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6	**A.**	NAME
7		**M. R. Croom**
8	**B.**	DATES (MONTH/DAY/YEAR)
9		CITY
10		NO. OF CUSTOMERS VISITED
11		ODOMETER END
12		ODOMETER START
13		TOTAL MILES
14		PERSONAL CAR @ 0.26/MILE
15		AIRPORT PARKING
16		AIRPORT SHUTTLE
17		TOTAL
18		OTHER
19		Air Fare
20		Car Rental
21		Gas for Rented Car
22		Taxi/Limo/Train
23		Parking/Tolls
24		
25		TOTAL
26		LODGING
27		MEALS-TRAVEL
28		FEES, TIPS, LAUNDRY
29		TEL/TGM/FAX
30		MEMBERSHIPS, DUES
31		MEALS-Business Entertainment
32		ENTERTAINMENT-Form No. 18084
33		OTHER: (Enter Detail at Bottom)
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37		**TOTAL THIS REPORT**
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39	**E.**	
40		ALTERNATE
41		CHARGE CODES
42		'AND AMOUNTS
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6	LOCATION
7	**Portland**
8	9/4/1997
9	Portland
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39		ACCOUNTING DISTRIBUTION
40	008 072 0711 1443	
41	008 072 0711 1449	
42	008 072 0716 1785	
43	008 072 0711 1420	

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6		CORP. CODE	
7		**106**	
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37	**0.00**	**0.00**	**0.00**
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39			
40	**61305**	Meals	**030711**
41	**61304**	General	**030711**
42	**65112**	Phone	**030716**
43	**61306**	Entertainment	**030711**

	I	J	K	L	M	N
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2	NON-GOV TRAVEL				**Page 1 of 1**	
3	REPT NO.	**97-**	**1**			
5						
6	SOC. SEC. NO.				DATE	
7					**13-Aug-08**	
8		**C.**	TRAVEL	**D.**	TOTALS	
9		TRANSACTION				
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25	**0.00**		501		**0.00**	
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29			402		**0.00**	
30			700		**0.00**	
31			700		**0.00**	
32			301		**0.00**	
33			700		**0.00**	
34			700		**0.00**	
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43	**0.00**		700			

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44		Automatically Codes Except Other
45		Please Code Other
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49	**F.**	T/T
50		CASH 200 ID NO.
51		AMOUNT
52		TICKETS 210 ID NO.
53		AMOUNT
54		ADVANCE 260 ID NO.
55		AMOUNT
56		REGISTRATION 250 ID NO.
57		AMOUNT
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59	TOTAL THIS REPORT	
60		**$0.00**
61	CHECKED BY	
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59	AMOUNT DUE ME		AMOUNT DUE CO.
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63	Explanation/Remarks/Purpose		
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49	TOTAL	**G.**				
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53	0.00		DOC.NO.			
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55	0.00		CK.DT.			
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59			FUNDS ON HAND		PERMANENT FUND	
60			**$0.00**		**$0.00**	
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70		**SUBSTANTIATION OF BUSINESS ENTERTAINMENT EXPENSE**	
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78		Date	
79		Place	
80		City, State	
81		Business Relation	
82		to Hercules	
83			
84		*Entertainment Amount	
86			
87		Date	
88		Place	
89		City, State	

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72	**Detail to Support Travel Expense Report No.**		
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78		9/4/1997	
79		Portland Brewing Company	
80		Portland, OR	
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87		9/4/1997	
88		Portland Brewing Company	
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72				**97-1**
73				
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75				**Type of Entertainment and/or**
76				**Nature of Business Discussion****
77				
78				
79				Lunch - Regional Payroll Transfer
80				to Savannah
81				
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83				
84		$32.10		
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88				Lunch _ SAP Training for Export
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72	**Name**		M. R. Croom
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75			**Persons Entertained**
76			**Name of Company and Title**
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79			Beth Brown - Hercules Savannah
80			Carol O'Brien - Hercules Portland
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88			Dave Eckart - Hercules Wilmington
89			E.P. Trotter - Hercules Portland

	O	P	Q
90		Business Relation	
91		to Hercules	
92			
93		*Entertainment Amount	
94			
95			
96		Date	
97		Place	
98		City, State	
99		Business Relation	
100		to Hercules	
101			
102		*Entertainment Amount	
103			
104			
105		Date	
106		Place	
107		City, State	
108		Business Relation	
109		to Hercules	
110			
111		*Entertainment Amount	
112			
113			
114		* Attach receipt for expenditures of $25 or more.	
115		** In order for the entertainment costs to be reimbursable, the	
116		entertainment must have immediately preceeded or followed	
117		a substantial business discussion.	

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115				THIS REPORT MUST BE ATTACHED TO TRAVEL EXPENSE REPORT
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117				

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DRAFT

PHASE I ENVIRONMENTAL SITE ASSESSMENT

HERCULES INCORPORATED
PULP AND PAPER DIVISION
3366 NW YEON AVENUE
PORTLAND, OREGON 972210-1526

PREPARED FOR:
HERCULES INCORPORATED AND
CREDIT SUISSE FIRST BOSTON

JANUARY 4, 2000

PREPARED BY:
URS CORPORATION
7101 WISCONSIN AVE., SUITE 700
BETHESDA, MARYLAND 20814
(301) 652-2215

PROJECT NO: D&M 04874-129-027 (19)

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Figure 4 Sanitary Sewer Layout Map

Figure 5 Approximate UST Location Map

Figure 6 Hazardous Material Storage Map

TABLES

Table 1 Historical Summary

Table 2 Environmental Database Summary

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Appendix B Historic Documents

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Appendix E DEQ LUST and ECSI Reports

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Appendix G Resumes of URS Project Personnel

SUMMARY OF KEY FINDINGS

The Hercules Pulp and Paper Division facility is located at 3366 NW Yeon Avenue in the City of Portland, Multnomah County, Oregon. The subject property is located in a industrial area in the City of Portland, approximately 1,000 feet south of the Willamette River. A Site Location Map is presented as Figure 1. Groundwater is not known to be used as a potable supply in the vicinity of the site. Groundwater is likely to be encountered at a depth of 10 to 25 feet and is assumed to move in a northerly direction.

The property was first developed between 1897 and 1929, and was created by the filling of a portion of Guild Lake. In approximately 1929, Paper Makers Chemical Company developed the site for a rosin-based paper sizing manufacturing facility. Hercules purchased the subject property from Paper Makers Chemical Company in 1931. The Portland plant formulates and distributes chemical additives for the paper manufacturing industry.

The results of URS' Phase I Environmental Site Assessment indicate that historic onsite or offsite activities of environmental concern were identified and are further described in the appropriate sections of the following table.

The property consists of approximately 9 acres and is entirely covered by pavement (asphalt and concrete) or buildings except for a few small areas where concrete pads have been removed. There are nine main buildings, which have a combined area of 43,628 square feet. The improvements have changed gradually over the years as processes and products evolved since the original plant was constructed in 1929. Most of the property is covered by the building or pavement. A rail spur enters the site from the southwest and terminates near the north-central portion of the site

The results of URS' Phase I Environmental Site Assessment indicate that current onsite or offsite activities of environmental concern were identified and are further described in the appropriate sections of the following table.

This Summary of Key Findings is not intended to be a "stand-alone" document, but a summary of URS' findings as described in the following report. It is intended to be used in conjunction with the scope of services and limitations described therein.

SUMMARY OF KEY FINDINGS

HERCULES – PULP AND PAPER DIVISION
3366 NW YEON AVENUE
PORTLAND, OREGON

URS Inspection Date – December 11, 2000

Topic	Finding	Significance [2]	Financial Materiality [3]	Report Reference
Hazardous Materials & Petroleum Products	The manufacturing processes utilize large quantities of several hazardous materials as feed products. The primary liquid hazardous materials used onsite are epichlorohydrin, hexamethylenediamine (HMDA), diethylenetriamine (DETA), sulfuric acid, sodium hydroxide, and potassium hydroxide. Diesel fuel is also used onsite for a backup fuel source.	NM	NA	5.1
Hazardous Wastes	The facility operates as a Small Quantity Generator of hazardous waste. Hercules uses Safety-Kleen to dispose of its hazardous waste. Approximately 15 drums of waste heat-transfer liquid (Therminol VP-1, which is a hazardous substance) is stored in the outdoor hazardous waste storage area.	NM	NA	5.1

HERC093733

Topic	Finding	Significance [2]	Financial Materiality [3]	Report Reference
Aboveground Storage Tanks	Approximately 100 aboveground chemical storage tanks are located onsite. All ASTs that contain hazardous materials were observed to be bermed within secondary containment. The ASTs appeared in relatively good condition, with minor spills and staining visible on the structures, and within the concrete berms. The staining was mostly present in the area of the tanks that contain the viscous crude tall oil material.	NM	NA	5.2
Underground Storage Tanks	Up to 13 USTs were in use at the subject property during its 81 year operating history, with the earliest UST installed in 1938. Limited decommissioning and investigative documentation was available. Eight of the USTs were reported to contain petroleum products or hazardous materials, and one UST contained used oil. There is limited decommissioning documentation possibility due to record retention policies; however, it is not appropriate to consider these UST's a "Moderate" Financial Materiality. According to URS's guidelines "A ranking of **Indeterminate** indicates that insufficient information is available to assign a monetary value to an issue."	AOC	Indeterminate	5.3
Drums and Containers	Drums, totes, bags, and pails are stored throughout the facility and contain raw materials and finished products.	NM	NA	5.4
Solid Waste	All solid waste is currently and historically disposed of offsite.	NM	NA	5.5
Wastewater and Septic Systems	The wastewater pretreatment and conveyance systems are approximately 36 and 15 years old, respectively. Limited information on the structural integrity of each system was available. Hazardous materials may potentially enter these systems.	AOC	NA	4.1.2 5.6

HERC093734

Topic	Finding	Significance [2]	Financial Materiality [3]	Report Reference
Drains, Sumps or Clarifiers	No floor drains other than the wastewater collection trenches were observed on the subject property. Stormwater runoff is directed to stormwater detention basin located near the northwest corner of the site. No drywells, french drains, or other drainage structures are on the subject property.	NA	NA	5.7

HERC093735

Topic	Finding	Significance [2]	Financial Materiality [3]	Report Reference
Pits, Ponds, or Lagoons	Two concrete-lined wastewater pretreatment settling lagoons are located on the northwest portion of the property and are part of the treatment system discussed in Sections 4.1.2 and 5.6. Water within one of the lagoons contained a slight sheen.	AOC	NA	5.8
PCBs	No PCB equipment is currently known to be located on the property. One unlabeled transformer is onsite.	NM	NA	5.9
Asbestos	An asbestos survey initiated by Hercules resulted in a significant amount of asbestos removal from the facility. Most of the asbestos has reportedly been removed from the site, but isolated areas of asbestos-containing materials reportedly still remain onsite.	AOC	NA	4.1.3
Wells	No monitoring wells are currently or historically located on the property. Two capped, but not decommissioned, water wells are located on the subject property. Hercules relinquished the water rights for these two wells to the City of Portland, and the wells are not currently used.	NM	NA	5.10
Other Onsite Issues	A Hercules "Environmental Incident Description" form for the year 2000 documents environmental violations, releases, complaints, and agency visits.	AOC	NA	4.1.1
Regulatory Compliance	Hercules representatives reported that they believe they have minor non-compliance with their stormwater discharge permit.	NA	NA	4.1.3
Government Agency Information	The facility is listed in several government agency databases including the Oregon HAZMAT for hazardous material incidences. No other information was available for this listing. The subject property handles many hazardous materials, most of which are reportable to Oregon HAZMAT. There have been incidents where HAZMAT has been notified however these have all been documented. According to URS's definitions an AOC is most applicable.	AOC	Indeterminate	6.1.1

HERC093736

Topic	Finding	Significance [2]	Financial Materiality [3]	Report Reference
	The facility is listed on the Oregon ECSI database as a site needing further investigation.	AOC	NA	6.1.1

HERC093737

Topic	Finding	Significance [2]	Financial Materiality [3]	Report Reference
Offsite Issues	The subject property is located in an industrial area of Portland. There are six offsite locations that are considered areas of concern.	AOC	NA	6.1.2

NOTES:

1. This Summary of Key Findings is not intended to be a "stand-alone" document, but a summary of URS' findings as described in the following report. It is intended to be used in conjunction with the scope of services and limitations described therein.
2. **NA** - Not Applicable; **NM** – No material significance associated with finding or a "de minimis" condition. **REC** – Recognized Environmental Condition; **HREC** – Historic Recognized Environmental Condition; **AOC** – Area or Issue of Concern. See section 1.2 for complete definitions.
3. Actual cost figures represent Hercules supplied costs to fully address an identified issue. Financial Materiality rankings of **Low** (< $100,000), **Moderate** ($100,000 to $ 1 Million), and **High** (> $ 1 Million) represent an "educated guess" estimate to address the issue based on available information and URS' experience. A ranking of **Indeterminate** indicates that insufficient information is available to assign a monetary value to an issue. See section 1.2 for complete definitions.

HERC093738

1.0 INTRODUCTION

1.1 OBJECTIVES AND SCOPE OF SERVICES

The objectives of the Phase I Environmental Site Assessment (ESA) are to: 1.) Gather reasonably ascertainable information regarding current and historic activities on or near the subject property to evaluate whether known or suspect environmental concerns exist in association with the subject property and the adjoining properties that would represent a "*Recognized Environmental Condition or REC*"; and, 2.) Determine, to the extent reasonably ascertainable, the "*financial materiality*" of identified REC's.

The scope of service for this Phase I ESA is detailed in Project Contract No. 1-URS between Hercules Incorporated and URS Corporation, dated December 4, 2000. The contract incorporates URS' December 1, 2000 proposal to prepare Phase I ESA's in general conformance with methods and definitions specified in the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM Standard E 1527-00). The Scope of Services specifically did not include an evaluation of regulatory compliance; or the testing of soil or groundwater; or surveys and sampling for asbestos, lead paint, drinking water or radon; or, any other services not specifically included in the contract.

