



SECTION A-A

NOTES:

1. END TRUSSES TO BE COVERED WITH ½" CDX PLYWOOD
2. ALL ELEVATIONS ARE FEET ABOVE NATIONAL GEODETIC VERTICAL DATUM (NGVD)



SECTION B-B

FOUNDATION EL. 13.25

SCALE 3/8" = 1'-0"

REFERENCE: O.G.C. PL. ENG. FILE 61-G-3 FOR NGVD DATA DEVELOPED BY CH2M HILL, OCT., 1985.

REVISED JUNE 1986

NWR

VICTOR ATIYEH
GOVERNOR

Department of Environmental Quality

522 S.W. FIFTH AVENUE, BOX 1760, PORTLAND, OREGON 97207 PHONE (503) 229-5696

May 30, 1984

Dept. of Environmental Quality
RECEIVED
MAY 30
NORTHWEST REGION

KOPPERS COMPANY, INC.
Attention: Paul W. Guth, Plant Superintendent
7540 NW St. Helens Road
Portland, OR 97229

Re: Permit 3077-J
File No. 47430
(Creosote Terminal)

Gentlemen:

Our records indicate that your present waste water disposal permit will expire on November 30, 1984.

The enclosed application form must be completed, signed by your responsible official and returned to the Department of Environmental Quality as soon as possible for permit renewal.

A filing fee of $50 and a processing fee of $150 are required to accompany this application. No action can be taken on the application until the fees are paid.

If you request a significant increase in effluent discharge or disposal limitations, the processing fee will be $250.

If you have any questions regarding the renewal application or the associated fees, please contact this office. An invoice for the amount of the fees will be sent to you upon request. Copies of the permit fee regulations are attached.

Sincerely,

for Charles K. Ashbaker
Supervisor
Source Control Section
Water Quality Division

CKA:mjb
Enclosures (2)

cc: Northwest Region, DEQ

DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION FORM

COUNTY: Multnomah

SOURCE NAME: Koppers

SOURCE ADDRESS: 7540 NW St Helens Rd Portland 97210

OFFICIAL CONTACTED: John Oxford

☐ ☐ NC

TABLE A PARA	PREP. TIME	TRANS TIME	INSPECTION TIME	PAPER TIME

PERMIT NUMBER CO.	PERMIT NUMBER SOURCE	POINT	ACTION NO.	ACTION	ACTION TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
ANT	3077J			7		8 12 87	8 12 87	X	

3 1 1 IN COMPLIANCE
3 1 2
3 1 3
3 1 4

COMPLIANCE STATUS *(RESULT CODE)*

	IN COMP.	NOT IN COMPLIANCE	ON SCHEDULE
All permit conditions	X		
Permit emission limits	R	A	I
Emission standards	S	B	J
Performance reqts.	T	C	K
Monitoring & Reporting	U	D	L
Open burning limits	V	E	M
Procedural Reqts.	W	F	N
Fugitive emissions	X	G	O
Other	Y	H	P

SOURCES IN VIOLATION & LIMITS VIOLATED

NONE

TREATMENT/PROCESS EQUIPMENT – ADDITIONAL REMARKS – OPERATING CONDITIONS

Surface drainage from a portion of the plant area is collected in tanks (four are used depending on volume needed) All runoff and some condensate from steam traps is held in the tanks then sampled. Once water quality is confirmed, i.e., meets permit standards, the tanks are discharged through a pipe to an open drainage at edge of property. The drainage leads to a creek and to the Willamette River about 3/4 mi distant. The last discharge occurred on August 4, 1987. Tanks #1 and #2 were pumped. These tanks were sampled on July 27, 1987. Sampling is performed by Cutter Labs. A ~~total~~ maximum of 15,000 gallons was discharged over two days.

Koppers water sampling has not evaluated a permit violation for the past three years.

Site was inspected - no violations or unusual activity noted

Dennis Adamczyk Aug 12, 1987
SIGNATURE OF INSPECTOR AND DATE

John A Oxford 8-12-87
SIGNATURE OF PERSON INTERVIEWED AND DATE

REGION COPY

NWT 003592

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME

ADDRESS

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2040-0004
Expires 2-29-84

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM				TO			
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT		10000								
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT		100 F								
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT				6.0		9.0				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

File
Koppers
Water Quality
MWK

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. (Reference all attachments here)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

TYPED OR PRINTED

(Reproduce this form as needed)

(Reproduce this form as needed) ... WHICH MAY BE USED

PAGE

NWT 003593

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME

ADDRESS

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2040-0001
Expires 2-29-84

PERMIT NUMBER (2-16)	DISCHARGE NUMBER (17-19)

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM				TO			
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT		10,000								
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT		100								
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT				5.0		2.0		5		
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT					10	15		5		
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT					0.5					
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

File -

WQ - Korpers
Multno.

NORTHWEST REGION

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY AND AM I ON MY I OBTAINING IS TRUE NIFICANT THE POSS 33 USC § and or max
TYPED OR PRINTED	

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE AREA CODE	NUMBER	DATE YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Refer

STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

TO: Greg Baesler, NWR

DATE: March 4, 1985

FROM: Larry Patterson, WQ

SUBJECT: WQ-Koppers Company - Mill Co.

This is in response to your memo regarding appropriate effluent limitations for specific polynuclear aromatic hydrocarbons commonly found in creosote substances.

As you know, creosote is a mixture of many different chemical substances. Since there is no one test for creosote, our laboratory staff have selected eleven of the major substances in creosote for analysis. There is very little water quality information available on the individual substances beyond the following:

Substance	Acute Toxicity		Chronic Toxicity
Fluoranthene	Bluegill	LC_{50} = 3.98 mg/l	Not Available
	Daphnia Magna	LC_{50} = 325.0 mg/l	Not Available
Acenaphthene	Bluegill	LC_{50} = 1.70 mg/l	Not Available
	Daphnia Magna	LC_{50} = 41.20 mg/l	Not Available
Naphthalene	Daphnia Magna	LC_{50} = 8.57 mg/l	Not Available
	Rainbow Trout	LC_{50} = 2.30 mg/l	Not Available
	Gambusia	LC_{50} = 150.0 mg/l	Not Available
	Fathead Minnow	LC_{50} = 4.9 mg/l	0.620 mg/l

In general, polynuclear aromatic hydrocarbon creosote substances are fairly insoluble in water and are denser than water. Although these substances may react differently in a creosote mixture, the individual substances are generally a solid at ambient temperatures. PAH's adsorb strongly to suspended particulates and biota. Those PAH's that do dissolve in the water column will probably undergo destruction by photolysis at a rapid rate. Those PAH's adsorbed to sediment will probably undergo biodegradation although the rate of this process could be quite slow.

At this point, we do not have sufficient information to establish limitations for PAH's for the Kopper's NPDES Permit. Based on the physical characteristics of these substances, sedimentation is an appropriate

method of control. Kopper's storm runoff should flow through a facility where both settling and skimming can be provided. Settled materials should be periodically removed to reduce the potential for redissolving some of the substances.

The existing permit limits for oil/grease and phenols are appropriate. PAH limitations should not be established at this time. However, monthly monitoring for PAH substances should be required. The definition of PAH must also be included in the permit and a test procedure should be referenced. The permit currently requires monitoring for phenols. We should specify that phenols or phenolics be analyzed by Standard Methods #510, 4-aminoantipyrene complexing with chloroform extraction.

LDP:t
WT756

DEPARTMENT OF ENVIRONMENTAL QUALITY
Request for Analysis

Laboratory No. 84-0814

Location/Site: KOPPERS - NW PILO Date: 9-28-84

Date Received Lab: SEP 28 1984

Collected By: G.D. BAESLER Program: 3250I

Date Reported: NOV 07 1984

Purpose: WQ COMPLIANCE INSPECTION

Report Data To: NWR - BAESLER
WQ - PATTERSON

Comments:

* Basic (P) unpreserved; Nutrient (R) add H_2SO_4 in field; Metals (Tm) HNO_3 added in lab--don't rinse; Organic (X) mason jar lab prepared

Item No.	Sampling Point Description (include time)	*Sample Container (bottle) #'s Nutrients / Basic	DO / BOD	Metals / Organic		Test Required GDB
1	DISCHARGE 001 2:45 PM			X637		GCMS BN CREOSOTE UNPRESERVED
2	001 2:47 PM			X640		PHENOLS GCMS acids UNPRESERVED
3	001 2:49 PM			X636		O & G 15 DROPS H_2SO_4
4	001 2:51 PM			X635		PHENOLICS $CuSO_4$ M. ORAN H_3PO_4
5	001 2:51 PM	S101				pH
6	pH = paper in field 5.0 pH meter in Koppers lab 7.0 temp 26.9					

Dept. of Environmental Quality
RECEIVED
NOV 9 1984
NORTHWEST REGION

Laboratory comments

NWT 003597

DEPARTMENT OF ENVIRONMENTAL QUALITY
Laboratory Data Sheet

Laboratory No: 84-0814
Program Code: 3250I
Page: 1 of: 95
Analysis Completed: OCT 19 1984

Koppers Baesler

Item No.	Test Results (All units in ~~mg/l or ug/m³~~)											
	Poly #	pH										
1	S101	6.5										

Comments:

NWT 003598

DEPARTMENT OF ENVIRONMENTAL QUALITY
Laboratory Data Sheet

Laboratory No: 84-0814
Program Code: 3250F
Page: 2 of: 5
Analysis Completed: [illegible]

Koppers

Item No.	Test Results (All units in mg/l or ug/m³)											
	O+G	Phenolics	O+G	Phenolics								
1	X636	X635	0.5	0.27								

Comment

4/25

DATE: 02 NOV 84

DJH

LAB #: 84-0814
ITEM #: 1
SAMPLE: X640

PESTICIDES
METHOD 625

AMOUNT MG/L	PARAMETER
<.005	ALPHA-BHC
<.005	HEPTACHLOR
<.005	ALDRIN
<.005	HEPTACHLOR EPOXIDE
<.005	ENDOSULFAN I
<.005	TRANS-NONACHLOR
.005	P,P'-DDE
<.005	DIELDRIN
<.005	ENDRIN
<.005	ENDOSULFAN II
.005	P,P'-DDD
<.005	ENDOSULFAN CYCLIC SULFATE
<.005	P,P'-DDT
<.005	GAMMA-BHC (LINDANE)

S/S

02 NOV 84

DJH

GC/MS SCAN ID

84-0814 X640

THE WATER SAMPLE WAS EXTRACTED IN METHYLENE CHLORIDE AND ANALYZED BY GC/MS. IN ADDITION TO THE PRIORITY POLLUTANT CHEMICALS, THE SAMPLE WAS SCANNED FOR ANY OTHER UNKNOWNS. THE FOLLOWING COMPOUNDS WERE TENTATIVELY IDENTIFIED WITH THE ESTIMATED CONCENTRATIONS SHOWN.

COMPOUND	MG/L
1H-INDENE	.02
BENZO(B)THIOPHENE	.03
2-METHYLNAPHTHALENE	.27
1,1'-BIPHENYL	.01
1,3-DIMETHYLNAPHTHALENE	.04
DIBENZOFURAN	.13
1,1'-(1,2-ETYLENEDI/L)BISBENZENE	.01

Koppers Company, Inc., Organ[illegible]aterials Group
7540 N.W. St. Helens Road, Portlan[illegible] OR 97229
Telephone 503-286-3681

Dept. of Environmental Quality
RECEIVED
NOV 1 1984
NORTHWEST REGION

KOPPERS

November 2, 1984

Department of Environmental Quality
Northwest Region
P.O. Box 1760
Portland, Oregon 97207

Dear Sirs:

Please note that the average of our oil and grease results from our samples show that we have exceeded the parameters of our permit. Attached, you will find copies of the laboratory reports showing that the two samples taken on October 23, 1984 and October 24, 1984, respectively, were indeed high. As you can also see, copies of two other samples taken during the month were within the parameters of our permit.

I have found no leak in our system that would put creosote oil into the effluent water. I have sampled water coming from the hillside above our plant down on to St. Helens Road and into our facility. The oil seems to be of an organic nature and quite possibly could be coming from septic tank systems from the homes above our facility. This oil is in the process of being analyzed and results will be forthcoming. May I point out at this time that if the oil was coming from our system the phenol count would also be extremely high. As you can see from the laboratory reports, this is not the case.

To insure that Koppers Company remains within the parameters of the permit that you have issued, we are now piping our system into a series of empty tanks. We will then pump the ground water into these tanks and hold that water until the laboratory assures us that we are in compliance with state regulations. Once we have received that assurance, we will then pump these tanks through our outfall #001 to the Willamette River. I feel that these steps will eliminate a repeat of this type of incident in the future.

At this time, please let me assure you that this incident was immediately reported to D.E.Q. by me personally. The man I spoke to at D.E.Q., Mr. Leo Boton, advised me at that time that even though we had exceeded the limit of our permit, that the nature was not that serious. He agreed with the steps I am taking to avoid this problem atain and asked that I advise D.E.Q. when the piping system is complete.

Thank you,

John A. Oxford

John A. Oxford
Plant Manager

NW Reg

GAB
CBC

STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

TO: Greg Baesler, NWR

DATE: March 4, 1985

Dept. of Environmental Quality

RECEIVED

FROM: Larry Patterson, WQ

SUBJECT: WQ-Koppers Company

NORTHWEST REGION

This is in response to your memo regarding appropriate effluent limitations for specific polynuclear aromatic hydrocarbons commonly found in creosote substances.

As you know, creosote is a mixture of many different chemical substances. Since there is no one test for creosote, our laboratory staff have selected eleven of the major substances in creosote for analysis. There is very little water quality information available on the individual substances beyond the following:

Substance	Acute Toxicity		Chronic Toxicity
Fluoranthene	Bluegill	LC_{50} = 3.98 mg/l	Not Available
	Daphnia Magna	LC_{50} = 325.0 mg/l	Not Available
Acenaphthene	Bluegill	LC_{50} = 1.70 mg/l	Not Available
	Daphnia Magna	LC_{50} = 41.20 mg/l	Not Available
Naphthalene	Daphnia Magna	LC_{50} = 8.57 mg/l	Not Available
	Rainbow Trout	LC_{50} = 2.30 mg/l	Not Available
	Gambusia	LC_{50} = 150.0 mg/l	Not Available
	Fathead Minnow	LC_{50} = 4.9 mg/l	0.620 mg/l

In general, polynuclear aromatic hydrocarbon creosote substances are fairly insoluble in water and are denser than water. Although these substances may react differently in a creosote mixture, the individual substances are generally a solid at ambient temperatures. PAH's adsorb strongly to suspended particulates and biota. Those PAH's that do dissolve in the water column will probably undergo destruction by photolysis at a rapid rate. Those PAH's adsorbed to sediment will probably undergo biodegradation although the rate of this process could be quite slow.

At this point, we do not have sufficient information to establish limitations for PAH's for the Kopper's NPDES Permit. Based on the physical characteristics of these substances, sedimentation is an appropriate

method of control. Kopper's storm runoff should flow through a facility where both settling and skimming can be provided. Settled materials should be periodically removed to reduce the potential for redissolving some of the substances.

The existing permit limits for oil/grease and phenols are appropriate. PAH limitations should not be established at this time. However, monthly monitoring for PAH substances should be required. The definition of PAH must also be included in the permit and a test procedure should be referenced. The permit currently requires monitoring for phenols. We should specify that phenols or phenolics be analyzed by Standard Methods #510, 4-aminoantipyrene complexing with chloroform extraction.

LDP:t
WT756

FIAHWE

Mult. Co

628.54
71.06.07 Fi20

KOPPERS

Interoffice Correspondence

To Mr. P. W. Guth

Location Northwest Plant

Subject Effluent Sample Analyses

From Environmental Health & Safety Section

Location Monroeville Research Center

Date June 7, 1971

Attached are: Table I giving nature and description of samples received May 3, 1971 from the Northwest Plant, and Table II giving summary of tests and analyses on these samples.

The samples from the farm sump (PO-NW-4), from Well #6 (PO-NW-5), and from Well #3 (PO-NW-6) all had fairly high pollutional properties with oils of 15 to 50 ppm, total organic carbon of 25 to 55 ppm, 5-day biochemical oxygen demand of 25 to 120 ppm, and phenols of 0.6 to 10 ppm. Cyanides were maximum 0.04 ppm.

Analytical data for ammonia, nitrates, and phosphates are not completed at this time. This will be forwarded at a later date.

Attached also is a table giving quality of water taken from Test Well No. 3 for August 11, 1966 and February 20, 1967. This is sent for reference purposes.

C. W. Fisher

CWF:jd

Enclosures: 3

cc with enclosures to: Mr. K. R. Caldwell, Mr. D. L. O'Dell, Mr. B. K. Pospishil, Dr. T. E. Robbins

TABLE I

ORGANIC MATERIALS DIVISION
KOPPERS COMPANY, INC.

NORTHWEST PLANT
PORTLAND, OREGON

NATURE AND DESCRIPTION OF SAMPLES RECEIVED MAY 3, 1971

(THREE DAY COMPOSITES)

Lab Sample No.	Nature of Sample	DESCRIPTION		
		Color	Odor	Remarks
PO-NW-3	Tank 28 C - no $CuSO_4$ D - $CuSO_4$	Muddy green	Sulfide	2 x 1/2 gal. One with $CuSO_4$ for phenol analysis.
PO-NW-4	Farm Sump G - no $CuSO_4$ H - $CuSO_4$	Light brown	Oily	(ditto)
PO-NW-5	Well #6 E - no $CuSO_4$ F - $CuSO_4$	Rusty brown	?	(ditto)
PO-NW-6	Well #3	Brown	?	(ditto)

Effluent Services Group
Environmental Health & Safety Section
Monroeville Research Center
June 7, 1971

CWF:jd

TABLE II

ORGANIC MATERIALS DIVISION
KOPPERS COMPANY, INC.

NORTHWEST PLANT
PORTLAND, OREGON

SUMMARY OF TESTS AND ANALYSES ON SAMPLES RECEIVED MAY 3, 1971

(THREE DAY COMPOSITES)

Tests and Analyses	Tank 28 PO-NW-3	Farm Sump PO-NW-4	Well #6 PO-NW-5	Well #3 PO-NW-6
Biochemical Oxygen Demand, ppm, 5 days	1,700	80	25	120
20 days	4,400	150	5	210
K_1 Value	0.04	0.07	0.05	0.07
Phenols, ppm	210	10	4	0.06
Cyanides, ppm	22.0	0.01	0.03	0.04

Effluent Services Group
Environmental Health & Safety Section
Monroeville Research Center
June 7, 1971

CWF:js

REFERENCE TABLE

KOPPERS COMPANY, INC.

NORTHWEST PLANT
PORTLAND, OREGON

Lab Sample No.	Nature of Sample	Color	pH	COD ppm	BOD_6 ppm	SOLIDS ON EVAPORATION, ppm TOTAL at 103°C	FIXED at 600°C	VOLATILE at 600°C	Phenols ppm	Conductivity µmhos	Hardness as $CaCO_3$ ppm	Ammonia as N ppm
PO-NW-1A	Well No. 3 - Before start up of plant. Aug. 11, 1966, 2:20 pm, Temp. = 20°C Tar Plant Odor. 1/2 gal, very trubid, Considerable earth solids	Brown	7.2	260	130	270	235	35	-	280	95	2
PO-NW-1B	as 1A, but preserved with $CuSO_4$ for phenol analysis 1/2 gallon	—	—	—	—	—	—	—	10.4	—	—	—
PO-NW-2A	Well No. 3 - After plant in operation. Feb. 20, 1967, 1 pm, Temp. = 11°C Tar Plant Odor. 1/2 gal, very turbid, Considerable earth solids	Brown	7.3	100	65	215	215	0	-	250	110	2
PO-NW-2B	as 2A, but preserved with $CuSO_4$ for phenol analysis.	-	-	—	—	—	—	—	2.5	—	—	—

NOTES: COD = Chemical Oxygen Demand
BOD_6 = 6-day Biochemical Oxygen Demand, DO Probe.

Samples filtered thru coarse filter paper to remove earth collected during sampling of water.

C. W. Fisher
Environmental Health & Safety
Monroeville Research Center

NWT 003608

	Yes	No
B. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for long periods.	X	

Discussion: _____

C. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contractions. X ____

Discussion: _____

D. All aboveground valves and pipelines are inspected on a scheduled, periodic basis (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces). X ____

Discussion: _____

E. Vehicles entering the facility are inspected and/or warned to avoid damaging aboveground piping. X ____

Discussion: _____

5. Intra-facility Tank Car & Tank Truck Loading/Unloading (Onshore)

A. Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation.	____	____
B. The unloading area has quick drainage system.	____	____
C. The containment system will hold maximum capacity of any single tank truck loaded/unloaded in the plant.	____	____
D. An interlocked warning light or physical barrier system or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines.	____	____
E. Drains and outlets on tank trucks and tank cars are checked for leakage before loading or unloading.	X	____

Discussion: _____

6. Inspections and Records

	Yes	No
A. The required inspections follow written procedures	___	___
B. The written procedures and a record of inspections, signed by the appropriate supervisor, are included in the SPCC Plan.	___	___

Discussion: _____

7. Security (Excluding Production)

A. Plants handling or storing oil are fenced.	X	___
B. Entrance gates are locked and/or guarded when the plant is unattended or not in production.	X	___
C. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or non-standby status.	___	___
D. Starter controls on all oil pumps in non-operating or non-standby status are locked or electrically isolated in the "off" position.	___	___
E. The loading/unloading connections of oil pipelines are capped or blank-flanged when not in service or on standby service for extended periods.	___	___

F. Description of the lighting around the facility: General yard lighting.

Discussion: _____

8. Personnel, Training, and Spill Prevention Procedures

A. Personnel are properly instructed in the following:

(1) Operation and maintenance of equipment to prevent oil discharges, and	X	___
(2) Applicable pollution control laws, rules, and regulations.	X	___
B. Spill prevention briefings for the operating personnel are conducted on a scheduled, periodic basis.	___	___

SPILL PREVENTION PLAN CHECKLIST

Discussion: _____

_____

_____

NWT 003611

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

Section 311(j)(1)(C) of the Federal Water Pollution Control Act Amendments of 1972, authorized the President to issue regulations establishing procedures, methods, equipment and other requirements to prevent discharges of oil and hazardous substances from vessels and from onshore facilities and offshore facilities, and to contain such discharges. The President delegated the responsibility for such regulations to the Administrator of the Environmental Protection Agency. Accordingly, the Administrator developed and promulgated Oil Pollution Prevention Regulations in 40 CFR Part 112. These regulations require owners and operators on shore and offshore non-transportation-related facilities to develop and implement Spill Prevention Control and Countermeasure (SPCC) Plans to prevent the discharge of oil into the navigable waters of the United States or adjoining shoreline. Owners or operators are not required to develop an SPCC Plan if their facilities have not discharged and because of their location could not be reasonably expected to discharge oil into the navigable waters of the United States.

GENERAL INFORMATION

1. Name and location of facility:

   Name Koppers Company, Inc.
   Location:
   Direction and distance to nearest town (attach map)
   County Multnomah State Oregon

2. Name, address and phone number of owner or operator:

   Name Koppers Company, Inc.
   Address: 7540 N.W.
   Street St. Helens Rd. State Oregon
   City Portland Zip 97229 County Multnomah
   Telephone No. 503 286-3681

3. Name or title and telephone number of person in charge of facility:

   Name or title Paul Guth Telephone: 503 286-3681

4. Name and telephone number of person responsible for oil spill prevention at facility:

   Name Paul Guth Telephone: 503 286-3681

Certification

I hereby certify and attest that I am familiar with the facility and the information contained in this plan and that to the best of my knowledge and belief such information is true, complete and accurate. Further, this plan has been prepared in accordance with good engineering practices.

DONALD LEE O'DELL
Printed name of Registered Engineer
Date: JULY 3, 1974

Donald Lee O'Dell
Signature of Registered Engineer
Registration No.: Reg No. 4400

NWT 003612

SPILL RECORD

	Yes	No
1. This facility, over the past year, has had a reportable spill.	X	

2. Descriptions of any reportable spills are given below, including corrective action taken and plans for preventing recurrence:

See attachments.

Phone Numbers

Environmental Protection Agency	-	221-3250
Department of Environmental Quality	-	229-5696
Fire Department	-	232-2111
Coast Guard	-	221-2994
Police Department	-	226-7551

PREDICTION OF POTENTIAL SPILL

1. Name of plant(s): Northwest

2. Nearest navigable water:

   A. Name: Williamette River

   B. Distance and direction from plant(s): East of Plant approx. 1800 ft.

3. Possible spill sources:

Source	Type of Failure	Maximum Volume(bbls.)	Maximum Flow Rate(bbls./hr.)	Direction of Flow

See attached sheet.

SPILL PREVENTION PLAN CHECKLIST

1. Secondary containment and/or diversionary structures are used for possible spill sources:

Source	Type of Containment or Diversionary Structure

See attached sheet.

Select from:
Onshore: Dikes, berms, retaining walls; curbing; culverting, gutters, drains; weirs, booms, other barriers; spill diversion and retention ponds.
Offshore: Floating booms or fences; floating oil/water separators with storage.

2. If the containment or diversionary structures above are impracticable, state reasons for impracticability N/A

and attach a strong oil spill contingency plan and written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged. Check if attached:

Contingency Plan _____ Written Commitment _____

Discussion: _____

NWT 003614

KOPPERS COMPANY, INC.

PORTLAND, OREGON

Tank No.	Gallons (M)	Contents
1	660	Tar
2	1065	Tar
3	99	Creosote
4	99	Creosote
11	254	Tar
17	20	Creosote
18	20	Creosote
19	20	Creosote
20	317	Creosote
23	20	Creosote
33	45	Creosote
34	45	Creosote
65	880	Tar
66	240	Creosote
67	102	Creosote
68	248	Creosote
90	209	Creosote
101	47750	Creosote
	5,093,000	

Prediction of Potential Spills

2B. The water flow leaving the plant and entering the Willamette River at approx. 3/4 of a mile from the plant. The water flows South of the plant and then East into the river.

The river at closest point to the plant is 1800 ft., but the water from the plant does not enter here.

Organic Materials Division, Koppers Company, Inc.
7540 N.W. St. Helens Road, Port[illegible] Ore. 97229
Telephone 503-286-3681

WQ-

KOPPERS
Chemicals
and Coatings

OCTOBER 6, 1975

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

ATTN: MR. LARRY PATTERSON

DEAR SIR:

WE ARE IN THE PROCESS OF REVISING OUR SPILL PREVENTION, AND CONTINGENCY PLAN TO CONFORM TO OUR WASTE WATER PERMIT. THE PLAN WILL BE COMPLETED BY OCTOBER 31, 1975.

SINCERELY

Paul W. Guth

PAUL W. GUTH
PLANT SUPERINTENDENT

PWG:ip

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone 412-391-3300

LDT

WQ-

Certified Mail
Return Receipt Requested

KOPPERS

August 20, 1975

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

Attn: Mr. Larry Patterson

Dear Sir:

With respect to paragraph 14 on page 4 of 7 of Permit No. 2180-J issued to Koppers Company, Inc., this is to certify that in the event of a reduction, loss or failure of a power source, Koppers Company shall halt, reduce or otherwise control production and/or all discharges in order to maintain compliance with the terms and conditions of Permit No. 2180-J.

Very truly yours,

P. W. Guth

P. W. Guth
Plant Superintendent

Organic Materials Division, Kop[illegible] Company, Inc.
Pittsburgh, Pa. 15219, Telephon[illegible]2-391-3300

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
JUL 31 1975
WATER QUALITY CONTROL

Certified Mail
Return Receipt Requested

WQ-

KOPPERS

July 29, 1975

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

Re: Koppers Company, Inc.
7540 N.W. St. Helens Road
Portland, Oregon 97229
Permit No. 2180-J

Gentlemen:

Sampling and analytical procedures will be according to the Standard Methods of the Environmental Protection Agency and the Department of Environmental Quality. For 001, the boiler blowdown sample will be taken at the south end of the boiler house, the tank farm runoff sample at the southwest corner of the plant, and storm water runoff sample at the center catch basin in the parking area. For 002, the cooling water sample will be taken at the base of the dike wall at the southeast corner of the tank farm, and the air compressor cooling water sample will be taken at the east side of the boiler house.

Very truly yours,

Paul W. Guth

Paul W. Guth
Plant Superintendent

of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: Files

Date: July 14, 1975

From: Douglas D. Fraley

Subject: Koppers Chemical

On July 10, 1975, Larry Patterson and I made an inspection of Koppers Company on St. Helens Road. The purpose of the inspection was to check on completion of intermediate controls for elimination of oil contaminated waters. This inspection revealed the following:

1. The three-stage filter has been installed at the outfall of the drain leaving their property. The filter material being used is Ecelsior.

2. The material at track #3 has been removed and fresh material put back in. This will be covered with gravel.

3. The loading spouts are being capped to prevent spillage when not in use.

4. The unloading line has been revamped to minimize chance of spillage. All flex hoses have been capped when not in use.

5. The material at track #5 has been removed and fresh soil put back in, then covered with gravel.

Conclusion:

They have done a good job of cleaning up around their plant. I believe that this will help eliminate the oil discharge from the plant. The filter should be observed during the wet weather when the water flow is high.

DDF:gcd
cc: Portland Regional Office, DEQ
U. S. Coast Guard
Water Quality Control, DEQ

DEQ 1

ROBERT W. STRAUB
GOVERNOR

KESSLER R. CANNON
Director

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, OREGON • 97205 • (503) 238-847

June 9, 1975

Koppers
Organic Materials Division
Koppers Company, Inc
7540 N. W. St. Helens Road
Portland, Oregon 97229

Attention: Mr. Paul W. Guth, Plant Superintendent

Re: Oil Contaminated Water

Gentlemen:

This will acknowledge receipt of your two letters dated May 27 and May 28, 1975, in regard to oil contaminated waters being discharged from your property.

The program set forth in the May 28, 1975 letter seems to be timely and will serve as an intermediate control until you are able to meet the provisions of your NPDES permit referred to in the May 27, 1975 letter.

As agreed to, in our conversation on May 30, 1975, the completion date for the intermediate controls will be July 1, 1975.

The Department appreciates the Company's action in this incident. Your concern for the environment in Oregon is also appreciated.

Cordially,

KESSLER R. CANNON
Director

Douglas D. Fraley
Division Engineer

DDF/bw

cc: U. S. Coast Guard, Portland, Oregon
cc: Water Quality Control
cc: Portland Region

Organic Materials Division, Koppers Company, Inc.
7540 N.W. St. Helens Road, Portland, Ore. 97229
Telephone 503-286-3681

KOPPERS
Chemicals
and Coatings

MAY 28, 1975

DEPT. OF ENVIRONMENTAL QUALITY
1234 S.W. MORRISON STREET
PORTLAND, OREGON 97205
ATTN: DOUGLAS D. FRALEY

GENTLEMEN:

THIS IS THE PROGRAM FOR OUR TIMELY ELIMINATION OF MATERIAL WHICH COULD CAUSE THE WATERS TO BE CONTAMINATED.

WE WILL PUT IN A THREE STAGE FILTER SYSTEM AT THE OUTFALL OF THE WATER LEAVING OUR PLANT.

AT TRACK #3 WE WILL PICK UP THE SOILED GROUND AND REPLACE WITH FRESH MATERIAL. BETWEEN THE TRACK WE WILL LET THE BALLAST SHOW. THE WALLED-IN CEMENT AREA BY TRACK #3 WILL ALSO HAVE THE SOILED GROUND REMOVED AND THEN BE REPLACED WITH FRESH MATERIAL.

THE LOADING SPOUTS WILL HAVE CONTAINERS TO CATCH ANY DRIPPINGS. THERE WILL BE PORTABLE CATCH BASINS BENEATH THE TANK CARS TO CATCH ANY DRIPPINGS ALSO.

THE UNLOADING LINE WILL BE REVAMPED TO MINIMIZE ANY CHANCE OF SPILLAGE. THE FLEX HOSES WILL CONTAIN CAPS FOR THE HOSES WHEN THEY ARE NOT IN USE.

TRACK #5 WILL HAVE THE SOILED MATERIAL REMOVED BETWEEN AND ON EITHER SIDE OF THE TRACK. SOME PORTIONS WILL BE FILLED IN BETWEEN THE TRACKS BECAUSE OF VEHICLE TRAFFIC OVER THE TRACKS.

THE AREA AROUND #42 TANK WILL THEN BE CLEANED OF SOILED GROUND AND THIS REPLACED WITH FRESH MATERIAL.

THE TAR PUMPS AREA WILL BE CLEANED AND HAVE DRIP PANS FOR ANY LEAKAGE.

RESPECTFULLY,

Paul W. Guth

PAUL W. GUTH

PLANT MANAGER

Organic Materials Division, Kopp[illegible]ompany, Inc.
7540 N.W. St. Helens Road, Portla[illegible]re. 97229
Telephone 503-286-3681

KOPPERS
Chemicals
and Coatings

MAY 28, 1975

DEPT. OF ENVIRONMENTAL QUALITY
1234 S.W. MORRISON STREET
PORTLAND, OREGON 97205
ATTN: DOUGLAS D. FRALEY

GENTLEMEN:

THIS IS THE PROGRAM FOR OUR TIMELY ELIMINATION OF MATERIAL WHICH COULD CAUSE THE WATERS TO BE CONTAMINATED.

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THE LOADING SPOUTS WILL HAVE CONTAINERS TO CATCH ANY DRIPPINGS. THERE WILL BE PORTABLE CATCH BASINS BENEATH THE TANK CARS TO CATCH ANY DRIPPINGS ALSO.