1.2 DEFINITIONS AND TERMINOLOGY

The definitions and terminology used in this report are consistent with the definitions in ASTM Standard E1527-00 unless noted otherwise. The following ASTM terms and definitions are used throughout this report:

Recognized Environmental Condition (REC) - The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

Any issues identified by URS through its review of historic information, information provided by Hercules or in the public domain, or identified during onsite reconnaissance that would meet the above definition is classified in this report as a REC. In addition, URS will classify any government or facility initiated environmental investigation as a REC until data supporting reclassification can be reviewed and evaluated or the government agency requires no further action. For example, an area that is identified as a Solid Waste Management Unit (SWMU) or is under a Resource Conservation Recovery Act (RCRA) Facility Investigation would be classified as a REC. Any cleanup that is planned or underway either through a regulatory enforcement action, Consent Order or a Voluntary Cleanup program would be classified as a REC.

URS classifies as "de minimis" documented or suspected contamination that does not, or is unlikely to present a health or environmental risk and would not, or would be unlikely to trigger an enforcement action based on URS' understanding of the materials involved and its experience with local regulators at similar facilities. All de minimis concentrations are not detailed in this report.

Offsite facilities that may impact the subject property with hazardous materials or petroleum products are not classified as creating a REC on the subject property unless, based on available information and in URS' opinion, such impacts present a material risk of harm to the health or safety of current site occupants or the appropriate governmental agencies would initiate an independent enforcement action against the Hercules facility.

Historical Recognized Environmental Condition (HREC) - An environmental condition which in the past would have been considered a REC, but which may or may not be considered a REC currently. The final decision rests with the environmental professional and will be influenced by the current impact of the HREC on the property. If a past release of any hazardous material or petroleum product has occurred in connection with the property and has been remediated, with such remediation accepted by the responsible regulatory agency (for example, as evidenced by the issuance of a no further action letter or equivalent), this condition shall be considered an HREC.

For the purpose of this report, an apparent HREC would be classified in this report as a REC if, for example, its remediation or closure would not conform to current minimum regulatory requirements or industry standards for the investigation or chemical analyses. Another example could include a site or area that has been remediated, but ongoing groundwater and monitoring and reporting is required.

The following terms and definitions are not defined by ASTM but are defined by URS below and are used throughout this report:

Area or Issue of Concern (AOC) – Is a finding that warrants discussion in the report however, based on reasonably ascertainable information URS can not justify classifying it as a REC, HREC, or de minimis per the ASTM definition. AOC's are considered as having an unknown potential to create a REC. Examples of AOC's would include, but are not limited to, areas that appear to be landfill activities on historic air photographs and for which no other information is available or the reported presence of septic fields without additional information on waste streams, etc.

Financial Materiality – Is the estimated or documented cost (in 2000 dollars) to investigate, remediate, and bring to final regulatory closure REC's identified by Hercules representatives or governmental agencies. Cost information provided by Hercules representatives is presumed to be accurate.

Where no cost estimate is available, URS will classify REC's based on its experience, knowledge of local government agency responses to similar situations and other factors as having "Low, Moderate or High" Financial Materiality. These classifications have the following monetary values: **Low** = Less than $100,000; **Moderate** = $100,000 to less

than $1 Million; and, **High** – Greater than $1 Million. REC's without sufficient information to reasonably assign any monetary value are classified as having an **Indeterminate** Financial Materiality. These monetary classifications should only be viewed as an "educated guess" based on limited information and analyses and should not be relied on as an engineering cost estimate for accounting or valuation purposes.

1.3 LIMITING CONDITIONS

URS' ability to complete the scope of services was limited by the fact that information on the subject and adjacent properties held by regulatory agencies was not available for review, or replies from regulators to URS' requests for this information were not received at the time this report was prepared.

1.4 LIMITATIONS

The ESA was prepared in accordance with the Scope of Services described in URS' contract with Hercules Incorporated. The work conducted by URS is limited to the services agreed to with Hercules, and no other services beyond those explicitly stated should be inferred or are implied.

The conclusions presented in this report are professional opinions based solely upon indicated data described in this report, visual observations of the subject property and vicinity, and URS' interpretation of the available historical information and documents reviewed. They are intended exclusively for the purposes outlined herein and the subject property location and project indicated. URS assumed that future land use of the subject property will be consistent with its current use and was provided with no information to the contrary. URS' evaluation of issues and findings reflect this assumption unless noted otherwise.

It should be recognized that this study was not intended to be a definitive investigation of contamination at the subject property and the conclusions provided are not necessarily inclusive of all the possible conditions. Given that the scope of services for this investigation was limited and that exploratory borings, soil and/or groundwater sampling or analytical testing was not undertaken, it is possible that currently unrecognized subsurface contamination may exist at the subject property. URS makes no representations regarding the value or marketability of the subject property or the suitability for any particular use, and none should be inferred based on this report.

Opinions and recommendations presented herein apply to the subject property conditions existing at the time of our investigations and cannot necessarily apply to subject property changes of which URS is not aware and has not had the opportunity to evaluate. Changes in the conditions of this property may occur with time due to natural processes or the works of man on the subject property or adjacent properties. Changes in applicable standards may also occur as a result of legislation or the broadening of knowledge. Accordingly, the findings of this report may be invalidated, wholly or in part, by changes beyond our control.

URS has exercised due and customary care in the conduct of this Phase I ESA but has not independently verified information provided by others. Therefore, URS assumes no liability for any loss resulting from errors or omissions arising from the use of inaccurate/incomplete information or misrepresentations made by others.

1.5 RELIANCE

This report has been prepared for use solely by Hercules Incorporated and Credit Suisse First Boston in connection with Hercules Incorporated's debt restructuring. This report shall not be relied upon by or transferred to any other party, or used for any other purpose, without the express written authorization of URS.

This report is valid for a period of 180 days from the date of publication. Use of this report after 180 days of publication is subject to the provisions of Section 4.7 of ASTM Standard E 1527-00. The use of, or reliance on this report by any unauthorized party shall be at their sole risk.

2.0 SITE DESCRIPTION

2.1 LOCATION

The Hercules – Pulp and Paper Division facility is located at 3366 NW Yeon Avenue in the City of Portland, Multnomah County, Oregon. (subject property or site). The legal description of the facility was not available from facility representatives. The subject property is located in a industrial area in the City of Portland, approximately 1,000 feet south of the Willamette River. A Site Location Map is presented as Figure 1.

2.2 SITE FEATURES AND USE

The subject property is occupied by numerous buildings used for, or in support of, the formulation of chemical additives for the paper manufacturing industry. The two main product lines manufactured at the subject property are Kymene, which is used to give paper strength when it is wet, and paper sizing agents, which are used to prevent water from penetrating paper. Products include Kymene, Aquapel (animal fat-based), Paracol (paraffin wax based), Neuphor phase materials, and paraffin oil-based defoamers. Raw materials used and stored onsite include (but are not limited to): epichlorohydrin, hexamethylenediamine (HMDA), diethylenetriamine (DETA), sulfuric acid, potassium hydroxide, sodium hydroxide, paraffin oil, alum, and formic acid.

Past manufactured products included crude tall oil (CTO), rosin, and fatty acids (used in paints). A tall oil fractionation facility was added to the northwest portion of the property in 1963. For the first two years that the fractionation facility was in operation, a soap acidulation process was used to produce CTO. After that, CTO was purchased directly from pulp and paper mills. Products from the tall oil fractionation facility included rosin, crude fatty acid (CFA), and Pamak (a re-distilled CFA). The tall oil operation was discontinued in 1999 due to market factors. In approximately 1974, the Neuphor process was added to the onsite production facilities to produce a dispersed rosin-sizing agent. Solvents were used in this process until approximately 1986, when improvements in the system eliminated the need for solvents.

A Site Plan that indicates major site features is presented as Figure 2. The improvements have changed gradually over the years as processes and products evolved since the original plant was constructed in 1929. The plant includes approximately 100 aboveground chemical storage tanks, ranging in capacity from 25 gallons to 300,000 gallons. The property consists of approximately 9 acres and is entirely covered by pavement (asphalt and concrete) or buildings except for a few small areas where concrete pads have been removed. There are nine main buildings, which have a combined area of 43,628 square feet. Major buildings or general portions of the plant include:

- "Old plant" where Kymene wet-strength resins are manufactured.
- Neuphor area where paper sizing chemicals are manufactured.

FIGURE 1

FIGURE 2

- Tall oil area where crude tall oil (CTO) was formerly fractionated into raw material chemical intermediates and usable products for use by the plant and for resale.
- Warehouse where raw materials are stored, and non-bulk products are containerized into drums and totes and stored prior to shipping.
- Finished products tank farm.
- Maintenance shop where welding, sandblasting, and repairs of small equipment like instrumentation occurs.
- Boiler control room, and the three adjacent oil- and natural gas-fired boilers, and the two fuel storage tanks.
- Wastewater treatment plant for pre-treatment of wastewaters discharged to the publicly owned treatment works (POTW).
- Truck wash station for cleaning the tanks of the six company-owned tanker trucks.
- Outdoor storage area where off-specification products in drums and totes are stored.
- Hazardous waste storage area (outdoor, bermed and fenced compound).
- Changing room for employees.
- Parking area and loading dock.
- Office where personnel/administration functions are conducted.

2.3 UTILITIES

Electricity is provided to the site by Portland General Electric Company. Heat for the buildings is provided by natural gas-fired heaters. Natural gas service is provided to the site by Wasatch Energy through a transportation contract with Northwest Natural. Process steam for manufacturing is generated onsite by gas-fired boilers. Two diesel-fuel, aboveground storage tanks (ASTs) serve as back-up sources of fuel for the boilers.

Potable, process, and cooling water is obtained from the City of Portland's public water system. Sanitary and process wastewater is discharged to the City of Portland's sanitary sewer. Prior to being discharged to the POTW Wastewater enters the pretreatment facility, where solids are precipitated and the pH of the wastewater is adjusted. The onsite layout of the storm and sanitary sewer systems is provided on Figures 3 and 4.

FIGURE 3

FIGURE 4

2.4 SITE VICINITY AND ADJACENT PROPERTIES

URS conducted a limited visual reconnaissance (from public rights-of-way) of adjacent properties and discussed surrounding property use with site representatives. Properties and features that surround the subject property are as follows:

North: The Portland Terminal Railroad Company is located along the northwest, north, and northeast of the subject property. Numerous rail transfer tracks are situated on this property. NW Front Avenue, the Portland Harbor, and the Willamette River are 500 to 1,000 feet north of the subject property. Several warehouses, docks, and loading facilities are situated along the harbor front.

East: An industrial park owned by Schnitzer Investment Corporation is adjacent to the east of the subject property. Several small businesses are within this business park. Additional light industrial businesses are located farther to the east of the subject property.

South: NW Yeon Avenue extends along the southern boundary of the subject property. Several industrial parks are situated across NW Yeon Avenue to the south of the subject property. Grinnel Corporation (a pipe manufacturing/supply company) is situated due south of the site, across NW Yeon Avenue.

West: An industrial park is located adjacent to the west of the subject property. Twenty-Four Seven Marketing occupies the space adjacent to the subject property. Railroad yards are located farther to the west of the subject property.

Properties or land uses of potential environmental concern were identified adjacent to the subject property and include the Portland Terminal Railroad Company and Grinnel Corporation. These properties are evaluated further in subsequent sections of this report.

3.0 PHYSICAL SETTING

The physical setting and environmental characteristics of the subject property are based on URS' site reconnaissance and review of public documents, and documents provided by Hercules referenced in Section 9.0.

3.1 TOPOGRAPHY

According to the 1990 United States Geological Survey (USGS) 7.5-minute topographic map of the Portland, Oregon-Washington, the topography of the subject property ranges from a high of approximately 50 feet above mean sea level (msl) to a low of 30 feet msl. There were no surveys performed during the field investigation. In fact, during the 1996 Portland flood, the subject property was not flooded and landmarks located at adjacent properties indicated that the subject property is 30 feet msl. The property is situated approximately ½ mile north from the southeast-northwest trending Tualatin Mountains (also referred to as the Portland Hills). The regional topography of the area slopes to the north and northeast from the Portland Hills ridgeline towards the Willamette River.

3.2 SURFACE WATER

The nearest surface water is the Willamette River, located approximately 1,000 feet north of the subject property. In the vicinity of the subject property, the Willamette River flows from the southeast to the northwest and discharges into the Columbia River approximately 8 ½ miles to the northwest of the subject property. Tidal influences from the Pacific Ocean are transmitted through the Columbia River and affect the stage of the Willamette River as far south as Oregon City (nearly 20 miles south of the subject property). This stretch of the Willamette River is not used as a source of potable water, but is used for industrial and recreational purposes

Balch Creek is situated about ¾ miles due south of the subject property. This creek no longer follows its natural path northward, as it exits Tualatin Mountains, to the Willamette River. Developments associated with the Portland metropolitan area have resulted in the creek runoff being diverted into storm water conveyances buried beneath the industrial properties in this area of Northwest Portland.

3.3 GEOLOGY

A review of geologic information indicates that the subject property is located within the Willamette Valley physiographic province. The Willamette Valley province is an elongate, roughly north-south trending alluvial plain that pinches out at the northern and southern ends (Orr, et. al., 1992). The valley is confined by the Cascade Mountain Range to the east, the Coast Range to the west, and the Columbia River to the north. Locally, the site area is situated within the Portland Basin, which is a sub-basin of the Willamette Valley.

The subject property is mapped as underlain by unconsolidated Pleistocene-aged alluvium deposited by the Willamette and Columbia Rivers. The alluvium consists of silt, sand, and gravel deposited on the floodplain of the Columbia River. Included in these alluvial sediments are deposits associated with catastrophic, glacial outburst floods that originated in Western Montana, and were channeled across Northern Idaho, Eastern Washington, and through the Columbia River Gorge. These deposits are estimated to be between 50 and 75 feet thick in the vicinity of the subject property (Swanson et. al., 1993). Depth to bedrock at the site area is estimated to be approximately 200 feet below ground surface (Madin, 1990).

According to the United States Department of Agriculture Soil Conservation Service, Soil Survey of Multnomah County (Green, 1983), the subject property is situated upon Urban Land complex classification. The Urban Land classification consists of areas where more than 80 percent of the surface is covered by asphalt, concrete, buildings, or other impervious surfaces. These areas are found throughout Multnomah County, but are mainly in the City of Portland along the floodplain of the Willamette River. Grading for business centers, parking lots, shopping centers, industrial areas and similar uses, has typically altered these areas.

3.4 HYDROGEOLOGY

Groundwater is not used as a potable drinking water supply for the subject property. It is unknown if groundwater in the surrounding areas is used as a source for potable drinking water. The site area overlies an unconfined sedimentary aquifer that consists of Pleistocene-aged alluvium deposited along the major rivers of the area. Groundwater flow direction in this area is complex. Depth to groundwater will vary seasonally and with changes in infiltration rates in the unpaved, upgradient areas. Generally, groundwater will be deeper in the summer or dry months, and more shallow in the winter or wet months. Tidal influence from the Pacific Ocean is transmitted through the Columbia River, and affects the stage of the Willamette River in the site area. These fluctuations are expected to influence groundwater levels beneath the subject property. Groundwater in the site area probably occurs under water table conditions within the urban land complex and likely is within 10 to 25 feet of the ground surface.

Based on available information, URS has assumed that the direction of groundwater flow in the unconsolidated formation will generally follow topography and move in a northerly direction, towards the Willamette River. Therefore, areas at topographically higher elevation to the southwest, south, and southeast are assumed to be hydrogeologically upgradient and areas at lower elevations to the north are assumed to be hydrogeologically downgradient.

No site-specific data or studies were available for reference. A subsurface investigation would be needed determine the actual direction of groundwater flow and the depth to groundwater beneath the subject property.

4.0 INFORMATION PROVIDED BY OWNER AND SITE HISTORY

The history or the subject and adjacent properties was developed with information provided by Hercules and the review of one or more reasonably ascertainable Standard and Other Historical Sources referenced below and in Section 9.0.

4.1 INFORMATION PROVIDED BY HERCULES REPRESENTATIVES

URS submitted a written request to Hercules Corporate Environmental Affairs for documents and access to knowledgeable facility representatives who could provide information relating to historic and current site operations and activities. Relevant findings are summarized below.

4.1.1 Documents

Documents provided by Hercules and reviewed by URS are listed in Section 9.0. Documents that provide relevant information related to activities that identify Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs) or Areas of Concern (AOCs) are summarized below. As appropriate, copies or relevant sections of these documents are included in Appendix A.

- A Hercules document titled "Portland Plant History" (dated November 22, 2000) provides a summary of the history of the Portland plant. Included in this document are brief descriptions of the different production processes and the dates of their startup and/or discontinuation at the subject property since onsite manufacturing began in 1929. The Neuphor manufacturing process, which began in 1974, used solvents (benzene, methylene chloride, MIBK has not been used on this siteduring production. Solvent use was eliminated from the process due to production improvements. According to the Mr. Michael Croom, the Environmental Coordinator for the Hercules Portland plant, benzene was used in the process until approximately 1976. Methylene chloride and MIBK were used after 1976. Mr. Croom did not know the quantity or percent concentration of solvents used in the process. Solvent usage in the Neuphor process was eliminated in 1986 due to process improvements.

  The wastewater systems are described brief in the Portland Plant History document. This document states that there is "…no known soil contamination on the site." Also worth noting is the description of the flooring around the CTO and Pamak storage tanks, which states these areas are diked and "…have a concrete floor, but the floors were added several years after the CTO fractionation process was started up." No specific dates are given for how long the CTO area lacked concrete flooring and diking protection.

- A Hercules "Environmental Incident Description" form for the year 2000 (through October). Documents environmental violations, releases, complaints, and agency

visits. Important to note are a violation of NPDES permit for total residual chlorine (was brought into compliance, source of chlorine originated from the City of Portland (feed-water)), a violation due to discharging Betzdearborn wastewater (brought to the site from the Washougal, Washington plant; oil and grease were detected at 142 ppm), and numerous air quality complaints from the neighboring property to the east (Schnitzer) The subject property is in full compliance with the ACDP. Issues with air quality complaints are continually reviewed the sites Air Permit Manager . Based on the review of available information, these incidents are believed to represent AOCs to the subject property.

- Letter correspondence (dated April 7, 1998) from the Oregon Department of Environmental Quality (DEQ) to the Environmental Coordinator for the Hercules Portland plant (Mr. Michael Croom) regarding an invoice for oversight of a 1995 cleanup for Balch Creek. According to this letter, the DEQ determined Hercules was responsible for a release to Balch Creek. URS discussed this matter with Mr. Croom, who stated a DEQ inspector found an oily sludge material at the Balch Creek outfall to the Willamette River during an inspection. Mr. Croom stated Hercules felt they were not the source of the material, but decided to pay the fine rather than investigate further. Based on this information, URS considers the Balch Creek incident to represent a HREC. The incident was investigated numerous times. The City of Portland and DEQ determined that the Balch Creek incident did not implicate Hercules Portland.

- Laboratory results (dated April 10, 1995 and prepared by National Environmental Testing, Inc.) for a soil sample. According to Mr. Peter Harris the Hercules Portland Plant Engineer who collected and submitted the sample for analysis, the soil sample was a composite of several surficial soil samples collected from a former "boneyard" located along the western property boundary. Materials stored in this area included scrap metal, piping debris, and miscellaneous equipment. The boneyard was in the process of being cleared by Hercules for paving (it had not been paved previously) and Hercules wanted to determine whether contamination was present. The soil sample was analyzed for Total Petroleum Hydrocarbons (TPH) by the 418.1M Method, and the result indicates diesel-range hydrocarbons at a concentration of 180 parts per million (ppm). Soil from the "boneyard" project was disposed in a landfill to be used a capping material for the landfill. Based on the review of available information, URS has no reason to believe that this site has created a REC.

- Letter correspondence (dated October 22, 1990) prepared by Hercules for the DEQ concerning the disposition of several of the onsite underground storage tanks (USTs). The document lists five USTs as having been decommissioned (UST identification numbers: T-102, 80-6, MC-125, MC-135, WO-1) in the "third quarter 1989No active USTs were reported to be in use on the site. No other UST decommissioning activity or assessment documentation is included in this report. URS used this letter as a reference relative to other Hercules documentation of onsite USTs.

- Letter report (dated December 4, 1989) prepared by Pacific Tank and Construction Corporation regarding the decommissioning of four USTs and addressed to the DEQ. Four USTs were apparently decommissioned in July of 1989 and were located just south of the truck wash station and just west of the change house. A 12,000-gallon diesel UST was decommissioned by removal. A 1,000 gallon used oil tank, a 2,000-gallon gasoline tank, and a 1,000-gallon diesel tank were all decommissioned in-place. According to the report, no holes were observed in the 12,000-gallon diesel tank, no visible evidence of petroleum product contamination in the excavations was noted, and groundwater was not encountered in the excavation. Two soil samples were collected during the decommissioning work. One soil sample was collected at the base of the either the diesel or used oil tank (it is not clear in the document), and the other sample was collected at the base of the 2,000-gallon gasoline tank. Both samples were analyzed for TPH by the 418.1M Method. Petroleum hydrocarbons were detected in one sample at a concentration of 300 ppm and (below the site-determined DEQ Soil Matrix Cleanup Level II of 80 ppm for gasoline and 500 ppm for diesel). Soil from this project was disposed in a landfill to be used a capping material for the landfill.

  Based on the above information, it appears a total of two soil samples were collected during the decommissioning of these four USTs. The soil samples were only evaluated for total petroleum hydrocarbons. Soil was impacted with petroleum hydrocarbons. The 418.1M Method does not differentiate whether gasoline, diesel, or heavy oil range hydrocarbons are detected. The structural conditions of the three tanks that were decommissioned in-place were not noted. It should be noted that the exact UST identification numbers, sizes, etc. varied in the documents reviewed. URS has inferred that the 12,000-gallon UST is MCR-80-6, the 1,000-gallon waste oil tank is WO-1, the 2,000-gallon gasoline tank is MC-125, and the 1,000-gallon diesel tank is MC-135.)

- Two, separate hand-written tank inventory documents (one dated April 1989, and the other not dated) were reviewed by URS. It appears these two documents were written for Hercules' internal use. Based on these two documents, it appears that there were thirteen USTs onsite. URS used the two inventory documents with information provided by plant personnel to identify the approximate locations of the USTs on Figure 5.

  Several USTs were indicated within the hand-written documents as "abandoned," but the means of abandonment, tank conditions, and soil/groundwater conditions were not described. General information provided in these documents includes tank identification numbers, tank locations, installation dates, sizes, contents, and usage. Information important to note includes: UST T102 stored benzene from 1973 to 1976, tank installation dates range from 1938 (UST PFS-1) to 1980 (UST MCR-80-6), and the decommissioning dates for USTs MC-125 and MC-135 are indicated to have been in 1981 and 1980, respectively (contradicting the "third quarter 1989" decommissioning date given in the October 22, 1990 document referenced above). No tank decommissioning reports, or information regarding the collection of

confirmatory soil/groundwater samples is provided or referenced. Based on this information, adequate documentation on tank decommissioning and the status of soil/groundwater conditions around the tanks is not provided.

FIGURE 5

- An undated description of the disposition of seven USTs. It should be noted that only one UST had internal protection (UST T-102 had an interior lining), no USTs had external protection, only three tanks had inventory control (no other leak detection methods were used), no tank/piping repairs occurred, and the location/disposition of all tank piping is unknown. No tank decommissioning reports, or information regarding the collection of confirmatory soil/groundwater samples is provided. This document was used by URS to verify the information provided in the two hand-written documents referenced above.

- A Hercules "Minor Capital Request" (dated April 11, 1980) describes a UST (identified as MCR-80-6) which has "…increasing amounts of water contamination due to groundwater intrusion and is due for removal from service due to these leaks." This UST was indicated to be located "…under the concrete tank truck washing station." No other information was provided regarding a determination of whether groundwater was impacted. Documents referenced above indicate this tank was not removed until 1989, approximately nine years later.

  Based on URS' review of available information, up to 13 USTs were in use at the subject property during its 81-year operating history, with the earliest UST installed in 1938. Two of the USTs were reportedly removed and 11 USTs were reportedly closed or abandoned in-place. Eight of the USTs were reported to contain petroleum products or hazardous materials, and one UST contained used oil. All but one of the USTs appeared to be constructed of unprotected steel. Five of the USTs appear to have been closed when the Oregon UST regulations were in effect (the subject property is listed on the DEQ's UST database as having five decommissioned tanks). Available documentation indicates that four of the USTs may have been subject to the regulations and may have been closed in conformance with the regulations in effect at that time. Given that the average life of an unprotected steel tank is 15 years and the limited or absence of soil and groundwater sampling associated with closure, and other information, it is URS' opinion that the closed/abandoned USTs and areas where USTs were removed represents a Recognized Environmental Condition with a Moderate aggregate Financial Materiality. There is limited decommissioning documentation possibility due to record retention policies; however, it is not appropriate to consider these UST's a "Moderate" Financial Materiality. According to URS's guidelines "A ranking of **Indeterminate** indicates that insufficient information is available to assign a monetary value to an issue."

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4.1.2 Interviews

URS representatives, Mr. Jeff Wallace and Mr. Brian McNamara, interviewed Mr. E. Preston Trotter, Jr., the Portland Plant Manager, Mr. Michael R. Croom, the Environmental Coordinator and utility Area Supervisor, and Mr. Peter K. Harris, the Portland Plant Engineer, all of Hercules on December 11, 2000. Mr. Croom accompanied URS personnel throughout the site reconnaissance of the facility. Mr. Trotter and Mr. Harris answered questions on an as needed basis during the reconnaissance. URS personnel had follow-up questions regarding conditions at the plant that were answered by Mr. Croom on December 15 and December 18, 2000. Mr. Trotter

has worked at the Portland plant since 1993, Mr. Croom since 1997, and Mr. Harris since 1989.

Information discussed with the Hercules Portland plant personnel included but was not limited to, site history, site use, manufacturing processes, hazardous materials storage and use, waste disposal areas, wastewater, treatment/discharges, sewer or septic system, wells, historic fuel supplies and storage areas, USTs, ASTs, previous environmental work, and information on neighboring sites. This information is included and referenced throughout this report.

According to Hercules personnel, no Phase I Environmental Site Assessments of the subject property have previously been performed at the Portland plant. Two limited soil investigations occurred onsite and were reported previously within this report (see Section 4.1.1 for discussion of the April 10, 1995 laboratory results for the soil sample collected from the boneyard, and the December 4, 1989 letter report describing the decommissioning of four USTs). Regarding the environmental conditions of the subject property, Mr. Croom stated that no soil or groundwater contamination, related to onsite or offsite operations, at the subject property is known to exist.

Hercules personnel stated the structural integrity of the wastewater conveyance and treatment facilities is unknown. The wastewater pretreatment system was installed in approximately 1964 for the tall oil fractionation system wastewater. The wastewater conveyance system that directs wastewater to the pretreatment system was installed 15 to 20 years ago. The conveyance system consists of a series of open-air, subgrade concrete trenches that receive surface runoff and transport plant process waters and stormwater runoff to the pretreatment facility located on the northwest corner of the property. These concrete trenches crisscross the site and receive runoff from all areas of the site. At the pretreatment facility, solids are skimmed and the pH of the wastewater is adjusted prior to discharge to the City of Portland's sanitary sewer system. The wastewater is reported to contain no priority pollutants, but hazardous materials are used on the subject property. Given the age of the wastewater treatment system, the types of materials used onsite, that potentially enter the system and the limited information on the structural integrity of the system, it is URS' opinion that the wastewater treatment and conveyance system represents an AOC to the subject property.

According to Hercules personnel, benzene was used onsite in the Neuphor production for approximately three years from 1973 to 1976. This solvent was stored in UST T-102, located in the Neuphor production area, and was used as a carrier in the production process. After approximately 1976, benzene was no longer stored in the UST, and no longer used in the Neuphor process. UST T-102 was reportedly decommissioned in 1987. No assessment for the presence solvent contamination associated with this tank was provided to URS.

4.1. 3 Other Information

Regulatory Compliance – Hercules provided URS with information about the facility's environmental permits and representations regarding compliance with permits and

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environmental programs. This information is included in Appendix A and in accordance with the Scope of Services, has not been independently evaluated by URS.