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TRACK #5 WILL HAVE THE SOILED MATERIAL REMOVED BETWEEN AND ON EITHER SIDE OF THE TRACK. SOME PORTIONS WILL BE FILLED IN BETWEEN THE TRACKS BECAUSE OF VEHICLE TRAFFIC OVER THE TRACKS.

THE AREA AROUND #42 TANK WILL THEN BE CLEANED OF SOILED GROUND AND THIS REPLACED WITH FRESH MATERIAL.

THE TAR PUMPS AREA WILL BE CLEANED AND HAVE DRIP PANS FOR ANY LEAKAGE.

RESPECTFULLY,

Paul W. Guth

PAUL W. GUTH

PLANT MANAGER

DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

NWRO

2
TRS
LDP

May 30, 1975

WQ -
Koppers
Organic Materials Division
7540 N. W. St. Helens Road
Portland, Oregon 97229

Attention: Mr. Paul W. Guth, Plant Superintendent

Re: W. Q. - Koppers
Multnomah County

Gentlemen:

This letter will refer to your letter, dated May 20, 1975, concerning your comments relative to the proposed NPDES Waste Discharge Permit for your Portland plant.

The phenol effluent discharge limitations of 0.5 mg/l (monthly average) and 0.7 mg/l (daily maximum) as required in the permit beginning July 1, 1977, are the minimum levels which we believe we can allow from your plant. The Water Quality Standards for the Willamette River for phenols is 0.001 mg/l. Even with a discharge level of 0.5 mg/l from your plant, your waste will have to be diluted 500 times to meet the standards.

Furthermore, we believe your Company can practicably install a waste water control system which can reliably meet these effluent limitations. It is true that an oil-water separator alone will probably not be able to achieve these limits, but a separator followed by a small aerated lagoon should provide sufficient treatment.

In regards to your comment relative to the oil and grease effluent discharge limitations, it should be pointed out that oil terminals in the Portland area can consistently meet oil grease limits of 10 mg/l (monthly average) and 15 mg/l (daily maximum). Most of these terminals use only a gravity separator for treatment. Consequently, we can find no reason for increasing the daily maximum oil and grease limitation to 20 mg/l.

COPY

DEQ-2

Finally, as proposed, the permit does not prohibit you from discharging your waste water to the City of Portland sewerage system. Should your Company be granted permission from the City to discharge wastes to the City's sewerage system, you could connect your wastes to that system without violating the permit or receiving Departmental approval. Consequently, there is no need to add a condition to the permit to allow you to connect to the City of Portland sewerage system.

Should you have questions relative to this matter, please feel free to contact Mr. Dick Nichols in this office at 229-5309.

Very truly yours,

KESSLER R. CANNON
Director

Charles K. Ashbaker, Administrator
Water Pollution Control Division
Water Quality Program

RJN:rb

cc: NWRO (DEQ)

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone 412-391-3300

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
MAY 27 1975
WATER QUALITY CONTROL

KOPPERS

May 20, 1975

Mr. Charles K. Ashbaker, Administrator
Water Pollution Control Division
Dept. of Environmental Quality
1234 S.W. Morrison Street
Portland, OR 97205

Re: W.Q. - Koppers
Multnomah County

Dear Sir:

We wish to comment on the proposed NPDES permit for Koppers' Portland, Oregon plant. The proposed permit as presently written in paragraph 5 on page 2 requires that plant effluent be treated to reduce phenol to less than 0.5 mg/l as a monthly average and 0.7 mg/l as a daily maximum. These limits are quite stringent, and would be difficult to achieve consistently. In view of the low discharge volume from this small and intermittently operated plant, these limits should be 1.0 mg/l as a monthly average and 2.0 mg/l as a daily maximum.

The proposed daily maximum limitation for oil and grease as shown in paragraph 5 on page 2 is 15 mg/l. This limitation should be revised to 20 mg/l in recognition of the fact that any well-operated effluent treatment system is still subject to fluctuations.

The proposed permit is written such that plant effluent must be treated and discharged to the Willamette River. Koppers is planning to investigate as part of the compliance program, various methods to reduce effluent volume throughout the plant. If these methods are successful, it may be possible to reduce volume to the extent that this effluent would be acceptable to the City of Portland for discharge to the municipal sewer system. Therefore, it is requested that the permit be revised to allow for this possibility in the event that it can be achieved.

The permit expiration date shown in the upper right-hand corner of each page should be revised.

Thank you for this opportunity to comment.

Very truly yours,

P. W. Guth

P. W. Guth
Plant Superintendent

TEO
TMB
LDP

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, OREGON • 97205 • (503) ~~229-XX~~ 238-8471

ROBERT W. STRAUB
GOVERNOR

KESSLER R. CANNON
Director

April 29, 1975

WQ

Koppers
Organic Materials Division
Koppers Company, Inc.
7540 N. W. St. Helens Road
Portland, Oregon 97229

Attention: Mr. Paul W. Guth

Re: Meeting of April 24, 1975

Gentlemen:

This letter is in reference to our meeting of April 24, 1975, concerning the oil contaminated waters which are being discharged from your property.

Te reemphasize our conversation, you are responsible for any problems which occur as a result of the oil on your property, as well as any cleanup costs.

Specifically, oily waste has been deposited on your property such that it is entering or likely to enter public waters, which is in violation of Oregon Revised Statutes 468.785, a copy of which you received at our meeting.

Therefore, it is requested that you submit a program for a timely elimination of this problem to the Department within thirty (30) days of receipt of this letter.

Your immediate attention to this matter is appreciated.

Respectfully,

KESSLER R. CANNON
Director

Douglas D. Fraley
Division Engineer

DDF/bw

cc: Water Quality
Portland Region
U. S. Coast Guard

DEPARTMENT OF ENVIRONMENTAL QUALITY

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

April 4, 1975

Koppers Company
1201 Koppers Building
Pittsburg, Pennsylvania 15219

Re: File No. 47430

Gentlemen:

This is the draft of the permit that was sent out on notice on April 4, 1975. The public notice period will be up May 4, 1975, after which the permit will be issued.

If you have any further comments, please let us know within this 30-day period.

Very truly yours,

KESSLER R. CANNON
Director

Charles K. Ashbaker
Administrator
Water Pollution Control Division

CKA:rb

Enclosure

NWRO, DEQ

NORTHWEST REGION OFFICE
RECEIVED
APR 1975
DEPARTMENT OF
ENVIRONMENTAL QUALITY

COPY

DEQ-2

THE CITY OF
PORTLAND
OREGON

DEPARTMENT OF
PUBLIC WORKS

CONNIE McCREADY
COMMISSIONER

OFFICE OF
PUBLIC WORKS
ADMINISTRATOR

400 S.W. SIXTH AVE.
PORTLAND, OR. 97204

To C. 4, PDC
copy to REG.

OFFICE OF DEPUTY DIRECTORS
RECEIVED
MAR 28 1975
DEPT. OF ENVIROMENTAL QUALITY

March 27, 1975

Department of Environmental Quality
1234 SW Morrison Street
Portland, Oregon 97205

Attn: E. J. Weathersbee, Director, Technical Services

WQ- Re: Koppers Co. - 7540 NW St. Helens Road, Portland

Gentlemen:

We are in receipt of your letter dated March 19, 1975 inviting comments regarding NPDES permit application OR-000077-9 for the above referenced discharger.

Your draft requires the permittee to submit plans to the department by May 1, 1975, for connecting all wastewaters to the City of Portland's sewerage system by November 1, 1975. We will be pleased to accept the permittee's effluent subject to meeting Portland's sewer regulations. Accordingly, we request the opportunity to review concurrently with your department, all plans prepared by the permittee regarding proposed drainage and pretreatment facilities.

Please contact Harry Edmonds of our Industrial Wastewater staff (telephone 248-4678) if you have any comments or questions regarding this matter.

Very truly yours,

L. D. BROWNSON, P. E.
Principal Engineer

HGE:al

cc: Dick Nichols - DEQ

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
APR 2 1975
WATER QUALITY CONTROL

Pittsburgh, Pa. 15219, Telephone 412-391-3300

7.R3
COP

WQ -

Certified Mail
Return Receipt Requested

KOPPERS

March 27, 1975

Department of Environmental Quality
Northwest Region
1010 N.E. Couch Street
Portland, Oregon 97232

Attn: Mr. Richard J. Nichols
Engineer-Technical Services

Re: Appl. No. OR-000077-9
File No. 47430

Gentlemen:

We are in receipt of the draft NPDES permit for the Koppers Company plant located at 7540 N.W. St. Helens Road, and wish to make several comments on it.

Since the proposed permit specifies that the discharge limitations will be achieved by connecting all wastewaters to the City of Portland sewage system, the City must agree to accept this effluent before the permit can be issued in the final form. The compliance program to be prepared by Koppers must have a firm basis on which to proceed.

The compliance schedule should be revised so that final plans for connection to the sewage system are due 60 days after the City accepts this connection principle. Engineering cannot begin on the connection facilities until the City provides a firm design basis by agreeing to accept the effluent. Discharge to the municipal system would be 9 months after the connection plan is approved by the City. This period of time is required due to the delivery time for pumps and other equipment of approximately 34 weeks.

Thank you for this opportunity to comment.

Very truly yours,

P. W. Guth

P. W. Guth
Superintendent

THE CITY OF
PORTLAND
OREGON

DEPARTMENT OF
PUBLIC WORKS

CONNIE McCREADY
COMMISSIONER

OFFICE OF
PUBLIC WORKS
ADMINISTRATOR

400 S.W. SIXTH AVE
PORTLAND, OR. 97204

March 27, 1975

Department of Environmental Quality
1234 SW Morrison Street
Portland, Oregon 97205

Attn: E. J. Weathersbee, Director, Technical Services

WQ-

Re: Koppers Co. - 7540 NW St. Helens Road, Portland

Gentlemen:

We are in receipt of your letter dated March 19, 1975 inviting comments regarding NPDES permit application OR-000077-9 for the above referenced discharger.

Your draft requires the permittee to submit plans to the department by May 1, 1975, for connecting all wastewaters to the City of Portland's sewerage system by November 1, 1975. We will be pleased to accept the permittee's effluent subject to meeting Portland's sewer regulations. Accordingly, we request the opportunity to review concurrently with your department, all plans prepared by the permittee regarding proposed drainage and pretreatment facilities.

Please contact Harry Edmonds of our Industrial Wastewater staff (telephone 248-4678) if you have any comments or questions regarding this matter.

Very truly yours,

LDB

L. D. BROWNSON, P. E.
Principal Engineer

HGE:al

cc: Dick Nichols - DEQ

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone [illegible]91-3300

Air Mail
Return Receipt Requested

KOPPERS

December 11, 1974

Tom ~~Bispham~~
No problem
with us.

Mr. Richard J. Nichols
Engineer-Technical Services
Department of Environmental Quality
1010 N.E. Couch Street
Portland, Oregon 97232

Subject: Application No. 071-OYA-2-000189

Dear Mr. Nichols:

This is to inform you that Koppers intends to resume operations temporarily at 2570 N.W. Street and St. Helens Road in order to produce an experimental batch of 1,000 tons of electrode binder pitch to be used in a trial run at a local customer's plant. The plant will operate part time for four to six weeks to produce this material and then cease operating while the material is evaluated by our customer. We do not expect to produce any changes in our present effluent discharge because of this operation. We are proceeding to draw up plans to control our tank farm infiltration as outlined in Mr. Guth's letter of October 30, 1974.

Very truly yours,

R L Shannon

R. L. Shannon
Engineering Department

RLS:jfc

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone [redacted]-391-3300

File
W. G
Mill. Co.

Certified Mail
Return Receipt Requested

KOPPERS

October 30, 1974

Mr. Richard J. Nichols
Engineer - Technical Services
Department of Environmental Quality
1010 N.E. Couch Street
Portland, Oregon 97232

Re: Appl. No. 071-OYA-2-000189

Dear Sir:

On March 7, 1974, a letter was sent to Mr. Charles K. Ashbaker of your office advising that production at this location had been temporarily suspended, and that effluent sampling at that time would not be representative. On September 24, 1974, you visited the plant to review plant operations and the effluent permit application. As of this date, production has not resumed, and plans are still indefinite as to when it will resume.

The major portion of the effluent from this location is ground water which collects in the tank farm area. The floor of the tank farm, which is below grade, will be paved to reduce the volume of ground water which infiltrates this area. This water will be pretreated in the API separator and then discharged, together with boiler house effluent, to the sanitary sewer which has recently been extended through the plant property.

These plans will be reviewed with the sewer authority to obtain their approval.

Very truly yours,

Paul W. Guth

Paul W. Guth
Plant Superintendent

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone 412-391-3300

KOPPERS

January 3, 1974

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

ATTN: Mr. Charles K. Ashbaker

Dear Sir:

In response to your letter of December 17, 1973, we have reviewed our pending Refuse Act permit application 071-OYA-2-000189, and are unsure if it is still accurate. Therefore, we are undertaking a program of sampling and analysis of this discharge. We expect to report revisions, if any, in that application to you by April 1, 1974.

Very truly yours,

Paul W. Guth

Paul W. Guth
Superintendent
Koppers Company, Inc.
7540 N. W. St. Helens Road
Portland, Oregon 97229

PWG/mak

FORM APPROVED
OMB NO. 49-R 0408

DEPARTMENT OF THE ARMY, CORPS OF ENGINEERS

JUN 29 1971

APPLICATION FOR PERMIT TO DISCHARGE OR WORK IN NAVIGABLE WATERS AND THEIR TRIBUTARIES

OR-000077-9
File # 47430 000189

SECTION I. GENERAL INFORMATION

1. State	Application Number (to be assigned by Corps of Engineers)			
O R	07L	09A	2	------
	Div.	Dist.	Type	Sequence No.

2. Name of applicant and title of signing official
Koppers Company, Inc.
R. E. Spatz - Vice President & Asst. General Manager - Organic Matls. Div.

3. Mailing address of applicant
Koppers Company, Inc.
1201 Koppers Building
Pittsburgh, Pennsylvania 15219

4. Name, address, telephone number and title of applicant's authorized agent for permit application coordination and correspondence.
Paul W. Guth, Plant Superintendent
7540 N.W. St. Helena Road
Portland, Oregon 97229
503-286-3681

NOTE TO APPLICANT: Refer to the pamphlet entitled "Permits for Work and Structures in and for Discharges or Deposits into Navigable Waters" before attempting to complete this form.

Required Information

a. All information contained in this application will, upon request, be made available to the public for inspection and copying. A separate sheet entitled "Confidential Answers" must be used to set out information which is considered by the applicant to constitute trade secrets or commercial or financial information of a confidential nature. The information must clearly indicate the item number to which it applies. Confidential treatment can be considered only for that information for which a specific written request of confidentiality has been made on the attached sheet. However, in no event will identification of the contents and frequency of a discharge be recognized as confidential or privileged information.

b. The applicant shall furnish such supplementary information as is required by the District Engineer in order to evaluate fully an application.

c. If additional space is needed for a complete response to any item on this form, attach a sheet entitled "Additional Information." Indicate on that sheet the item numbers to which answers apply.

d. Drawings required by items 20 and 21 should be attached to this application. Other papers which must be attached to this application include, if applicable, copies of a water quality certification or a written communication which describes water quality impact (see Item 22 and Item 10 of Section II below), the additional information sheet(s) in "c" above, and the confidential information sheet described in "a" above.

Fees

If any discharge or deposit is involved, an application fee of $100 must be submitted with this application. An additional $50 is required for each additional point of discharge or deposit.

Signature

a. If a discharge is involved, an application submitted by a corporation must be signed by the principal executive officer of that corporation or by an official of the rank of corporate vice president or above who reports directly to such principal executive officer and who has been designated by the principal executive officer to make such applications on behalf of the corporation. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor. Other signature requirements are discussed in the pamphlet.

b. If no discharge is involved, an application may be signed by the applicant or his authorized agent.

Application is hereby made for a permit or permits to authorize the activities described herein. I certify that I am familiar with the information contained in this application, and that to the best of my knowledge and belief such information is true, complete, and accurate.

R. E. Spatz
Signature of Applicant

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

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

FOR CORPS OF ENGINEERS USE ONLY

Acronym name of applicant

Are discharge structures
Major? ☐ Minor? ☐ N/A? ☐

Date received, form not complete — — — — — —
Date received, form complete but without certificate — — — — — —
Date received, form complete — — — — — —
Date of Cert./Ltr. — — — — — —
day mo yr

Date sent to EPA, form not complete — — — — — —
Date sent to EPA, NOAA, D/I, AEC, FPC in complete form — — — — — —
day mo yr

ENG FORM 4345
MAY 71

NWT 003634

5. Date 6 mo 29 day 71 yr

(Office use only) 0 -0YA-2-000189

6. Check type of application: a. Original [X] b. Revision [ ]

7. Number of original application JUN 21 1972

8. Name of facility where discharge or construction will occur.

Koppers Company, Inc.
Northwest Plant

9. Full mailing address of facility named in item 8 above.

Koppers Company, Inc.
7540 N. W. St. Helena Road
Portland, Oregon 97229

10. Names and mailing addresses of all adjoining property owners whose property also adjoins the waterway.

Northwest Natural Gas Co.
7900 N. W. St. Helena Road
Portland, Oregon 97229

Rivergate Rock Products
7881 N. W. St. Helena Road
Portland, Oregon 97229

11. Check to indicate the nature of the proposed activity:
a. Dredging [ ] b. Construction [ ] c. Construction with Discharge [ ] b. Discharge only [X]

12. If activity is temporary in nature, estimate its duration in months.

If application is for a discharge:

13. List intake sources

Source	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal or private water supply system	.054
Surface water body	
Ground water	
Other	

14. Describe water usage within the plant

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Cooling water	.014
Boiler Feed water	.040
Process water	
Sanitary system*	.001
Other	

15. List volume of discharges or losses other than into navigable waters.

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal waste treatment system	
Surface containment	.002
Underground disposal	
Waste Acceptance firms	
Evaporation	.018
Consumption	

* Indicate number employees served per day 12

ENG FORM 4345 MAY 71

NWT 003635

If structures exist, or dredging, filling or o[illegible] nstruction will occur, the precise location of the activity must be desc[illegible].

(Office use only) 000189

JUN 29 1971

a. Name the corporate boundaries within which the structures exist or the activity will occur.

16. State: Oregon 17. County: Multnomak 18. City or Town: Portland

b. Name of waterway at the location of the activity

19. Willamette River

20. Maps and sketches which show the location and character of each structure or activity, including any and all outfall devices, dispersive devices, and non-structural points of discharge, must be attached to this application.

21. For construction or work in navigable waters for which a seperate permit is sought under 33 U.S.C. 403, the character of each structure must be fully shown on detailed plans to be submitted with this application. Note on the drawings those structures for which separate discharge information (Section II of this form) has been submitted.

22. List all approvals or denials granted by Federal, interstate, State or local agencies for any structures, construction, discharges or deposits described in this application.

Type of document	Id. No.	Date	Issuing Agency
Letter	1 W 3-0	1-11-66	Oregon State Sanitary Authority

23. Check if facility existed or was lawfully under construction prior to April 3, 1970. [X]

24. If dredging or filling will occur:

State the type of materials involved, their volume in cubic yards, and the proposed method of measurement.

Not Applicable

25. Describe the proposed method of instrumentation which will be used to measure the volume of any solids which may be deposited and to determine its effect upon the waterway.

Not Applicable

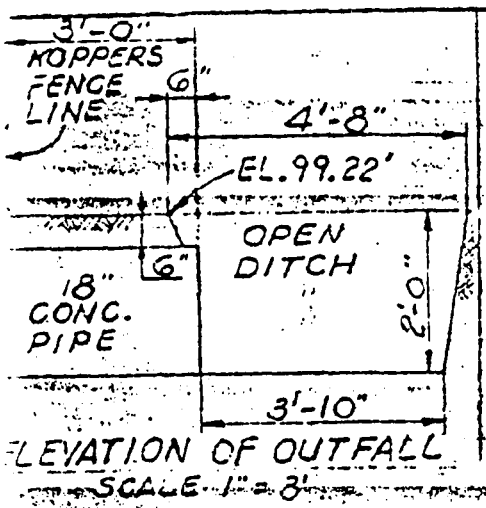
26. State rates and periods of deposition described in Item 25.

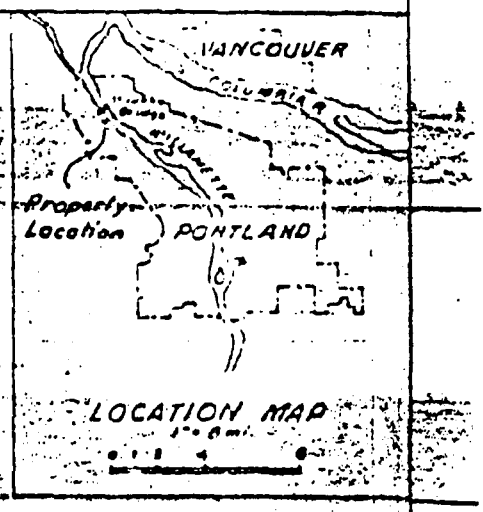
Not Applicable

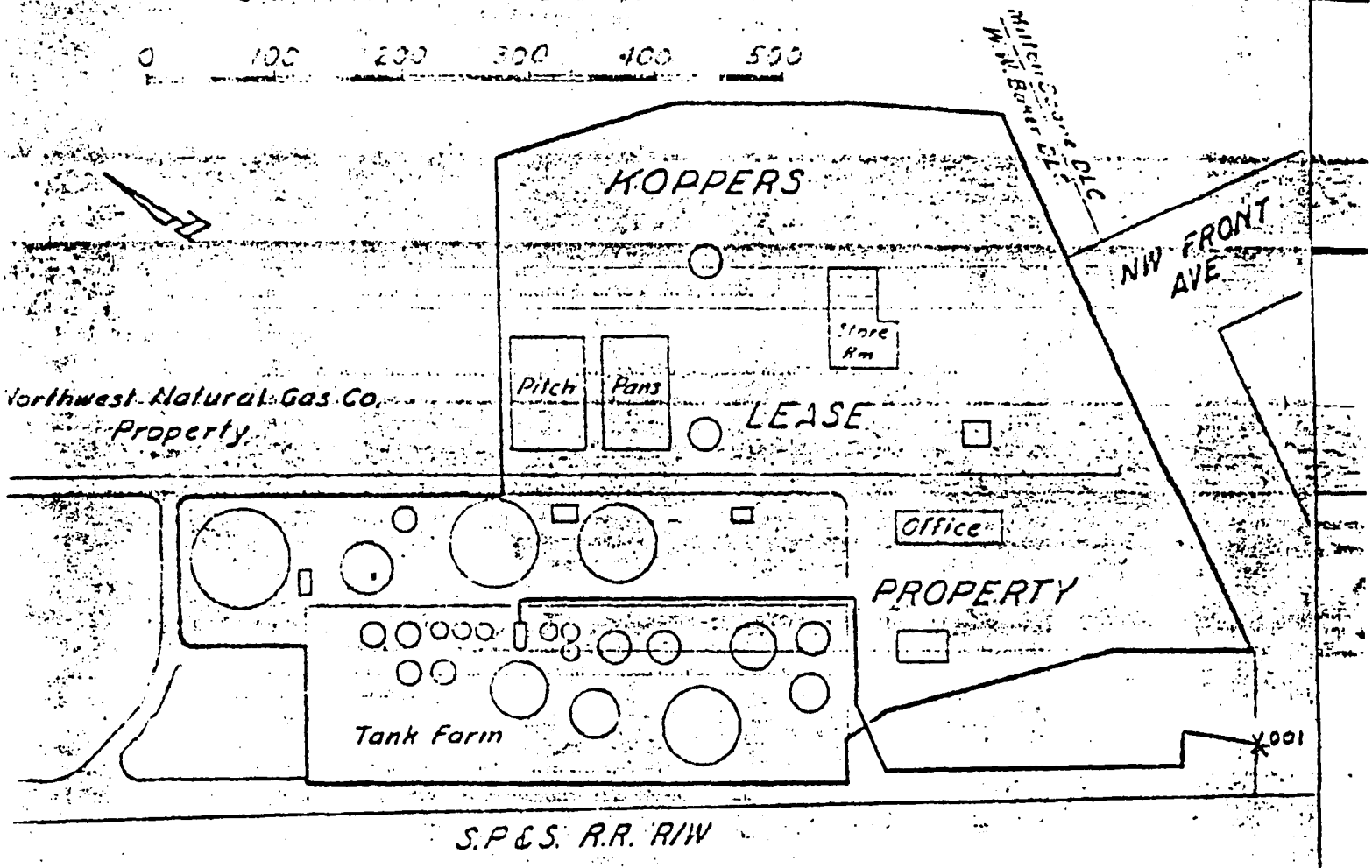
NWT 003636

000139

NOV 19 1971







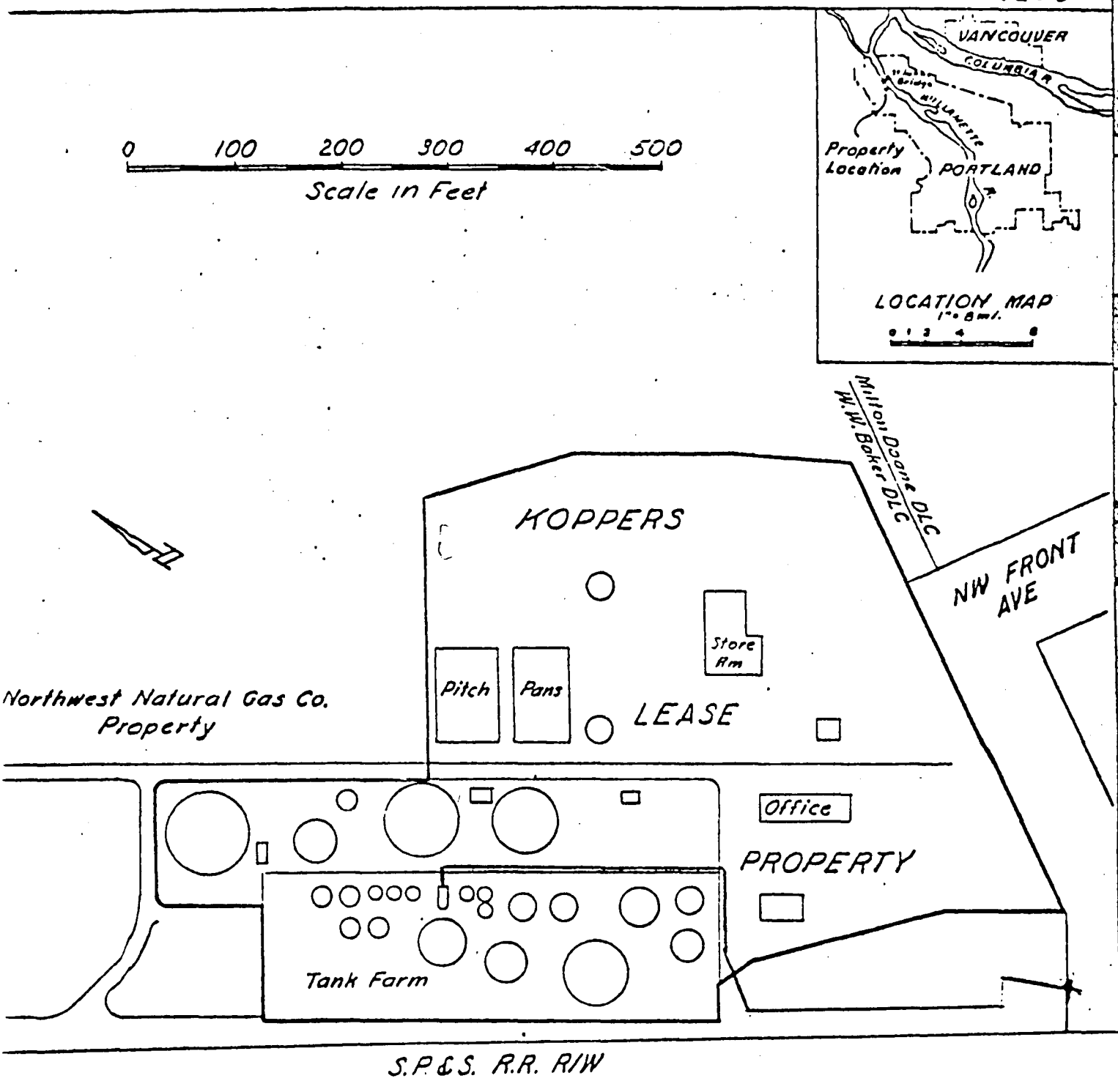
Location of Koppers Lease Property on Northwest Natural Gas Co. property at 7900 NW St Helens Rd., City of Portland, County of Multnomah, State of Oregon.

June 3, 1971
REVISED Nov. 5, 1971

NWT 003637

JUN 29 1971

000189



Location of Koppers Lease Property on Northwest Natural Gas Co. property at 7900 NW St Helens Rd., City of Portland, County of Multnomah, State of Oregon.

June 3, 1971

NWT 003638

SECTION [illegible] PLANT PROCESS AND DISCHARGE DE[illegible]PTION

1. Discharge described below is
a. Present [X] b. Proposed new or changed [ ]

2. Implementation schedule [ ]

(Office use only) NOV 19 1971 000139

Name of corporate boundaries within which the point of discharge is located.

3. State: Oregon
4. County: Muttnomach
5. City or Town: Portland

6. Discharge Serial No.: 001

State the precise location of the point of discharge.

7. Latitude N 45 Degrees; 3 5 Min; __ __ Sec.
8. Longitude W 122 Degrees; 4 6 Min; __ __ Sec.

9. Name of waterway at the point of discharge.
Unnamed Drainage Ditch.

10. Has application for water quality certification or description of impact been made? If so, give date:

Date: 6 (mo) 29 (day) 71 (yr)
Check if certificate is attached to form [ ]
Name Issuing Agency: Oregon Dept. of Environmental Quality

11. Narrative description of activity (include terms of general 4-digit Standard Industrial Classification, and specific manufacturing process).

Primarily engaged in manufacturing industrial organic chemicals by the distillation of coke oven tar.

12. Standard industrial classification number.
SIC 2818

13. Principal product.
See #15

14. Amount of principal product produced per day.
See #16

15. Principal raw material.
Coke Oven Tar

16. Amount of principal raw material consumed per day.
280,000 lbs.

17. Number of batch discharges per day.
Not Applicable.

18. Average gallons per batch discharge.
Not Applicable.

19. Date discharge began.
6 (mo) 1 (day) 66 (yr)

20. Date discharge will begin.
__ (mo) __ (day) __ (yr)

21. Describe waste abatement practices.

Water discharged at this outfall is contained in a separate drainage system where pumps with special seals and local separators are employed.

ESEPAR, EPUMPS, LOCALS.

PHYSICA[illegible]CRIPTION OF INTAKE WATER AND D[illegible]ARGE

Intake | Discharge | (Office use only) JUN 29 1971 000189

Discharge Serial No. 001

Parameter and (Code)	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	AVERAGE (DAILY) (3)	MINIMUM (OPERATING YEAR) (4)	MAXIMUM (OPERATING YEAR) (5)	SAMPLE FREQUENCY (6)	CONTINUOUS MONITORING (7)
Flow (Gallons per day) 00056		54,000	34,000	Data Not Avail.	Data Not Avail.	OTHR	ABS
pH 00400		6.9	8.8	Data Not Avail.	Data Not Avail.	OTHR	ABS
Temperature (Winter) (°F) 74028		45	85	Data Not Avail.	Data Not Avail.	OTHR	ABS
Temperature (Summer) (°F) 74027		52	110	Data Not Avail.	Data Not Avail.	OTHR	ABS

23. **DISCHARGE CONTENTS**

PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT
Color 00080	X		Aluminum 01105		X	Nickel 01067		X
Turbidity 00070	X		Antimony 01097		X	Selenium 01147		X
Radioactivity 74050		X	Arsenic 01002		X	Silver 01077		X
Hardness 00900	X		Beryllium 01012		X	Potassium 00937	X	
Solids 00500	X		Barium 01007		X	Sodium 00929	X	
Ammonia 00610	X		Boron 01022		X	Titanium 01152		X
Organic Nitrogen 00605	X		Cadmium 01027		X	Tin 01102		X
Nitrate 00620	X		Calcium 00916	X		Zinc 01092		X
Nitrite 00615		X	Cobalt 01037		X	Algicides 74051		X
Phosphorus 00665	X		Chromium 01034		X	Oil and Grease 00550	X	
Sulfate 00945	X		Copper 01042		X	Phenols 32730	X	
Sulfide 00745	X		Iron 01045	X		Surfactants 38260		X
Sulfite 00740		X	Lead 01051		X	Chlorinated Hydrocarbons 74052		X
Bromide 71870		X	Magnesium 00927		X	Pesticides 74053		X
Chloride 00940	X		Manganese 01055		X	Fecal Streptococci Bacteria 74054		X
Cyanide 00720	X		Mercury 71900		X	Coliform Bacteria 74056		X
Fluoride 00951		X	Molybdenum 01062		X			

ENG FORM MAY 71 4345-1

NWT 003640

24. Has all known hazardous or potentially hazardous substances in your plant been inventoried?

☐ Yes ☒ No

JUL 29 1971 000189

24b. If yes, have steps been taken to insure that there exists no possibility of any such known hazardous or potentially hazardous substance entering this discharge?