Asbestos – In accordance with the Scope of Services, URS did not conduct an asbestos survey or evaluate the adequacy of the documents reviewed. However, according to Hercules personnel, an asbestos survey initiated by Hercules resulted in a significant amount of asbestos removal from the facility. Most of the asbestos has reportedly been removed from the site, but isolated areas of asbestos-containing materials reportedly still remain onsite. The bulk of the asbestos was removed from the chemical area (old plant building) and from AST insulation. A dumpster for asbestos-containing material removed from structures was observed onsite during URS' site reconnaissance. The asbestos-containing materials discarded within this dumpster are reportedly hauled offsite for proper disposal. Based on this information, asbestos-containing material remaining onsite represents an AOC.

Title Records – Title records for the subject property were not provided or available for review.

Environmental Liens or Activity and Use Limitations – Mr. Michael Croom, the Environmental Coordinator, of Hercules stated that he has no knowledge of environmental liens associated with the subject property or any use limitations affecting the subject property.

Valuation Reduction for Environmental Issues – Mr. Croom of Hercules stated that he has no knowledge of the property value or any reductions associated with environmental issues.

4.2 CHRONOLOGICAL HISTORICAL REVIEW

Prior to the initial development sometime between 1897 and 1929, the subject property was undeveloped. The subject property was created by filling of a portion of Guild Lake between 1897 and 1929. In approximately 1929, Paper Makers Chemical Company developed the site for a rosin-based paper sizing manufacturing facility. Hercules purchased the subject property from Paper Makers Chemical Company in October 1931. URS' review of Standard Historical and Other Sources are chronologically summarized in Table 1.

TABLE 1
HISTORICAL SUMMARY
HERCULES – PULP AND PAPER DIVISION
PORTLAND, OREGON

Date	Location	Finding	Source
1897	Subject Property	Does not appear to exist, as a lake, "Guild Lake" extends across the site.	Topographic Map

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Date	Location	Finding	Source
	Adjacent Properties	North: lake and the "Northern Pacific Railroad" East: water associated with Guild Lake South: water associated with Guild Lake West: an unnamed peninsula within Guild Lake	
1929	Subject Property	Rosin size facility built by Paper Makers Chemical Co.	"Portland Plant History" document (11/22/00)
1931	Subject Property	Site purchased by Hercules Powder Co., only one process building is onsite.	"Portland Plant History" document (11/22/00)
1938	Subject Property	UST PFS-1 installed for "Ames boiler….near cooling tower – 12,000 gallon capacity, contains heating oil.*	Several different Hercules documents on USTs
1939	Subject Property	Wax emulsion process added to production facilities.	"Portland Plant History" document (11/22/00)
1940	Subject Property	Guild Lake is no longer present and the site is developed with the Chemical Area building (also known as the "old plant building), a small building, and a railroad spur. Sometime between 1897 and 1929, the subject property was created by filling of a portion of Guild Lake. Improvements on the subject property have changed gradually over the years as processes and products evolved since the original plant was constructed.	Topographic Map
	Adjacent	North: railroad tracks and additional rail spurs East: open land South: NW Yeon Road appears to be present; open land West: several small buildings and railroad spurs	
1945	Subject Property	UST MC-61 installed near "fence line on east side of shop"– 675 gallon capacity, contains gasoline.*	Several different Hercules documents on USTs
1950	Subject Property	Present on site are: ten "Steel sizing tanks," a "Change HQ," a boiler house (near the northeast corner of the site, an "Inflam Chem Stge" building (on western boundary), and two small buildings (one of which is labeled "Inflam Chem," located near the north central portion of the site.	Sanborn Map

Date	Location	Finding	Source
	Adjacent Property	North: Northern Pacific Terminal Company rail "Roundhouse" and "Yards"* East: "Scrap Iron and Junk Yard" South: NW Yeon Road and an automobile parking lot West: "Timber Structures, Inc." facility with office, welding building, warehouse, "tractor repair" building, and carpenter shop	
1953	Subject Property	UST MC-117 installed "in front of boiler control room" – 1,000 gallon capacity, contains (possibly) diesel or boiler fuel.*	Several different Hercules documents on USTs
1954	Subject Property	Sales office building added near the entrance to facility (southern end of site).	"Portland Plant History" document (11/22/00)
1954	Subject Property	A building is visible in the northeast corner of the property (in the location historically occupied by a boiler house) and two other small buildings are present (one is possibly the change house).	Topographic Map
	Adjacent	Additional rail spurs and buildings (Timber Structures, Inc.) are present to the west.	
1955	Subject Property	UST MC-125 installed at the "wash rack" – 2,000 gallon capacity, contains gasoline.*	Several different Hercules documents on USTs
1955	Subject Property	Several additional structures (possibly ASTs) are visible across the central and eastern portion.	Aerial photograph
	Adjacent	A large warehouse building is present across NW Yeon Avenue to the south (site now occupied by Grinnel Corporation).	
1958	Subject Property	UST MC-135 installed at the "wash rack" – either 1,000 or 2,000 gallon capacity, contains diesel.*	Several different Hercules documents on USTs
1959	Subject Property	AKD emulsions and kymene processes are added to the production facilities.	"Portland Plant History" document (11/22/00)
1961	Subject Property	An additional building is present in the area historically occupied by the office (southeast corner).	Topographic Map
	Adjacent	Same as depicted on the 1954 topographic map.	
1962	Subject Property	Process equipment vessels C-1 (depitching column) and C-2 (fractionation column) installed.	"Portland Plant Profile" document (12/07/00)

Date	Location	Finding	Source
1963	Subject Property	Tall oil fractionation facility added to the northwest quadrant of the site; the tall oil facility included an acidulation process (converts soap skimmings from pulp mills into crude tall oil (CTO).	"Portland Plant History" document (11/22/00)
1963	Subject Property	UST PFS-2 installed "in front of B&W boiler" – 1,000 gallon capacity, contains heating oil and, later, diesel.*	Several different Hercules documents on USTs
1963	Subject Property	Several ASTs are present, including the tall oil tanks in the northwest portion of the site; the warehouse and drum storage area visible near the south central portion of the site.	Aerial photograph
	Adjacent	Additional buildings are present to the south-southeast of the site (across NW Yeon Avenue).	
1964	Subject Property	Wastewater treatment system installed for CTO wastewaters.	Interviews with Hercules personnel
1965	Subject Property	Soap acidulation process discontinued, all CTO obtained directly from pulp mills.	"Portland Plant History" document (11/22/00)
1968	Subject Property	UST WO-1 installed at the "wash rack" – either 500 or 1,000 gallon capacity, contains waste oil.*	Several different Hercules documents on USTs
1969	Subject Property	Additional structures and ASTs are present around the chemical area building (old plant building); a barrel yard is present in the southwest corner of the site, tall oils tanks are present on the northwest portion of the site.	Sanborn Map
	Adjacent	Several warehouses are present on the water front to the north of the site.	
1970	Subject Property	Several ASTs and the warehouse are now present.	Topographic Map
	Adjacent	Same as depicted on the 1961 topographic map.	
1970	Subject Property	An additional tall oil tank is present on the northwest portion of the site.	Aerial photograph
	Adjacent	Same as depicted on the 1963 aerial photograph.	
1972 or 1974	Subject Property	Neuphor process added to production facility – solvent was initially used in this process.	"Portland Plant History" document (11/22/00)
1973	Subject Property	UST T-102 installed "in Neuphor area" – 10,000 gallon capacity, contains benzene.	Several different Hercules documents on USTs

Date	Location	Finding	Source
1976	Subject Property	UST T-102 no longer used to store benzene, now contains surfactant	Several different Hercules documents on USTs
1977	Subject Property	Same as depicted on the 1970 topographic map	Topographic Map
	Adjacent	Same as depicted on the 1970 topographic map	
1980	Subject Property	Tank MCR-80-6 installed at the "wash rack" – 12,000 gallon capacity, contains diesel.*	Several different Hercules documents on USTs
1982	Subject Property	Paraffin oil-based defoamer production process added.	"Portland Plant History" document (11/22/00)

Date	Location	Finding	Source
1984	Subject Property	The process water lagoons are visible in the northwest corner of the site.	Aerial photograph
	Adjacent	The scrap yard to the east of the site has been replaced with a warehouse building; the Timber Structures, Inc. building has been removed and replaced with another building.	
1986	Subject Property	Solvent use in the Neuphor process is discontinued.	Interviews with Hercules personnel
1987	Subject Property	UST T-102 decommissioned by removal*	Several different Hercules documents on USTs
1989	Subject Property	USTs MCR-80-6 decommissioned by removal; UST WO-1 decommissioned in-place.*	Several different Hercules documents on USTs
1994	Subject Property	The truck wash buildings appear to be present.	Aerial photograph
	Adjacent	Same as depicted on the 1984 aerial photograph.	
1999	Subject Property	CTO fractionation facility shut down, primary steam boiler converted to natural gas fuel.	"Portland Plant History" document (11/22/00)

* Findings identified as REC's, HREC's or AOC's in Section 4.1.

4.3 SUMMARY OF HISTORICAL FINDINGS

Based on URS' review of historical aerial photography, fire insurance maps, historic topographic maps, and information provide by Hercules in documents or through interviews, the subject property has been used for, or in support of, the formulation of chemical additives for the paper manufacturing industry since 1929. Sometime between 1897 and 1929, the subject property was created by filling of a portion of Guild Lake. Improvements on the subject property have changed gradually over the years as processes and products evolved since the original plant was constructed. Thirteen underground storage tanks (USTs) have either been decommissioned by removal or by abandonment in-place.

Other than the Recognized Environmental Conditions and Areas of Concern identified by Hercules in Section 4.1, no additional Recognized Environmental Conditions, Historic Recognized Environmental Conditions, or Area of Concern was identified by URS' review of available historic information. Copies of relevant historic documents are included in Appendix B.

5.0 SITE RECONNAISSANCE

Mr. Jeff Wallace and Mr. Brian McNamara of URS conducted a reconnaissance of interior and exterior areas of subject property on December 11, 2000. Mr. Michael R. Croom, the Environmental Coordinator and utility Area Supervisor of the Hercules Pulp and Paper Division Portland plant escorted the URS personnel.

The reconnaissance of operational areas of the site generally followed the manufacturing process from raw material receipt and storage, through manufacturing, to finished product storage and shipping and waste management. Photographs taken during the site reconnaissance are presented as Appendix C. URS' observations and findings are summarized below.

5.1 HAZARDOUS MATERIALS, WASTES AND PETROLEUM PRODUCTS

The manufacturing processes utilize large quantities of several hazardous materials as feed products. Liquid feed products are primarily stored in aboveground bulk storage tanks, surrounded by concrete secondary containment berms, which are located throughout the plant. These materials are typically received in bulk deliveries by rail car. In a few cases, liquid hazardous materials are also received in totes or drums that are stored in the warehouse or near the manufacturing area until needed. The primary liquid hazardous materials used onsite are epichlorohydrin, hexamethylenediamine (HMDA), diethylenetriamine (DETA), sulfuric acid, sodium hydroxide, and potassium hydroxide. Diesel fuel is stored onsite and used as a backup fuel for the onsite boilers.

Solid feed chemicals are typically received and stored in 2,000-pound "supersacks," which are stored in warehouse until needed in the manufacturing area. The primary solid chemical utilized onsite is adipic acid, which comes in a granular form.

A variety of small containers of lubricants, paints, cleaners, and similar items were also observed at the maintenance shop.

Evidence of incidental spills such as accumulations of liquid or granular materials on floors, or etched concrete were noted in the manufacturing areas and within some of the tank containment areas.

According to Mr. Croom, the facility currently operates as a Small Quantity Generator of hazardous waste. However, Hercules typically generates less than 220 pounds of hazardous waste per month. Mr. Croom noted that about once per year, the facility's waste generation exceeds 220 pounds in a month. This is reportedly due to a one-time disposal need, such as a house-cleaning of unneeded chemicals from the onsite laboratory. Hercules uses Safety-Kleen to dispose of its hazardous waste. URS also observed approximately 15 drums of waste heat-transfer liquid (Therminol VP-1, which is a hazardous substance) stored in the outdoor hazardous waste storage area. Hercules personnel reported that this waste was removed from the two CTO fractionation towers

after the tall oil product line ceased operation in September 1999. All lines have been blown to clear residual material; no additional waste remains in associated. The equipment and lines however, have not been cleaned adequately enough to dispose or recycle. No other hazardous waste is currently stored onsite.

In the maintenance shop, the facility operates a small parts washer that uses aqueous solvent. Safety-Kleen is contracted to service this unit and remove/replace the spent solvent approximately every two months. No visual evidence of spills was noted in the area of the parts washer.

URS also observed a sealed roll-off type dumpster which the facility uses to collect asbestos-containing insulation materials which are periodically removed from process equipment.

Figure 6 shows the location of the major hazardous material accumulation areas, the hazardous waste storage area, and the asbestos waste dumpster.

5.2 ABOVEGROUND STORAGE TANKS

Approximately 100 aboveground chemical storage tanks, ranging in size from 25 gallons to 300,000 gallons are located onsite. All ASTs that contain hazardous materials were observed to be bermed within secondary containment. For a complete listing of tanks, tank sizes, and tank contents, is contained in the "Production Site Profile" document in Appendix A. The ASTs appeared in relatively good condition, with minor spills and staining visible on the structures, and within the concrete berms. The staining was mostly present in the area of the tanks that contain the viscous crude tall oil material.

5.3 UNDERGROUND STORAGE TANKS

No active USTs were reported to be in use on the site. In addition, no evidence fill ports or piping related to USTs was observed on the subject property during the site inspection. As discussed in Section 4.1.1, 11 abandoned in-place USTs are believed to be present on the subject property.

5.4 DRUMS AND CONTAINERS

Hercules stores a variety of feedstock chemicals, hazardous materials needed to support operations, manufactured products, and wastes in 55-gallon drums and 350-gallon totes. The location and contents of these containers is discussed in the Hazardous Materials section of this report.

5.5 SOLID WASTE

Solid wastes, consisting of paper trash, cardboard, empty adipic acid supersacks, and office waste (mostly paper) is placed in dumpsters located near the southwest corner of the property. Waste Management, Inc. removes the solid waste on a weekly basis for disposal in a sanitary landfill, and the asbestos wastes on an as-needed basis. URS

observed no evidence of oil or other hazardous material stains near the solid waste dumpsters.