☐ Yes ☐ No

25. Remarks. Principal Raw Material is used as process unit in Part A,Column 4. Item 24a. is checked NO even though we feel that we have such substances under control, because the question is too vague and all encompassing to answer yes comfortably. In Part A all maximum values are arbitrarily taken as 140% of the average in lieu of sufficient data. Part A information is based upon a 24 hour composite sample.

The information above completes the basic reporting requirements which are required of all applicants. Those applicants whose discharge results from an activity included within any of the Standard Industrial Classification Code (SIC Code) categories listed below must complete Part A of this form as well.

CRITICAL INDUSTRIAL GROUPS

SIC	098	FISH HATCHERIES, FARMS, AND PRESERVES
SIC	10–14	DIVISION B – MINING
SIC	201	MEAT PRODUCTS
SIC	202	DAIRY PRODUCTS
SIC	203	CANNED PRESERVED FRUITS, VEGETABLES (EXCEPT SEAFOODS, SIC 2031 AND 2036)
SIC	2031, 2036	CANNED AND CURED FISH AND SEAFOODS; FRESH OR FROZEN PACKAGED FISH AND SEAFOODS
SIC	204	GRAIN MILL PRODUCTS
SIC	206	SUGAR
SIC	207	CONFECTIONARY AND RELATED PRODUCTS
SIC	208	BEVERAGES
SIC	209	MISCELLANEOUS FOOD PREPARATIONS AND KINDRED PRODUCTS
SIC	22	TEXTILE MILL PRODUCTS
SIC	23	APPAREL AND OTHER FINISHED PRODUCTS MADE FROM FABRICS AND SIMILAR MATERIALS
SIC	242	SAWMILLS AND PLANING MILLS
SIC	2432	VENEER AND PLYWOOD
SIC	2491	WOOD PRESERVING
SIC	26	PAPER AND ALLIED PRODUCTS
SIC	281	INDUSTRIAL INORGANIC AND ORGANIC CHEMICALS (EXCEPT SIC 2818)
SIC	2818	INDUSTRIAL ORGANIC CHEMICALS
SIC	282	PLASTICS MATERIALS AND SYNTHETIC RESINS, SYNTHETIC RUBBER, SYNTHETIC AND OTHER MAN-MADE FIBERS, EXCEPT GLASS
SIC	283	DRUGS
SIC	284	SOAP, DETERGENTS, AND CLEANING PREPARATIONS, PERFUMES, COSMETICS, AND OTHER TOILET PREPARATIONS
SIC	285	PAINTS, VARNISHES, LACQUERS, ENAMELS, AND ALLIED PRODUCTS
SIC	2871	FERTILIZERS
SIC	2879	AGRICULTURAL PESTICIDES, AND OTHER AGRICULTURAL CHEMICALS, NOT ELSEWHERE CLASSIFIED
SIC	2891	ADHESIVES AND GELATIN
SIC	2892	EXPLOSIVES
SIC	29	PETROLEUM REFINING AND RELATED INDUSTRIES
SIC	3011, 3069	TIRES AND INNER TUBES; FABRICATED RUBBER PRODUCTS, NOT ELSEWHERE CLASSIFIED
SIC	3079	MISCELLANEOUS PLASTICS PRODUCTS
SIC	311	LEATHER TANNING AND FINISHING
SIC	32	STONE, CLAY, GLASS, AND CONCRETE PRODUCTS
SIC	331	BLAST FURNACES, STEEL WORKS, AND ROLLING AND FINISHING MILLS
SIC	332	IRON AND STEEL FOUNDRIES
SIC	333 334	PRIMARY SMELTING AND REFINING OF NONFERROUS METALS; SECONDARY SMELTING AND REFINING OF NONFERROUS METALS
SIC	336	NONFERROUS FOUNDRIES
SIC	347	COATING, ENGRAVING, AND ALLIED SERVICES
SIC	35	MACHINERY, EXCEPT ELECTRICAL
SIC	36	ELECTRICAL MACHINERY, EQUIPMENT, AND SUPPLIES
SIC	37	TRANSPORTATION EQUIPMENT (EXCEPT SHIP BUILDING AND REPAIRING, SIC 3731)
SIC	3731	SHIP BUILDING AND REPAIRING
SIC	491	ELECTRIC COMPANIES AND SYSTEMS
SIC	493	COMBINATION COMPANIES AND SYSTEMS

PART A

(Note: Submission of Part A is required of all applicants whose processes are listed on page 3 above.)

(Office use only) 1-0YA-2-000189

Discharge Serial No. 001

INFORMATION REQUIRED OF SPECIFIED INDUSTRIES

Intake			Discharge									
PARAMETER AND CODE	(DAILY AVG. CONCENTRATION) UNTREATED INTAKE WATER (1)	(DAILY AVG. CONCENTRATION) TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	DAILY AVG. CONCENTRATION (5)	AVERAGE POUNDS PER DAY (6)	SAMPLE TYPE (7)	SAMPLE FREQUENCY (8)	METHOD OF ANALYSIS (9)	CONTINUOUS MONITORING (10)	(11)
ALKALINITY (as $CaCO_3$) 00410		14	101	$10X 10^{-5}$	28	72	20	COMP	OTHR	AWWA	ABS
B.O.D. 5-DAY 00310		1	112	$11 X 10^{-5}$	32	80	23	COMP	OTHR	AWWA	ABS
CHEMICAL OXYGEN DEMAND (C.O.D.) 00340		3	334	$35 X 10^{-5}$	98	246	70	COMP	OTHR	AWWA	ABS
TOTAL SOLIDS 00500		28	246	$25 X 10^{-5}$	70	176	50	COMP	OTHR	AWWA	ABS
TOTAL DISSOLVED SOLIDS 70300		26.8	162	$16 X 10^{-5}$	46	116	33	COMP	OTHR	AWWA	ABS
TOTAL SUSPENDED SOLIDS 00530		1.2	84	$86 X 10^{-6}$	24	60	17	COMP	OTHR	AWWA	ABS
TOTAL VOLATILE SOLIDS 00505		11.5	106	$11 X 10^{-5}$	31	76	22	COMP	OTHR	AWWA	ABS
AMMONIA (as N) 00610		0.2	7.98	$81 X 10^{-7}$	2.27	5.7	1.62	COMP	OTHR	AWWA	ABS
KJELDAHL NITROGEN 00625		4.4	36.5	$3.69X 10^{-5}$	10.3	26.1	7.39	GRAB	OTHR	AWWA	ABS
NITRATE (as N) 00620		0.08	.71	$75 X 10^{-8}$	.21	.51	0.15	COMP	OTHR	AWWA	ABS
PHOSPHORUS TOTAL (as P) 00665		0.01	.42	$46 X 10^{-8}$	.13	.30	.09	COMP	OTHR	AWWA	ABS

ENG FORM 4345-1 MAY 71

NWT 003642

TABLE A
Guide for Completion of Part A

29 1970 000189

PARAMETER & UNITS	METHOD	REFERENCES			SIGNIFICANCE IN REPORTING DATA
		STANDARD METHODS 13TH ED. 1971	A.S.T.M. STANDARDS Pt. 23 1970	W.Q.O. METHODS 1971	
ALKALINITY AS Ca CO_3 Mg/liter	ELECTROMETRIC TITRATION TECHNICON METHYL ORANGE METHOD	p. 370	p. 154	p. 6	X.
B.O.D. 5-DAY Mg/liter	MODIFIED WINKLER METHOD OR PROBE METHOD	p. 489	p. 712	p. 15	X.
CHEMICAL OXYGEN DEMAND (C.O.D.) Mg/liter	DICHROMATE REFLUX METHOD	p. 495	–	p. 17	X.
TOTAL SOLIDS Mg/liter	GRAVIMETRIC, 105°C. METHOD	p. 535	–	p. 280	X.
TOTAL DISSOLVED (FILTERABLE) SOLIDS Mg/liter	GLASS FIBER FILTRATION METHOD, 180°C.	p. 539	–	p. 275	X.
TOTAL SUSPENDED (NON-FILTERABLE) SOLIDS Mg/liter	GLASS FIBER FILTRATION METHOD, 103-105°C.	p. 537	–	p. 278	X.
TOTAL VOLATILE SOLIDS Mg/liter	GRAVIMETRIC METHOD 550°C.	p. 536	–	p. 282	X.
AMMONIA (as N) Mg/liter	DISTILLATION-NESSLERIZATION METHOD OR TECHNICON-DIGESTION & PHENOLATE METHOD	p. 453	–	p. 134	.XX
KJELDAHL NITROGEN Mg/liter	DIGESTION-DISTILLATION METHOD OR TECHNICON-DIGESTION & PHENOLATE METHOD	p. 469	–	p. 149	.XX
NITRATE (as N) Mg/liter	BRUCINE SULFATE METHOD OR TECHNICON-HYDRAZINE REDUCTION METHOD	p. 461	–	p. 170	.XX
TOTAL PHOSPHORUS (as P) Mg/liter	PERSULFATE DIGESTION & SINGLE REAGENT METHOD OR TECHNICON-MANUAL DIGESTION & SINGLE REAGENT OR STANNOUS CHLORIDE	p. 526	–	p. 235	.XX

ENG FORM MAY 71 4345-1

NWT 003643

PART B DISCHARGE DESCRIPTION

(Note: Submission of Part B is required of all applicants who are also required to submit Part A. Only those parameters specifically indicated in the instructions are to be reported by a particular industry)

(Office use only) OCT 13 1971

071-0YA-2- 000139

Discharge Serial No. 001

B-1. PHYSICAL AND BIOLOGICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-1)

Intake	Discharge						
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	AVERAGE (DAILY) (3)	MINIMUM (OPERATING YEAR) (4)	MAXIMUM (OPERATING YEAR) (5)	SAMPLE FREQUENCY (6)	CONTINUOUS MONITORING (7)
COLOR 00080	5		180		252	0	A
SPECIFIC CONDUCTANCE 00095	1		230		322	0	A
TURBIDITY 00070	<1		45		63	0	A
FECAL STREPTOCOCCI BACTERIA 74054							
FECAL COLIFORM BACTERIA 74055							
TOTAL COLIFORM BACTERIA 74056							

Sample frequency was once for those marked "0" in Column 6. These samples were analyzed and reported under average. Maximums were calculated as 1.4 times average values. Intake, average and maximum values are all in the required units.

PART B

(Office use only) MAY 21 1972

071-0YA-2-000180

Discharge Serial No. 001

B-2. CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake	Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
ACIDITY (as $CaCO_3$) 00435	0.9		24	2.41×10^{-5}	6.74	17	4.81	C	O	S	A
TOTAL ORGANIC CARBON (T.O.C.) 00680											
TOTAL HARDNESS 00900											
NITRITE (as N) 00615											
ORGANIC NITROGEN 00605											
PHOSPHORUS-ORTHO (as P) 70507											
SULFATE 00945	0.45		9.8	9.91×10^{-6}	2.76	7	1.983	G	O	S	A
SULFIDE 00745	0.00045		0.0014	1.4×10^{-9}	0.00040	<0.001	0.00028	G	O	S	A
SULFITE 00740											
BROMIDE 71870											

ENG FORM 4345-1 JUN 71

NWT 003645

(Office use only) 071-0YA-2-000139

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

PARAMETER AND CODE	Intake: UNTREATED INTAKE WATER (1)	Intake: TREATED INTAKE WATER (2)	Discharge: MAXIMUM CONCENTRATION (3)	Discharge: MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	Discharge: DAILY AVG. CONCENTRATION (5)	Discharge: AVERAGE POUNDS PER DAY (6)	Discharge: SAMPLE TYPE (7)	Discharge: SAMPLE FREQUENCY (8)	Discharge: METHOD OF ANALYSIS (9)	Discharge: CONTINUOUS MONITORING (10)	(11)
CHLORIDE 00940	1.349		4.9	4.96×10^{-6}	1.388	3.5	0.991	C	O	S	A
CYANIDE 00720	<0.0045		<.028	3.0×10^{-7}	.0084	<0.02	.006	G	O	S	A
FLUORIDE 00951	0.018		0.35	3.54×10^{-7} -S	0.0991	0.25	0.0708	G	O	S	A
ALUMINUM-TOTAL 01105	0.054		310	3.12×10^{-7}	0.0872	220	0.0623	G	O	S	A
ANTIMONY-TOTAL 01097											
ARSENIC-TOTAL 01002											
BARIUM-TOTAL 01007											
BERYLLIUM-TOTAL 01012											
BORON-TOTAL 01022				micrograms							
CADMIUM-TOTAL 01027	0.00045		2.8	2.8×10^{-9}	0.00079	x	0.00057	G	O	S	A

ENG FORM JUN 71 4345-1

PART B

OCT 1 8 1979

(Office use only)

071-0YA-2- 000139

Discharge Serial No.

001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake	Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	DAILY AVG. CONCENTRATION (5)	AVERAGE POUNDS PER DAY (6)	SAMPLE TYPE (7)	SAMPLE FREQUENCY (8)	METHOD OF ANALYSIS (9)	CONTINUOUS MONITORING (10)	(11)
CALCIUM-TOTAL 00916	0.765		25	2.53×10^{-5}	7.1	17.9	5.07	G	O	S	A
CHROMIUM-TOTAL 01034	0.0067	micro grams	74	7.51×10^{-8}	0.021	53	0.015	G	O	S	A
COBALT-TOTAL 01037	<0.00045	"	49	4.96×10^{-8}	0.0139	35	0.0099	G	O	S	A
COPPER-TOTAL 01042	0.009	"	133	1.34×10^{-7}	0.0377	95	0.0269	G	O	S	A
IRON-TOTAL 01045	0.099	"	1400	1.42×10^{-6}	0.396	1000	0.283	G	O	S	A
LEAD-TOTAL 01051	0.0067	"	2.8	2.8×10^{-9}	0.00079	2	0.00057	G	O	S	A
MAGNESIUM-TOTAL 00927	0.225	"	8	8.07×10^{-6}	2.26	5.7	1.614	G	O	S	A
MANGANESE-TOTAL 01055	0.081		14000	1.42×10^{-5}	3.96	10000	2.83	G	O	S	A
MERCURY-TOTAL 71900	<0.0022		1.4	1.4×10^{-9}	0.0004	<1	0.0003	C	O	S	A
MOLYBDENUM-TOTAL 01062											

ENG FORM JUN 71 4345-1

PART B

OCT - 5 1971

(Office use only)

071-0YA-2-000139

Discharge Serial No.

001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

PARAMETER AND CODE	Intake: UNTREATED INTAKE WATER (1)	Intake: TREATED INTAKE WATER (2)	Discharge: MAXIMUM CONCENTRATION (3)	Discharge: MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	Discharge: DAILY AVG. CONCENTRATION (5)	Discharge: AVERAGE POUNDS PER DAY (6)	Discharge: SAMPLE TYPE (7)	Discharge: SAMPLE FREQUENCY (8)	Discharge: METHOD OF ANALYSIS (9)	Discharge: CONTINUOUS MONITORING (10)	Discharge: (11)
NICKEL-TOTAL 01067											
POTASSIUM-TOTAL 00937	0.1349		3.1	3.12×10^{-6}	0.872	2.2	0.623	G	O	S	A
SELENIUM-TOTAL 01147											
SILVER-TOTAL 01077											
SODIUM-TOTAL 00929	0.72		20	1.98×10^{-5}	5.55	14	3.96	G	O	S	A
THALLIUM-TOTAL 01059											
TIN-TOTAL 01102											
TITANIUM-TOTAL 01152											
ZINC-TOTAL 01092	0.1574	micro grams	770	7.79×10^{-7}	0.218	550	0.1558	G	O	S	A
OIL AND GREASE 00550	0.135	milligrams	27	2.72×10^{-5}	7.61	19.2	5.44	C	O	S	A

ENG FORM JUN 71 4345-1

NWT 003648

PART B

(Office use only) 071-0YA-2-000139

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake	Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
PHENOLS 32730	0.00045		4300	4.39×10^{-6}	1.23	3100	0.878	C	O	S	A
SURFACTANTS 38260											
ALGICIDES* 74051											
CHLORINATED HYDROCARBONS* (EXCEPT PESTICIDES) 74052	A					A					
PESTICIDES* 74053											

*Name specific compound(s) and fill in the required data for each. Use extra blanks at the end of the form and the "Remarks" space as necessary.

Sample frequency was once for those marked "0" in Column 9. These samples were analyzed and reported as daily average concentration in Column 6. Maximum values were calculated as 1.4 times average values. Intake values are in lb/day. No TOC analyses are available because the independent laboratory doing the tests was not equipped torun them.

ENG FORM JUN 71 4345-1

PART B

(Office use only) 071-0YA-2-000139

Discharge Serial No.

B-3. RADIOACTIVE PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-3)

Intake	Discharge						
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	AVERAGE (DAILY) (3)	MINIMUM (OPERATING YEAR) (4)	MAXIMUM (OPERATING YEAR) (5)	SAMPLE FREQUENCY (6)	CONTINUOUS MONITORING (7)
ALPHA-TOTAL 01501				X			
ALPHA COUNTING ERROR 01502				X			
BETA-TOTAL 03501				X			
BETA COUNTING ERROR 03502				X			
GAMMA-TOTAL 05501				X			
GAMMA COUNTING ERROR 05502				X			
TRITIUM-TOTAL 07000				X			
TRITIUM COUNTING ERROR 07001				X			

B-4. REMARKS

ENG FORM JUN 71 4345-1

PART B INTAKE CONCENTRATIONS

JUN 21 1972

Parameter	Intake Mg/l	Concentration µg/l	Other
Color			2.25 PCV
Specific Conductance			0.45 µ mhos
Turbidity			<0.45 JTU
Acidity	2		
Sulfate	<1		
Sulfide	<0.001		
Chloride	3		
Cyanide	<0.01		
Fluoride	0.04		
Aluminum		120	
Cadmium		1	
Calcium	1.7		
Chromium		15	
Cobalt		<1	
Copper		20	
Iron		220	
Lead		1	
Magnesium	0.5		
Manganese		180	
Mercury		<5	
Potassium	0.3		
Sodium	1.6		
Zinc		350	
Oil & Grease	0.3		
Phenol		<1	

State of Oregon

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

To: ~~REGilbert~~, LDPatterson, ~~RHNixon~~

Date: March 29, 1974

From: RJNichols

Subject: WQ - Koppers, Multnomah County

This is to document that the Koppers NPDES permit will be moved to July because at present the plant is not operating.

cc CKAshbaker
JSweeney

DEQ-14

SP*76014-340

NWT 003652

~~REG~~.

~~FMB~~

RG Portland Dept

To ~~R(S)~~

These analyses are going to be quite revealing to us. Some of these installations are discharging things they shouldn't be.

EJW

June 30, 1971

IW3-0

Mr. P. W. Guth, Superintendent
Koppers Company, Inc.
7540 N.W. St. Helens Road
Portland, Oregon 97229

Dear Mr. Guth:

Reference is made to your letter of June 29, 1971, regarding certification by this Department to the U. S. Corps of Engineers that the discharges from your plant to the Willamette River will not violate applicable water quality standards.

The procedure worked out between the Corps and the Water Quality Office of the Federal Environmental Protection Agency provides for state certification after the application has been filed with the Corps and determined by WQO-EPA to be a completed and adequate application.

Upon such determination by WQO-EPA, state certification will be requested by the Federal agencies.

Very truly yours,

Ely J. Weathersbee
Deputy Director

EJW:lb

State of Oregon
DEPARTMENT OF ENVIROMENTAL QUALITY
RECEIVED
JUL 6 1971
PORTLAND DISTRICT OFFICE

NWT 003653

Pittsburgh, Pa. 15219, Telephone 412-391-3300

KOPPERS

June 29, 1971

Department of Environmental Quality
State Office Building
1400 S. W. Fifth Avenue
Portland, Oregon 97201

Gentlemen:

Attached is a copy of the application for the Corps of Engineers permit. It is necessary to obtain certification from you prior to the Corps approving an application. Will you please forward the required certification to the District Engineer.

Very truly yours,

P. W. Guth, Superintendent
7540 N. W. St. Helens Road
Portland, Oregon 97229

KRC/PWG:mak

Attachment

cc: K. R. Caldwell
D. Eynon
D. L. O'Dell
B. K. Pospishil
T. Smith

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
WATER QUALITY CONTRO

FORM APPROVED
OMB NO. 49-R 0408

DEPARTMENT OF THE ARMY, CORPS OF ENGINEERS

APPLICATION FOR PERMIT TO DISCHARGE OR WORK IN NAVIGABLE WATERS AND THEIR TRIBUTARIES

SECTION I. GENERAL INFORMATION

1. State	Application Number (to be assigned by Corps of Engineers)			
O R	Div.	Dist.	Type	Sequence No.

2. Name of applicant and title of signing official
Koppers Company, Inc.
R. E. Spatz - Vice President & Asst. General Manager - Organic Matls. Div.

3. Mailing address of applicant
Koppers Company, Inc.
1201 Koppers Building
Pittsburgh, Pennsylvania 15219

4. Name, address, telephone number and title of applicant's authorized agent for permit application coordination and correspondence.
Paul W. Guth, Plant Superintendent
7540 N.W. St. Helena Road
Portland, Oregon 97229
503-286-3681

NOTE TO APPLICANT: Refer to the pamphlet entitled "Permits for Work and Structures in and for Discharges or Deposits into Navigable Waters" before attempting to complete this form.

Required Information

a. All information contained in this application will, upon request, be made available to the public for inspection and copying. A separate sheet entitled "Confidential Answers" must be used to set out information which is considered by the applicant to constitute trade secrets or commercial or financial information of a confidential nature. The information must clearly indicate the item number to which it applies. Confidential treatment can be considered only for that information for which a specific written request of confidentiality has been made on the attached sheet. However, in no event will identification of the contents and frequency of a discharge be recognized as confidential or privileged information.

b. The applicant shall furnish such supplementary information as is required by the District Engineer in order to evaluate fully an application.

c. If additional space is needed for a complete response to any item on this form, attach a sheet entitled "Additional Information." Indicate on that sheet the item numbers to which answers apply.

d. Drawings required by items 20 and 21 should be attached to this application. Other papers which must be attached to this application include, if applicable, copies of a water quality certification or a written communication which describes water quality impact (see Item 22 and Item 10 of Section II below), the additional information sheet(s) in "c" above, and the confidential information sheet described in "a" above.

Fees

If any discharge or deposit is involved, an application fee of $100 must be submitted with this application. An additional $50 is required for each additional point of discharge or deposit.

Signature

a. If a discharge is involved, an application submitted by a corporation must be signed by the principal executive officer of that corporation or by an official of the rank of corporate vice president or above who reports directly to such principal executive officer and who has been designated by the principal executive officer to make such applications on behalf of the corporation. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor. Other signature requirements are discussed in the pamphlet.

b. If no discharge is involved, an application may be signed by the applicant or his authorized agent.

Application is hereby made for a permit or permits to authorize the activities described herein. I certify that I am familiar with the information contained in this application, and that to the best of my knowledge and belief such information is true, complete, and accurate.

R. E. Spatz
Signature of Applicant

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

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

FOR CORPS OF ENGINEERS USE ONLY

Acronym name of applicant

Date received, form not complete — — — — — —
Date received, form complete but without certificate — — — — — —
Date received, form complete — — — — — —
Date of Cert./Ltr. — — — — — —
day mo yr

Are discharge structures
Major? ☐ Minor? ☐ N/A? ☐

Date sent to EPA, form not complete — — — — — — —
Date sent to EPA, NOAA, D/I, AEC, FPC in complete form — — — — — — — — —
day mo yr

ENG FORM 4345
MAY 71

NWT 003655

5. Date 6 29 71
mo day yr

(Office use only)

6. Check type of application: a. Original [X] b. Revision [ ]

7. Number of original application

8. Name of facility where discharge or construction will occur.

Koppers Company, Inc.
Northwest Plant

9. Full mailing address of facility named in item 8 above.

Koppers Company, Inc.
7540 N. W. St. Helena Road
Portland, Oregon 97229

10. Names and mailing addresses of all adjoining property owners whose property also adjoins the waterway.

Northwest Natural Gas Co.	Rivergate Rock Products
7900 N.W. St. Helena Road	7881 N.W. St. Helena Road
Portland, Oregon 97229	Portland, Oregon 97229

11. Check to indicate the nature of the proposed activity:
a. Dredging [ ] b. Construction [ ] c. Construction with Discharge [X] b. Discharge only [ ]

12. If activity is temporary in nature, estimate its duration in months.

If application is for a discharge:

13. List intake sources

Source	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal or private water supply system	.034
Surface water body	
Ground water	
Other	

14. Describe water usage within the plant

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Cooling water	.014
Boiler Feed water	.040
Process water	
Sanitary system*	.001
Other	

15. List volume of discharges or losses other than into navigable waters.

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal waste treatment system	
Surface containment	.002
Underground disposal	
Waste Acceptance firms	
Evaporation	.018
Consumption	

* Indicate number employees served per day 12

If structures exist, or dredging, filling or other construction will occur, the precise location of the activity must be described.

(Office use only)

a. Name the corporate boundaries within which the structures exist or the activity will occur.

16. State: Oregon 17. County: Muttnomak 18. City or Town: Portland

b. Name of waterway at the location of the activity

19. Willamette River

20. Maps and sketches which show the location and character of each structure or activity, including any and all outfall devices, dispersive devices, and non-structural points of discharge, must be attached to this application.

21. For construction or work in navigable waters for which a separate permit is sought under 33 U.S.C. 403, the character of each structure must be fully shown on detailed plans to be submitted with this application. Note on the drawings those structures for which separate discharge information (Section II of this form) has been submitted.

22. List all approvals or denials granted by Federal, interstate, State or local agencies for any structures, construction, discharges or deposits described in this application.

Type of document	Id. No.	Date	Issuing Agency
Letter	1 W 3-0	1-11-66	Oregon State Sanitary Authority

23. Check if facility existed or was lawfully under construction prior to April 3, 1970. [X]

24. If dredging or filling will occur:

State the type of materials involved, their volume in cubic yards, and the proposed method of measurement.

Not Applicable

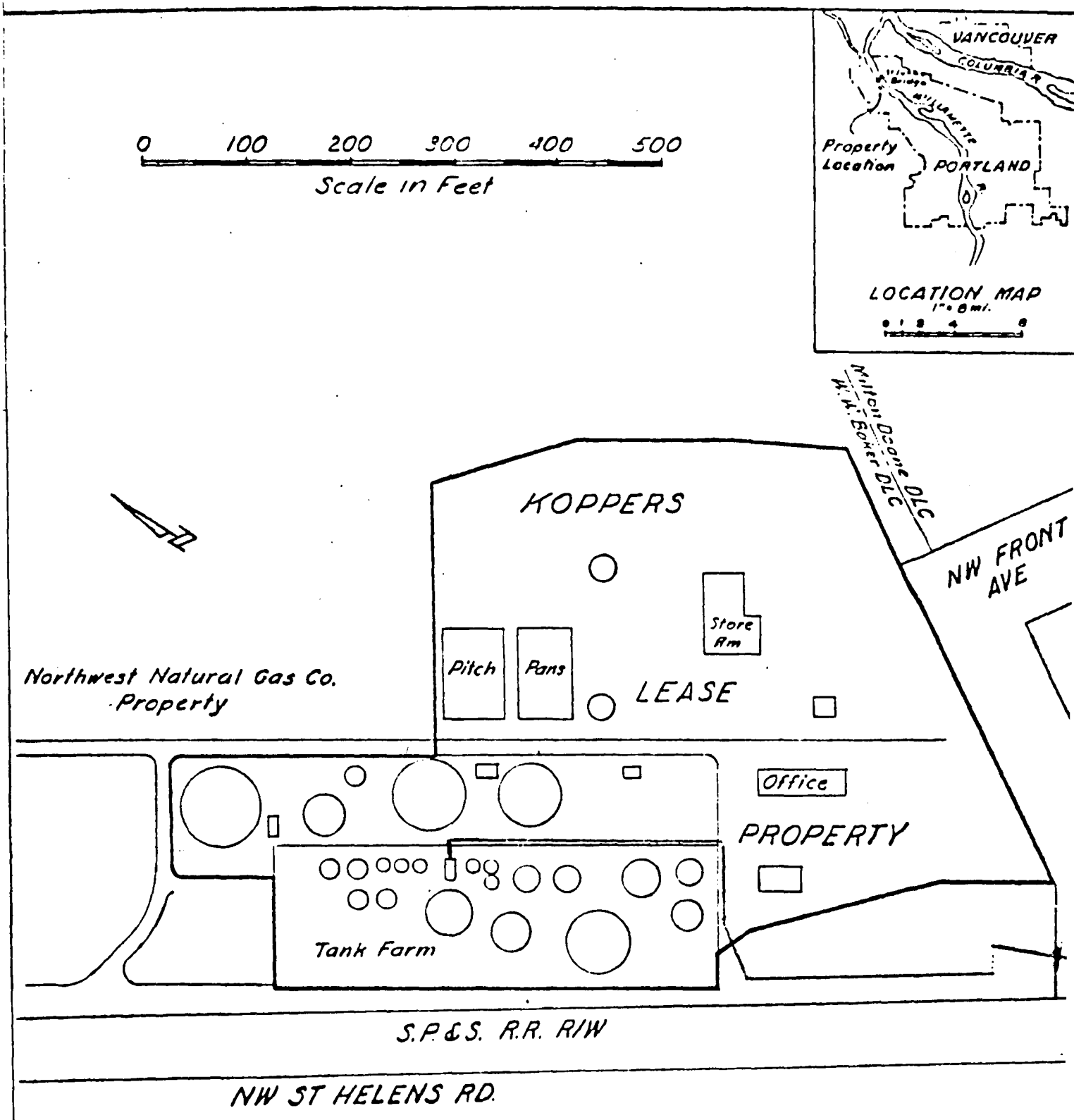
25. Describe the proposed method of instrumentation which will be used to measure the volume of any solids which may be deposited and to determine its effect upon the waterway.

Not Applicable

26. State rates and periods of deposition described in Item 25.

Not Applicable

NWT 003657



Location of Koppers Lease Property on Northwest Natural Gas Co. property at 7900 NW St Helens Rd., City of Portland, County of Multnomah, State of Oregon.

June 3, 1971

SECTION II. PLANT PROCESS AND DISCHARGE DESCRIPTION

1. Discharge described below is
a. Present [X] b. Proposed new or changed [ ]

2. Implementation schedule [ ]

(Office use only)

Name of corporate boundaries within which the point of discharge is located.

3. State: Oregon

4. County: Muttnomack

5. City or Town: Portland

6. Discharge Serial No.: 001

State the precise location of the point of discharge.

7. Latitude N 45 Degrees; 3 5 Min; __ __ Sec.

8. Longitude W 122 Degrees; 4 6 Min; __ __ Sec.

9. Name of waterway at the point of discharge.

Not applicable

10. Has application for water quality certification or description of impact been made? If so, give date:

Date: 6 (mo) 29 (day) 71 (yr)

Check if certificate is attached to form [ ]

Name Issuing Agency: Oregon Dept. of Environmental Quality

11. Narrative description of activity (include terms of general 4-digit Standard Industrial Classification, and specific manufacturing process).

Primarily engaged in manufacturing industrial organic chemicals by the distillation of coke oven tar.

12. Standard industrial classification number.

SIC 2818

13. Principal product.

See #15

14. Amount of principal product produced per day.

See #16

15. Principal raw material.

Coke Oven Tar

16. Amount of principal raw material consumed per day.

280,000 lbs.

17. Number of batch discharges per day.

Not Applicable

18. Average gallons per batch discharge.

Not Applicable

19. Date discharge began.

6 (mo) 1 (day) 66 (yr)

20. Date discharge will begin.

__ (mo) __ (day) __ (yr)

21. Describe waste abatement practices.

Water discharged at this outfall is contained in a separate drainage system where pumps with special seals and local separators are employed.

ESEPAR, EPUMPS, LOCALS

PHYSICAL DESCRIPTION OF INTAKE WATER AND DISCHARGE

Intake | Discharge | (Office use only)

Discharge Serial No. 001

Parameter and (Code)	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	AVERAGE (DAILY) (3)	MINIMUM (OPERATING YEAR) (4)	MAXIMUM (OPERATING YEAR) (5)	SAMPLE FREQUENCY (6)	CONTINUOUS MONITORING (7)
Flow (Gallons per day) 00056		54,000	34,000	Data Not Avail.	Data Not Avail.	OTHR	ABS
pH 00400		6.9	8.8	Data Not Avail.	Data Not Avail.	OTHR	ABS
Temperature (Winter) (°F) 74028		45	85	Data Not Avail.	Data Not Avail.	OTHR	ABS
Temperature (Summer) (°F) 74027		52	110	Data Not Avail.	Data Not Avail.	OTHR	ABS

23. **DISCHARGE CONTENTS**

PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT
Color 00080	X		Aluminum 01105		X	Nickel 01067		X
Turbidity 00070	X		Antimony 01097		X	Selenium 01147		X
Radioactivity 74050		X	Arsenic 01002		X	Silver 01077		X
Hardness 00900	X		Beryllium 01012		X	Potassium 00937	X	
Solids 00500	X		Barium 01007		X	Sodium 00929	X	
Ammonia 00610	X		Boron 01022		X	Titanium 01152		X
Organic Nitrogen 00605	X		Cadmium 01027		X	Tin 01102		X
Nitrate 00620	X		Calcium 00916	X		Zinc 01092		X
Nitrite 00615		X	Cobalt 01037		X	Algicides 74051		X
Phosphorus 00665	X		Chromium 01034		X	Oil and Grease 00550	X	
Sulfate 00945	X		Copper 01042		X	Phenols 32730	X	
Sulfide 00745	X		Iron 01045	X		Surfactants 38260		X
Sulfite 00740		X	Lead 01051		X	Chlorinated Hydrocarbons 74052		X
Bromide 71870		X	Magnesium 00927		X	Pesticides 74053		X
Chloride 00940	X		Manganese 01055		X	Fecal Streptococci Bacteria 74054		X
Cyanide 00720	X		Mercury 71900		X	Coliform Bacteria 74056		X
Fluoride 00951		X	Molybdenum 01062		X			

ENG FORM MAY 71 4345-1

NWT 003660

24. H. all known hazardous or po. ially hazardous substances in your plant been invent 1?

☐ Yes ☒ No

24b. If yes, have steps been taken to insure that there exists no possibility of any such known hazardous or potentially hazardous substance entering this discharge?