The facility also has two outdoor accumulations areas for non-hazardous off-specification product that needs to either be reworked into manufacturing processes or disposed of as solid waste. The two accumulation areas are located on either side of the wastewater treatment plant, along the west fence-line of the property. Collectively, the facility currently has about 40 350-gallon totes and 30 55-gallon drums of various product onsite. Reportedly, most of these materials will be disposed of as solid waste, after solidification, at a landfill in Utah. The facility uses Safety-Kleen to provide transportation and disposal services.

The facility operates a small, glove-bag style sandblasting booth in the maintenance shop. The Hercules mechanic reported that small parts that require maintenance are sandblasted to clean and/or to remove paint, unless they have a machined surface,. The blast media used consists of a 50-50 mix of carborundum and glass beads. About every two months the facility disposes of the spent blast media with other solid waste. URS estimated that the sandblast booth contains about 200 pounds of blast media.

5.6 WASTEWATER AND SEPTIC SYSTEMS

There are reportedly no septic systems are located on the subject property. Wastewater is generated onsite from a variety of processes and disposed of, following pretreatment, via discharge to the City of Portland sanitary sewer system (i.e., "POTW"). Processes that generate wastewater include the cleaning of company-owned tanker trucks (including those from the offsite BetzDearborn-Washougal, Washington plant), the cleaning of aboveground process/product storage tanks and ancillary equipment, general washdown of manufacturing areas, and stormwater.

The wastewater conveyance system consists of a series of open-air, subgrade concrete trenches that receive surface runoff and transport plant process waters and stormwater runoff to the pretreatment facility. At the pretreatment facility, solids are precipitated and the pH of the wastewater is adjusted. Reportedly, no priority pollutant analyses are conducted on the wastewater prior to discharging to the POTW. The conveyance system and pretreatment facility contained wastewaters or sludges during the site visit and could not be inspected for the presence of cracks or holes.

The wastewater pretreatment system includes two concrete settling lagoons and an oil/water separator. A large piece of scrap or damaged metal sheeting was observed in the abandoned oil The 10-inch diameter sanitary sewer line runs along the western portion of the property. According to Hercules personnel, the city sewer lines may have been installed in the 1930s.

A separate non-contact cooling-water system collects non-contact cooling-water, directs the water through parshal-flume, and releases it to a 54-inch diameter storm sewer that crosses the western portion of the subject property. Another 60-inch storm sewer

parallels the 54-inch line, but no Hercules sewer lines connected to the 60-inch sewer. The facilities storm-water runoff is directed into the waste treatment process.

5.7 DRAINS, SUMPS, OR CLARIFIERS

No floor drains were observed on the subject property. Process wastewater and stormwater runoff are directed by the series of subgrade concrete troughs to the wastewater pretreatment facility located near the northwest corner of the site. Mr. Croom stated he was not aware of any drywells, french drains, or other drainage structures on the subject property.

5.8 PITS, PONDS, OR LAGOONS

Two concrete-lined wastewater pretreatment settling lagoons are located on the northwest portion of the property and are part of the treatment system discussed in Section 5.6. This is irrelevant, the plant is in compliance with our wastewater permit.

5.9 POLYCHLORINATED BIPHENYL CONTAINING EQUIPMENT

Mr. Croom stated he was not aware of any PCB surveys or removals that have been conducted at the subject property, nor was he aware of PCB-containing equipment onsite. An aboveground transformer was located on the northeast corner of the site, but has been removed and replaced within the past few years. The transformer was released to Portland General Electric. Currently, there are two electrical transformers located on the subject property: one on the northeastern corner of the property and one adjacent to the office. The transformer located on the northeastern corner of the property was labeled as having no PCB-containing fluids. The transformer located adjacent to the office did not have a PCB label on it. Both transformers were pad-mounted and appeared to be in good condition. No visual evidence of leaks, damage or corrosion was noted on the outside of the transformers. These two transformers are serviced and maintained by an electrical contractor.

5.10 WELLS

Two capped, but not decommissioned, water wells are located on the subject property. One water well is located in the northeast corner of the subject property and the other is in the southwest corner (see Figure 2 for locations). These wells were formerly used as a source of plant process water, and have not been used for several years. The wells are capped, and personnel with Hercules were not familiar with the specifics of the wells (final well depths, depths to groundwater, groundwater quality, etc.). Hercules relinquished the water rights for these two wells to the City of Portland several years ago. No other wells, observation, monitoring, or production, were observed on (or adjacent to) the subject property during the site inspection.

5.11 DISCOLORED/STAINED PAVEMENT OR SOIL, STRESSED VEGETATION, ODORS, TOPOGRAPHIC ANOMALIES

Evidence of incidental spills such as accumulations of liquid or granular materials on floors, or etched concrete were noted in the manufacturing areas, within some of the tank containment areas, and in the wastewater collection trenches.

One of the few areas of unpaved ground on the subject property is in the location of a former epichlorohydron (EPI) AST. Mr. Croom stated that when this tank was removed by Hercules, the concrete pad was removed with it. This tank was formerly located near where the current EPI tank is situated (in the tank farm area where finished products are primarily stored).

5.12 ADDITIONAL ISSUES

None

6.0 GOVERNMENT AGENCY INFORMATION

6.1 DATABASE SEARCH

URS reviewed information gathered from several environmental databases compiled by Environmental Data Resource, Inc. (EDR) in order to evaluate, to the extent possible, whether activities on or near the subject property have the potential to create adverse environmental impacts on the subject property. EDR reviews databases compiled by federal, state, and local government agencies. The complete list of databases is provided in Appendix D.

It should be noted that this information is reported as URS received it from EDR, which in turn reports information as it is provided in various government databases. It is not possible for either URS or EDR to verify the accuracy or completeness of information contained in these databases. However, the use of and reliance on this information is a generally accepted practice in the conduct of environmental due diligence. A description of the databases searched and the information obtained is summarized below.

TABLE 2
ENVIRONMENTAL DATABASE SUMMARY
HERCULES – PULP AND PAPER DIVISION
PORTLAND, OREGON

Type of Database	Description of Database/Effective Date	Radius Searched	Number of Sites Identified
NPL	The National Priorities List identifies uncontrolled or abandoned hazardous waste sites. To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a state's top priority site, pose a significant health or environmental threat, or be a site where the EPA has determined that remedial action is more cost-effective than removal action. Effective Date – June 2000	1 mile	1
CORRACTS	Listing of RCRA facilities that are undergoing corrective action. Corrective actions may be required beyond the facility's boundary and can be required regardless of when the release occurred, even if it predates RCRA. Effective Date – April 2000	1 mile	2

Type of Database	Description of Database/Effective Date	Radius Searched	Number of Sites Identified
CERCLIS	The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment. Effective Date – April 2000	0.5 mile	0
RCRA TSDs	Resource Conservation & Recovery Act treatment, storage, or disposal sites. Effective Date – June 2000	0.5 mile	1
RCRA Generators	RCRA-regulated hazardous waste generator notifiers list; both Large and Small Quantity Generators are included in this list. Effective Date – June 2000	Subject property and adjacent	SQG – 17 LQG – 2
ERNS and state spills list	EPA's Emergency Response Notification System (ERNS) list contains reported spill records of oil and hazardous substances. Effective Date – August 2000	Subject property	0
SWLF	State inventory of solid waste disposal and landfill sites. Effective Date – March 1999	0.5 mile	0
LUST	List of information pertaining to all reported leaking underground storage tanks. Effective Date – September 2000	0.5 mile	27
SHWS	State Hazardous Waste Site (SHWS) listing of information about sites that may be of environmental interest – the State of Oregon equivalent is the DEQ's Environmental Cleanup Site Information (ECSI) database. Effective Date – August 2000	1.0 mile	29
UST/AST	State registered underground and above-ground storage tank sites listing. Effective Date – August 2000	0.25 mile	10

6.1.1 Subject Property Listings

The subject property was identified by EDR as being listed on several regulatory agency databases including:

CERCLIS – The subject property is listed on CERCLIS database as having No Further Remedial Action Planned (CERCLIS-NFRAP). The EPA completed a Basic Preliminary Assessment of the site in 1984 and completed a Preliminary Assessment in 1988. The site received the NFRAP designation from the EPA in 1988. Personnel with Hercules could not recall these two assessments, and paperwork was not available. URS has no reason to believe that the listing of the subject property as a CERCLIS-NFRAP site represents a REC.

SHWS - The subject property is listed on the Oregon State Environmental Cleanup Site Information (ECSI) database as having no evidence of a confirmed release of hazardous substances. However, the DEQ classifies the subject property as a suspect site requiring further investigation (no reason given). Based on this information, URS has no reason to believe that the listing of the subject property as a SHWS represents a REC, but considers this listing as an AOC. The ECSI Site Summary Report for the subject property is included in Appendix E.

RCRIS-LQG– The subject property is listed as a large quantity generator of RCRA-regulated hazardous wastes. According to Mr. Croom, the subject property operates as a RCRIS-SQG. This is in conflict with the EDR report. Four violations during compliance evaluation inspections are listed for the subject property. One violation occurred in October 1992 and was brought into compliance in November 1992. Three violations occurred in February 1997 and were all brought into compliance in May of 1997. URS has no reason to believe that the listing of the subject property as a RCRIS-LQG or that the identification of four violations for the subject property represent RECs.

UST– The subject property is listed on the DEQ's UST database as having five decommissioned tanks. No other information is provided in the EDR database report on these tanks. As noted in Section 4.1.1, 11 abandoned tanks are believed to be present on the subject property. It is URS' opinion that the historic USTs represent RECs.

Oregon HAZMAT– The subject property is listed on the Oregon State Fire Marshal's database for sites having hazardous material incidents. No other information is provided in the EDR database report for this listing. In the absence of additional information, URS considers this listing to represent a REC with an indeterminate financial materiality.

HSIS– The subject property is listed on the Oregon State Fire Marshal's Hazardous Substance Information Survey (HSIS) database. This database provides information regarding companies in Oregon that submit the survey and either report or not report hazardous substances. URS has no reason to believe that the listing of the subject property as a HSIS site represents a REC.

FINDS- The subject property is listed on the EPA's Facility Index System/Facility Identification Initiative Program Summary (FINDS). No other information is provided in the EDR database report for this listing. URS has no reason to believe that the listing of the subject property as a FINDS site represents a REC.

TRIS- The subject property is listed in the EPA's Toxic Chemical Release Inventory System. No other information is provided in the EDR database report for this listing. URS has no reason to believe that the listing of the subject property as a TRIS site represents a REC.

TSCA- The subject property is listed in the EPA's Toxic Substances Control Act (TSCA database. No other information is provided in the EDR database report for this listing. URS has no reason to believe that the listing of the subject property as a TSCA site represents a REC.

6.1.2 Offsite Property Listings

URS reviewed the EDR database report to identify offsite facilities that have suspected or documented environmental concerns or Recognized Environmental Conditions that may negatively impact the subject property. URS' criteria for further evaluating the potential impact of a listed offsite facility are summarized below:

- The listed offsite facility is adjacent to the subject property; or, the listed offsite facility is documented or assumed to be hydrogeologically upgradient and a likely pathway exists for environmentally mobile contaminants to reach the subject property; or, contaminants from the listed offsite facility can reach the subject through other pathways (i.e., surface runoff); and,

- The offsite facility is listed on one of the databases of the (Federal NPL, Federal CORRACTS, Federal CERCLIS, Federal ERNS, State SPL, State SCL, State LUST, State Deed Restrictions, and State Toxic Pits, Landfill (excluding transfer stations) and is not listed in the database as "closed" or "no further action" (including NFRAP); or,

- The facility adjoins the subject property and is listed as a RCRA large-quantity hazardous waste generator, a CERCLIS NFRAP site, or an UST operator; or

- The facility is a known or suspected concern based on URS' experience or observations made during the site reconnaissance. (i.e., dry-cleaning operations that may or may not be listed as RCRA-SQG or a non-adjacent UST site that appears to have a remediation system in-place).

Summarized below are identified facilities that, using the criteria discussed above, appeared to be of potential concern including EDR's map reference number, site name and address, direction and distance from subject site, type, and URS' evaluation of the listed sites potential to create a Recognized Environmental Condition on or otherwise

impact the subject property. All LUST Incident Reports and ECSI Site Summary Reports are included in Appendix E.

EDR Site D14 – Portland Railroad Company is located at 3500 NW Yeon Avenue, adjacent to the northwest and north of the subject property. This facility is identified on the LUST database for contamination found during the decommissioning of two USTs. No information on the date of decommissioning was available from the LUST Incident Report or the EDR report. Diesel contamination in soil and groundwater was confirmed; however, no offsite migration was reported. This facility is located in a position inferred to be hydrogeologically cross or downgradient from the subject property. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

EDR Site 9 – Grinnel Supply Sales Company is located at 3230 NW 29th Avenue, across NW Yeon road to the south of the subject property. The facility is identified on the LUST database as having one UST decommissioned in March 1996. During the decommissioning, a diesel release was reported as a result of tank overfilling. Soil was reportedly impacted, however no groundwater contamination and no offsite migration was reported. The impacted soil was cleaned-up by June 1996, and the DEQ issued a no further action letter for the site in October 1996. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

EDR Site G22 – Longview City Laundry & Cleaners is located at 2737 NW Nell Street, approximately $^1/_8$ mile to the south-southeast of the subject property. This facility is identified on the ECSI database as having shallow soils and groundwater contaminated from two separate sources. One source appears to be from a historic landfill that received incinerator ash. Contaminants from this source include metals and organics (including petroleum products). The second, more recent, release is from an unnamed source and consists of petroleum products. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

EDR Site G24 – Nudelman & Son, Inc. is located at 2707 NW Nela Street, approximately $^1/_8$ mile to the south-southeast of the subject property. According to the EDR and ECSI report, an EPA Preliminary Investigation of the site was initiated in October 1988, and completed in May 1989. The EPA identified the facility as needing no further remediation action. However, the DEQ indicates further investigation is necessary. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

EDR Site J33 – Terminal Transfer, Inc. is located at 3601 NW Yeon Avenue, less than ¼ mile to the west of the subject property. This facility is identified on the LUST database for a release from a leaking pipe. Six USTs were decommissioned and cleanup was

initiated in January 1991. This facility is located in a position inferred to be hydrogeologically upgradient/crossgradient from the subject property. According to the DEQ LUST Incident Report, soil and groundwater were impacted, but no offsite migration was reported. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

EDR Site 43 – Mogul Corporation is located at 2852 NW 31st Avenue, approximately ¼ mile to the south-southwest of the subject property. According to the EDR and ECSI report, an EPA Preliminary Investigation of the site was initiated in October 1984, and completed in December 1984. The EPA identified the facility as needing no further remediation action. However, the DEQ considers this site to require further investigation. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

EDR Site 44 – American Machine and Gear is located at 2770 NW Industrial Street, approximately ¼ to ½ mile to the south of the subject property. This facility is identified on the ECSI database for historical releases of petroleum products. Site investigative work indicates impacts are minimal, however exposure pathways are incomplete. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

EDR Site M46 – Guilds Lake is located at 2615-2619 NW Industrial Street, less than ¼ mile to the south-southeast of the subject property. Guilds Lake consists of reclaimed land filled in the early 1900s. An industrial park is currently situated on it, and this site is identified on the ECSI database for historical releases from ash disposal, a municipal waste landfill, and possibly from USTs. Releases occurred from 1909 to the 1940s. Petroleum contaminated soil has been removed, the site has been capped, a venting system has been installed, and long-term monitoring of groundwater is taking place. Based on the review of available information, this site represents an AOC to the subject property.

EDR Site O51 – Hill Investment Company is located at 3320 NW 35th Avenue, approximately ¼ mile to the south-southeast of the subject property. According to the ECSI database summary report, during a 1990 site assessment, chlorinated solvents were detected in groundwater beneath the site. Nabisco formerly occupied the site, and Ashland Chemical Company is the current operator. Since the discovery of chlorinated solvents, DEQ's oversight has been limited to UST issues and petroleum contamination. No groundwater sampling for chlorinated solvents has occurred since 1990. The DEQ is currently recommending an expanded assessment of the site. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

EDR Site 56 – Todd, T HOT (Heating Oil Tank) is located at 2535 NW 28th Avenue, approximately ¼ mile to the south of the subject property. This facility is identified on

the LUST database for a heating-oil tank leak that affected soil only. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

EDR Site 62 – Columbia American Plating Company is located at 3003 NW 35th Avenue, approximately ¼ mile to the south-southwest of the subject property. According to the ECSI database summary report, past waste management practices resulted in RCRA compliance and enforcement actions for storage of hazardous wastes for over 90 days, storage of wastes in deteriorated and leaking containers, and other management practices. The facility has also been cited for violations of its wastewater discharge permit for metals. Groundwater grab samples collected from the site contained metals and solvents. In 1995, the site was placed on the confirmed release list and a remedial investigation was recommended to evaluate the nature and extent of groundwater contamination. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

EDR Site 69 – Russel, Rick is located at 2455 NW 29th Avenue, approximately ¼ mile to the south of the subject property. This facility is identified on the LUST database for a heating-oil tank leak that affected soil only. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

EDR Site 73 – Galvanizers Company is located at 2406 NW 30th Avenue, approximately ½ mile to the south-southwest of the subject property. This facility is identified on the ECSI database for a overflow, spills, and probable improper disposal methods at this zinc galvanizing facility. Soil and groundwater are impacted with metals and petroleum hydrocarbons. Groundwater at the site is indicated to flow northward, and has most likely spread contamination offsite. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

6.1.3 Unmapped or Orphan Sites

URS reviewed EDR's listing of Unmapped Sites, which are sites that have not been geocoded based on lack of sufficient data regarding their exact location within the general area. The subject property was not identified as an Unmapped Site. No additional unmapped sites identified on the database summary as located within the ASTM-designated radii of the subject property appear to be located upgradient, and, therefore, URS has no reason to believe that these sites have created a Recognized Environmental Condition on the subject property.

However, one of these unmapped sites is located downgradient of the subject property, has recently been placed on the NPL, and could potentially dictate further investigative work at the subject property. According to the ECSI database report, the Portland Harbor was placed on the NPL on December 1, 2000 due to the presence of contaminated

river sediments. The Portland Harbor occupies a six-mile stretch of the Willamette River, just north of the subject property, and is downgradient from it. Sediments within the harbor are impacted with metals, butylins, PCBs, pesticides, and petroleum products. Most of the contamination is concentrated in sediments adjacent to on-shore areas that are impacted, and are currently undergoing assessment or cleanup. Based on the review of available information, URS has no reason to believe that this site has created a REC or represents an AOC to the subject property.

6.2 REGULATORY AGENCY CONTACT

URS submitted written Freedom of Information requests to government agencies listed to obtain information regarding of contamination, environmental permits, violations, or corrective actions the subject property and the offsite properties listed in Sections 6.1.2 and 6.1.3 above. Copies of URS' correspondence and agency provided documentation is presented as Appendix E.

City of Portland Fire Bureau, Portland, Oregon - At the time this report was prepared URS had not received a response from the agency.

Multnomah County Health Department, Portland, Oregon - At the time this report was prepared, URS had not received a response from the agency.

Oregon Department of Environmental Quality, Northwest Regional Office – Mr. Brian McNamara of URS was contacted by the ECSI File Reviewer for the DEQ's Northwest Regional (NWR) Office, Ms. Crystal Montgomery. Ms. Montgomery coordinated FOI request with other DEQ staff, and stated that the materials URS requested would have to be reviewed, by appointment, at the DEQ's NWR Office. These materials could not be reviewed within the project schedule, and were therefore not reviewed by URS.

In addition to written requests, URS interviewed, by telephone, government officials from the Office of Oregon State Fire Marshal about environmental conditions at the subject and surrounding properties. URS spoke with Ms. Vi Pelly of the State Fire Marshal's Data Unit on December 14, 2000 who indicated no fire incidents were reported for the subject property since 1996. According to Ms. Pelly, information regarding fire responses prior to 1996 was not available on their database. Ms. Pelly was also unable to provide information for fire responses in the surrounding area.

URS also spoke with Ms. Lisa Bradley of the State Fire Marshal's Data Unit on December 14, 2000. Ms. Bradley stated the hazardous material response database contains response information back to 1986. Ms. Bradley indicated one hazardous material response was listed for the subject property, and provided URS with a copy of the incident report, which is included in Appendix E. According to this report, a welders torch ignited tall oil residue located in the insulation around a storage tank. No product was spilled and the product within the tank was not ignited. The cause of the fire was not attributed to the tall oil product. URS has no reason to believe that this incident created a Recognized Environmental Condition on the subject property.

7.0 OPINIONS AND CONCLUSIONS

URS has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E 1527-00 for the Hercules Pulp and Paper Division Portland Plant located at 3366 NW Yeon Avenue, in Portland, Oregon. Any modifications to the scope or limitations are identified in Section 1.0 and elsewhere in this report.

7.1 RECOGNIZED ENVIRONMENTAL CONDITIONS (REC)

This assessment has revealed the following Recognized Environmental Conditions, the basis for URS' opinion and Financial Materiality are summarized below:

- Based on URS' review of available information, up to 13 USTs were in use at the subject property during its 81 year operating history, with the earliest UST installed in 1938. Two of the USTs were reportedly removed and 11 USTs were reportedly closed or abandoned in-place. Eight of the USTs were reported to contain petroleum products or hazardous materials, and one UST contained used oil. All but one of the USTs appeared to be constructed of unprotected steel. Five of the USTs appear to have been closed when the Oregon UST regulations were in effect (the subject property is listed on the DEQ's UST database as having five decommissioned tanks). Available documentation indicates that four of the USTs may have been subject to the regulations and may have been closed in conformance with the regulations in effect at that time. Given that the average life of an unprotected steel tank is 15 years and the limited or absence of soil and groundwater sampling associated with closure, and other information, it is URS' opinion that the closed/abandoned USTs and areas where USTs were removed represents a Recognized Environmental Condition with a Moderate aggregate Financial Materiality.

- The subject property is listed on the Oregon State Fire Marshal's database for sites having hazardous material incidents. No other information is provided in the EDR database report for this listing. In the absence of additional information, URS considers this listing to represent a REC with an indeterminate Financial Materiality.

7.2 AREAS OF CONCERN (AOC)

This assessment revealed Areas of Concern for which insufficient information is available to classify as a REC or assign a Financial Materiality to. The AOC's and the basis for URS' opinion are summarized below:

- A Hercules "Environmental Incident Description" form for the year 2000 documents environmental violations, releases, complaints, and agency visits. Based on the review of available information, these incidents are believed to represent AOCs to the subject property.

- Hercules personnel stated the structural integrity of the wastewater conveyance and pretreatment facilities is unknown. The wastewater is reported to contain no priority

pollutants, but etched concrete was observed near on of the trenches and hazardous materials are used on the subject property. Given the age of these system, the types of materials used onsite that potentially enter the system, and the limited information on the structural integrity of the system, it is URS' opinion that the wastewater treatment and conveyance system represents a an AOC to the subject property.

- An asbestos survey initiated by Hercules resulted in a significant amount of asbestos removal from the facility. Based on this information, asbestos-containing material remaining onsite is considered an AOC.

- The subject property is listed on the Oregon State Environmental Cleanup Site Information (ECSI) database as having no evidence of a confirmed release of hazardous substances. However, the DEQ classifies the subject property as a suspect site requiring further investigation (no reason given). Based on this information, URS has no reason to believe that the listing of the subject property as a SHWS represents a REC, but considers this listing as an AOC.

- Longview City Laundry & Cleaners is located approximately $^1/_8$ mile to the south-southeast of the subject property. This facility is identified on the ECSI database as having shallow soils and groundwater contaminated from two separate sources. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

- Nudelman & Son, Inc. is located $^1/_8$ mile to the south-southeast of the subject property and is listed on the DEQ's ECSI database as needing further investigation. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

- Mogul Corporation is located approximately ¼ mile to the south-southwest of the subject property and is listed on the DEQ's ECSI database as needing further investigation This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

- The Guilds Lake site is located at 2615-2619 NW Industrial Street, less than ¼ mile to the south-southeast of the subject property and consists of reclaimed land filled in the early 1900s. Releases occurred at this site from 1909 to the 1940s. Petroleum contaminated soil has been removed, the site has been capped, a venting system has been installed, and long-term monitoring of groundwater is taking place. Based on the review of available information, this site represents an AOC to the subject property.

- Hill Investment Company is located approximately ¼ mile to the south-southeast of the subject property. Groundwater beneath this site is impacted with chlorinated solvents. This facility is located in a position inferred to be hydrogeologically

upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

- Columbia American Plating Company is located approximately ¼ mile to the south-southwest of the subject property and has had several RCRA compliance and enforcement actions. Groundwater grab samples collected from the site contained metals and solvents. This facility is located in a position inferred to be hydrogeologically upgradient from the subject property. Based on the review of available information, this site represents an AOC to the subject property.

8.0 QUALIFICATIONS AND SIGNATURES

This report was prepared and reviewed by the undersigned employees of URS Corporation, a national and international environmental and engineering company. Additional information about URS is available through the Internet at www.urscorp.com. The qualifications of the individuals involved in the preparation of this report are presented in Appendix G.

Prepared by:

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Reviewed by:

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HERC093781

9.0 REFERENCES

References included as an appendix to this report are marked with a "*"

Public Documents

American Society for Testing and Materials (ASTM). Standard E section, "Standard Practice for environmental Site Assessments: Phase I Environmental Sire Assessment Process," July, 2000.

* Environmental Data Resources (EDR). Aerial photographs dated 1955 (1" =750'), 1963 (1" =750'), 1970 (1" =750'), 1984 (1" =750'), 1994 (1" =833').

* Environmental Data Resources (EDR). Sanborn Maps by dated 1950 and 1969.

* Environmental Data Resources (EDR). Site Assessment Report No.0571285.1r, 3366 NW Yeon Avenue, Portland, OR 97210, December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 2261, American Machine and Gear, December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 29, Columbia American Plating Co., December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 1196, Galvanizers Co., December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 404, Guilds Lake, December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 988, Hercules, Inc., December 19, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 1076, Hill Investment Co., December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 1395, Longview City Laundry & Cleaners, December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 1307, Mogul Corporation, December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 966, Nudelman & Sons, Inc., December 6, 2000.

* Oregon Department of Environmental Quality. Environmental Site Cleanup Site Summary Report No. 2068, Portland Harbor Sediments, December 19, 2000.

* Oregon Department of Environmental Quality. Oregon Public Environmental System LUST Incident Report No. 26-91-0441, Portland Railroad Company, December 8, 2000.

* Oregon Department of Environmental Quality. Oregon Public Environmental System LUST Incident Report No. 26-00-0814, Russel, Rick, December 8, 2000.

* Oregon Department of Environmental Quality. Oregon Public Environmental System LUST Incident Report No. 26-89-0013, Terminal Transfer, Inc., December 8, 2000.

* Oregon Department of Environmental Quality. Oregon Public Environmental System LUST Incident Report No. 26-97-0282, Todd, T HOT, December 8, 2000.

* USGS Topographic Map, Portland, Oregon-Washington, 1897.

* USGS Topographic Map, Portland, Oregon-Washington, 1940.

* USGS Topographic Map, Portland, Oregon-Washington, 1954.

* USGS Topographic Map, Portland, Oregon-Washington, 1961.

* USGS Topographic Map, Portland, Oregon-Washington, 1961, Photorevised 1970.

* USGS Topographic Map, Portland, Oregon-Washington, 1961, Photorevised 1970 and 1977.

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U.S. Department of Agriculture Soil Conservation Service. *Soil Survey of Multnomah County, Oregon,* 1983.

Hercules Provided Documents

Coalson, Jack. L., Environmental Coordinator - Hercules, Inc., October 22, 1990 letter correspondence with Mr. Dick Wixom, Oregon Department of Environmental Quality Underground Storage Tank Program., 2 p.

Hercules, Inc., April 11, 1980, *Minor Capital Request*. 1 p.

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Hercules, Inc., November 22, 2000, *Portland Plant History*, 2 p.

Hercules, Inc., December 7, 2000, *Production Site Profile*, 12 p.

Hercules, Inc., December 11, 2000, *Master Tank List*, 3 p.