☐ Yes ☐ No

25. Remarks. Principal Raw Material is used as process unit in Part A,Column 4. Item 24a. is checked NO even though we feel that we have such substances under control, because the question is too vague and all encompassing to answer yes comfortably. In Part A all maximum values are arbitrarily taken as 140% of the average in lieu of sufficient data. Part A information is based upon a 24 hour composite sample.

The information above completes the basic reporting requirements which are required of all applicants. Those applicants whose discharge results from an activity included within any of the Standard Industrial Classification Code (SIC Code) categories listed below must complete Part A of this form as well.

CRITICAL INDUSTRIAL GROUPS

SIC	098	FISH HATCHERIES, FARMS, AND PRESERVES
SIC	10-14	DIVISION B – MINING
SIC	201	MEAT PRODUCTS
SIC	202	DAIRY PRODUCTS
SIC	203	CANNED PRESERVED FRUITS, VEGETABLES (EXCEPT SEAFOODS, SIC 2031 AND 2036)
SIC	2031, 2036	CANNED AND CURED FISH AND SEAFOODS; FRESH OR FROZEN PACKAGED FISH AND SEAFOODS
SIC	204	GRAIN MILL PRODUCTS
SIC	206	SUGAR
SIC	207	CONFECTIONARY AND RELATED PRODUCTS
SIC	208	BEVERAGES
SIC	209	MISCELLANEOUS FOOD PREPARATIONS AND KINDRED PRODUCTS
SIC	22	TEXTILE MILL PRODUCTS
SIC	23	APPAREL AND OTHER FINISHED PRODUCTS MADE FROM FABRICS AND SIMILAR MATERIALS
SIC	242	SAWMILLS AND PLANING MILLS
SIC	2432	VENEER AND PLYWOOD
SIC	2491	WOOD PRESERVING
SIC	26	PAPER AND ALLIED PRODUCTS
SIC	281	INDUSTRIAL INORGANIC AND ORGANIC CHEMICALS (EXCEPT SIC 2818)
SIC	2818	INDUSTRIAL ORGANIC CHEMICALS
SIC	282	PLASTICS MATERIALS AND SYNTHETIC RESINS, SYNTHETIC RUBBER, SYNTHETIC AND OTHER MAN-MADE FIBERS, EXCEPT GLASS
SIC	283	DRUGS
SIC	284	SOAP, DETERGENTS, AND CLEANING PREPARATIONS, PERFUMES, COSMETICS, AND OTHER TOILET PREPARATIONS
SIC	285	PAINTS, VARNISHES, LACQUERS, ENAMELS, AND ALLIED PRODUCTS
SIC	2871	FERTILIZERS
SIC	2879	AGRICULTURAL PESTICIDES, AND OTHER AGRICULTURAL CHEMICALS, NOT ELSEWHERE CLASSIFIED
SIC	2891	ADHESIVES AND GELATIN
SIC	2892	EXPLOSIVES
SIC	29	PETROLEUM REFINING AND RELATED INDUSTRIES
SIC	3011, 3069	TIRES AND INNER TUBES; FABRICATED RUBBER PRODUCTS, NOT ELSEWHERE CLASSIFIED
SIC	3079	MISCELLANEOUS PLASTICS PRODUCTS
SIC	311	LEATHER TANNING AND FINISHING
SIC	32	STONE, CLAY, GLASS, AND CONCRETE PRODUCTS
SIC	331	BLAST FURNACES, STEEL WORKS, AND ROLLING AND FINISHING MILLS
SIC	332	IRON AND STEEL FOUNDRIES
SIC	333, 334	PRIMARY SMELTING AND REFINING OF NONFERROUS METALS; SECONDARY SMELTING AND REFINING OF NONFERROUS METALS
SIC	336	NONFERROUS FOUNDRIES
SIC	347	COATING, ENGRAVING, AND ALLIED SERVICES
SIC	35	MACHINERY, EXCEPT ELECTRICAL
SIC	36	ELECTRICAL MACHINERY, EQUIPMENT, AND SUPPLIES
SIC	37	TRANSPORTATION EQUIPMENT (EXCEPT SHIP BUILDING AND REPAIRING, SIC 3731)
SIC	3731	SHIP BUILDING AND REPAIRING
SIC	491	ELECTRIC COMPANIES AND SYSTEMS
SIC	493	COMBINATION COMPANIES AND SYSTEMS

PART A

(Note: Submission of Part A is required of all applicants whose processes are listed on page 3 above.)

(Office use only)

Discharge Serial No. 001

INFORMATION REQUIRED OF SPECIFIED INDUSTRIES

Intake		Discharge									
PARAMETER AND CODE	(DAILY AVG. CONCENTRATION) UNTREATED INTAKE WATER (1)	(DAILY AVG. CONCENTRATION) TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER PROCESS UNIT PER DAY (4)	DAILY AVG. CONCENTRATION (5)	AVERAGE POUNDS PER DAY (6)	SAMPLE TYPE (7)	SAMPLE FREQUENCY (8)	METHOD OF ANALYSIS (9)	CONTINUOUS MONITORING (10)	(11)
ALKALINITY (as $CaCO_3$) 00410		14	101	10×10^{-5}	28	72	20	COMP	OTHR	AWWA	ABS
B.O.D. 5-DAY 00310		Not Avail	112	11×10^{-5}	32	80	23	COMP	OTHR	AWWA	ABS
CHEMICAL OXYGEN DEMAND (C.O.D.) 00340		Not Avail	344	37×10^{-5}	105	246	75	COMP	OTHR	AWWA	ABS
TOTAL SOLIDS 00500		28	246	25×10^{-5}	70	176	50	COMP	OTHR	AWWA	ABS
TOTAL DISSOLVED SOLIDS 70300		26.8	162	16×10^{-5}	46	116	33	COMP	OTHR	AWWA	ABS
TOTAL SUSPENDED SOLIDS 00530		1.2	84	86×10^{-6}	24	60	17	COMP	OTHR	AWWA	ABS
TOTAL VOLATILE SOLIDS 00505		11.5	106	11×10^{-5}	31	76	22	COMP	OTHR	AWWA	ABS
AMMONIA (as N) 00610		Not Avail	7.98	81×10^{-7}	2.27	5.7	1.62	COMP	OTHR	AWWA	ABS
KJELDAHL NITROGEN 00625		Not Avail				Not Avail					AB
NITRATE (as N) 00620		Not Avail	.71	75×10^{-8}	.21	.51	0.15	COMP	OTHR	AWWA	AB
PHOSPHORUS TOTAL (as P) 00665		Not Avail	.42	46×10^{-8}	.13	.30	.09	COMP	OTHR	AWWA	AB

TABLE A
Guide for Completion of Part A

PARAMETER & UNITS	METHOD	REFERENCES			SIGNIFICANCE IN REPORTING DATA
		STANDARD METHODS 13TH ED. 1971	A.S.T.M. STANDARDS Pt. 23 1970	W.Q.O. METHODS 1971	
ALKALINITY AS $CaCO_3$ Mg/liter	ELECTROMETRIC TITRATION TECHNICON METHYL ORANGE METHOD	p. 370	p. 154	p. 6	X.
B.O.D. 5-DAY Mg/liter	MODIFIED WINKLER METHOD OR PROBE METHOD	p. 489	p. 712	p. 15	X.
CHEMICAL OXYGEN DEMAND (C.O.D.) Mg/liter	DICHROMATE REFLUX METHOD	p. 495	–	p. 17	X.
TOTAL SOLIDS Mg/liter	GRAVIMETRIC, 105°C. METHOD	p. 535	–	p. 280	X.
TOTAL DISSOLVED (FILTERABLE) SOLIDS Mg/liter	GLASS FIBER FILTRATION METHOD, 180°C.	p. 539	–	p. 275	X.
TOTAL SUSPENDED (NON-FILTERABLE) SOLIDS Mg/liter	GLASS FIBER FILTRATION METHOD, 103-105°C.	p. 537	–	p. 278	X.
TOTAL VOLATILE SOLIDS Mg/liter	GRAVIMETRIC METHOD 550°C.	p. 536	–	p. 282	X.
AMMONIA (as N) Mg/liter	DISTILLATION-NESSLERIZATION METHOD OR TECHNICON-DIGESTION & PHENOLATE METHOD	p. 453	–	p. 134	.XX
KJELDAHL NITROGEN Mg/liter	DIGESTION-DISTILLATION METHOD OR TECHNICON-DIGESTION & PHENOLATE METHOD	p. 469	–	p. 149	.XX
NITRATE (as N) Mg/liter	BRUCINE SULFATE METHOD OR TECHNICON-HYDRAZINE REDUCTION METHOD	p. 461	–	p. 170	.XX
TOTAL PHOSPHORUS (as P) Mg/liter	PERSULFATE DIGESTION & SINGLE REAGENT METHOD OR TECHNICON-MANUAL DIGESTION & SINGLE REAGENT OR STANNOUS CHLORIDE	p. 526	–	p. 235	.XX

NWT 003663

K45 TO: RCS

RCS

To: Portland dist

UNITED STATES
DEPARTMENT OF THE INTERIOR
FEDERAL WATER POLLUTION CONTROL ADMINISTRATION
NORTHWEST REGION

October 30, 1969

IN REPLYING ADDRESS:
REGIONAL OFFICE
ROOM 501 PITTOCK BLOCK
PORTLAND, OREGON 97205

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY
RECEIVED
NOV 3 - 1969
OFFICE OF THE DIRECTOR

Mr. Clifford Comisky, District Counsel
U.S. Army Engineers, Portland District
P.O. Box 2946
Portland, Oregon 97066

IW3-0

Re: Pollution Incident - Koppers Chemical Co. (10-23-69)

Dear Mr. Comisky:

Attached for your review are copies of the U.S. Coast Guard report regarding a pollution case at Koppers Chemical Company.

Pending your evaluation of this case, we will withhold analyzing the samples collected during the incident. A copy of this letter and the attached report are being forwarded to the Department of Environmental Quality.

If any additional information is needed, please let us know.

Sincerely yours,

James C. Willmann
Sanitary Engineer

enclosure

cc: Mr. Kenneth Spies, Director
Department of Environmental Quality

Captain of the Port, USCG, Portland

Commander Henry Haugen, USCG

Mr. Leon Jourolman, Assistant Regional Solicitor

DEPARTMENT OF TRANSPORTATION
U. S. COAST GUARD
CG-3639 (Rev. 7-68)

REPORTS CONTROL SYMBOL OLE-2101

WATER POLLUTION (*Check applicable violation(s)*)

- [ ] OIL POLLUTION ACT OF 1961 (*Discharge of oil by vessels within prohibited zones of the high seas.*)
- [ ] OIL POLLUTION ACT OF 1924 (*Discharge of oil by vessels into navigable waters of the United States.*)
- [ ] THE REFUSE ACT OF 1899 (*Discharge of refuse by vessel or shore facility into any navigable waters of the United States.*)

REPORTING UNIT	CG DISTRICT	DATE OF VIOLATION
U. S. COAST GUARD STATION PORTLAND, OREGON	13	23 OCTOBER 1969

SECTION I - VESSEL DATA

1. NAME OF VESSEL	2. OFFICIAL NUMBER	3. NATIONALITY
NOT APPLICABLE	NA	NA

4. TYPE OF VESSEL	5. GROSS TONS	6. INTERNATIONAL CALL
[ ] DRY CARGO [ ] TANKER [ ] TANK BARGE NA [ ] OTHER (*Specify*)	NA	NA

7. OWNERS (*Name and address*)	8. LOCAL AGENT (*Name and address*)
NA	NA

9. MASTER		10. CHIEF ENGINEER	
a. NAME AND ADDRESS (*If available*)	b. LICENSE NO.	a. NAME AND ADDRESS (*If available*)	b. LICENSE NO.
NA	NA	NA	

SECTION II - OIL RECORD BOOK DATA

1. REQUESTED RECORD BOOK FROM	2.
[ ] MASTER NA [ ] CHIEF ENGINEER	[ ] PROPERLY MAINTAINED NA [ ] IMPROPERLY MAINTAINED [ ] COULD NOT BE PRODUCED

SECTION III - SHORE FACILITY DATA

1. NAME AND ADDRESS OF COMPANY	2. TYPE OF FACILITY
Koppers Chemical Co., Inc. 7540 N.W. St. Helens Road Portland, Oregon	Chemical Plant
	3. TYPE OF REFUSE: Pitch dust

SECTION IV - POLLUTION DATA

1. PLACE OF POLLUTION (*Local name or geographical coordinates*)	2. TIME	3.
Koppers Chemical Company 7540 N.W. St. Helens Rd., Portland, Ore.	0830T	[ ] EQUIPMENT FAILURE [illegible] [ ] PERSONNEL FAILURE

4. OPERATING PERSONNEL INVOLVED	5. DUTY	6. MARINERS LICENSE NUMBER (*If any*)	7. SIGNED STATEMENT ATTACHED
NA	NA	NA	NA
NA	NA	NA	NA

8. EMERGENCY MEASURES TAKEN TO REDUCE FIRE HAZARD	9. POLLUTANT
NA	Pitch Dust

SECTION V - POLLUTION SAMPLES (*Include this information on label of sample*)

1. SOURCES	2. TIME	3. DATES
A. Conveyor on pier, Hopper on [illegible] B. Willamette River	A. [illegible] B. 0855	A. 23 OCT 69 B. 23 OCT 69

4. NAME OF PERSON(S) TAKING SAMPLES	5. WITNESSES TO TAKING SAMPLES
BM1 L. B. Poland, BM2 S. F. Holmes	CS1 C. (S) Shiddon, BM3 C. U. Grigsby III

PERSON REPORTING POLLUTION	WITNESS	SIGNED STATEMENT ATTACHED
BM1 Leland B. Poland, USCG USCG Station Portland	BM3 Steven M. Sanders, USCG USCG Station Portland	NA [ ] YES [ ] NO

INVESTIGATING OFFICER (*Typed name*)	SIGNATURE (*Investigating Officer*)
BM3 Steven M. Sanders, USCG	Steven M. Sanders

FIRST ENDORSEMENT

DATE	SIGNATURE (*Unit Commanding Officer*)
OCT 28 1969	RICHARD F. HALM, CDR, USCG

SECOND ENDORSEMENT

DATE	SIGNATURE (*District Commander*)

PREVIOUS EDITIONS ARE OBSOLETE

NWT 003665

0830 - While conducting a routine inspection of the M/V Possum, BM1 Leland B. Poland and MM3 Steven M. Sanders noticed that a large area of water around Koppers Chemical Company was covered with pitch dust.

0835 - BM1 L. B. Poland informed Portland Station of the possible pollution.

0845 - CG-17163 departed moorings enroute to Koppers Chemical to investigate and to take samples.

0955 - The following samples were taken:

Sample [illegible] - 400 yards down river from Koppers Chemical Co.
[illegible] - Around piers at Koppers Chemical Co.
[illegible] - 400 yards down river from Koppers Chemical Co.
8141 - Around piers at Koppers Chemical Co.
000196 - End of conveyor on pier.
000195 - Beginning of conveyor on beach.

Samples and a copy of this report forwarded to FWPCA on 28 October 1969.

RCS ~~RCS~~

FMB ~~FMB~~

REG ~~REG~~

NPPOC

7 November 1969

Koppers Chemical Co., Inc.
7540 N. W. St. Helens Road
Portland, Oregon

IW 3-0
Portland Dist

Gentlemen:

This office is in receipt of copy of a U. S. Coast Guard report concerning an incident occurring 23 October 1969, in which refuse in the nature of pitch dust was discovered entering the Willamette River adjacent to your plant.

The Refuse Act of 1899 expressly prohibits the discharge of any form of refuse from a shore facility into the navigable waters of the United States. The Willamette River is such a waterway.

It is requested that your office take prompt remedial action to prevent any recurrence of this type of pollution of our waters, and to advise in the near future as to the action you have undertaken. If a proper spirit of cooperation is shown, we probably will not invite prosecution by the U. S. Attorney's Office. Any recurrence, of course, would necessitate such a recommendation. Your prompt compliance would be appreciated.

Sincerely yours,

PAUL D. THIEM
Lieutenant Colonel, CE
Deputy District Engineer

Copy furnished:

Mr. Kenneth Spies, Director
Department of Environmental Quality

Captain of the Port, USCG, Portland

Commander Henry Haugen, USCG

Mr. Leon Jourolmen, Assistant Regional Solicitor

NWT 003667

VICTOR ATIYEH
GOVERNOR

Department of Environmental Quality

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

March 18, 1983

Koppers Company, Inc.
7540 N.W. St. Helens Road
Portland, Oregon 97229

Re: HW - Koppers Company, Inc.
ORD 027734357
Multnomah County

Dear Mr. Rassi:

Enclosed please find a copy of the site inspection report of the inspection conducted on March 10, 1983. Please review the report and indicate any items you feel should be added, deleted or changed.

If you have any questions, please feel free to call me at 229-5296.

Sincerely,

Gregory D. Baesler
Environmental Analyst
Northwest Region

GDB/emc
Enclosure

STATE OF OREGON

INTEROFFICE MEMO

HMI

TO: Bill, Fred, Steve

DATE: March 21, 1993

FROM: Rich Reiter, Supervisor

SUBJECT: Koppers Co., Inc. — file & inspection report
[illegible] St. Helens Road
Portland, OR
ORD 027734359

Dept. of Environmental Quality
RECEIVED
MAR 22 1993
NORTHWEST REGION

On 3-10-93, Al Goodman, EPA-OCO, Greg Baesler and I met with Henry Rassi of Koppers to discuss their status as RCRA TSD facility. Kopper's principal product at this plant is the blending of various creosote products that are brought in by railcar to make a saleable product for the wood preserving industry.

No hazardous wastes are routinely produced by this plant. The purpose for the Part A filing was to attain status if it became necessary to store spilled commercial chemical product (U051) longer than 90 days.

On 3-[illegible]-93, Jordan Dern of Koppers corporate offices (Pennsylvania) visited Arlington and was apparently convinced that that site could receive spilled U051 in less than 90 days.

Henry Rassi understood that Jordan Dern would be filing an amended notification requesting generator status only.

Conclusion: Koppers is clearly a small quantity generator (if that) and does not accumulate more than 2000 lbs. and store it for longer than 90 days.

RPR:m
cc Greg Baesler, NWR-DEQ
Al Goodman, EPA-OOO
Dave Hanline, EPA-Region 10

Contains Recycled Materials

The complete Part B portion of the application must be submitted to this office within 6 months of your receipt of this letter. Failure to comply with this time limit could result in the loss of interim status for existing hazardous waste management facilities and penalties under Section 3008 of RCRA up to $25,000 a day. While the regulations allow 6 months to complete the Part B portion of the application process we urge you to submit your application earlier if possible. If you submit any information under a claim of confidentiality please indicate this fact. Such claims must be substantiated as outlined in 40 CFR Part 2.

Both the Department of Environmental Quality (DEQ) and the Environmental Protection Agency (EPA) require permits for hazardous waste management facilities according to their respective regulations. In order to minimize the amount of paperwork for you, both agencies will work together to issue a joint permit. As you may already know, DEQ has expressed their intent to apply for authorization to administer a hazardous waste permit program in the State of Oregon in lieu of federally issued permits. When they receive this authorization, they will be responsible for issuing all hazardous waste permits in the State. DEQ has indicated that the information required by EPA in 40 CFR 270.14 through 270.21 should satisfy all of the information requirements of the State except for completion of the DEQ land use compatibility form (Form DEQ 12-81). A copy of Form DEQ 12-81 is enclosed for completion and submittal with the Part B application to EPA.

Due to the wide variety of the types of hazardous waste recognized by EPA and the many unique treatment, storage, and disposal methods utilized, EPA has elected not to develop a Part B application form. We believe the reporting burden will be minimized by allowing the applicant to tailor the Part B application to the specific needs and requirements of the facility.

Since there is no rigid format for the Part B application, we are very willing to provide whatever assistance is necessary, both verbal and written, in order to ensure the submission of a complete and accurate document.

Through a joint effort we are confident that we can resolve this issue in a timely manner. We are looking forward to working with you.

Sincerely,

Alexandra B. Smith, Director
Air & Waste Management Division

Enclosures

cc: Richard Reiter, DEQ
Al Goodman, DOJ

DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION FORM

HENRY RASSI - 503681

☒ WQ
☐ SW
☐ AQ
☐ NC

COUNTY: MULT

SOURCE NAME: KOPPERS CO. INC

SOURCE ADDRESS: 7540 NW ST HELENS RD. PORTLAND

OFFICIAL CONTACTED: HENRY RASSI, TERM SUPT.
FILE 47430

PERMIT NUMBER CO.	PERMIT NUMBER SOURCE	POINT	ACTION NO.		ACTION TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
	3072J			7			10 11 82	X	F04

TABLE A PARA	PREI. TIME	TRANS TIME	INSPECTION TIME	PAPER TIME
	0.8	0.6	.5	

8 1
8 2
8 3
8 4

COMPLIANCE STATUS *(RESULT CODE)*

	IN COMP.	NOT IN COMPLI-ANCE	ON SCHEDULE
All permit conditions	Q		
Permit emission limits	R	A	I
Emission standards	S	B	J
Performance reqts.	T	C	K
Monitoring & Reporting	U	D	L
Open burning limits	V	E	M
Procedural Reqts.	W	F	N
Fugitive emissions	X	G	O
Other	Y	H	P

TREATMENT/PROCESS EQUIPMENT – ADDITIONAL REMARKS – OPERATING CONDITIONS

CONDENSATE RETURN LINE IN TANK FARM LEAKS AND SHOULD BE REPAIRED AND ELEVATED.

OUTFALL NO. 2 NOW CONNECTED TO OUTFALL NO. 1

NO FLOW AT OUTFALL NO. 1 DURING INSPECTION

SOURCES IN VIOLATION & LIMITS VIOLATED

Henry M. Jennings 10/11/82
SIGNATURE OF INSPECTOR AND DATE

REGION COPY

Henry S. Rassi
SIGNATURE OF PERSON INTERVIEWED AND DATE

NWT 003671

DEPARTMENT OF ENVIRONMENTAL QUALITY
Request for Analysis

Laboratory No. 82-040

Location/Site: KOPPER'S CO. INC. Date: 7/19/82 4284 Date Received Lab: JUL 19 [illegible]

Collected By: GDBAESLER Program: WQ/HW-3150 B Date Reported: 8-11-82

MARK HOPE

Purpose: ABANDON SITE SURVEY Report Data To: ~~GDB~~ 29 HMD

Comments:

HW - via Mark Hope advised that this impoundment is to be included in area wide study

Item No.	Description	Sample Containers * Basic / Nutrients	DO / BOD	Metals / Organic		Test Required
1	MONITORING WELL 1				X129	OIL, GREASE, PHENOL, Pb TOTAL
2	" " 2				X248	SAME
3	" " 3				X157	SAME
4	" " 5				G012	SAME
5	MIDDLE POND NWNG				X247	SAME

Dept. of Environmental Quality RECEIVED AUG 12 1982 NORTHWEST REGION

* Basic - Unpreserved sample; Nutrient - Preserve with H_2SO_4

Metals - HNO_3 added in Laboratory do not rinse; Organic - Laboratory prepared Mason Jar

NWT 003672

Copy to L Patterson G Baesler NWR

3150 B

DEPARTMENT OF ENVIRONMENTAL QUALITY
Laboratory Data Sheet

Laboratory No. 82-0404
Page: 1 of: 1
Analysis Completed: 2 Aug 82

KOPPERS CO. INC. G. BAESLER

Test Results (All units in mg/l or ug/m³)

Item No.	Bottle #	O+G *	Phenol	Pb *								
1	X129		0.59									
2	X248		24.									
3	X157		0.12									
4	G012		0.44									
5	X249		0.51									

Comments: * Not enough samples to run oil & grease – Bottles washed after phenol analysis per KEB

NWT 003673

DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION FORM

☐ WQ ☐ SW ☐ AQ ☐ NC

COUNTY: Mult.
SOURCE NAME: Koppers Co
OFFICIAL CONTACTED: Henry Rassin
SOURCE ADDRESS: 7540 NW St Helens Rd

TABLE A PARA	PREP. TIME	TRANS TIME	INSPECTION TIME	PAPER TIME
	2	3	5	1

PERMIT NUMBER CO.	SOURCE	POINT	ACTION NO.	/	TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
26	30775	000	84	7	07		120781	Q	B03

8 1 IN Compliance
8 2
8 3
8 4

COMPLIANCE STATUS *(RESULT CODE)*

	IN COMP.	NOT IN COMPLI-ANCE	ON SCHEDULE
All permit conditions	Q		
Permit emission limits	R	A	I
Emission standards	S	B	J
Performance reqts.	T	C	K
Monitoring & Reporting	U	D	L
Open burning limits	V	E	M
Procedural Reqts.	W	F	N
Fugitive emissions	X	G	O
Other	Y	H	P

SOURCES IN VIOLATION & LIMITS VIOLATED

TREATMENT/PROCESS EQUIPMENT – ADDITIONAL REMARKS – OPERATING CONDITIONS

Water Sample Taken of 001 Discharge 72°F 7.8 PH

002 Discharge Discontinued

Water aeration plant clean

R G Wilson 12/7/81
SIGNATURE OF INSPECTOR AND DATE

REGION COPY

Henry E Rassi
SIGNATURE OF PERSON INTERVIEWED AND DATE

DEQ/RO-101 (4/80)

NWT 003674

DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION FORM

~~IAB~~ ~~CRC~~ IRB

☐ WQ
☐ SW
☒ AQ
☐ NC

COUNTY: Mult.
SOURCE NAME: Koppers Co.
OFFICIAL CONTACTED: Henry Rassi

SOURCE ADDRESS: 7540 NW St Helens Rd

TABLE A PARA	PREP. TIME	TRANS TIME	INSPECTION TIME	PAPER TIME
58B	.2	.3	.5	.2

PERMIT NUMBER CO.	PERMIT NUMBER SOURCE	POINT	ACTION NO.	ACTION	ACTION TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
26	2930	001	99	7	07		12 07 81	Q	B03

81 1-Bioliner 25 Ton Facility in Compliance
82
83
84

COMPLIANCE STATUS (RESULT CODE)

	IN COMP.	NOT IN COMPLIANCE	ON SCHEDULE
All permit conditions	~~Q~~		
Permit emission limits	R	A	I
Emission standards	S	B	J
Performance reqts.	T	C	K
Monitoring & Reporting	U	D	L
Open burning limits	V	E	M
Procedural Reqts.	W	F	N
Fugitive emissions	X	G	O
Other	Y	H	P

TREATMENT/PROCESS EQUIPMENT – ADDITIONAL REMARKS – OPERATING CONDITIONS

Producing only Creosote
100,000 gal Mo. Production
7 Employees

SOURCES IN VIOLATION & LIMITS VIOLATED

[signature] Dixon 12/7/81
SIGNATURE OF INSPECTOR AND DATE

REGION COPY

Henry E. Rassi
SIGNATURE OF PERSON INTERVIEWED AND DATE

DEQ/RO-101 (4/80)

NWT 003675

DEPARTMENT OF ENVIRONMENTAL QUALITY
Request for Analysis

Laboratory No. 81-0211 File

Location/Site: Koppers Date: 10/2/81 Date Received Lab: 12-7-81

Collected By: R H Wixon Program: WQ 3150b Date Reported: Mat Co.

Purpose: Field check, Split Samples Report Data To: ~~R H~~

Comments: Outfall 001

Oil + G if possible

Item No.	Description	Sample Containers *				Test Required
		Basic / Nutrients	DO / BOD	Metals / Organic		
					~~X268~~	
	Outfall 001			X268		Phenols

Dept. of Environmental Quality
RECEIVED
DEC 14 1981
NORTHWEST REGION

* Basic - Unpreserved sample; Nutrient - Preserve with H_2SO_4

Metals - HNO_3 added in Laboratory do not rinse; Organic - Laboratory prepared Mason Jar

NWT 003676

DEPARTMENT OF ENVIRONMENTAL QUALITY
Laboratory Data Sheet

Laboratory No. 81-0519
Page: 1 of: 1
Analysis Completed: 12 Dec 81

Koppers

Item No.	Phenols	* O&G										
	Test Results (All units in mg/l or ~~mg/m³~~)											
X265	0.2	0.8										

Comments: *Do O&G if possible, Do phenols first

NWT 003677

DEPARTMENT OF ENVIRONMENTAL QUALITY
SOURCE INSPECTION FORM

COUNTY: Mult

PROGRAM: WQ

SOURCE NAME: Koppers

SOURCE ADDRESS: 7540 NW St. Helens Rd.

OFFICIAL CONTACTED: Paul Guth

TABLE A PARA	PREP. TIME	TRANS TIME	INSPECTION TIME	PAPER TIME
	0.5	0.5	1.0	0.5

PERMIT NUMBER CO	SOURCE	POINT	ACTION NO.		TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
	3077J	001	04	7	99	1 15 80	1 15 80	01	B08

8 1 [redacted] phenols (1240) 0.29 0.06 0.2 ← LAB
2 TEMP 7°C
3 pH < 6.5

POINT	ACTION NO.		TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
002	04	7	99	1 15 80	1 15 80	01	B08

SOURCE DESCRIPTION: Runoff H_2O

8 1 pH < 6.5
2 TEMP 7°C
3

POINT	ACTION NO.		TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
		7					

SOURCE DESCRIPTION:

8 1
2
3

POINT	ACTION NO.		TYPE	DATE SCHEDULED MO. DAY YR.	DATE ACHIEVED MO. DAY YR.	RESULT	INSPEC. NO.
		7					

SOURCE DESCRIPTION:

8 1
2
3

COMPLIANCE STATUS: ☑ IN ☐ OUT

Some coal tar pitch buried on site / [redacted]
Only H_2O d/c runoff water & boiler H_2O d/c
Sanitary to city of Ptld. Still utilize separator - use as part of contingency
All tanks concrete bermed - TANKS IN USE bottom normal dirt - some ground H_2O d/c
TANKS - NOT IN USE - bottom concrete lined -

David Berger 1-15-80
SIGNATURE OF INSPECTOR AND DATE

Paul Guth 1-15-80
SIGNATURE OF PERSON INTERVIEWED AND DATE

REGION COPY

NWT 003678

I.W.
NWR

IW 80-005

052

I.B

DEPARTMENT OF ENVIRONMENTAL QUALITY

SPECIAL SURVEY DATA SHEET

Location: Koppers Date: 1-15-79 Date Received (Lab): 1/15/80

Collected by: Dave Berger Weather: Clear Date Reported: 2/1/80

Purpose: Inspection

FIELD INFORMATION

Lab. No.	Bottle No. DO	Bottle No.	pH	Temp.	Cl_2	Flow	Description	Test Required
240							[illegible]	[illegible]
47							[illegible]	O&G

LABORATORY RESULTS

Lab. No.	Lab. pH	DO	BOD Results	Susp. Solids ml	Susp. Solids SS	Phenol mm	O&G mg/l				
1240						.24	—				
0147						—	0.2				

Dept. of Environmental Quality
RECEIVED
FEB 7 1980
NORTHWEST REGION

DEQ/L-300-7/76

[illegible] 0.1 [illegible]

NWT 003679

TICB

September 1, 1976

Mr. Paul W. Guth
Plant Superintendent
Koppers Company, Inc.
7540 N. W. St. Helens Road
Portland, Oregon 97229

Re: PERMIT ACTION
WQ - Koppers Company, Inc.
Multnomah County

Dear Mr. Guth:

This is in response to your letter of June 28, 1976, in which you stated that Koppers Company, Inc. is presently operating with the 1977 effluent limitations as set forth in Condition S5 of your National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit No. 2180-J.

On the basis of your plant's demonstrated ability to comply with the projected waste discharge limitations, the requirement for submittal of engineering plans as detailed in Condition S1 is hereby waived. This change is made on the condition that wastewater discharged from your plant continues to consistently meet criteria stated in Special Condition 5.

If you have any questions or if we can be of further assistance, please feel free to contact this office at 229-5348.

Sincerely,
Original Signed By
Loren Kramer

SEP 1 1976

LOREN KRAMER
Director

SMW/jms

cc: Environmental Protection Agency, Oregon Operations
Water Quality Division - DEQ

Number _____

STATE OF OREGON
DEPARTMENT OF ENVIRONMENTAL QUALITY
1234 S. W. Morrison
Portland, Oregon 97205

Date Resolved 2-[illegible]

TRB, [illegible]

Pollution Type:

POLLUTION COMPLAINT

Date: 2-17-78

Time: 9:13

☐ Air ☑ Water ☐ Solid Waste/Hazardous Waste
☐ Noise ☐ Oil ☐ Subsurface Sewage

Date & Time Observed: 2-

Source: Kopper's Chemical

Location: ~~[illegible]~~ St. John's - west side of river

Description: white foamy water into river pouring off of their property.

Reported by: Name: Dayton

Address: 7756 N. Crawford

City: Portland ZIP

County: Mult. Phone

In person ☐ Letter ☐ Phone ☑ Complaint taken by 286-3913

Referred to: (Agency or Person) SMW

Action Taken: met w/ Vance Klaus @ PNWNG storage site; water being pumped from their sump across Kopper's (leased < PNWNG) property was picking up contaminated soil & carrying > Willamette. O&G levels were w/in NPDES limits according to chemist. ~~[illegible]~~ called complt 2-21-78 PNWNG had rec'd permission to d/c < LDT.

Tom Amiss

DEQ/RO-100-10/75

NWT 003681

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone 412-391-3300

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

KOPPERS

June 28, 1976

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

Gentlemen:

Special Condition No. 1 of Permit No. 2180-J issued to this facility specified that plans for compliance with the effluent limitations of that permit be submitted by July 1, 1976.

As shown by the Discharge Monitoring Reports, maintenance of existing effluent equipment at this facility has been sufficient to achieve compliance with the limitations of the permit.

Very truly yours,

P. W. Guth

P. W. Guth
Plant Superintendent
Koppers Company, Inc.
7540 N.W. St. Helens Road
Portland, Oregon 97229

DEPARTMENT OF ENVIRONMENTAL QUALITY

PORTLAND REGION

1234 S.W. MORRISON STREET • PORTLAND, ORE. 97205 • Telephone (503) 229-5263

June 14, 1976

Koppers Company, Inc.
7540 N. W. St. Helens Road
Portland, Oregon 97229

Re: WQ - Koppers Company, Inc.
Multnomah County

Gentlemen:

This will remind you that your National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit includes a compliance date of July 1, 1976.

Please review your permit, and in particular Condition S1.

If you have any questions or if we can be of any assistance, please feel free to contact this office at 229-5348.

Sincerely,

LOREN KRAMER
Director

Stephen M. Willingham
Assistant Regional Engineer
Portland Region

SMW/jms

DEQ-26

DEPARTMENT OF ENVIRONMENTAL QUALITY
INVESTIGATION AND COMPLIANCE
SPILL REPORT

Date Reported May 20, 1976 Time 10:20 AM

Name of Contact Petty Officer Mills Agency U.S. Coast Guard

This office received a phone call from the above person relative to an observation of a water pollution problem. The following information was provided:

1. Date observed _____ Time _____

   Observer Kirk Roberts, Operations, Mgr. Phone # 224-0261

   Address Shaffer Transportation

2. Location of Spill Koppers Chemical - Barge ST-21

3. Source of Spill Apparent leak from Barge ST-21 which was tied up at Koppers Chemical

4. Description of Spill:

   a. Type of Material Diesel Quantity About 2 gallons

   b. Width 50 x 100 feet d. Danger _____

   c. Length _____ e. Other _____

5. Action taken by responding agencies _____

6. Corrective action taken: Natural dissipation

7. Notified Public Affairs Office Yes ☐ No. ☒

8. Call taken by Gloria Davis

cc: ~~Regional Office~~ PR
Water Quality
Public Affairs

R. P. Underwood
Laboratory, DEQ
EPA Oregon Operations

January 26, 1976

Koppers Company, Inc.
7540 N. W. St. Helens Road
Portland, Oregon 97229

Attention: Mr. Paul W. Goth,
Plant Superintendent

Re: WQ - Koppers Company, Inc.
Multnomah County
ENF-WQ-PR-76-15
NOTICE OF VIOLATION

Gentlemen:

During a recent review of your National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit monitoring reports, it was noted that Koppers Company, Inc. has not been submitting monitoring data for phenols in Discharge 001.

Please include this information with you future monthly monitoring reports.

If you have any questions or if we can be of any further assistance, please feel free to contact this office at 229-6955.

Sincerely,

LOREN KRAMER
Director

Larry D. Patterson
Regional Engineer
Portland Region

LDP/jms

cc: Regional Operations - DEQ
Water Quality Division - DEQ

Organic Materials Division, Koppers Company, Inc.
Pittsburgh, Pa. 15219, Telephone 412-391-3300

WQ

KOPPERS

October 20, 1975

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

Attn: Mr. Larry Patterson

Dear Sir:

Enclosed please find the spill prevention and contingency plan for the Portland, Oregon facility of Koppers Co., Inc. in accordance with special condition No. 15 of Permit No. 2180-J.

Very truly yours,

Paul W. Guth

Paul W. Guth
Plant Superintendent

ROBERT W. STRAUB
GOVERNOR

KESSLER R. CANNON
Director

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, OREGON • 97205 • (503) 238-8

June 9, 1975

Koppers
Organic Materials Division
Koppers Company, Inc
7540 N. W. St. Helens Road
Portland, Oregon 97229

Attention: Mr. Paul W. Guth, Plant Superintendent

Re: Oil Contaminated Water

Gentlemen:

This will acknowledge receipt of your two letters dated May 27 and May 28, 1975, in regard to oil contaminated waters being discharged from your property.

The program set forth in the May 28, 1975 letter seems to be timely and will serve as an intermediate control until you are able to meet the provisions of your NPDES permit referred to in the May 27, 1975 letter.

As agreed to, in our conversation on May 30, 1975, the completion date for the intermediate controls will be July 1, 1975.

The Department appreciates the Company's action in this incident. Your concern for the environment in Oregon is also appreciated.

Cordially,

KESSLER R. CANNON
Director

Douglas D. Fraley
Division Engineer

DDF/bw

cc: U. S. Coast Guard, Portland, Oregon
cc: Water Quality Control
cc: Portland Region

Telephone 503-289-3001

KOPPERS
Chemicals
and Coatings

MAY 28, 1975

DEPT. OF ENVIRONMENTAL QUALITY
1234 S.W. MORRISON STREET
PORTLAND, OREGON 97205
ATTN: DOUGLAS D. FRALEY

GENTLEMEN:

THIS IS THE PROGRAM FOR OUR TIMELY ELIMINATION OF MATERIAL WHICH COULD CAUSE THE WATERS TO BE CONTAMINATED.

WE WILL PUT IN A THREE STAGE FILTER SYSTEM AT THE OUTFALL OF THE WATER LEAVING OUR PLANT.

AT TRACK #3 WE WILL PICK UP THE SOILED GROUND AND REPLACE WITH FRESH MATERIAL. BETWEEN THE TRACK WE WILL LET THE BALLAST SHOW. THE WALLED-IN CEMENT AREA BY TRACK #3 WILL ALSO HAVE THE SOILED GROUND REMOVED AND THEN BE REPLACED WITH FRESH MATERIAL.

THE LOADING SPOUTS WILL HAVE CONTAINERS TO CATCH ANY DRIPPINGS. THERE WILL BE PORTABLE CATCH BASINS BENEATH THE TANK CARS TO CATCH ANY DRIPPINGS ALSO.

THE UNLOADING LINE WILL BE REVAMPED TO MINIMIZE ANY CHANCE OF SPILLAGE. THE FLEX HOSES WILL CONTAIN CAPS FOR THE HOSES WHEN THEY ARE NOT IN USE.

TRACK #5 WILL HAVE THE SOILED MATERIAL REMOVED BETWEEN AND ON EITHER SIDE OF THE TRACK. SOME PORTIONS WILL BE FILLED IN BETWEEN THE TRACKS BECAUSE OF VEHICLE TRAFFIC OVER THE TRACKS.

THE AREA AROUND #42 TANK WILL THEN BE CLEANED OF SOILED GROUND AND THIS REPLACED WITH FRESH MATERIAL.

THE TAR PUMPS AREA WILL BE CLEANED AND HAVE DRIP PANS FOR ANY LEAKAGE.

RESPECTFULLY,

Paul W. Guth

PAUL W. GUTH
PLANT MANAGER

Certified Mail
Return Receipt Requested

KOPPERS

May 27, 1975

Mr. Douglas D. Fraley
Division Engineer
Department of Environmental Quality
1234 S.W. Morrison Street
Portland, Oregon 97205

Gentlemen:

This letter is in reply to yours of April 29, 1975 regarding discharge of contaminated water. The Water Pollution Control Division of the Department is preparing to issue an NPDES permit to this facility. This permit will contain provisions requiring the treatment of contaminated effluent before discharge. It is expected that this control system will prevent discharge of untreated contaminated effluent.

Very truly yours,

P. W. Guth
Plant Superintendent

ROBERT W. STRAUB
GOVERNOR

KESSLER R. CANNON
Director

DEPARTMENT OF ENVIRONMENTAL QUALITY

1234 S.W. MORRISON STREET • PORTLAND, OREGON • 97205 • (503) 238-8471

April 29, 1975

Koppers
Organic Materials Division
Koppers Company, Inc.
7540 N. W. St. Helens Road
Portland, Oregon 97229

Attention: Mr. Paul W. Guth

Re: Meeting of April 24, 1975

Gentlemen:

This letter is in reference to our meeting of April 24, 1975, concerning the oil contaminated waters which are being discharged from your property.

Te reemphasize our conversation, you are responsible for any problems which occur as a result of the oil on your property, as well as any cleanup costs.

Specifically, oily waste has been deposited on your property such that it is entering or likely to enter public waters, which is in violation of Oregon Revised Statutes 468.785, a copy of which you received at our meeting.

Therefore, it is requested that you submit a program for a timely elimination of this problem to the Department within thirty (30) days of receipt of this letter.

Your immediate attention to this matter is appreciated.

Respectfully,

KESSLER R. CANNON
Director

Douglas D. Fraley
Division Engineer

DDF/bw

cc: Water Quality
Portland Region
U. S Coast Guard

SPILL PREVENTION PLAN CHECKLIST

3. Onshore Facilities (Excluding Production)

A. Drainage:

	Yes	No
(1) Drains from diked storage areas have valves.	X	
(2) Drain valves are manual, open-and-closed design.	X	
(3) Rainwater from diked areas is inspected before draining.	X	
(4) Plant drainage systems are equipped with either:		
a. Ponds, lagoons, or catchment basins to retain oil, or	X	
b. A diversion system at the final discharge point which could contain an uncontrolled spill and return the oil to the plant.		
(5) Flow of drainage water between treatment units is by either:		
a. Natural hydraulic flow, or		
b. Two "lift" pumps (one a spare and one permanently installed).		

Discussion: _____

B. Bulk Storage Tanks

	Yes	No
(1) Tank material and construction comply with API specifications	X	
(2) Secondary containment volume (3 million) is greater than the largest single tank capacity plus an allowance for rainwater.	X	
(3) Drainage of rainwater from diked areas into open waters, by-passing inplant treatment, is accomplished according to the following: N/A		
a. Normally the bypass valve is sealed close.		
b. The rainwater is inspected to ensure compliance with water quality standards.		
c. The bypass valve is opened and resealed under responsible supervision.		
d. Records are kept of bypassing and drainage events.		
(4) Buried metallic storage tanks: N/A		
a. New tanks are coated and wrapped to reduce corrosion.		
b. Cathodic protection is provided for tanks as determined by electrolytic testing.		
c. Tanks are pressure tested on a scheduled, periodic basis.		
(5) Partially buried metallic tanks are avoided (for storing oil) unless adequate shell coating is provided for the buried portion. N/A		

NWT 003691

	Yes	No
(6) Aboveground tanks are tested by one of the following methods:		
a. Hydrostatic testing	___	___
b. Visual inspection	X	___
c. Shell thickness testing (comparison records of shell thickness reduction are maintained)	___	___
(7) Internal heating coil leakage is controlled by one or more of the following:		
a. Monitoring the steam return or exhaust lines for oil.	X	___
b. Passing the steam return or exhaust lines through a settling tank, skimmer or other separation system.	___	___
c. Installing external heating systems.	___	___
(8) All bulk storage tanks are externally inspected on a monthly basis (including seams, rivets, bolts, gaskets, nozzle connections, valves, connected pipelines, and tank foundation and/or supports) for leaks or failures.	X	___
(9) Tanks are fail-safe engineered by the following:		
a. High liquid level alarms with an audible signal at a constantly manned station.	___	___
b. High liquid level pump cutoff devices.	___	___
c. Direct communication between the tank gauger and pumping station.	___	___
d. One fast means of determining the liquid level in tanks (such as digital computers, telepulse, or direct visual gauges).	X	___
e. Liquid level sensing devices are inspected and tested on a scheduled, periodic basis.	___	___

Discussion: _____

4. Intra-Facility Transfer Operations, Pumping, and Inplant Process (Onshore; Excluding Production)

A. Buried Pipelines

(1) Pipelines are wrapped and coated to reduce corrosion	___	___
(2) Cathodic protection is provided for pipelines as determined by electrolytic testing.	___	___
(3) When a pipeline section is exposed, it is inspected and corrective action taken as necessary.	X	___

Discussion: _____

MITTEE NAME/ADDRESS (Include Name, Location if different)
E KOPPERS COMPANY INC.
RESS 7540 N.W. ST. HELENS ROAD
PORTLAND OREGON 97229
LITY
ATION MULTNOMAH COUNTY

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

(2-16) OR-100011-9 — PERMIT NUMBER
(17-19) 001 — DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	86 (20-21)	1 (22-23)	1 (24-25)	TO	86 (26-27)	2 (28-29)	1 (30-31)

WQ 3077-J 47430

Form Approved
OMB No. 158-R0073

NOTE: Read instructions before completing this form.

PARAMETER (12-17)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW	SAMPLE MEASUREMENT	3000 ✓		GPD						ESTIMATE	
	PERMIT REQUIREMENT		10,000								
TEMPERATURE	SAMPLE MEASUREMENT	56 ✓		F							
	PERMIT REQUIREMENT		100								
P.H.	SAMPLE MEASUREMENT					6.2 ✓				5 Per Week Grab	
	PERMIT REQUIREMENT				6.0		9.0			5 Per Week Grab	
OIL & GREASE	SAMPLE MEASUREMENT					1.0 ✓ Less Than		MGL		1 Per Week	8 Hr Comp.
	PERMIT REQUIREMENT					10	15	MGL		1 Per Week	8 Hr Comp.
PHENOLS	SAMPLE MEASUREMENT					0.065 ✓		MGL		1 Per Week	8 Hr. Comp.
	PERMIT REQUIREMENT					0.5	0.7	MGL		1 Per Week	8 Hr Comp.
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

Dept. of Environmental Quality
RECEIVED
1986
NORTHWEST REGION

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
JOHN A. OXFORD Plant Manager (TYPED OR PRINTED)	THIS DOCUMENT IS SIGNED WITH RECOGNITION THAT KNOWINGLY MAKING A FALSE CERTIFICATION ON THIS REPORT OR SUPPORTING DOCUMENTS OR INTENTIONALLY TAMPERING WITH ANY MONITORING DEVICE OR METHOD ARE CRIMINAL OFFENSES, SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may be fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	503 (AREA CODE)	286-3681 (NUMBER)	86 (YEAR)	2 (MO)	18 (DAY)

MENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NWT 003693

STATE OF OREGON

INTEROFFICE MEMO

TO: Larry Patterson, WQ

DATE: January 23, 1985

FROM: Gregory D. Baesler, NWR

SUBJECT: WQ - Koppers Company, Inc.
Discharge Limitations
Multnomah County

The referenced company's NPDES permit is due to be renewed. In order to monitor the company's effluent for possible contamination by creosote, the Department's lab has suggested polyaromatic hydrocarbons be analyzed in the effluent. To complete the permit processing I need a discharge limitation for all or for each of the following:

Napthalene

Anthracene

Phenanthrene

Pyrene

Benz(a)Anthracene

Chrysene

Benz(a)Pyrene

Acenaphthene

Acenaphthylene

Fluorene

Fluoranthene

If you could provide some guidance on the limitations I should place in the permit it would be greatly appreciated.

GDB/emc

81-125-1387

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

Steve Bill

REPLY TO ATTN OF: M/S 533

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

FEB 9 1984

cc Greg Baesler

Dept. of Environmental Quality

RECEIVED
FEB 10 1984
NORTHWEST REGION

L. L. Nagel, Vice President
Koppers Company, Incorporated
The Koppers Building
Pittsburg, Pennsylvania 15219

Re: Facility No. ORD050955848

Dear Mr. Nagel:

On November 19, 1980, you submitted a Part A Resource Conservation and Recovery Act (RCRA) permit application specifying that there was hazardous waste storage in waste piles at the Kopper's facility in Portland, Oregon. On June 22, 1983, you requested that your Part A be withdrawn and that your facility be considered as only a generator of hazardous waste.

To resolve these matters and to comply with your request we are formally requesting submission of the Part B portion of the application. This request is made under authority of 40 CFR Part 270.10(e)(4). Should your formal response to this request remain as you stated on June 22, 1983, we would proceed to process your termination of interim status and ensure that any applicable closure requirements are met in lieu of Part B issuance.

You will be contacted during the next 2 weeks for the purpose of setting up a meeting regarding the Part B application. At that time, we can discuss the permit program in detail and can answer specific questions that pertain to your facility. Should you still desire to withdraw your Part A, we can also discuss the ramifications of this decision as well as what information will be necessary to verify: that hazardous wastes were never treated or disposed of at this site; that any hazardous waste storage complied with the applicable exemption rules specified in 40 CFR Parts 262.34 and 270.1; and that, therefore, formal closure would not be necessary.

Since this letter constitutes a formal request for your Part B application, I am obligated to include some information in case you should decide to remain in the RCRA system and receive a Part B permit. The Part B application requirements specified in 40 CFR Parts 270.14 through 270.21 reference other regulations such as Part 264. I have enclosed commercial reprints of 40 CFR Parts 264 and 270. This is the current available form of consolidated information. If copies of other regulations are needed, please make a specific request to this office.

The complete Part B portion of the application must be submitted to this office within 6 months of your receipt of this letter. Failure to comply with this time limit could result in the loss of interim status for existing hazardous waste management facilities and penalties under Section 3008 of RCRA up to $25,000 a day. While the regulations allow 6 months to complete the Part B portion of the application process we urge you to submit your application earlier if possible. If you submit any information under a claim of confidentiality please indicate this fact. Such claims must be substantiated as outlined in 40 CFR Part 2.

Both the Department of Environmental Quality (DEQ) and the Environmental Protection Agency (EPA) require permits for hazardous waste management facilities according to their respective regulations. In order to minimize the amount of paperwork for you, both agencies will work together to issue a joint permit. As you may already know, DEQ has expressed their intent to apply for authorization to administer a hazardous waste permit program in the State of Oregon in lieu of federally issued permits. When they recieve this authorization, they will be responsible for issuing all hazardous waste permits in the State. DEQ has indicated that the information required by EPA in 40 CFR 270.14 through 270.21 should satisfy all of the information requirements of the State except for completion of the DEQ land use compatibility form (Form DEQ 12-81). A copy of Form DEQ 12-81 is enclosed for completion and submittal with the Part B application to EPA.

Due to the wide variety of the types of hazardous waste recognized by EPA and the many unique treatment, storage, and disposal methods utilized, EPA has elected not to develop a Part B application form. We believe the reporting burden will be minimized by allowing the applicant to tailor the Part B application to the specific needs and requirements of the facility.

Since there is no rigid format for the Part B application, we are very willing to provide whatever assistance is necessary, both verbal and written, in order to ensure the submission of a complete and accurate document.

Through a joint effort we are confident that we can resolve this issue in a timely manner. We are looking forward to working with you.

Sincerely,

Alexandra B. Smith, Director
Air & Waste Management Division

Enclosures

cc: Richard Reiter, DEQ
Al Gooman, DEQ

Koppers

EFFLUENT TREATMENT FACILITIES

NORTHWEST BAR PLANT

Retained 1/27/86

[illegible]

[illegible]

Process Wastes

Dehydration water and [illegible] oil from the [illegible] are collected in tanks # [illegible] and # 18 respectively. Oil-free water is drained from these tanks to the existing adjacent [illegible] water from the [illegible] floor drains [illegible] the laboratory sink drains. [illegible] the water to an [illegible] ft. diameter X [illegible] ft. high surge tank.

The surge tank is located next to a [illegible] which has been divided into three sections. Each section has a central ditch which feeds furrows plowed at right angles. Water is admitted to one end of the ditch through an 8" pipe line with a quick opening valve. When the valve is opened, the ditch fills and overflows into the furrows flooding the section.

The water then percolates through the soil and the BOD contributing compounds are consumed by soil bacteria. BOD reduction will exceed 90% the year round and will be well over 95% during the warm months.

Sanitary Wastes

Sanitary wastes are treated in two 1,000 gallon septic tanks. One tank, an existing one, handles the effluent from the main washroom. This area will contain 2 toilets, 1 urinal, 1 Bradley sink, 1 service sink, and 3 shower heads. The other septic tank handles waste from the office (2 toilets, 2 lavatories) and boiler house (1 toilet, 1 lavatory). Both septic tanks overflow into dry wells but could be piped into a city sewer which such a sewer is run adjacent to the plant.

Uncontaminated Wastes

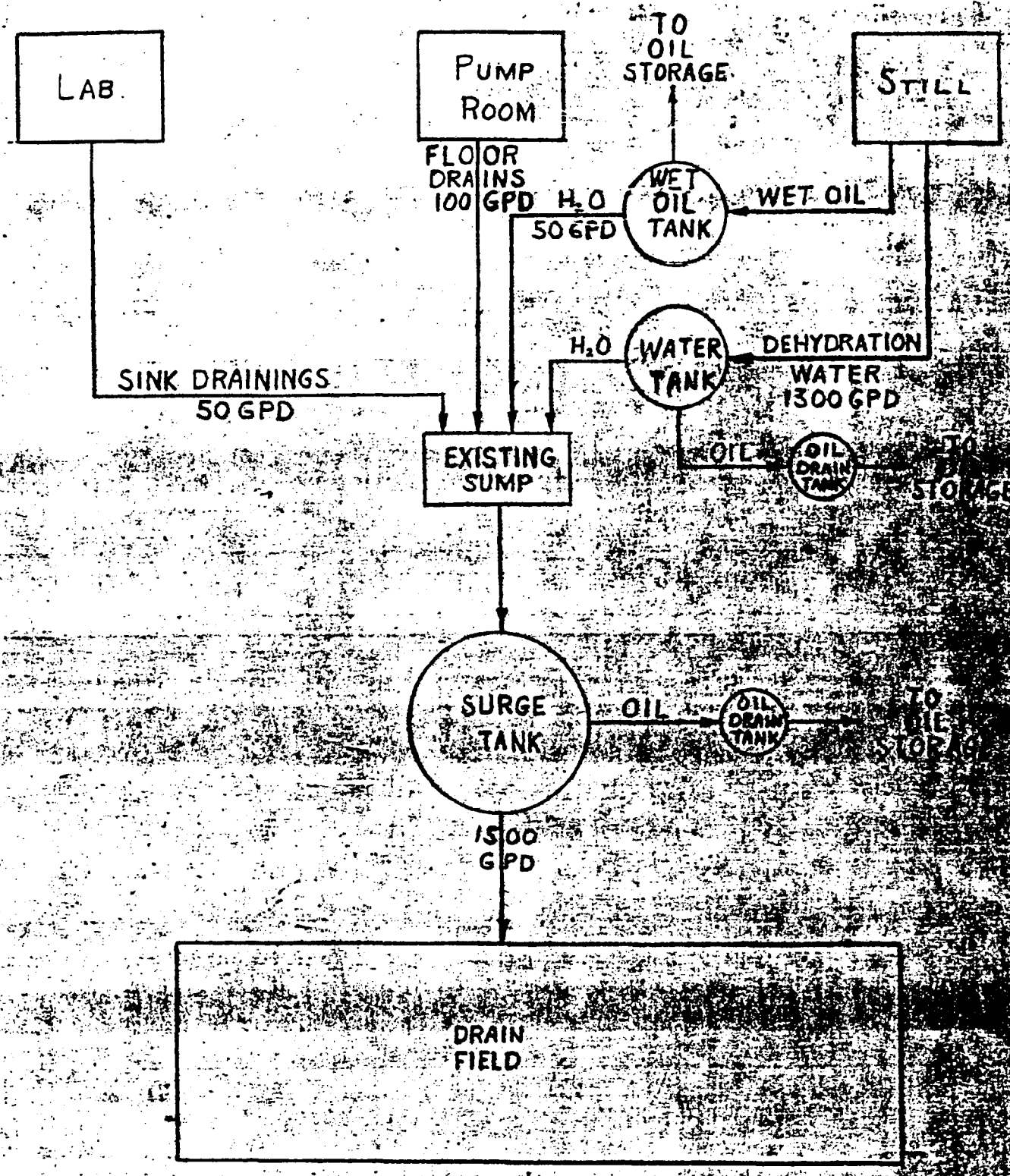
Indirect cooling will drain into an existing ditch leading to the river. City water will be used for cooling.

KOPPERS COMPANY, INC.
TAR PRODUCTS DIVISION
PITTSBURGH, PA.

THIS DRAWING AND ALL INFORMATION THEREON IS THE PROPERTY OF KOPPERS COMPANY, INC. TAR PRODUCTS DIVISION AND IS CONFIDENTIAL AND MUST NOT BE MADE PUBLIC OR COPIED UNLESS AUTHORIZED BY IT AND IS SUBJECT TO RETURN UPON DEMAND.

SKETCH SHEET

	NAME	DATE
DRAWN	R. L. SHANNON	1-27-66
CHECKED		



REV.	DESCRIPTION	CHKD. BY DATE

CONT. 300-1 NORTHWEST TAR PLANT

TITLE BLOCK FLOW DIAGRAM - PROCESS WASTE DISPOSAL

F-2663-0

[illegible]

[illegible]

	Quantity		
Item 1 Tank T-23	1		Description - Dehydration Water Tank
		Purpose:	Collect dehydration water from the batch still.
		Service:	Intermittent
		Type:	Vertical, cylindrical
		Capacity:	20,000 gallons
		Size:	12' [illegible] x 24 ft. high
		Remarks:	Use existing tank from Portland Gas Works. Install oil drains
Item 2	1		Pumping Sump
		Purpose:	Collect water from the dehydration water tank, laboratory, floor drains and pump room.
		Service:	Continuous
		Type:	Open concrete pit
		Capacity:	520 gallons
		Size:	21'-10" long x 9'-4" wide x 11'-2" deep
		Remarks:	Existing
Item 3 Pumps P 401 P 402	1		Sump Pump
		Purpose:	Transfer water from the pumping sump to the effluent surge tank
		Service:	Intermittent
		Type:	Centrifugal
		Capacity:	30 gpm @ 100 ft., sp. gr. 1.0
		Construction:	All iron
		Remarks:	Existing Pacific Model SLO

Revised 1/27, 56

		Purpose:	[illegible]
		Service:	Intermittent
		Type:	Squirrel cage induction motor
		Size:	3 HP, 220/440 volt, 3 phase 60 cycle.
		Remarks:	Existing
Item 5	2		Motor Starters
		Purpose:	Provide Across-the-line starting & electrical disconnect for pump motors.
		Service:	Intermittent
		Type:	Rowan 780 KNF-1 oil immersed, explosion-proof
		Size:	Frame 50
		Remarks:	Existing
Item 6	1		Effluent Surge Tank
		Purpose:	Collect one month's contaminated water ahead of effluent treatment facility.
		Service:	Continuous
		Type:	Vertical cylindrical
		Capacity:	44,000 gallons
		Size:	18"dia. x 24' high
		Nozzles:	Inlet 2 - 4" Vent 1 - 6" Gauge 1 - 6" Relief 6 1-1/2" Outlet 2 8" Manways 2 - 20"
		Remarks:	Design to API 650 - Use existing tank from Portland Gas Works. Add nozzles necessary.

Vessels V-401 V-402	Type:	[illegible]
	Service:	Intermittent
	Type:	Vertical, cylindrical, open top
	Capacity:	[illegible] gal.
	Size:	[illegible] dia. x [illegible] high
	Construction:	[illegible] carbon steel plate
Item 8 Pumps P-403 P-404		Transfer Pumps
	Purpose:	Transfer oil from the drain tanks to [illegible] storage
	Service:	Intermittent
	Type:	Rotary
	Capacity:	30 gpm. @ 50 psig., [illegible]
	Construction:	[illegible]
Item 9	?	Pump Motors
	Purpose:	Drive transfer pump
	Service:	Intermittent
	Type:	Squirrel cage induction motor
	Size:	3 H.P. 220/440 volts, 3 phase, 60 cycles
	Construction:	Class [illegible], Group D, vapor tight
Item 10	?	Motor Starters
	Purpose:	Provide across-the-line starting and electrical disconnect for the pump motor
	Service:	Intermittent
	Type:	[illegible] 720-KIP-1, [illegible]
	Size:	[illegible]

[illegible]

NWT 003702

Item 11		Drain Field
	Purpose:	Provide irrigation area for soil percolation treatment of effluent
	Service:	Continuous
	Size:	3/4 acre, divided into 3 equal sections
	Loading:	1500 gpd
	Remarks:	Provide water seal dike and plow distribution dikes and furrows.
Item 12		Well Points
	Purpose:	Provide sample points for effluent leaving the percolation area (drain field)
	Service:	Intermittent
	Type:	1-6" dia. x 8' deep hole with pipe case 1-6" dia. x 15' deep hole with pipe case Cases to be porous for bottom 2 feet.

Revised 1/27 66

January 20, 1966

Effluent Water Handling for Northwest Tar Plant at Portland, Oregon

I. Source of Tar Plant Process Waste Water

As described in the specifications for "Northwest Tar Plant Effluent Facilities," the process waste waters are largely a distillate overhead product from the distillation of tar. The water layer will be decanted to tank T-23 Dehydration Water Tank and this water will then be pumped to Tank T-28 Effluent Surge Tank - 44,000 gallon capacity.

II. Volume and Quality of Process Waste Water

Information obtained from other tar processing plants which are similar in operation to the proposed plant in Portland, Oregon, is used as a basis for estimating the volumes and characteristics of the effluent waters: These values are estimated to be:

		Low	High
Volumes - Gallons/day		1,200	1,800
Characteristics -			
pH		9.3	9.5
COD,	ppm	40,000	53,000
	#/day	400	795
BOD,	ppm	35,000	45,000
	#/day	350	675
Phenol,	ppm	12,000	15,000
	#/day	120	225
Sulfides,	ppm	2,500	5,000
	#/day	25	75

The volumes of these waste waters are kept at a minimum, however, they do have high pollution properties. By keeping the volume of waste water to a minimum, the pounds per day of pollutants are also kept to a minimum.

III. Process Waste Water Treatment

The Effluent Services Group of the Koppers Research Department at Monroeville has studied several treatment methods for handling these process waste waters. The most promising method being soil irrigation or soil percolation. The waste waters are also biodegradable using extended aeration.

A. Soil Irrigation and/or Soil Percolation

Based on extensive field tests, irrigating of plant process waste waters from other Koppers operations which had waters of high oxygen demand values and phenols, a high degree of reduction in oxygen demand values (over 95%) and near complete removal of phenols were obtained by this method of treatment. One of these field tests was operated in a plant near Pittsburgh, Pa. This test was operated for a full year, irrigating throughout the winter

NWT 003704

January 20, 1966

Effluent Water Handling for Northwest Tar Plant at Portland, Oregon

months. Runoff during thawing periods indicated a high percentage reduction in organics. With this background, tests were started in the laboratory and in 55-gallon drums set up outdoors to determine efficiency of soil percolation using tar plant process effluent waters.

1. Indoor Tests

Test units were set up indoors using glass soil percolation test units (Fisher Cat. No. 13-391) which had 2-1/2" of glass wool and gravel in the base. The diameter of the units above the gravel was 3" and with 15" depth of soils and sand the diameter at the top was 7". These units were started first with 53 ml of 1% phenol on weekdays and after about 3 weeks, the feed waters were switched to tar plant effluent. This rate of application is equivalent to 1500 gallons per 0.5 acre per day. At about this same time, distilled water equivalent to 1" of rain was added once a week to simulate outdoor conditions, also no water soaked through the unit up to this time. Results of these tests can be summarized as follows:

Feed Material

pH	9.3
COD, ppm	53,000
BOD, ppm	43,000
Phenols, ppm	14,500
Sulfides, ppm	2,700

Effluent Characteristics

Date, 1965	Unit 1(33% Garden Soil, 67% Sand)		Unit 2 (Coarse Plant Fill)	
	Phenols, ppm	Other Tests	Phenols, ppm	Other Tests
Sept. 1	Unit started on 1% phenol			
Sept. 15			Unit started on 1% phenol	
Sept. 28	Feeds switched to tar plant waste waters			
Oct. 4	.35		385	
Oct. 11	5.4		438	
Oct. 15	32		350	
Oct. 22	Started adding nutrients with the "rain water" each week			
Oct. 25	8.1		38	
Nov. 1	4.7		.4	
Nov. 8	6.9		0.1	
Nov. 15	2.7		2.4	
Nov. 17		pH 7.4 COD, ppm 116 BOD, ppm 34 Sulfides, ppm <0.1		pH 7.7 COD, ppm 470 BOD, ppm 195 Sulfides, ppm <0.1

NWT 003705

January 20, 1966

Effluent Water Handling for Northwest Tar Plant at Portland, Oregon

Date, 1965	Phenols, ppm	Other Tests	Phenols, ppm	Other Tests
Nov. 22	16		3.2	
Nov. 26	<0.1		-	
Dec. 6	65		291	
Dec. 13	<0.2		59	
Dec. 20	<0.1		<0.1	
Dec. 27	37		6	
Jan. 19, 1966	10.5	COD, ppm 370	5.5	COD, ppm 345

Test percolation columns have also been operated for two months using dirt from the proposed Portland irrigation area; results to date indicate effluent from the units had phenols reduced to 5 to 95 ppm and COD is reduced to 300 to 1000 ppm.