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Hercules, Inc., No date given, *Environmental Incident Description – 2000 Incident Description Form*, 2 p.

Hercules, Inc., No date given *Facility Profile*, 3 p.

Hercules, Inc., No date given - hand written document. 2 p.

National Environmental Testing, Inc., April 10, 1995 Analytical Report, 2 p.

Nichols, Frank, General Manager – Pacific Tank and Construction Corporation, December 4, 1989 letter correspondence with Mr. Loren G. Garner, Oregon Department of Environmental Quality Environmental Consultant, 7 p.

Puent, Sally, Manager - Oregon Department of Environmental Quality Finance and Operations Section of Waste Management and Cleanup Division, April 7, 1998 letter correspondence with Mr. Michael R. Croom, Hercules, Inc., 1 p.

Interviews

Ms. Lisa Bradley, *Data Unit, Office of Oregon State Fire Marshal,* (503) 373-1540. December 14, 2000.

Mr. Michael R. Croom, *Environmental Coordinator and Utility Area Supervisor, Hercules Inc,* (503) 417-4254. December 11, 15 and 18, 2000.

Mr. Peter K. Harris, *Western Regional Engineer and Portland Plant Engineer, Hercules Inc,* (503) 417-4263. December 11, 2000.

Ms. Crystal Montgomery, *ECSI File Reviewer, Oregon Department of Environmental Quality – Northwest Region,* (503) 229-6729. December 18, 2000.

Ms. Vi Pelly, *Data Unit, Office of Oregon State Fire Marshal,* (503) 373-1540. December 14, 2000.

Mr. E. Preston Trotter, Jr., *Western Regional Manager and Portland Plant Manager, Hercules Inc,* (503) 417-4261. December 11, 2000.

APPENDIX A
INFORMATION PROVIDED BY HERCULES

APPENDIX B
HISTORIC DOCUMENTS

APPENDIX C
SUBJECT PROPERTY PHOTOGRAPHS

DRAFT

APPENDIX D
EDR DATABASE REPORT

APPENDIX E
DEQ LUST AND ECSI REPORTS

APPENDIX F
CORRESPONDENCE WITH REGULATORY AGENCIES

APPENDIX G
QUALIFICATIONS OF URS PROJECT PERSONNEL

Environmental Regulatory Profile, Facility Highlights & Key Issues
for the Portland, Oregon facility

Air Emissions – Department of Environmental Quality governs the emissions for the site. The site consist of ~44,000 ft^2 of buildings, including but not limited to warehouse, production, office, and maintenance. The facility produces ~54mt of Sizing, Kymene, and Defoamer. The equipment list, includes but not limited to, 3-boilers (2-steam (1-NG w/ Diesel backup, 1-Diesel w/ Bunker backup), 1-heat transfer liquid-not operational), 43 storage tanks, scrubbers in conjunction with 2-Kymene kettles, and 3-cooling towers. The plant is not a Title V facility but is a Synthetic minor. **DEQ Contact - Air Quality Program: George Yun**, Phone #(503) 229-6093, 2020 SW Fourth Ave., STE 400, Portland, OR 97201-4987, Fax #(503) 229-5265. Permit Renewal has been at DEQ since 1997.

Sanitary / Industrial Sewer Discharge – The plant is equipped with a primary treatment facility that will treat approximately 7MM gal of wastewater in Y2K. Wastewater from the BetzDearborn-Washougal Facility is transported via tank truck and discharged into the Portland's wastewater treatment system. The Washougal wastewater accounts for an additional 115K gal per year (~1.6%). This activity is approved by the POTW. **Bureau of Environmental Services Contact: Ann O'Roke, Phone #(503) 823-7230**, 6543 N. Burlington Ave., Portland, OR 97203-5432, Fax #(503) 823-5559. Non-compliance resulting from Oil & Grease exceedance (140 mg/l vs. 110 mg/l-permit requirement).

Water Consumption – The plant will consume approximately 44MM of water in Y2K. **Bureau of Water Works: Jane Burke, Phone #(503) 823-7124**, 1120 SW Fifth Ave, RM 400, Portland, OR 97204-1972, Fax #(503) 823-6995.

Stormwater – All stormwater is discharged through the Sanitary/Industrial Sewer. However, non-contact cooling water is discharged via a NPDES permit to the Willamette River. The facility will discharge approximately 23MM in Y2K (an increase of ~81% from the prior year). **DEQ Contact - Water Quality Program: Rene Dulay, Phone #(503) 229-5160**, 2020 SW Fourth Ave., STE 400 Portland, OR 97201-4987. Non-compliance resulting from T-Residual Chlorine exceedance (0.6 mg/l vs. 0.5 mg/l-permit requirement). Permit is for non-contact cooling water discharge.

SPCC/OPA 90 Integrated Response Plan – The facility stores bulk raw materials considered "oils" and is subject to the planning requirements. The plan is due for update 3/02.

Risk Management Program – On-file with EPA, and LEPC for bulk storage of Epichlorohydrin drum storage. (WCS - 4.4 miles, ACS – 0.06 miles)

Asbestos – ACM locations identified, O&M program in place. There is approximately 4,300 linear ft (friable) and 6,300 ft^2 (non-friable) of ACM remaining at the facility. Approximately 3,180 linear ft and 345 ft^2 of ACM is associated with the Tall Oil production area.

Environmental Management System - In response to customer demand, an Implementation Plan was developed in March 2000. Gap analysis has been conducted, Aspect/Impact analysis and Compliance programs have been drafted.

Responsible Care – The facility has implemented approximately 100% of the Code Management Practices to a level 5 status.

Environmental Incident Metric – Monthly reports are prepared and the facility is currently a "Moderate" status score through 2000 to date is 10-violations, 15-internal releases, 10-odor complaints. 1999's score was 10 (Minimal).

Internal audits - In March-2000, a gap analysis was conducted for the facility EMS. In October-1997, a corporate environmental audit was conducted. All findings have been resolved.

ISO14001 - ISO 9001 in place. In response to customer demand, an Implementation Plan was developed in March 2000. Gap analysis has been conducted, Aspect/Impact analysis and Compliance programs have been drafted.

SIGNIFICANT CONCERNS / CHALLENGES / OPPORTUNITIES

Government or 3rd party audits - The last government audit was an air audit conducted by DEQ on 9/21/00 and the last POTW audit was 5/9/00. EPA audited RMP document on 7/22/99.

Recent or unresolved NOV's/ enforcement actions - Non-compliance resulting from Oil & Grease exceedance (140 mg/l vs. 110 mg/l-permit requirement) in 10/00. The violation is being challenged by the facility.

Unresolved compliance issues /concerns – The facilities' air permit renewal has been at DEQ since 1997.

Current contamination investigations or remediation activities - There are no contamination investigation or remediation activities underway or known to be needed.

Unresolved or ongoing environmental concerns impacting good relations with others - None

Major environmental capital projects recently completed, underway or planned for 2001-2002 – None

FACILITY ENVIRONMENTAL STAFFING

Plant personnel (44) currently share the environmental compliance data collection duties and periodic inspections. These individuals include, but not limited to, the plant manager, area supervisors, and operators. Located at the facility is the Western Regional Environmental Coordinator, Mike Croom, who has Environmental program compliance accountabilities devotes 50 % of time towards the Portland facility. The balance of his environmental accountabilities is divided among the BetzDearborn facilities in Washougal, Bakersfield, and San Marcos. Mike also has area supervision accountabilities at the Portland Plant which he devotes approximately 50% of time towards.

	A	B	C	D	E	F
1	**Summary of Environmental Fines/ Penalties**					
2	**Hercules Incorporated - U.S. Operations only**					
3						
4	**1996**					
5	Plant	Date Reported	Amount $M (Fine)	Associated Violation	Date Booked (Fine)	Date Paid (Fine)
6	Savannah	Feb-96	8	Oil release to Canal		
7	Brunswick	Jun-96	1	Release of wastewater		
8	Portland	Jul-96	0.5	O&G Exceedance	2/28/1996	8/6/1996
9	**Portland**	**Oct-95**	0.85	O&G Exceedance - NPDES	7/21/1996	4/22/1998
10	Parlin	Sep-96	3.75	RCRA violation - testing		
11	Jefferson	Oct-96	4.9	???		
12	Jefferson	Dec-96	2.1	???		
13						
14		Subtotal	21.1			
15						
16						
17						
18	**1997**					
19	Plant	Date Reported	Amount $M (Fine)	Associated Violation	Date Booked (Fine)	Date Paid (Fine)
20	Portland	Apr-97	1.2	RCRA violation	2/24/1997	5/8/1997
21	Savannah	Apr-97	2	Tall Oil release to Canal		
22	Savannah	Jun-97	1	Dowtherm rel to Canal		
23	Savannah	Sep-97	7	Fish Kill/ rel to Canal		
24	Savannah	Nov-97	3.864	Air fee calc error		
25	Jefferson	Dec-97	11	Releases to water		
26						
27		Subtotal	26.064			
28						
29						
30						
31	**1998**					
32	Plant	Date Reported	Amount $M (Fine)	Associated Violation	Date Booked (Fine)	Date Paid (Fine)
33	Jefferson	Apr-98	20	RCRA violations		
34	MCW	Aug-98	12.7	Air violation		
35	Franklin	Oct-98	19.4	TSS violations		
36	Parlin	Oct-98	1	Wastewater spill		

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5	Account/ Charge Code (Fine)	Associated SEP $M	SEP Description	Date Booked (SEP)	Date Paid (SEP)	Account/ Charge Code (SEP)
6						
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8	1072060642					
9	1072060644					
10						
11						
12						
13						
14	Subtotal	0				
15						
16						
17						
18						
19	Account/ Charge Code (Fine)	Associated SEP $M	SEP Description	Date Booked (SEP)	Date Paid (SEP)	Account/ Charge Code (SEP)
20	1072060643					
21						
22						
23						
24						
25						
26						
27	Subtotal	0				
28						
29						
30						
31						
32	Account/ Charge Code (Fine)	Associated SEP $M	SEP Description	Date Booked (SEP)	Date Paid (SEP)	Account/ Charge Code (SEP)
33						
34						
35		39.6	Emergency Drill			
36						

	A	B	C	D	E	F
37	Brunswick	Dec-98	80	RCRA violations		
38	Brunswick	Dec-98	20	Air violations		
39						
40		Subtotal	153.1			

	G	H	I	J	K	L
37		195	Aquariums			
38						
39						
40	Subtotal	234.6				

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2	**ENVIRONMENTAL PERMITS/ LICENSES/ REGISTRATIONS/ PLANS/ETC. & COMPLIANCE STATUS**
3	
4	**PLANT NAME:**
5	
6	**PERMIT/ LICENSE/ REGISTRATION/ PLAN NAME & NUMBER**
7	Air Pollution Discharge Permit - #S-729
8	Industrial Storm Water Discharge - Facility ID #5F5S006089
9	Industrial Wastewater Discharge / Sanitary Sewer Use
10	Hazardous Waste Generator ID# CAT080012974
11	Hazardous Permit RCRA Part B (Storage)
12	Solid Waste Disposal Facilities
13	Solid Waste Disposal Facilities
14	SARA Title III - Facility ID# 93308BTZLB3050P
15	PCB Equipment
16	Water Supply - Customer #119 1 3050 90
17	Risk Management Program, Facility ID#1000 0009 3285
18	SPCC
19	Stormwater Pollution Prevention Plan
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	B
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4	Bakersfield
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6	**ISSUING AGENCY**
7	San Jaquion Valley Unified Air Pollution Control District
8	State Water Resources Control Board
9	North of River Sanitary District
10	Environmental Protection Agency
11	Department of Substances and Toxic Control
12	Safety Kleen - Customer
13	Waste Management Customer
14	Environmental Protection Agency
15	N/A
16	Oildale Mutual Water Company
17	Environmental Protection Agency
18	Environmental Protection Agency
19	State Water Resources Control Board
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6	**EXPIRATION DATE**	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****
7		Full Compliance	
8		Full Compliance	
9		Full Compliance	
10	N/A	Full Compliance	
11	N/A	Full Compliance	
12	N/A	N/A	
13	N/A	N/A	
14	N/A	Full Compliance	
15	N/A	N/A	
16	N/A	N/A	
17	Jul-04	Full Compliance	
18		Full Compliance	
19	N/A	Full Compliance	
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6	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**	**COMMENTS**
7		**SJVUAPCD Contact: Mike Buss, Phone #(661) 326-6969**, 2700 M. Street #275 Bakersfield, CA 93301, Fax #(661) 862-5201 In the process of submitting "Approval to Construct" to allow for opening vessel lid while operating.
8		**Regional Water Board Contact: Jarma Bennett, Phone #(559) 445-5116**, 3614 East Ashlan Ave., Fresno, CA 93726 email:Bennettj@rb5f.swrcb.ca.gov
9		**POTW Contact: Don Glover, Phone #(661) 399-6411,** 5001 Olive Drive, Bakersfield, CA 93308 Fax #(661) 399-2856 Permit application for the expansion of ARGO Scientific is currently being reviewed.
10		Small Quanity Generator
11		**DTSC Contact: William Veile, Phone #(916) 255-3605,** 10151 Croydon Way, STE 3 Sacramento, CA 95827 Fax #(916) 255-3595 **CH2MHill Contact: Maggie Fitzgerald, Phone #(714) 429-2020 x 2333,** 3 Hutton Centre Drive, STE 200, Santa Ana, CA 92707 Fax #(714) 424-2095
12		**Safety Kleen contact: Tim Shannon, Phone #(503) 781-9187**, 7835 SW Hunziker St, Tigard, OR 97223, Fax #(503) 658-0420 **Alternate Contact**: Dave Bowser, Phone #(559) 486-1960, 3561 S. Maple Ave, Fresno, CA 93725 Fax #(559) 486-2008 HazWaste Management
13		**Waste Management contact:** Non-HazWaste Management
14		
15		There is no PCB containing equipment on the site.
16		**Oildale Mutual Water Company: Phone #(661) 399-5516**, 2836 McCray St., Oildale, California 93388
17		RMP Chemical - Cyclohexylamine (WCS - 641 ft, ACS - 317 ft)
18		
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31	*** CHOOSE ONE OF THE FOLLOWING: FULL COMPLIANCE (NO VIOLATIONS FOR AT LEAST 1 YEAR),**
32	**SIGNIFICANT NON-COMPLIANCES/ DEFICIENCIES (CHRONIC, MAJOR OR MULTIPLE VIOLATIONS WHICH**
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34	**** COMPLETE THIS COLUMN ONLY IF CURRENT COMPLIANCE STATUS IS "SIGNIFICANT NON-**
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36	**AREAS TO BE COVERED:**
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36	**AIR EMISSIONS (EXCLUDING PERMITS TO CONSTRUCT, UNLESS ANY ARE CURRENTLY PENDING)**
37	**WASTEWATER (DISCHARGE TO SURFACE OR GROUNDWATER)**
38	**WASTEWATER (DISCHARGE TO POTW)**
39	**STORMWATER DISCHARGE**
40	**HAZARDOUS WASTE STORAGE, TREATMENT OR DISPOSAL FACILITIES (E.G. PART B PERMIT)**
41	**HAZARDOUS WASTE GENERATOR (E.G., EPA ID#)**
42	**SOLID WASTE DISPOSAL FACILITIES**
43	**SARA TITLE III (NO PERMITS APPLICABLE - BUT INCLUDE AS ENTRY TO SHOW COMPLIANCE STATUS**
44	**AST's & UST's**
45	**PCB EQUIPMENT**
46	**PUBLIC WATER SUPPLY (E.G. DRINKING WATER)**
47	**NUCLEAR MATERIALS**
48	**OTHER APPLICABLE ENVIRONMENTAL PROGRAMS (E.G. RMP, SPCCP, OPA-90, ETC.)**