2. Outdoor Tests

Three 55-gallon steel drums with open tops were set up outdoors at Monroeville. These units were filled with 7" gravel and 24" soil (1 part), and sand (2 parts). A connection from bottom of drum permitted collection of waters passing through this soil. Process effluent waters were then added at rates equivalent to 15,000, 7,500 and 1,500 gallons/day/0.5 acre. After about one week on the high rate unit, phenols were being removed by less than 50%, and on second unit,after two weeks of operation, phenol removal was less than 50%. These two units were then discontinued. At the lower rate of application, results were as follows:

Feed Material

pH	9.5
COD, ppm	5,600
Phenols, ppm	14,600
Sulfides, ppm	4,500

	Effluent Characteristics			Outdoor Conditions for past week		
				Air Temp., °F		Precipitation
Date 1965	Phenols, ppm	COD, ppm	Sulfides, ppm	High	Low	H_2O
Oct. 18	Feed to unit started					
Oct. 25	0.1	24	<0.1	71	26	1.0
Nov. 2	0.1	29	<0.1	55	18	0.1
Nov. 8	0.1	27	<0.1	58	38	0.6
Nov. 15	0.2	128	<0.1	52	23	0.3
Nov. 19	135	980	<0.1	45	29	1.0
Dec. 1	480	1800	<0.1	46	20	-
Dec. 13	1000	4250	<0.1	40	18	-
Dec. 22	1250	-	<0.1	46	15	Snow

NWT 003706

January 20, 1966

Effluent Water Handling for Northwest Tar Plant at Portland, Oregon

The steel drums started rusting badly the first of December and considerable iron was being carried through with the water, thus some of the COD value could be due to ferrous iron present. The units were discontinued before Christmas because of rusting of the drums. Several times in November and December, the effluent applied to soil surface would freeze and a thaw was required to percolate water through the unit.

Thus with greater depths of soil to percolate through or run over at the plant site, this method of waste water handling is expected to provide a high degree of removal for phenols and organic matter from the effluent waters.

B. Extended Aeration Process Effluent Treatment

Continuous flow type laboratory models of extended aeration activated sludge units have been operating on the process effluent waters diluted with about three parts of tap water. Units have been operated for over six weeks using fixed feeds with reductions of: phenol-100% ($<$0.1 ppm); sulfide-100% ($<$0.1 ppm); COD-82-96%; and BOD-95-99%. Several feed rates and other operating conditions were tested and these units were upset with loss of biological activity when feed conditions were varied rapidly. However, with fairly uniform operations, high organic reductions were shown. This method of operation would be Koppers Company's choice after soil percolation and irrigation, or being able to divert the effluent waters to a city sewer system.

IV. Sanitary Waste

Sanitary waste water will be provided with two septic tanks and dry wells or drain fields as outlined in the attached specifications.

V. Conclusions

It is believed that the process waste waters from the proposed tar plant can best be treated by use of soil percolation and irrigation as detailed in attached specifications "Effluent Treatment Facilities - Northwest Tar Plant." This is based on laboratory tests both indoors and outdoors using a tar plant process effluent water similar to that expected at Portland and on larger scale field testing of other Koppers plants' effluent waters. It is recommended that this method of process waste water treatment be installed at the Portland Plant.

Sanitary waste would be handled initially by septic tanks with dry wells or drain fields.

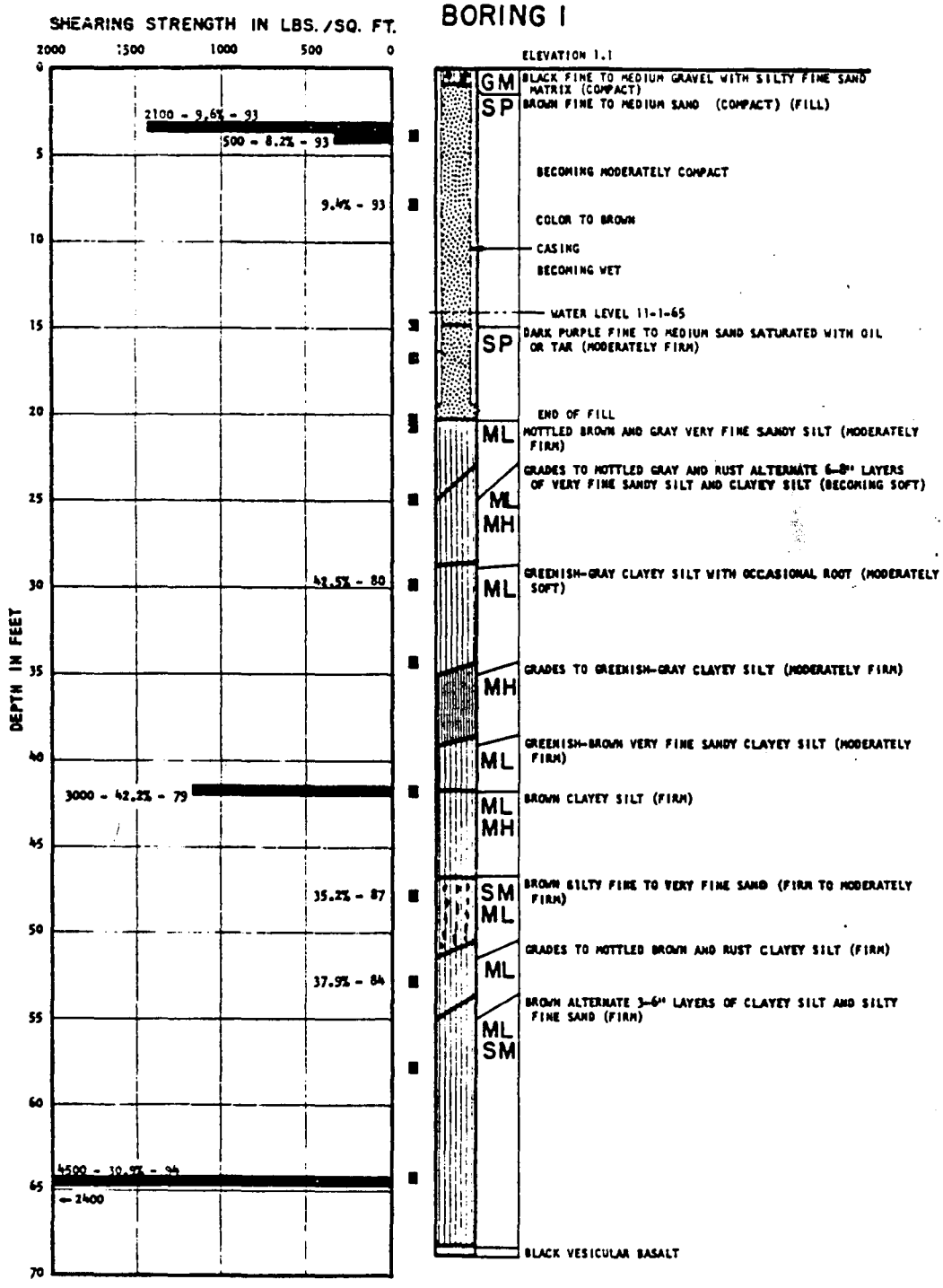
C. W. Fisher

C. W. Fisher

CWF:rtm

NWT 003707

SUB-SURFACE STUDY ADJACENT TO DRAIN FIELD



ATE OF OREGON

INTEROFFICE MEMO

:o Baton
:ter Quality

DATE: 10 Nov 84

:Gillaspie
orthwest Region

? - Koppers

ie attached letter from Koppers was included with their
DES monitoring forms for last month. In the future,
: would be helpful if you could discuss permit exceedances
.th the appropriate staff person in our region prior to
:lling sources that going over allowable permit limits is
:ceptable.

: is important to have everyone in the Department that deals
.th a source to be on the same wave length, especially the
.eld inspector who has the responsibility for the source.

:: CKAshbaker
FMBolton done
GDBaesler

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Dept. of Environmental Quality
RECEIVED
NOV 7 1984
NORTHWEST REGION

KOPPERS

November 2, 1984

Department of Environmental Quality
Northwest Region
P.O. Box 1760
Portland, Oregon 97207

Dear Sirs:

Please note that the average of our oil and grease results from our samples show that we have exceeded the parameters of our permit. Attached, you will find copies of the laboratory reports showing that the two samples taken on October 23, 1984 and October 24, 1984, respectively, were indeed high. As you can also see, copies of two other samples taken during the month were within the parameters of our permit.

I have found no leak in our system that would put creosote oil into the effluent water. I have sampled water coming from the hillside above our plant down on to St. Helens Road and into our facility. The oil seems to be of an organic nature and quite possibly could be coming from septic tank systems from the homes above our facility. This oil is in the process of being analyzed and results will be forthcoming. May I point out at this time that if the oil was coming from our system the phenol count would also be extremely high. As you can see from the laboratory reports, this is not the case.

To insure that Koppers Company remains within the parameters of the permit that you have issued, we are now piping our system into a series of empty tanks. We will then pump the ground water into these tanks and hold that water until the laboratory assures us that we are in compliance with state regulations. Once we have received that assurance, we will then pump these tanks through our outfall #001 to the Willamette River. I feel that these steps will eliminate a repeat of this type of incident in the future.

At this time, please let me assure you that this incident was immediately reported to D.E.Q. by me personally. The man I spoke to at D.E.Q., Mr. Leo Boton, advised me at that time that even though we had exceeded the limit of our permit, that the nature was not that serious. He agreed with the steps I am taking to avoid this problem atain and asked that I advise D.E.Q. when the piping system is complete.

Thank you,

John A. Oxford

John A. Oxford
Plant Manager

NWT 003710

STATE OF OREGON

INTEROFFICE MEMO

JAG
GDB

TO: Gary Calaba

DATE: August 27, 1984

FROM: CHGray, NWR CHG

SUBJECT: HW - Koppers Co., Inc. - Multnomah County

The above company has been investigated previously under the abandoned hazardous waste disposal site inventory in 1982. We took one set of samples from the five groundwater monitoring wells in 1982 for phenols. The wells surround an area which up until ten years ago received waste coat tar distillates (see attached diagram).

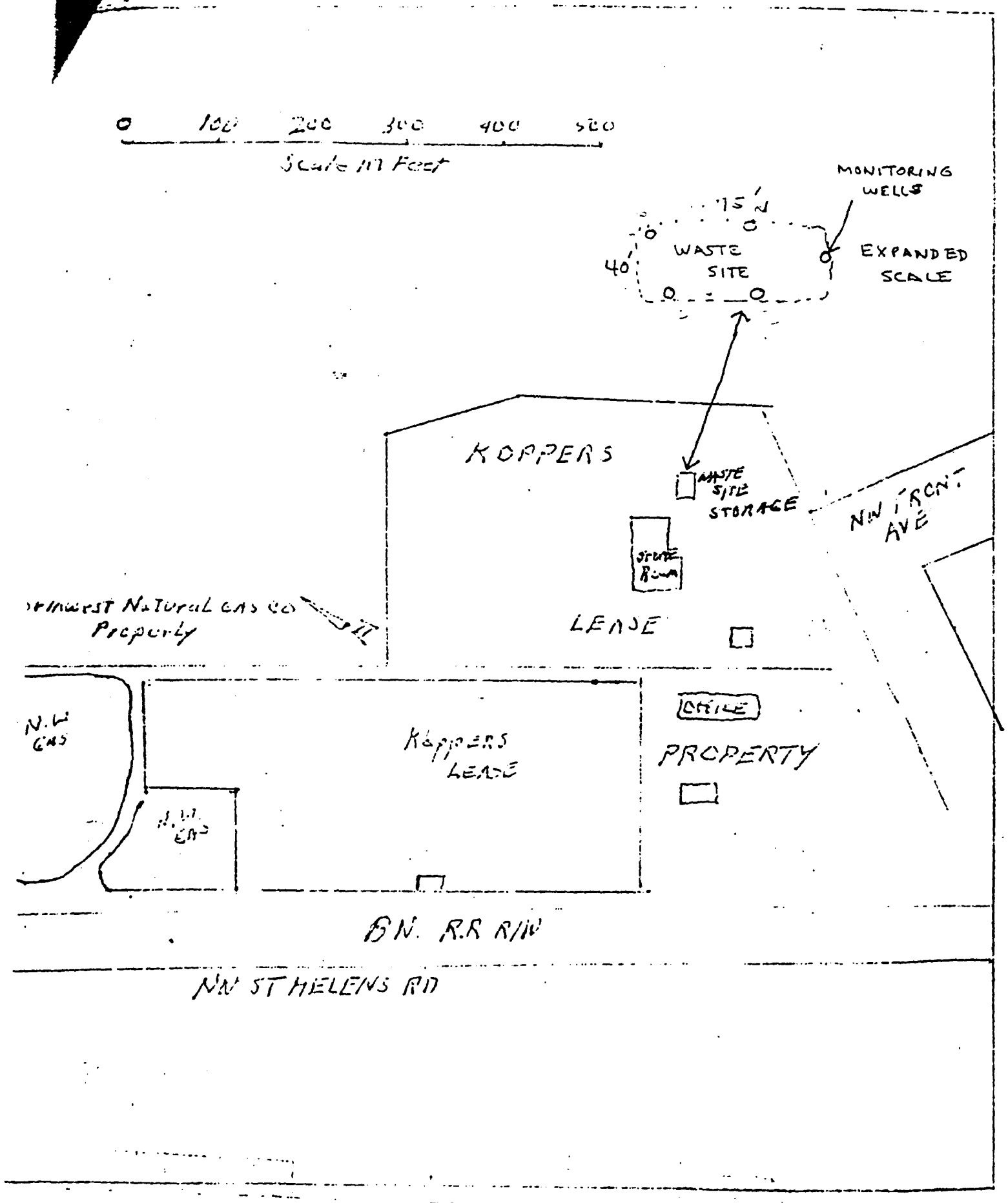
There was a benzene plant at this location which operated in the 1940's? The current company, Koppers, receives coal tar via rail cars and makes customized creosote blends for sale to wood treaters.

I'm not satisfied at this point to walk away from this facility. We need to do some more groundwater sampling and soil sampling. I will collect those samples this fall and provide a follow-up to this assessment. I intend to sample for a larger number of parameters than previously done in 1982.

Dood

CHG/mb
Attachment

81-125-1387


0 100 200 300 400 500
Scale in Feet
MONITORING WELLS
75'
40'
WASTE SITE
EXPANDED SCALE
KOPPERS
WASTE SITE STORAGE
NW FRONT AVE
Northwest Natural Gas Co Property
LEASE
N.W. GAS
Koppers LEASE
OFFICE
PROPERTY
N.W. GAS
BN. R.R R/W
NW ST HELENS RD

Request for Analysis

Laboratory No. 82-0408

Location/Site: KOPPER'S CO. INC. Date: 7/19/82 4284 Date Received Lab: JUL 19 [illegible]

Collected By: G D BASSLER Program: WQ/HW-3150B Date Reported: 8-11-82 [illegible]

Purpose: ABANDON SITE SURVEY Report Data To: ~~GDB~~ 29 [illegible]

Comments:

HW - via Mark Hope advised that this impoundment is to be included in area wide study

Item No.	Description	Sample Containers * Basic / Nutrients	DO / BOD	Metals / Organic		Test Required
1	MONITORING WELL 1				X129	OIL, GREASE, PHENOL, P TOTAL
2	" " 2				X248	SAME
3	" " 3				X157	SAME
4	" " 5				G012	SAME
5	MIDDLE POND NWNG				X247	SAME

Dept. of Environmental Quality RECEIVED AUG 12 1982 NORTHWEST REGION

* Basic - Unpreserved sample; Nutrient - Preserve with H_2SO_4

Metals - HNO_3 added in Laboratory do not rinse; Organic - Laboratory prepared Mason Jar

NWT 003713

Copy to L Patterson G Baesler NWR

3150 B

DEPARTMENT OF ENVIRONMENTAL QUALITY
Laboratory Data Sheet

Laboratory No. 82-0404
Page: 1 of: 1
Analysis Completed: 2 Aug 82

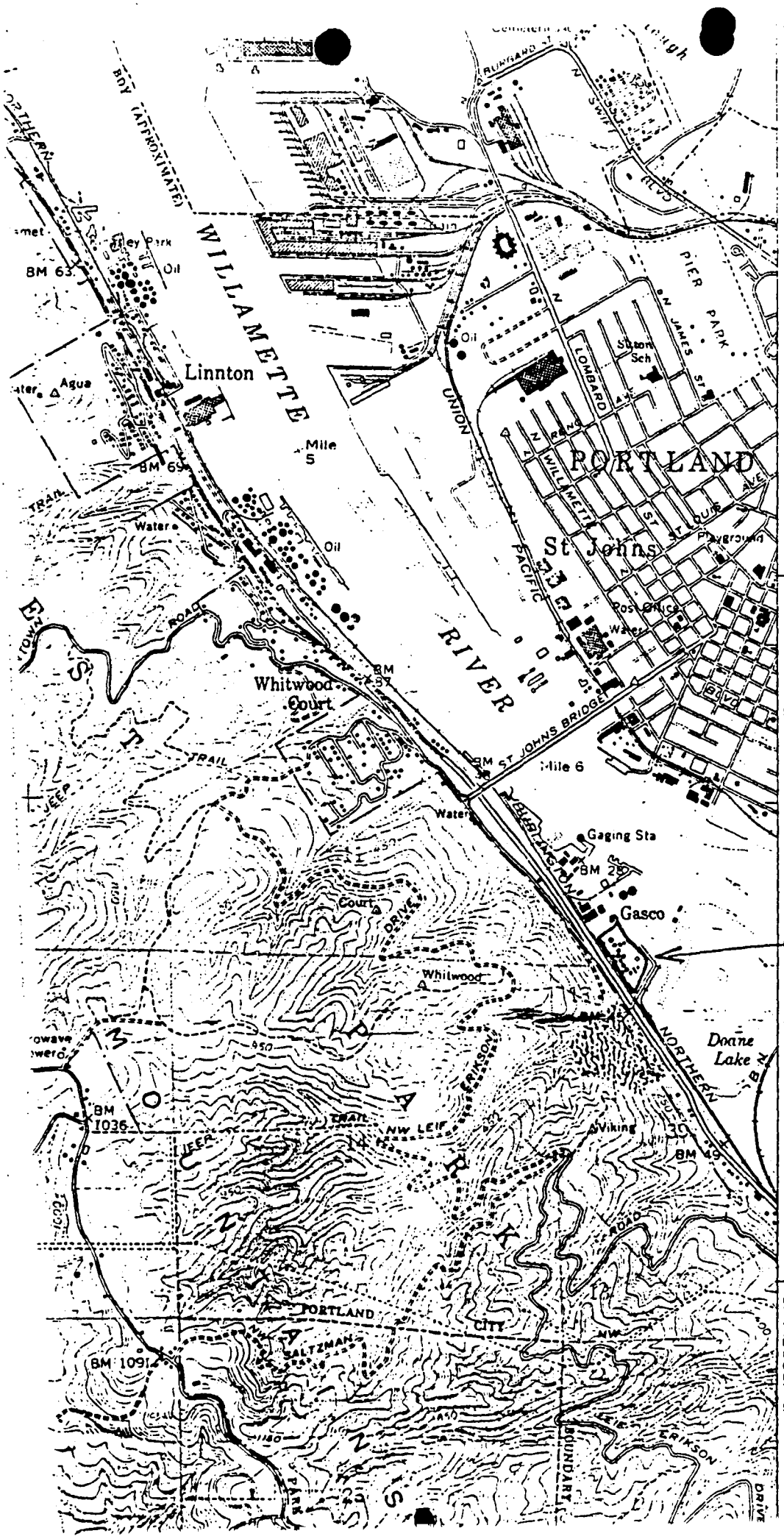
KOPPERS CO, INC. G. BAESLER

Test Results (All units in mg/l or ug/m³)

Item No.	Bottle #	O+G *	Phenol	Pb *								
1	X129		0.59									
2	X248		24.									
3	X157		0.12									
4	F012		0.44									
5	X249		0.51									

Comments: * Not enough samples to run oil & grease – Bottles washed after phenol analysis per KEB

NWT 003714



ORD027734359
Koppers Company In
Portland OR

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
KOPPERS COMPANY, INC.	7540 N.W. ST. HELENS RD.

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
PORTLAND	OR	97229	MULTNOMAH		

09 COORDINATES LATITUDE __ __ __.__ | LONGITUDE ___ __ __.__

10 DIRECTIONS TO SITE (Starting from nearest public road)

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
NW NATURAL GAS CO.	202 N.W. 2nd AVE.

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
PORTLAND	OR	97209	(503) 226-4211

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
KOPPERS COMPANY, INC	SAME AS ABOVE

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
			( )

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: __/__/__ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: __/__/__ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES DATE 6, 19, 84 (MONTH DAY YEAR)
☐ NO

BY (Check all that apply)

☐ A. EPA ☐ B. EPA CONTRACTOR ☒ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)

☐ A. ACTIVE ☒ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

_____ | _____ (BEGINNING YEAR / ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

DISTILLATES OF COAL TAR; CREOSOTE, PHENOLS

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

LOW POTENTIAL HAZARD TO THE ENVIRONMENT AND THE PUBLIC. LOCATION DOES NOT POSE THREAT TO MUNICIPAL WATER SOURCE.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
JOHN OXFORD	KOPPERS COMPANY, INC	(503) 286-3681

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
CHARLES GRAY	DEQ	STATE OF OR	(503) 229-5288	7, 31, 84 (MONTH DAY YEAR)

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER _____ (Specify)
- ☐ E. SLURRY
- ☐ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS _____

CUBIC YARDS _____

NO. OF DRUMS _____

03 WASTE CHARACTERISTICS (Check all that apply)

- ☐ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

SITE VISIT; INTERVIEW WITH JOHN OXFORD; SAMPLE ANALYSIS; DEQ FILES.

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION *(Include name(s) of species)*

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES *(Spills/runoff/standing liquids/leaking drums)* — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references, e. g., state files, sample analysis, reports)*

EPA FORM 2070-12 (7-81)

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

April 5, 1988

RECEIVED
APR 20 1988
Environmental Resources

REPLY TO ATTN OF: HW-113

Koppers Company, Incorporated
7540 N.W. St. Helens Road
Portland, Oregon 97229

Dear Sir:

The U.S. Environmental Protection Agency (EPA), through its contractor, Ecology and Environment (E&E), has completed the preliminary assessment of the Koppers facility. A copy of the report is enclosed.

Based on this assessment and other pertinent information, EPA finds it appropriate to defer to state authority for further consideration as part of the Doane Lake study.

If you have questions regarding report content or planned actions, I may be reached at (206) 442-2722.

Sincerely,

Deborah Flood

Deborah Flood
Environmental Protection Specialist
Superfund Response & Investigations Section

Enclosure

cc: Northwest Natural Gas, Portland
Chip Humphrey, EPA-000
Mary Wahl, DEQ, Portland

KOPPERS CO. PORTLAND, OR RECEIVED
APR 7 1988

cc: J. Batchelder
J. Dern
L. Flaherty

NWT 003719

PRELIMINARY ASSESSMENT REPORT
KOPPERS SITE
PORTLAND, OREGON

TDD F10-8709-09

Report Prepared by: Ecology and Environment, Inc.
Date: October 1987

Submitted to: J.E. Osborn, Regional Project Officer
Field Operations and Technical Support Branch
U.S. Environmental Protection Agency
Region X
Seattle, Washington

KOPPERS CO.
PORTLAND, OR
RECEIVED
APR 7 1993

ecology and environment, inc.
101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537
International Specialists in the Environment

recycled paper

ecology and environment, inc.
101 YESLER WAY, SEATTLE, WASHINGTON, 98104, TEL. 206/624-9537
International Specialists in the Environment

MEMORANDUM

DATE: October 28, 1987

TO: John Osborn, FIT-RPO, USEPA, Region X

THRU: for David Buecker, FIT-OM, E&E, Seattle

FROM: Lazar Gorelik, FIT-SM, E&E, Seattle

SUBJ: Preliminary Assessment Report for
Koppers Site
Portland, Oregon

REF: TDD F10-8709-09

CC: Deborah Flood, HWD-SM, USEPA, Region X
Jeffrey Villnow, FIT-PM, E&E, Seattle
Thomas Tobin, E&E, Seattle

1. Introduction and Purpose of the Preliminary Assessment:

Pursuant to U.S. Environmental Protection Agency (EPA) Contract No. 68-01-7347 and Technical Directive Document (TDD) F10-8709-09, Ecology and Environment, Inc. (E&E) conducted a Preliminary Assessment (PA) of Koppers Site in Portland, Oregon. The PA represents the second of a three-step investigative process which begins with Site Discovery and concludes, if necessary, with a Site Inspection. The investigative process, in general, is intended to identify, compare, and rank the potential hazards associated with a particular site relative to other sites across the nation for the purpose of identifying priority sites requiring remedial responses. It does not include extensive or complete site characterization, contaminant fate determination, or quantitative risk assessment.

The Koppers Site PA was conducted to identify potential public health and/or environmental hazards related to the site and, if present, evaluate the need for additional investigative action. The PA is based on data derived from available files and literature pertaining to the site (1-8). Information developed during the PA is summarized in Appendix A on EPA Form 2070-12.

2. Information Obtained During the Preliminary Assessment:

- Site Location and Description - The Koppers Site is located at 7900 N.W. St. Helens Road in the northwest industrial area of the City of Portland, Oregon (Figures 1 and 2). The facility occupies the southwest corner (8 acres) of a former gasification plant that was

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operated by Portland Gas and Coke Company from 1913 to 1956 when Northwest Natural Gas Company began distributing natural gas. Northwest Natural Gas currently owns the property and leases it to Koppers Company (1).

- Physical Environment - Several large facilities, including the Rhone-Poulenc Chemical Plant which previously generated dioxin containing wastes, are in the vicinity of the Koppers Site (5, 6). The Wacker-Siltronic Company purchased land from Northwest Natural Gas and constructed a facility near the Koppers Site in the late 1970s (3, 4). Sediments containing coal tar residues were found during the construction of the facility. Between the Siltronic and Koppers sites lies the Northern Doane Lake site. Investigation of this area by Northwest Natural Gas and Wacker-Siltronic resulted in the Oregon Department of Environmental Quality (DEQ) identifying the Koppers Site as a source of suspected contamination (4).

  The Willamette River is approximately 1,800 feet from the Koppers Site. The depth to ground water at the site is probably within five to twenty feet. The Portland area has a mild climate, wet winters and warm dry summers. Total annual precipitation is about 40 inches and the average annual evaporation is about 26 inches. Drinking water in this area is supplied by the City of Portland from the Bullrun Reservoir (7).

- Site History / Potential Problem(s) at Site - In 1965, Koppers Company of Pittsburgh signed a long term lease agreement with Northwest Natural Gas Company to construct a new coal tar distillation plant on the property (1, 2). In 1966, the new $1 million plant started processing coke oven tar, which is produced by the carbonization of coal in ovens.

  The plant consisted of tar processing and pitch cooling facilities, a tank farm, a boiler building, an office building, a machine shop, and an extensive piping system for transferring raw materials and finished products from or to transportation facilities or storage tanks (Figure 2) (1). Coal tar was brought by boat to the Willamette River docks at the plant site.

  In the period between 1966 and 1973, the plant produced chemical oil, creosote, and pitch by distillation of coal tar (8, 9). Preheated coal tar was pumped from storage tanks to a large batch still. Heat was supplied by circulating tar from the still through a gas fired heater. Distillation was carried out under relatively high temperatures and vacuum until the still contents reached a

specific softening point. Oil from the tar was separated in a fractionating column and after condensation was pumped to storage. The pitch was pumped to a cooling tank from which it was loaded into tank cars or sent to cooling pans (50 x 80 feet). The solidified pitch was then dug out and loaded into trucks or hopper cars.

Air pollution problems from the following sources were associated with these operations: vents on the heated storage tanks, seals on pumps handling the hot process steam, an oil seal on the condensing system for the fractionating column, spills, and fumes from pitch cooling tanks (10). An air pollution control system used at the plant (9, 11) consisted of a scrubbing tower in which fumes were contacted and condensed by relatively cool circulating oil. Separation of the water condensate (wastewater) from the circulating oil was accomplished in a water tank and a water dehydration tank.

In 1973, the production facilities at the plant were shut down due to a lack of raw materials (8). In 1974, Koppers received permission to operate the plant on a temporary basis for manufacturing experimental batches of electrode pitch, a new product consisting of both coal and petroleum residuals (12). An Air Contaminant Discharge Permit (No. 26-2930) issued by DEQ in 1975 suggests that the electrode pitch production was probably terminated in 1977 (13). Since this time, the facility has been used only for bulk transfer operations of creosote coal tar and coal tar pitch.

In 1987, Koppers proposed to expand the facility (14). The new facility will be used to mix chromic acid, arsenic acid, and dry copper oxide with water. Vapors and particulates from the mixing process will be controlled by a water powered eductor followed by a packed tower scrubber. Wastewater from the tower will be recycled for dilution of the raw materials.

- Waste Types, Quantities, and Characteristics - Available data suggests that solid wastes disposed of at the site in the past probably consist of wastes produced by the former gasification plant and wastes produced by the Koppers plant. Oregon DEQ has identified abandoned coal tar disposal pits at the site (4). The origin, composition, and volume of the wastes are unknown.

  An EPA hazardous waste inventory document from 1979 (15) indicates that wastes from roofing pitch and electrobinding operations were disposed at the site in an area measuring approximately 100 x 20 feet (15). The wastes consisted of phenols and oil and grease, and were probably generated by the Koppers plant. This document also indicates that Koppers Company did not ship wastes from the site and that the company generated over 200 cubic yards of wastes per year.

In the past, the Koppers plant generated approximately 1,500 gallons per day (gpd) of industrial wastewaters from the following sources: the laboratory, pump room, wet oil, wet oil tank and water dehydration tank (11). In 1966, the company proposed that after oil removal the wastewaters be discharged into a drain field, providing over 90% BOD reduction for compounds consumed by soil bacteria. It is unclear, however, whether Koppers applied this treatment method at the site. The company probably started to discharge industrial wastewaters to the City of Portland sewer system in 1975 (16).

The plant effluent consisting of wastewater runoff from the tank farm and boiler blowdown was discharged to the Willamette River in accordance with NPDES permits. In 1975, the company paved the surface in the tank farm area to reduce infiltration of surface water and installed a rainwater collection and treatment system, which included an oil water separator for oil removal (17). The effluent from the separator was discharged into a storm water ditch leading to the river.

The early NPDES permits specify the following daily maximum parameters for the plant effluent: flow (68,000 gpd), oil and grease (20 mg/l), pH (6-9), and temperature (110°F). The NPDES permit of 1975 also includes phenols (0.7 mg/l). In 1985, DEQ required settling and skimming for Kopper's runoff to reduce the content of polynuclear aromatic hydrocarbons (PAHs) and also required monthly monitoring for PAHs in the effluent (18). However, the NPDES discharge monitoring report of 1987 specified the following parameters: flow (3,000 - 10,000 gpd), temperature (72 - 100°F), pH (6 - 9), oil and grease (10 - 15 mg/l), and phenols (0.5 - 0.7 mg/l).

- Pollutants, Mobilization, Pathways, and Risks - In the past, products recovered by distillation of coal tar at the plant included: chemical oil, creosote, and pitch. Coal tar is a complex mixture of many chemicals. It is a viscous liquid heavier than water. A typical composition of coal tar by distillation may be given as: about 5% tar chemicals (tar acids); 30% distillation oils (creosote and other distillates); and 60% to 65% residuals (road tars, crude and refined tars, pitches and pitch coke) (19).

  Chemical oil produced by the plant consisted mainly of phenols and naphthalene (9). The product was shipped for further processing for recovery of naphthalene, phenol, xylenol, pyridine, picoline, and various solvent oils. Creosote, a well known wood preservative, is primarily composed of PAHs. It is an oily liquid slightly heavier than water. Pitches have a variety of uses. Hard pitches produced by the plant were used in electrodes as binding materials.

A majority of the chemical constituents of these products are characterized by chemical stability, low water solubility, low vapor pressure, and high affinity to soil (19). As a result, they exhibit low mobility in the environment, distributing preferentially to soil. Subsurface contamination by the liquid products may have a long term adverse affect on both the soil and ground water because of a high content of organic compounds and their low solubility.

A limited set of analytical results of ground water samples from on-site monitoring wells, old wastes from one on-site pond, and river sediment samples near the site suggest that soil and ground water contamination by coal tar constituents have occurred at the site (20). The transport of contaminants from the site is likely to be directed toward the river through surface water runoff and ground water flow.

However, the information gathered suggests that the Koppers Site has a low potential to cause human health problems because residual contaminants are unlikely to influence either the local drinking water source or air quality. In contrast, it appears that potential transport of toxic tar constituents from the site may affect water quality in the river and its aquatic population. This is primarily due to the close proximity of the site to the river. This potential environmental impact cannot be accurately assessed because of incomplete data on the extent and magnitude of the contamination.

3. Priority Assessment:

No further action is appropriate under the pre-remedial program. However, the site should continue to be assessed as part of the Doane Lake investigation.

4. Follow-up Recommendations:

Activities at the Koppers Site have been monitored by DEQ since the construction of the coal tar processing plant, which occupies a portion of the old gasification plant. Tar contamination has been found in the area of the old gas plant in a study conducted by Northwest Gas Company and Wacker-Siltronic Company.

Information gathered during the PA suggests that soil and ground water contamination by tar constituents has occurred at the site as a result of past operational and waste disposal practices. Coal tar was produced at the site in the period 1913-1953. The Koppers plant processed coal tar into chemical oil, creosote, and electrode pitches probably in the period 1966-1973. Experimental batches of an electrode pitch consisting of coal and petroleum residuals were produced probably in the period 1973-1977.

The EPA site file indicates that in the past the plant generated approximately 200 cubic yards per year of wastes which were disposed on the Koppers Site. The process sources of waste generation are unknown. Limited data is available on the waste composition. In the past, the tank farm area probably resulted in subsurface contamination by various coal tar products. It is possible that before 1975 industrial wastewaters from the plant were disposed beneath the site.

It appears that the site has a low potential to cause human health problems since residual contaminants at the site are unlikely to influence the local drinking water source or air quality. However, the site has potential to cause environmental damage through surface and subsurface migration of various toxic pollutants to the river. Due to the lack of a target population, no further action is recommended under CERCLA. It is, however, recommended that a study at the Koppers Site be conducted by a state or local agency to evaluate the extent and magnitude of contamination in the area leased by Koppers Company.

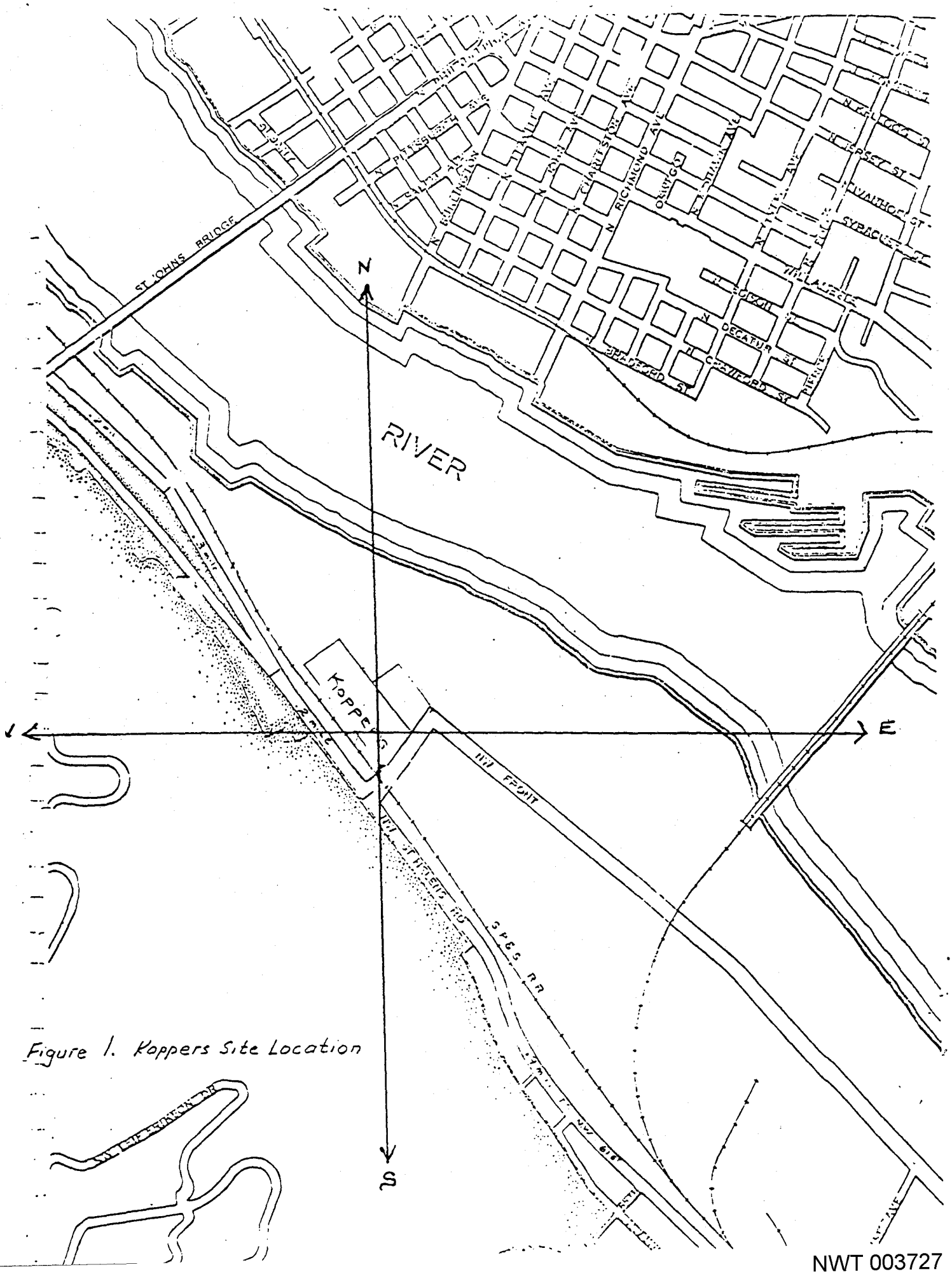


Figure 1. Koppers Site Location

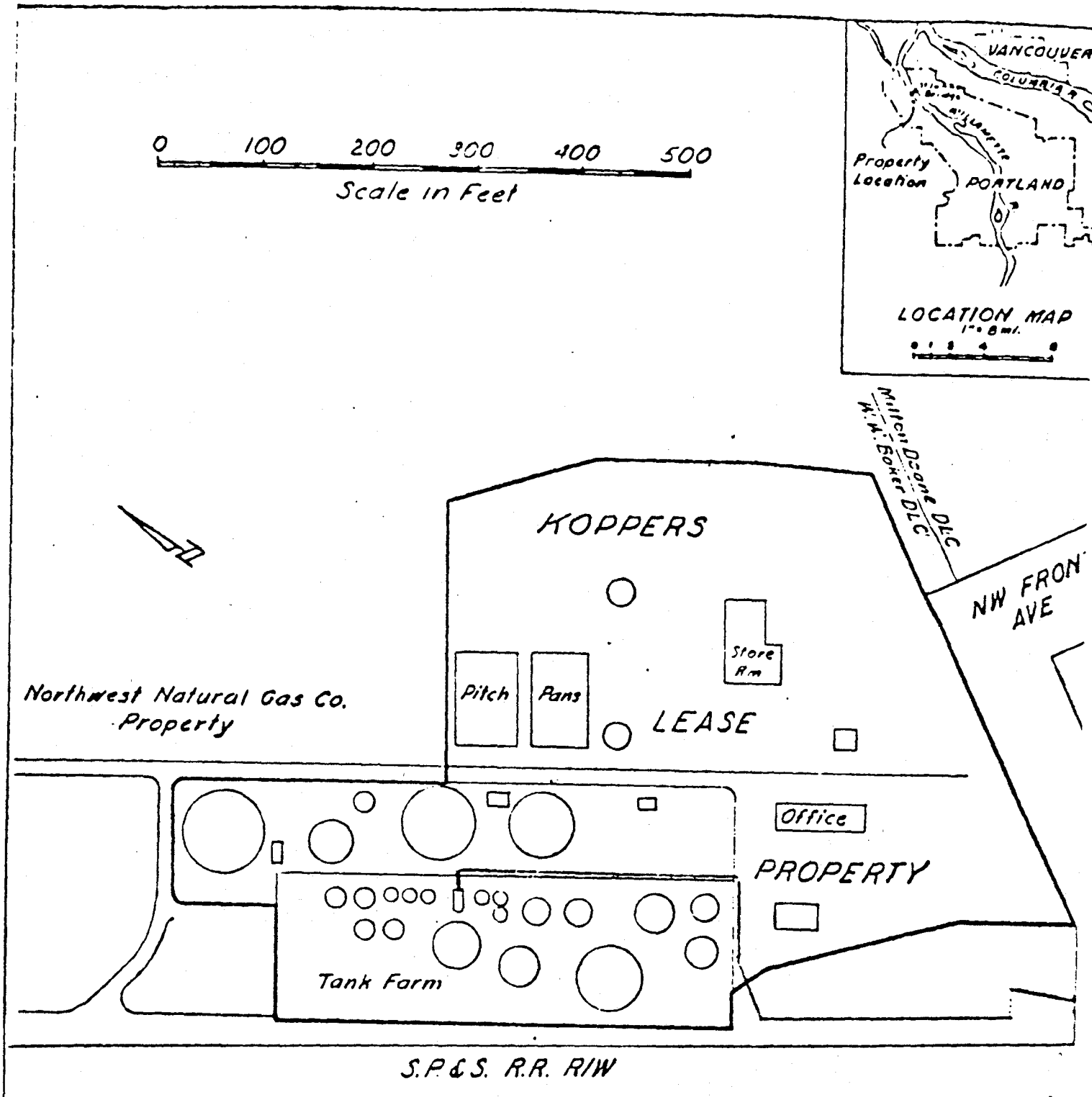


Figure 2. Location of Koppers Lease Property on Northwest Natural Gas Co. property at 7900 NW St Helens Rd., City of Portland, County of Multnomah, State of Oregon.

June 3, 1971

REFERENCES

1. The Oregon Journal, August 25, 1965. The Casco Plant in New Use. ODEQ Site Files.

2. The Oregonian, August 11, 1966. Koppers' Portland Plant Starts Initial Production. ODEQ Site Files.

3. Memo from Dennis Adamczyk to A. Goodman, December 19, 1986. ODEQ Site Files.

4. Dennis Adamczyk, December 26, 1986. Northern Doane Lake - Koppers Company Hazardous Waste Site. ODEQ Site Files.

5. L. Gorelik, 1985. Tier 2 Dioxin Screening, Phone-Poulene Chemical Plant, Portland, Oregon. Ecology and Environment, TDD R10-8405-09.

6. W. Ritthaler and L. Gorelik, 1986. Alkali Lake Disposal Site, Alkali Lake, Oregon, National Dioxin Study. Ecology and Environment, TDD R10-8410-12.

7. Personal Communication, September 15, 1987. Oregon Water Department.

8. AQ-Koppers-Multnomah County, September 25, 1974. ODEQ Site Files.

9. Memo from D. Roach to R. Hatchard, February 11, 1966. ODEQ Site Files.

10. Memo from T. Bispham to W. Hanson, October 14, 1970. ODEQ Site Files.

11. Effluent Treatment Facilities, January 27, 1966. ODEQ Site Files.

12. Memo from L. Shannon to R. Bispham, December 11, 1974, ODEQ Site files.

13. Memo from L. Patterson to Koppers Company, Inc., January 19, 1977. ODEQ Site Files.

14. ODEQ Memo from A. Broad, August 17, 1987. ODEQ Site Files.

15. Inventory - Possible Source of Hazardous Waste, August 21, 1979. EPA Region X, Site Files.

16. Application No. OR-000077-9, date unknown. ODEQ Site Files.

17. Northwest Tank Farm, Rainwater Collection and Treatment System, January 23, 1975. ODEQ Site Files.

18. Memo from L. Patterson to G. Bausler, March 4, 1985. ODEQ Site Files.

19. Handbook on Manufactured Gas Plant Sites, 1984. Environmental Research and Technology, Inc., Pittsburg PA and Koppers Company, Inc. Prepared for Utility Solid Waste Activity Group Superfund Committee, Washington, D.C., Under EPA Project No. P-D125.

REFERENCES (cont.)

20. Memo from C.H. Gray to G. Calaba, August 27, 1984, ODEQ Site Files.

21. Analytical Results of Samples from the Koppers Site, July 19, 1982. ODEQ Site Files.

APPENDIX A

EPA FORM 2070-12

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION	
01 State	02 Site Numbe
OR	D027734359

II. SITE NAME AND LOCATION

01 Site Name (Legal, common, or descriptive name of site)	02 Street, Route No., or Specific Location Identifier				
Koppers Co., Inc.	7540 N.W. St. Helens Road				
03 City	04 State	05 Zip Code	06 County	07 County Code	08 Co D: 0
Portland	OR	97229	Multnomah	051	

09 Coordinates Latitude	Longitude
45° 34' 40.0"	122° 45' 31.0"

10 Directions to Site (Starting from nearest public road)

III. RESPONSIBLE PARTIES

01 Owner (if known)	02 Street (Business, mailing, residential)		
Northwest Natural Gas	220 N.W. Second Avenue		
03 City	04 State	05 Zip Code	06 Telephone Number
Portland	OR	97209	(303) 226-4211

07 Operator (if known and different from owner)	08 Street (Business, mailing, residential)		
Koppers Co., Inc.	Environmental Resources		
09 City	10 State	11 Zip Code	12 Telephone Number
Pittsburgh	PA	15219	(412) 227-2000

13 Type of Ownership (Check one)
- [X] A. Private
- [ ] B. Federal _____ (agency name)
- [ ] C. State
- [ ] C. County
- [ ] E. Municipal
- [ ] F. Other _____ (specify)
- [ ] G. Unknown

14 Owner/Operator Notification on File (Check all that apply)
- [X] A. RCRA 3001 Date Received: 11 /19 /1980 (Month Day Year)
- [X] B. Uncontrolled Waste Site (CERCLA 103c) 07 /19 /1982 (Month Day Year) The company was investigated under abandoned HW site inventory.
- [ ] C. None

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 On-Site Inspection
- [X] Yes Date 07 /19 /1982 (Month Day Year)
- [ ] No

- [ ] A. EPA
- [ ] B. EPA Contractor
- [X] C. State
- [ ] D. Other Contractor
- [ ] E. Local Health Official
- [ ] F. Other _____ (specify)

Contractor Names(s): _____

02 Site Status (Check one)
- [X] A. Active
- [ ] B. Inactive
- [ ] C. Unknown

03 Years of Operation: 1966 (Beginning Year) | Present (Ending Year) [ ] Unknown

04 Description of Substances Possibly Present, Known, or Alleged
Coal gas plant from 1913-1956. Coal tar distillation into oil, creosote, and electrode pitch from 1966 to 1973. Electrode pitches production from coal tar and petroleum residues from 1973 to 1977. Transfer and storage of coal tar products from 1977.

05 Description of Potential Hazard to Environment and/or Population
Solid wastes and industrial wastewater from processing coal tar. Large quantities of solid wastes were disposed the Koppers site. Solid wastes are complex mixtures of phenols and PAHs. Subsurface contamination by coal tar constituents.

V. PRIORITY ASSESSMENT

01 Priority for Inspection (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part Description of Hazardous Conditions and Incidents)
- [ ] A. High (Inspection required promptly)
- [ ] B. Medium (Inspection required)
- [ ] C. Low (Inspect on time available basis)
- [X] D. None (No further action needed, complete current disposition fo

VI. INFORMATION AVAILABLE FROM

01 Contact	02 Of (Agency/Organization)	03 Telephone
Deborah Flood	USEPA, Region X, Superfund	(206) 442-272

04 Person Responsible for Assessment	05 Agency	06 Organization	07 Telephone No.	08 Date
Lazar Gorelik	EPA/FIT	E&E	(206)624-9537	09 /23 /8 (Month Day Y

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION	
01 State	02 Site Numb
OR	D02773435

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 Physical States (Check all that apply)

- [ ] A. Solid
- [ ] B. Powder, Fines
- [x] C. Sludge
- [ ] D. Other _____ (Specify)
- [ ] E. Slurry
- [ ] F. Liquid
- [ ] G. Gas

02 Waste Quantity at Site (Measure of waste quantities must be independent)

Tons _____

Cubic Yards > 200 cy/yr

No. of Drums _____

03 Waste Characteristics (Check all that apply)

- [ ] A. Toxic
- [ ] B. Corrosive
- [ ] C. Radioactive
- [ ] D. Persistent
- [ ] E. Soluble
- [ ] F. Infectious
- [ ] G. Flammable
- [ ] H. Ignitable
- [ ] I. Highly Volati
- [ ] J. Explos
- [ ] K. Reacti
- [ ] L. Incomp ible
- [ ] M. Not Applic

III. WASTE TYPE

Category	Substance Name	01 Gross Amount	02 Unit of Measure	03 Comments
SLU	Sludge			
OLW	Oily Waste	> 200	cubic yards	Oily waste containing coal tar compounds were generated in the past by Koppers Co., Inc. Waste is in fill on the property leased by Koppers Co., Inc.
SOL	Solvents			
PSD	Pesticides			
OCC	Other Organic Chemicals			
IOC	Inorganic Chemicals			
ACD	Acids			
BAS	Bases			
MES	Heavy Metals			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 Category	02 Substance Name	03 CAS Number	04 Storage/Disposal Method	05 Concentration	06 Measure Concentrat
OLW	Complex mixtures; PAHs and other compounds of coal tar	N/A	On-site	Unknown	N/A
		N/A	Disposed	Uknown	N/A

V. FEEDSTOCKS (See Appendix for CAS Numbers)

Category	01 Feedstock Name	02 CAS Number	Category	01 Feedstock Name	02 CAS Numb
FDS	Coal Tar	N/A	FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Adamczyk, 01/26/86, ODEQ Files; Adamczyk, 12/05/86, ODEQ Files; Adamczyk, 01/19/86, ODEQ Files; T. Berkmeir, 08/21/79, EPA Region X Files; Memo from C. H. Gray to G. Calala, 08/27/84, ODEQ Files; The Oregonian, 08/11/66, ODEQ Files; Memo from Koppers, 02/22/84, ODEQ Files; Memo from B. Smith to Koppers Co., 02/06/1984, EPA Region X ODEQ Files.

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 State	02 Site Numb
OR	D02773435

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. Ground Water Contamination — 02 [X] Observed (Date: 07/19/82) [ ] Potential [ ] Alle
03 Population Potentially Affected: 0 — 04 Narrative Description

Elevated levels of phenols were detected in the ground beneath the site. Other coal tar constituents are probab present in the water.

01 [X] B. Surface Water Contamination — 02 [ ] Observed (Date:) [X] Potential [ ] Alle
03 Population Potentially Affected: — 04 Narrative Description

Potential for migration of contaminants from the site to the Willamette River.

01 [X] C. Contamination of Air — 02 [X] Observed (Date: 07/28/1970) [ ] Potential [ ] Alle
03 Population Potentially Affected: — 04 Narrative Description

In the past, the chemical plant had a number of problems with air contamination.

01 [ ] D. Fire/Explosive Conditions — 02 [ ] Observed (Date:) [ ] Potential [ ] Alle
03 Population Potentially Affected: — 04 Narrative Description

None reported, observed, or suspected.

01 [ ] E. Direct Contact — 02 [ ] Observed (Date:) [ ] Potential [ ] Alle
03 Population Potentially Affected: — 04 Narrative Description

Facility is fenced and access is restricted.

01 [X] F. Contamination of Soil — 02 [ ] Observed (Date:) [X] Potential [ ] Alle
03 Area Potentially Affected (Acres) Unknown — 04 Narrative Description

Soil contamination is likely to occur at the site as a result of past operational and waste disposal practices. Areas of concern are: waste pit, tank farm, and drain field.

01 [ ] G. Drinking Water Contamination — 02 [ ] Observed (Date:) [ ] Potential [ ] Alle
03 Population Potentially Affected: — 04 Narrative Description

Ground water in the industrial area is not used for drinking water supplies. The site is unlikely to influence water quality of the local drinking water supply source.

01 [X] H. Worker Exposure/Injury — 02 [ ] Observed (Date:) [X] Potential [ ] Alle
03 Workers Potentially Affected: 12 — 04 Narrative Description

If safety procedures are violated, potential for worker exposure seems likely because of the toxic nature of products.

01 [ ] I. Population Exposure/Injury — 02 [ ] Observed (Date:) [ ] Potential [ ] Alle
03 Population Potentially Affected: — 04 Narrative Description

Current operations are unlikely to result in population exposure/injury.

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 State	02 Site Num
OR	D0277343

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 [ ] J. Damage to Flora — 02 [ ] Observed (Date: _____) [ ] Potential [ ] All
04 Narrative Description

None reported, observed, or suspected.

01 [X] K. Damage to Fauna — 02 [X] Observed (Date: Unknown) [ ] Potential [ ] All
04 Narrative Description (include name(s) of species)

The Willamette River is about 0.75 miles from the site. The presence of coal tar constituents have been detect in river sediments.

01 [ ] L. Contamination of Food Chain — 02 [ ] Observed (Date: _____) [ ] Potential [ ] All
04 Narrative Description

None reported, observed, or suspected.

01 [X] M. Unstable Containment of Wastes (Spills/runoff/standing liquids, leaking drums) — 02 [ ] Observed (Date: _____) [X] Potential [ ] All
03 Population Potentially Affected: _____ 04 Narrative Description

Potential for leaching of contaminants from disposed waste products into subsurface.

01 [X] N. Damage to Off-site Property — 02 [ ] Observed (Date: _____) [X] Potential [ ] All
04 Narrative Description

Damage to off-site property may result through subsurface migration of contaminants.

01 [ ] O. Contamination of Sewers, Storm Drains, WWTPs — 02 [ ] Observed (Date: _____) [ ] Potential [ ] All
04 Narrative Description

None reported, observed, or suspected.

01 [X] P. Illegal/Unauthorized Dumping — 02 [ ] Observed (Date: _____) [X] Potential [ ] All
04 Narrative Description

Waste products containing phenols and other tar compounds were disposed on site by Koppers Co., Inc. in the pas

05 Description of Any Other Known, Potential, or Alleged Hazards

Potential spills of liquid products as a result of a long operation period of the facility having a large stora capacity and extensive piping system.

III. TOTAL POPULATION POTENTIALLY AFFECTED:

IV. COMMENTS

It is recommended that a study be conducted at the Koppers Co., Inc. Site.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

Memo from Gray to Calala, 08/27/84, ODEQ Files; Analytical Results of Samples from Koppers Co., Inc. Site, 07/1 T. Berkmeir, 08/21/79, EPA Region X Files; Memo from C. H. Gray to G. Calala, 08/27/84; Memo, 11/27/87, USGS Ma Memo, 07/28/1970, ODEQ Files.

Interoffice Letter **KOPPERS** File: NW-W-E-Surveys **No.** 12439

To Jordan Dern | For Attention Of | Date 12-2-81

Send Reply To Tom Leake | Division | Department | Location Fontana, Ca

☐ If attached vendor's invoices are in order, please approve and return them in the usual manner: If another copy has already been approved, return attached properly approved with notation on invoice "Duplicate"
"Original passed on audit number, date, and distribution charged"

☐ See Copy Attached
☐ Refer To Your Copy

Subject or Document I Have No Knowledge of what Info was Provided To EPA in the Two Referenced Questionaires. & I'm Certainly Not the Person To Sign the Attached Contract So I'm Sending It To You. Perhaps You Are Not the Proper Person But You Are The One I Know Will Get It To the Proper Person If No One Wants It - Scrap It.

Tom Leake
Transmitted By

Reply

To Tom Leake | Date 12/7/81

As far as I can see, there is no data which we would now consider to be confidential

After Entering Reply, Snap Out The Set And Retain This Copy For Your Files.

[signature]
Signature

ADS-15 Rev. 2
20M 12-71

NWT 003736

86-119 corresp

Cc: Mike T. re: Time Oil
Shannon
Bill } Re: NW Terminal

THE OREGONIAN ◆ WEDNESDAY, MARCH 29, 2000

River heads for Superfund

THE HARBOR: *The Willamette cleanup likely will be managed at a federal level*

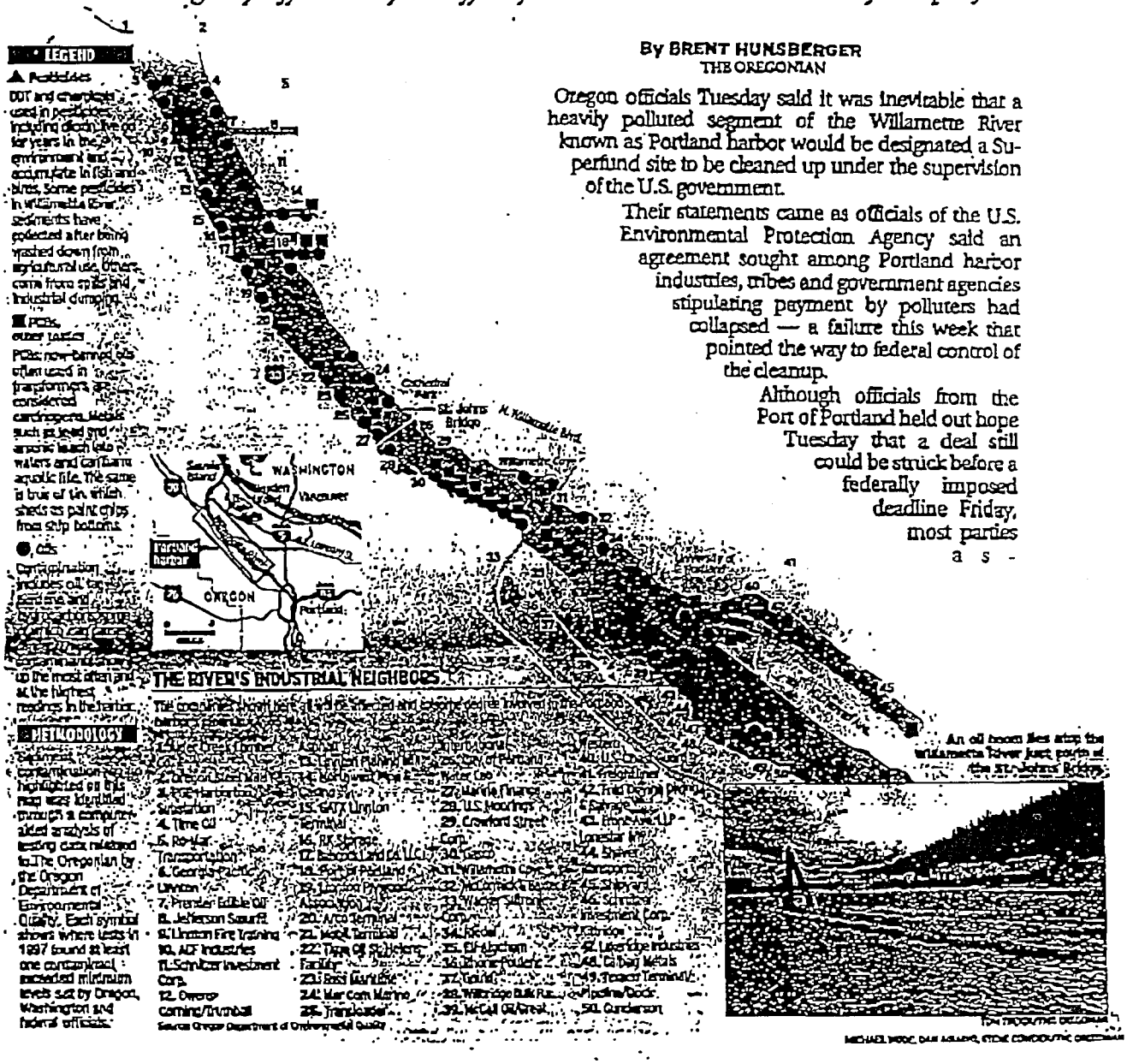
THE EPA: *Agency officials say an effort fails to secure state control of the project*

By BRENT HUNSBERGER
THE OREGONIAN

Oregon officials Tuesday said it was inevitable that a heavily polluted segment of the Willamette River known as Portland harbor would be designated a Superfund site to be cleaned up under the supervision of the U.S. government.

Their statements came as officials of the U.S. Environmental Protection Agency said an agreement sought among Portland harbor industries, tribes and government agencies stipulating payment by polluters had collapsed — a failure this week that pointed the way to federal control of the cleanup.

Although officials from the Port of Portland held out hope Tuesday that a deal still could be struck before a federally imposed deadline Friday, most parties a s -



An oil boom lies atop the Willamette River just south of the St. Johns Bridge.

TOM TROUGH/THE OREGONIAN

MICHAEL WOOD, DAN ASHANG, STONE CONDUCTIVE OREGONIAN

sumed that cleanup of the harbor would slip away from Oregon's control and default to the federal government.

"Our preference would've been to do it ourselves. But because of the enormous complexity at this site, it just wasn't possible," said Bill Wyatt, Gov. Kitzhaber's chief of staff and point man on the harbor. "Now we have to look at other models, and there are plenty of successful ones out there."

"(Superfund) is a law that has worked effectively," he said.

Oregon had fought fiercely to retain control of the cleanup and avoid the stigma of a Superfund listing on a river that won national attention in the early 1970s for improvements in water quality.

Since 1998, Kitzhaber, state environment officials and the Portland Harbor Group — a coalition of harbor industries, the city of Portland and the Port of Portland — tried to craft a state-run cleanup plan that they thought would do the job more quickly and cheaply while perhaps preserving a channel-deepening project crucial to Port customers.

"The Superfund law is a huge hammer, and when you have to use it, it makes a mess. You don't want a listing. It just puts a freeze on commerce around the river."

DAVID LOHMAN,
POLICY DIRECTOR, PORT OF PORTLAND

Large-scale Superfund sites — at 5.5 miles long, Portland harbor is one — are notoriously expensive and lengthy. Tacoma's Commencement Bay has been undergoing Superfund cleanup for more than a decade.

But Oregon Department of Environmental Quality officials told the Portland City Council on Tuesday that it was highly unlikely federal agencies and potential polluters could sign an agreement that would guarantee federal agencies and tribes could collect compensation from polluters after completion of the cleanup. Such a pact, called a "tolling agreement," was critical to the EPA's willingness to withhold Portland harbor's designation as a Superfund site.

"Our understanding is that a tolling agreement is not happening," said Bill Dunbar, an EPA spokesman.

DEQ hazardous waste administrator Mary Wahl told the City Council she thought a Superfund recommendation was "just a given."

"If there isn't a tolling agreement in place, then EPA will not be able to defer the site to the state," said Michelle Pirzadeh, EPA's associate administrator for Superfund in Seattle.

Pirzadeh said Tuesday that the EPA's Seattle office probably will seek Kitzhaber's concurrence on a Superfund listing next week before sending its proposal to EPA headquarters in Washington, D.C. A formal designation of the harbor as a Superfund site could take three to eight months and will involve a 60-day public comment period.

A Superfund listing is complicated further by the fact that steelhead and spring chinook swimming through the harbor carry protection under the Endangered Species Act — a competing federal designation made in 1999 and a circumstance that will slow the cleanup. Dredging for tainted sediments, for example, could not be conducted during migration.

And the Willamette River faces further challenge by the city of Portland's sewage overflows, which at times threaten human health.

Port of Portland officials Tuesday resisted the prospect of a Superfund listing, which would severely complicate its plans for deepening the Willamette River navigation channel from 40 to 43 feet. Speaking to the City Council, Port policy director David Lohman said last-minute agreements may still be possible. He also repeated his warnings of Superfund's lengthy and costly track record.

Nationally, the EPA has spent $17.7 billion at more than 1,200 Superfund sites in the program's 20-year history.

"The Superfund law is a huge hammer, and when you have to use it, it makes a mess," Lohman said. "You don't want a listing. It just puts a freeze on commerce around the river."

Sandra K. Hart, spokeswoman for Northwest Natural and four other private members of the Portland Harbor Group, said the group was disappointed by the failed tolling agreement, but she declined to comment further.

Pirzadeh disagreed that a Superfund listing would halt commerce in the harbor, pointing to sites in Tacoma's Commencement Bay and Seattle's Harbor Island, also a Superfund site, in which EPA worked with Port authorities to develop properties during cleanup.

"If you look at urban areas, in major cities with ports, it has really not been an economic disadvantage to them," Pirzadeh said.

Federal agencies and tribes had sought the tolling agreement to secure the right to recover from polluters any damages to fish, wildlife and other natural resources. Such protection automatically exists under the federal Superfund law. But under Oregon cleanup laws, it's not as strong.

Last summer, Kitzhaber asked the EPA to postpone its Superfund decision to give the Portland Harbor Group and federal and tribal officials time to hammer out an agreement. Three companies subsequently left the group, and efforts by the remaining parties failed to gain any ground.

Earlier this month, in a last-ditch effort to resurrect talks, the Port offered its own tolling agreement. Federal agencies initially appeared willing to consider it. But negotiations again broke down Monday because of three key issues: the amount of time agencies would have to recover damages from polluters, the authority they could exert over polluters and a sufficient number of companies that could be held liable for costs.

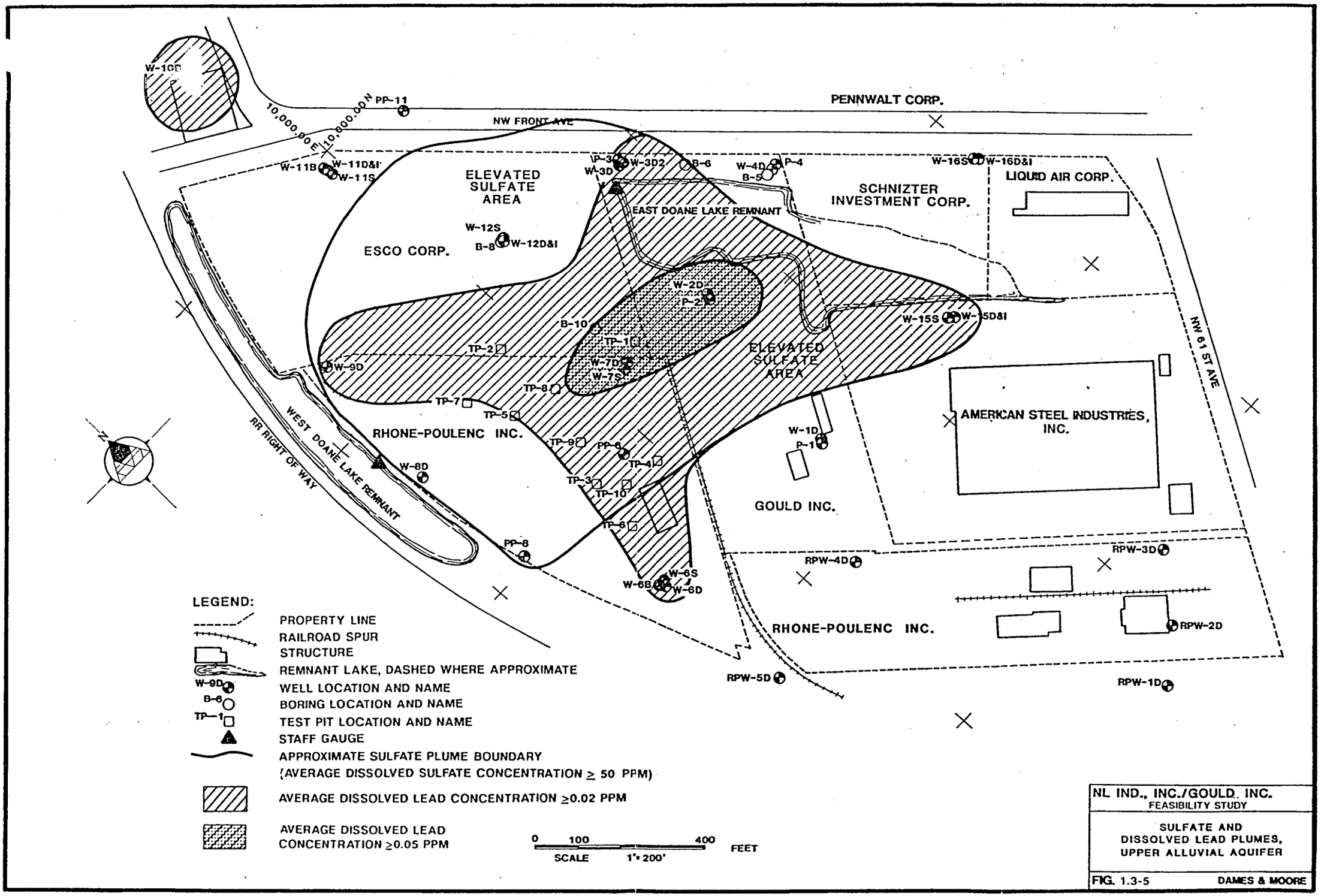
Federal agencies — the National Oceanic & Atmospheric Administration, U.S. Fish & Wildlife and the U.S. Department of Interior — and six Northwest tribes wanted three years after the cleanup to recover damages from polluters. They also wanted more parties to sign the agreement. The Port disagreed with the three-year window and declined to assume responsibility for other polluters. Efforts to bring more parties to the table had failed as of Tuesday.

Oregon officials tried to remain upbeat, saying the state would ask the EPA to give it the lead role in managing the cleanup. The EPA had done just that at one previously existing, far smaller Superfund site in Portland harbor called McCormick and Baxter Creosoting.

"It's not like some gong is going to go off on the 31st (Friday), and that will be the end of it," Wyatt said. "An awful lot of work has occurred and will continue to occur. I feel like the time was well-spent. We're just headed down a different path."

Scott Learn of The Oregonian staff contributed to this report.

You can reach Brent Hunsberger at 503-221-8359 or by e-mail at brenthunsberger@news.oregonian.com.

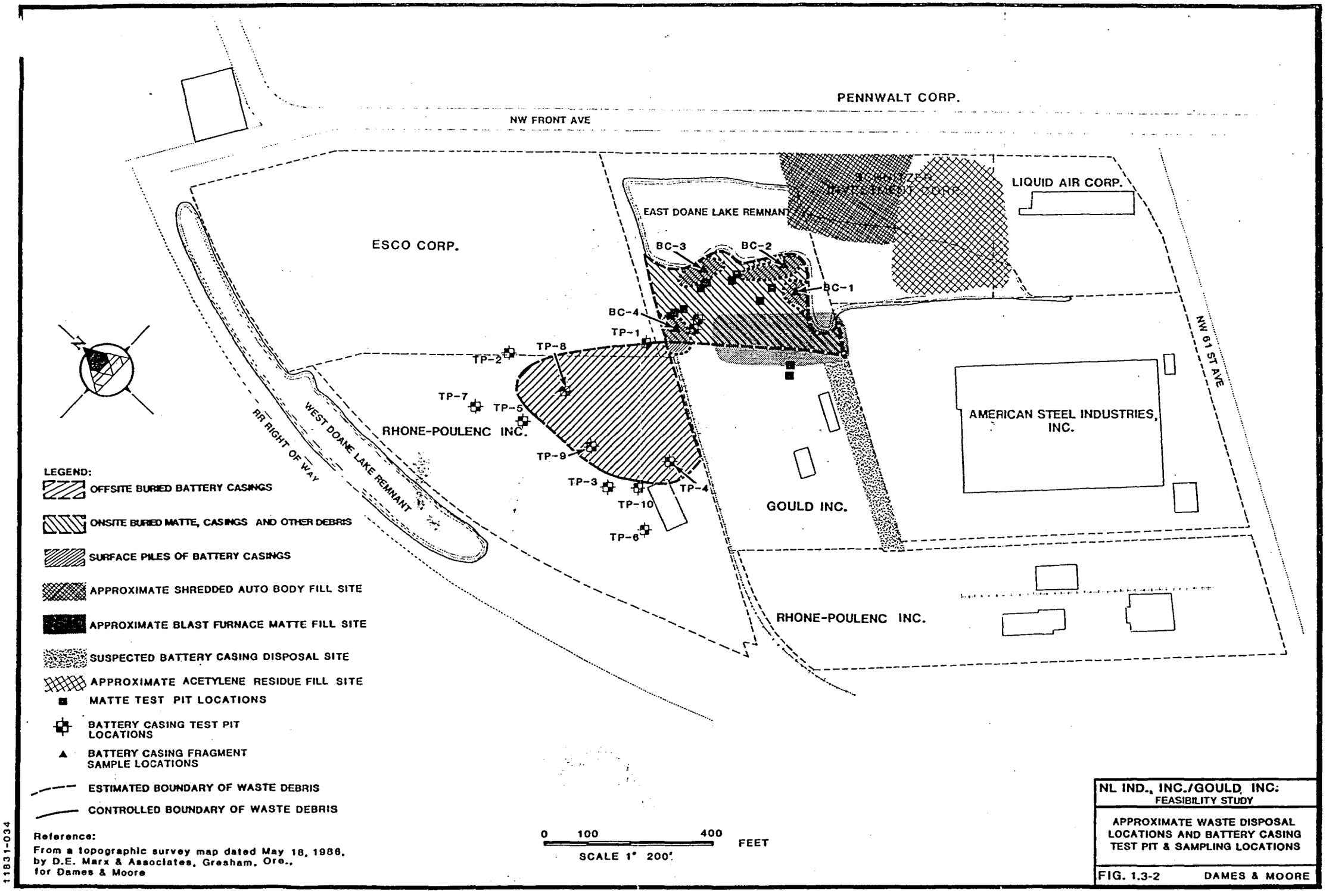


NL IND., INC./GOULD, INC.
FEASIBILITY STUDY

SULFATE AND DISSOLVED LEAD PLUMES, UPPER ALLUVIAL AQUIFER

FIG. 1.3-5 DAMES & MOORE

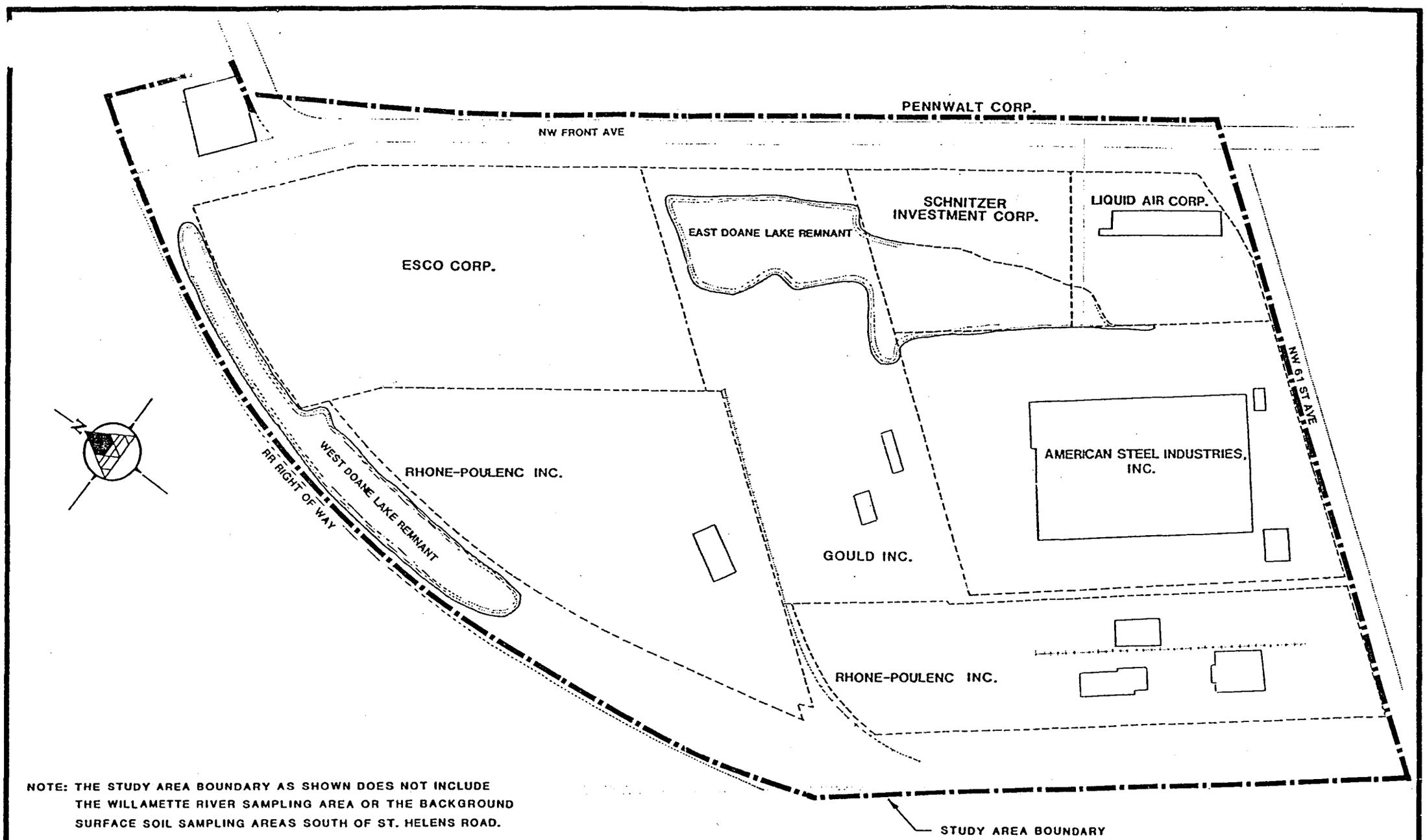
NWT 003739



NL IND., INC./GOULD, INC.
FEASIBILITY STUDY

APPROXIMATE WASTE DISPOSAL LOCATIONS AND BATTERY CASING TEST PIT & SAMPLING LOCATIONS

FIG. 1.3-2 DAMES & MOORE



NOTE: THE STUDY AREA BOUNDARY AS SHOWN DOES NOT INCLUDE THE WILLAMETTE RIVER SAMPLING AREA OR THE BACKGROUND SURFACE SOIL SAMPLING AREAS SOUTH OF ST. HELENS ROAD.

Reference:
From a topographic survey map dated May 18, 1986, by D.E. Marx & Associates, Gresham, Ore., for Dames & Moore

0 100 400 FEET
SCALE 1" 200'

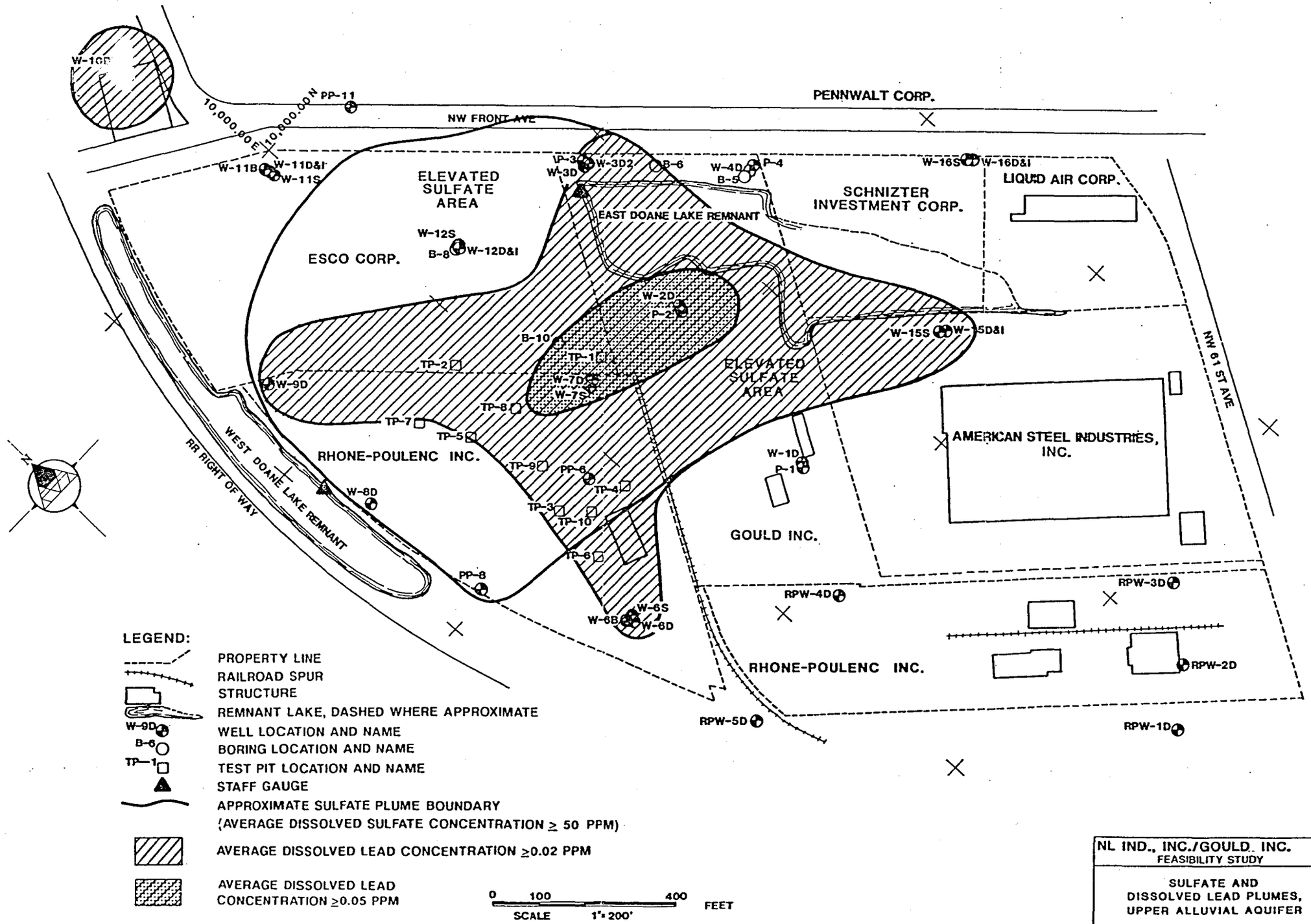
NL IND, INC./GOULD INC.
FEASIBILITY STUDY

STUDY AREA LOCATION MAP

FIG. 1.2-2 DAMES & MOORE

11831-034

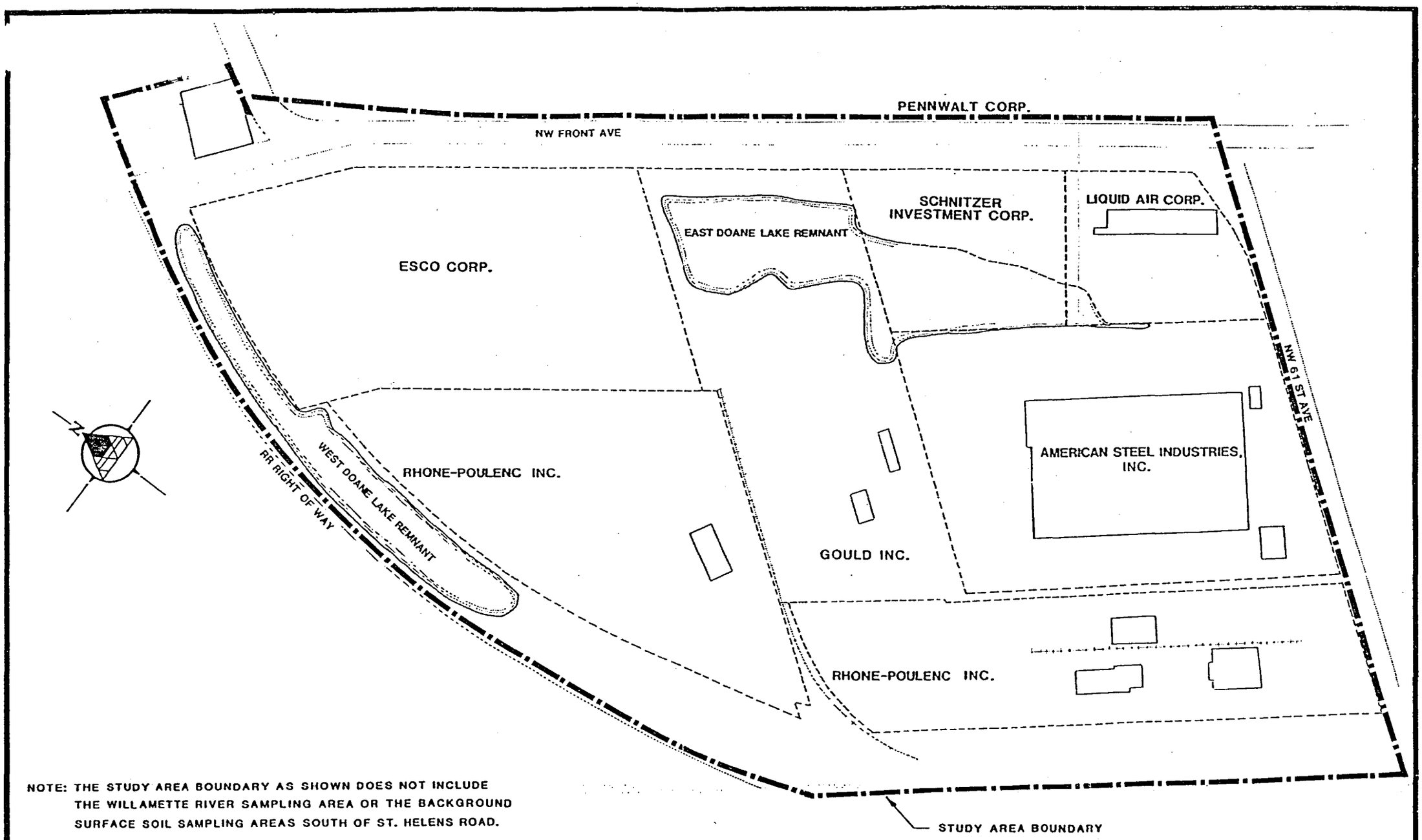
NWT 003741



NL IND., INC./GOULD, INC.
FEASIBILITY STUDY

SULFATE AND DISSOLVED LEAD PLUMES, UPPER ALLUVIAL AQUIFER

FIG. 1.3-5 DAMES & MOORE



NOTE: THE STUDY AREA BOUNDARY AS SHOWN DOES NOT INCLUDE THE WILLAMETTE RIVER SAMPLING AREA OR THE BACKGROUND SURFACE SOIL SAMPLING AREAS SOUTH OF ST. HELENS ROAD.

Reference:
From a topographic survey map dated May 18, 1986, by D.E. Marx & Associates, Gresham, Ore., for Dames & Moore

0 100 400 FEET
SCALE 1" 200'

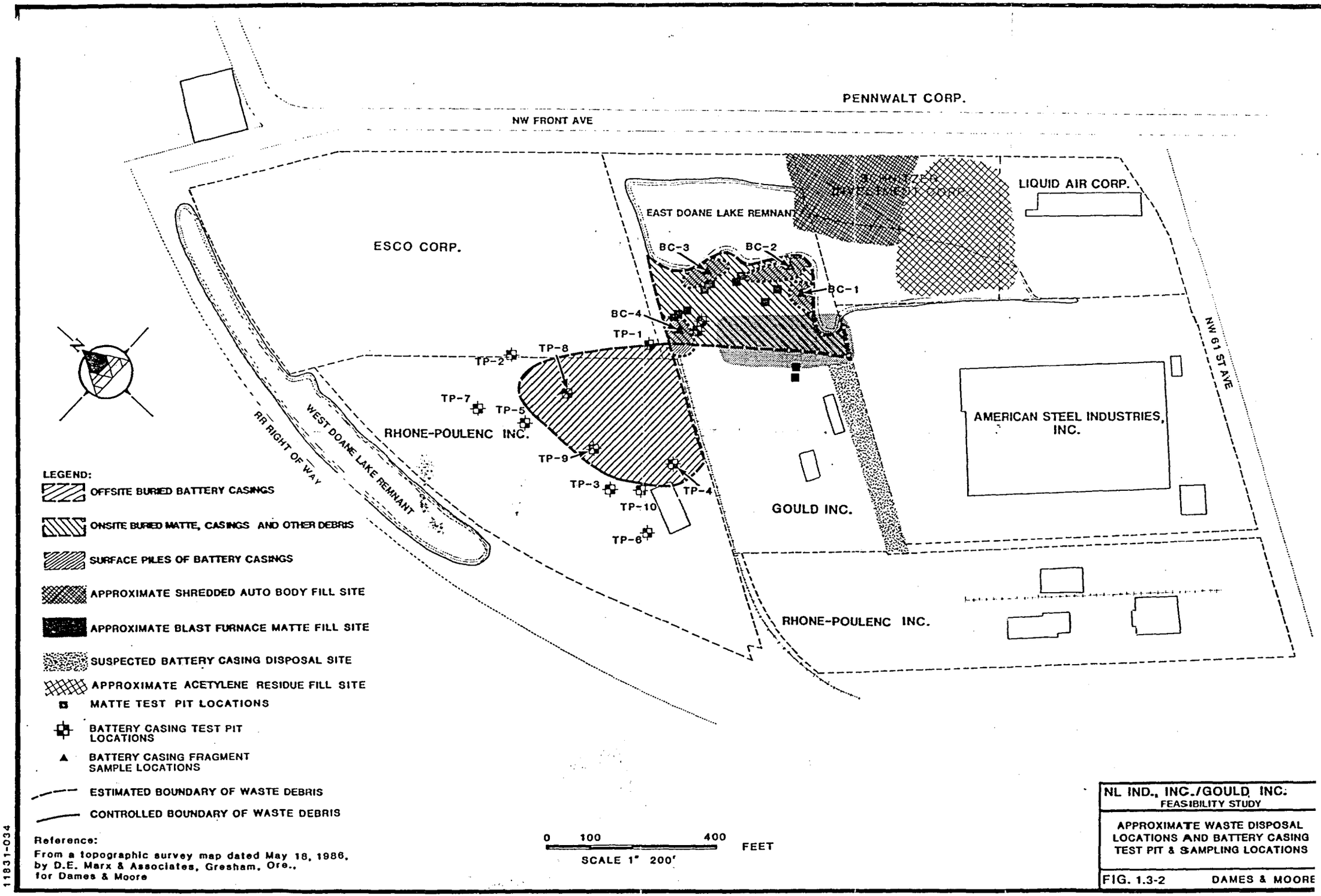
NL IND, INC./GOULD INC.
FEASIBILITY STUDY

STUDY AREA LOCATION MAP

FIG. 1.2-2 DAMES & MOORE

11831-034

NWT 003743



NL IND., INC./GOULD INC.
FEASIBILITY STUDY

APPROXIMATE WASTE DISPOSAL LOCATIONS AND BATTERY CASING TEST PIT & SAMPLING LOCATIONS

FIG. 1.3-2 DAMES & MOORE

Northwest Terminal

EPA'S PROPOSED ALTERNATIVE

MONITORING

GROUNDWATER WELLS
AIR MONITORS

BATTERY CASINGS

RECYCLE SURFACE AND SUBSURFACE CASINGS
ESTIMATE ABOUT 80,000 TONS TO RECYCLE
CONSTRUCT ON-SITE TREATMENT FACILITY
OPERATE FOR TWO YEARS
CLEAN MATERIAL EITHER RECYCLED, SENT TO SANITARY LANDFILL OR CAPPED
MATERIAL THAT FAILS EP TOX GOES TO RCRA LANDFILL

CONTAMINATED SOILS, SEDIMENT AND MATTE

TREATED TO BIND LEAD IN THE SOIL
ESTIMATE ABOUT 20,000 YDS TO BE TREATED
SOIL TREATMENT FACILITY CONSTRUCTED ON-SITE

SURFACE TREATMENT

IMPORT TOPSOIL
REVEGETATE

INSTITUTIONAL CONTROLS

PREVENT EXPOSURE TO CONTAMINATED GROUNDWATER, SURFACE WATER

ADDITIONAL STUDY

EXPANDED GROUNDWATER MONITORING
FOCUS ON ORGANICS AS WELL AS LEAD

cc: J. Dunn
L. Flaherty

SUMMARY OF ALTERNATIVES

NO ACTION ALTERNATIVE

MONITORING
INSTITUTIONAL CONTROLS

ALTERNATIVE 2C

4-.5 million Cost
Prefered by N. L. Gould

MONITORING
SURFACE WATER TREATMENT
SURFACE TREATMENT AND CAPPING
RECYCLE SURFACE PILES OF CASINGS
INSTITUTIONAL CONTROLS

EPA'S PREFERRED ALTERNATIVE (10C)

15-20 " million Cost

MONITORING
RECYCLE OF ALL BATTERY CASINGS
TREATMENT OF SOILS, SEDIMENT AND MATTE
SURFACE COVER
INSTITUTIONAL CONTROLS

ALTERNATIVE 21

15-20 million Cost

MONITORING
SURFACE WATER TREATMENT
DISPOSAL OF CASINGS IN ON-SITE RCRA LANDFILL
TREATMENT OF SOILS, SEDIMENT AND MATTE
INSTITUTIONAL CONTROLS

86-119

KOPPERS

Interoffice Correspondence

To	See Below	From	Thomas R. Hays
Location	Various	Location	K-1400
Subject	Northwest Terminal Site	Date	September 8, 1986

To: Key Caldwell
Larry Flaherty
Mark Urbassik
Jorden Dern
Jim Batchelder

Attached is the most recent correspondence from N.W. Natural Gas concerning our Northwest Terminal Site. Key indicates that N.W. Gas will meet with CDM on Thursday.

Tom Hays

Thomas R. Hays

TRH:cjh

Attachment

K-5 REV. 2

NW-A-6

TO RETURN THIS SURVEY
FOLD IN HALF AT INDICATED MARKS - REMOVE TAPE STRIP, FOLD AND SEAL

EMPLOYER FILE NUMBER	SURVEY CONTROL NUMBER
	460536

OCCUPANCY CODE : _____ (office use only)

STATUS CODE : _____ (office use only)

OREGON STATE FIRE MARSHAL
HAZARDOUS SUBSTANCE
EMPLOYER SURVEY FORM

SECTION A (check one)

1. _____ No chemicals are used at this location in any way. (Complete sections B and D)
2. _____ Chemicals are used at this location by our company, but do not meet reporting requirements. (Complete sections B and D) (See instructions for reporting requirements)
3. X Chemicals are used at this location by our business in reportable quantities. (Complete all parts of this form)

SECTION B (please provide the following information)

1. SIC CODE(S) that apply to this location (if known): 2865 _____ _____ _____
2. DATE FORM COMPLETED: 3/17/87
3. EMPLOYER NAME: KOPPERS COMPANY, INC.
4. COMPANY NAME: KOPPERS CO., INC.
5. LOCATION ADDRESS: 7540 N.W. ST. HELENS RD.
   CITY: PORTLAND COUNTY: MULTNOMAH ZIP: 97229
   BUSINESS PHONE: 503-286-3681

FOLD FOLD

DUPLICATE THIS FORM FOR EACH LOCATION

6. MAILING ADDRESS: (if different) SAME
   CITY: _____ COUNTY: _____ ZIP: _____
7. NUMBER OF EMPLOYEES: 7
8. EMERGENCY ASSISTANCE CONTACT (NAME): JOHN OXFORD
   CONTACT PHONE(S): (503) 286-3681 DAY (206) 254-8011 NIGHT

CORPORATE OFFICE (if different than above)

9. COMPANY NAME: KOPPERS CO., INC.
10. MAILING ADDRESS: KOPPERS BUILDING COUNTY: ALLEGHENY
    CITY: PITTSBURGH STATE: PA ZIP: 15219
    BUSINESS PHONE: 412-227-2000

11. SPECIAL EMERGENCY PROCEDURES
    (Use Additional Pages As Necessary)
    (See Instructions): _____

12. PORTLAND
    RESPONSIBLE FIRE DEPARTMENT

13. ARE STORAGE BUILDINGS/TANKS/AREAS PLACARDED (NFPA 704)? NO

814-440-185 (8-86)

SECTION C (Please provide the following information)

1. CHEMICAL/TRADE NAME: CREOSOTE

UN/NA#: N/A

CAS#: 8001-58-9

U.N. Hazard classes (use Table I) N/A

( )( )( )( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific):

2. CHEMICAL/TRADE NAME: COAL TAX PITCH

UN/NA#: NA

CAS#: 65996-93-2

U.N. Hazard classes (use Table I)

( )( )( )( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific):

3. CHEMICAL/TRADE NAME: SODIUM SULFITE

UN/NA#: NA

CAS#: 7757-83-7

U.N. Hazard classes (use Table I) NA

( )( )( )( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific):

4. CHEMICAL/TRADE NAME: SODIUM BISULFITE

UN/NA#: 2693

CAS#: 7631-90-5

U.N. Hazard classes (use Table I)

(5.1)( )( )( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific):

5. CHEMICAL/TRADE NAME: SULFURIC ACID

UN/NA#:

CAS#: 7664-93-9

U.N. Hazard classes (use Table I)

(5.1)( )( )( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific):

TABLE I — UNITED NATIONS CLASSIFICATIONS

(1.1) Class A Explosives
(1.2) Class B Explosives
(1.3) Class C Explosives
(1.4) Blasting Agents
(1.5) Insensitive Explosives
(2.1) Flammable Gases
(2.2) Nonflammable Gases
(2.3) Poison Gases
(3.1) Flammable Liq. (FP<0°F)
(3.2) Flamm. Liq. (0°F<FP>73°F)
(3.3) Flamm. Liq. (73°F<FP>141°F)
(4.1) Flammable Solids
(4.2) Combustible Materials
(4.3) Dangerous When Wet
(5.1) Oxidizers
(5.2) Organic Peroxides
(6.1) Poisonous Materials
(6.2) Etiologic Materials
(7.3) Radioactive Materials
(8.0) Corrosives
(9.0) Misc. Haz. Materials

SECTION C (Continued)

6. CHEMICAL/TRADE NAME: _____

UN/NA#: _____

CAS#: _____

U.N. Hazard classes (use Table I)

( ) ( ) ( ) ( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific): _____

7. CHEMICAL/TRADE NAME: _____

UN/NA#: _____

CAS#: _____

U.N. Hazard classes (use Table I)

( ) ( ) ( ) ( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific): _____

8. CHEMICAL/TRADE NAME: _____

UN/NA#: _____

CAS#: _____

U.N. Hazard classes (use Table I)

( ) ( ) ( ) ( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific): _____

FOLD FOLD

9. CHEMICAL/TRADE NAME: _____

UN/NA#: _____

CAS#: _____

U.N. Hazard classes (use Table I)

( ) ( ) ( ) ( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific): _____

10. CHEMICAL/TRADE NAME: _____

UN/NA#: _____

CAS#: _____

U.N. Hazard classes (use Table I)

( ) ( ) ( ) ( )

PHYSICAL STATE	AVG. ON HAND QUANTITY	AVG. ANNUAL QUANTITY	UNIT OF MEASURE
1. SOLID	1. 10-499	1. 10-999	1. GALLONS
2. LIQUID	2. 500-1499	2. 1000-9999	2. POUNDS
3. GAS	3. 1500-3999	3. 10,000-19,999	3. CUBIC FEET
	4. 4000-9999	4. 20,000-49,999	
	5. 10,000 +	5. 50,000 +	

Storage location (be specific): _____

SECTION D

I certify that the information provided in this form is complete and correct to the best of my knowledge.

Signature: John A Oxford

Name: John A. Oxford
(PLEASE PR

Title Plant Manager

SECTION D (Continued)

Within 15 days of any of the following events, any covered employer shall contact the Oregon State Fire Marshal's Office, Hazardous Materials Section (378-2885) to update the Employer Survey Form:

1) Change of business address
2) Change of business ownership
3) Change of business name
4) Cessation of business operations
5) Any addition, deletion or change to existing SIC codes for the business
6) A significant quantity change (one or more quantity range steps) has occurred for a previously reported material
7) A new hazardous material is introduced at your business location

RECEIVED

MAR 24 1987

Environmental Resources

FROM: KOPPERS COMPANY, INC.
7540 N.W. ST. HELENS RD.
PORTLAND, OREGON 97210

PLACE STAMP HERE

STATE FIRE MARSHAL'S OFFICE

3000 MARKET ST., NE, SUITE 534

SALEM, OR 97310-0198

ATTN: HAZARDOUS MATERIALS SECTION

NWT 003752