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2	**ENVIRONMENTAL PERMITS/ LICENSES/ REGISTRATIONS/ PLANS/ETC. & COMPLIANCE STATUS**
3	
4	**PLANT NAME:**
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6	**PERMIT/ LICENSE/ REGISTRATION/ PLAN NAME & NUMBER**
7	Air Pollution Discharge Permit
8	Industrial Storm Water Discharge
9	Industrial Wastewater Discharge / Sanitary Sewer Use - Permit #1066
10	Hazardous Waste Generator ID# CAC001318520
11	Solid Waste Disposal Facilities
12	Solid Waste Disposal Facilities
13	SARA Title III
14	PCB Equipment
15	SPCC
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27	*** CHOOSE ONE OF THE FOLLOWING: FULL COMPLIANCE (NO VIOLATIONS FOR AT LEAST 1 YEAR),**
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4	Bakersfield
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6	**ISSUING AGENCY**
7	N/A
8	N/A
9	Encina Wastwater Authority
10	Environmental Protection Agency
11	Safety Kleen
12	City of Carlsbad
13	N/A
14	N/A
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6	**EXPIRATION DATE**	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****
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9		Full Compliance	
10		Full Compliance	
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13	N/A		
14	N/A	N/A	
15	N/A		
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6	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**	**COMMENTS**
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9		**POTW Contact: Nancy Anson, Phone #(760) 438-3941,** 6200 Avenida Encinas, Carlsbad, CA 92009-1095
10		Small Quanity Generator
11		**Safety Kleen contact: Tim Shannon, Phone #(503) 781-9187**, 7835 SW Hunziker St, Tigard, OR 97223, Fax #(503) 658-0420
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14		There is no PCB containing equipment on the site.
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4	**PLANT NAME:**
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6	**PERMIT/ LICENSE/ REGISTRATION/ PLAN NAME & NUMBER**
7	Air Emmissions SWAPCA 81CL-95 Registration no: 176
8	WasteWater(Surface/Ground
9	WasteWater(POTW)
10	StormWater Discharge SO#-000094)
11	Haz Waste (Storage, Treatment, Disposal)
12	Haz Waste Generator - Small Quanity Generator of WA Dangerous Waste WAD000711598
13	Main Waste Stream - Non-Haz/Non-Dangerous Waste
14	Solid Waste Disposal
15	SARA Title III
16	SARA313
17	AST
18	UST
19	PCB
20	Public Water Supply
21	Nuclear Materials
22	City Business License 21197
23	Boiler Operation 03345-77W
24	Jacketed Vessels M2601 03347-77W, M2602 03348-77W, R2602 31960-86W, R2604 22288-91W
25	Air Compressor tanks, old 22032-93W, receiver 31953-85W
26	RMP Facility 1000 0008 6916
27	SPCC
28	Biocide Registration 003876-WA-001
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31	*** CHOOSE ONE OF THE FOLLOWING: FULL COMPLIANCE (NO VIOLATIONS FOR AT LEAST 1 YEAR), MINOR NON-COMPLIANCES, OR**

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4	Washougal	
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6	**ISSUING AGENCY**	**EXPIRATION DATE**
7	SWAPCA	N/A
8	N/A	N/A
9	N/A	N/A
10	DOE	11/18/2000
11	DOE	N/A
12	DOE	N/A
13	N/A	N/A
14	City of Washougal,WA	N/A
15	DOE	N/A
16	EPCRA	N/A
17	SWAPCA	N/A
18	DOE	N/A
19	N/A	N/A
20	City of Washougal,WA	N/A
21	N/A	N/A
22	City of Washougal,WA	12/31/2000
23	WA L&I	7/1/2001
24	WA L&I	7/1/2001
25	WA L&I	7/1/2001
26	EPA	6/17/2004
27	DOE	1/8/2001
28	EPA / Dept of Ag	N/A
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6	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**
7	Full Compliance	None	None
8	Full Compliance	None	None
9	Full Compliance	None	None
10	Full Compliance	None	None
11	Full Compliance	None	None
12	Full Compliance	None	None
13	Full Compliance	None	None
14	Full Compliance	None	None
15	Full Compliance	None	None
16	Full Compliance	None	None
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19	Full Compliance	None	None
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21	Full Compliance	None	None
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6	**COMMENTS**
7	Annual review by agency via Order of Authorization to Operate (OAO).
8	No waste water discharge in this means
9	No waste water discharge in this means
10	Recently submitted for premit renewal. Inspections 2X per year.
11	No waste processed at this location
12	Washougal is now a small quanity generator as the main stream was reclassified. We retain this status to handle the EP room trench sludge. 0-4 drums per year generated.
13	This stream is handled by Herc-Portland.
14	The city works with Waste Mgt as the subcontractor
15	Report submitted annually with some periodic updates.
16	TRI Reporting done Annually
17	OAO
18	Only tank removed in 1993.
19	None known on site
20	Three inbound lines. Process, Fire, and Domestic
21	None known on site
22	Expires each 12/31
23	Annual internal inspection by FM/State
24	Biannual inspection by FM/State
25	Biannual inspection by FM/State
26	Submitted in 1999.
27	Last update 1998. 3 year cycle due 2001
28	Dept of Ag last visist 6/97. No issues
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32	**SIGNIFICANT NON-COMPLIANCES/ DEFICIENCIES (CHRONIC, MAJOR OR MULTIPLE VIOLATIONS WHICH WILL REQUIRE SIGNIFICANT $$ TO**
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6	**ISSUING AGENCY**
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6	**ISSUING AGENCY**
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35	**AIR EMISSIONS (EXCLUDING PERMITS TO CONSTRUCT, UNLESS ANY ARE CURRENTLY PENDING)**
36	**WASTEWATER (DISCHARGE TO SURFACE OR GROUNDWATER)**
37	**WASTEWATER (DISCHARGE TO POTW)**
38	**STORMWATER DISCHARGE**
39	**HAZARDOUS WASTE STORAGE, TREATMENT OR DISPOSAL FACILITIES (E.G. PART B PERMIT)**
40	**HAZARDOUS WASTE GENERATOR (E.G., EPA ID#)**
41	**SOLID WASTE DISPOSAL FACILITIES**
42	**SARA TITLE III (NO PERMITS APPLICABLE - BUT INCLUDE AS ENTRY TO SHOW COMPLIANCE STATUS**
43	**AST's & UST's**
44	**PCB EQUIPMENT**
45	**PUBLIC WATER SUPPLY (E.G. DRINKING WATER)**
46	**NUCLEAR MATERIALS**
47	**OTHER APPLICABLE ENVIRONMENTAL PROGRAMS (E.G. RMP, SPCCP, OPA-90, ETC.)**

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6	**EXPIRATION DATE**	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****
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6	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**	**COMMENTS**
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2	**ENVIRONMENTAL PERMITS/ LICENSES/ REGISTRATIONS/ PLANS/ETC. & COMPLIANCE STATUS**
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4	**PLANT NAME:**
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6	**PERMIT/ LICENSE/ REGISTRATION/ PLAN NAME & NUMBER**
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30	*** CHOOSE ONE OF THE FOLLOWING: FULL COMPLIANCE (NO VIOLATIONS FOR AT LEAST 1 YEAR),**
31	**SIGNIFICANT NON-COMPLIANCES/ DEFICIENCIES (CHRONIC, MAJOR OR MULTIPLE VIOLATIONS WHICH**
32	
33	**** COMPLETE THIS COLUMN ONLY IF CURRENT COMPLIANCE STATUS IS "SIGNIFICANT NON-**
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35	**AREAS TO BE COVERED:**
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6	**ISSUING AGENCY**
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35	**AIR EMISSIONS (EXCLUDING PERMITS TO CONSTRUCT, UNLESS ANY ARE CURRENTLY PENDING)**
36	**WASTEWATER (DISCHARGE TO SURFACE OR GROUNDWATER)**
37	**WASTEWATER (DISCHARGE TO POTW)**
38	**STORMWATER DISCHARGE**
39	**HAZARDOUS WASTE STORAGE, TREATMENT OR DISPOSAL FACILITIES (E.G. PART B PERMIT)**
40	**HAZARDOUS WASTE GENERATOR (E.G., EPA ID#)**
41	**SOLID WASTE DISPOSAL FACILITIES**
42	**SARA TITLE III (NO PERMITS APPLICABLE - BUT INCLUDE AS ENTRY TO SHOW COMPLIANCE STATUS**
43	**AST's & UST's**
44	**PCB EQUIPMENT**
45	**PUBLIC WATER SUPPLY (E.G. DRINKING WATER)**
46	**NUCLEAR MATERIALS**
47	**OTHER APPLICABLE ENVIRONMENTAL PROGRAMS (E.G. RMP, SPCCP, OPA-90, ETC.)**

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6	**EXPIRATION DATE**	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****
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6	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**	**COMMENTS**
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2	**ENVIRONMENTAL PERMITS/ LICENSES/ REGISTRATIONS/ PLANS/ETC. & COMPLIANCE STATUS**
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4	**PLANT NAME:**
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6	**PERMIT/ LICENSE/ REGISTRATION/ PLAN NAME & NUMBER**
7	Air Pollution Discharge Permit - #26-1814
8	National Pollutant Discharge Elimination System Permit - #0100-J
9	Industrial Wastewater Discharge Permit - #454-001
10	Hazardous Waste Generator ID# ORD009058314
11	Solid Waste Disposal Facilities
12	Solid Waste Disposal Facilities
13	SARA Title III - Facility ID# 97210HRCLS3366N
14	PCB Equipment
15	Water Supply - Customer #161753

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4	Portland	
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6	**ISSUING AGENCY**	**EXPIRATION DATE**
7	Oregon - Department of Environmental Quality	1-Jan-97
8	Oregon - Department of Environmental Quality	31-Jul-01
9	City of Portland Environmental Services	30-Jun-04
10	Environmental Protection Agency	N/A
11	Safety Kleen - Customer #0002-3426-93	N/A
12	Waste Management Customer #574-0073063	N/A
13	Environmental Protection Agency	N/A
14	N/A	N/A
15	City of Portland Environmental Services - Bureau of Water Works	N/A

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6	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**
7	Full Compliance		
8	Minor Non-compliance		
9	Minor Non-compliance		
10	Full Compliance		
11	N/A		
12	N/A		
13	Full Compliance		
14	N/A		
15	N/A		

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6	**COMMENTS**
7	**DEQ Contact - Air Quality Program: George Yun, Phone #(503) 229-6093**, 2020 SW Fourth Ave., STE 400, Portland, OR 97201-4987, Fax #(503) 229-5265 Permit Renewal has been at DEQ since 1996.
8	**DEQ Contact - Water Quality Program: Rene Dulay, Phone #(503) 229-5160**, 2020 SW Fourth Ave., STE 400 Portland, OR 97201-4987 Non-compliance resulting from T-Residual Chlorine exceedance (0.6 mg/l vs 0.5 mg/l-permit requirement). Permit is for non-contact cooling water discharge.
9	**Bureau of Environmental Services Contact: Ann O'Roke, Phone #(503) 823-7230**, 6543 N. Burlington Ave., Portland, OR 97203-5432, Fax #(503) 823-5559 Non-compliance resulting from Oil & Grease exceedance (140 mg/l vs 110 mg/l-permit requirement).
10	Small Quanity Generator
11	**Safety Kleen contact: Tim Shannon, Phone #(503) 781-9187**, 7835 SW Hunziker St, Tigard, OR 97223, Fax #(503) 658-0420 HazWaste Management
12	**Waste Management contact: Dean Larson, Phone #(503) 781-8315**, 7227 NE 55th Ave Portland, OR 97128, Fax #(503) 493-7822 Non-HazWaste Management
13	
14	There is no PCB containing equipment on the site.
15	**Bureau of Water Works: Jane Burke, Phone #(503) 823-7124,** 1120 SW Fifth Ave, RM 400 Portland, OR 97204-1972, Fax #(503) 823-6995

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16	Risk Management Program
17	SPCC & OPA-90
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30	*** CHOOSE ONE OF THE FOLLOWING: FULL COMPLIANCE (NO VIOLATIONS FOR AT LEAST 1 YEAR), MINOR NON-COMPLIANCES, OR**
31	**SIGNIFICANT NON-COMPLIANCES/ DEFICIENCIES (CHRONIC, MAJOR OR MULTIPLE VIOLATIONS WHICH WILL REQUIRE SIGNIFICANT $$ TO**
32	
33	**** COMPLETE THIS COLUMN ONLY IF CURRENT COMPLIANCE STATUS IS "SIGNIFICANT NON-COMPLIANCE/ DEFICIENCIES"**
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35	**AREAS TO BE COVERED:**
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16	Environmental Protection Agency	Jul-04
17	Environmental Protection Agency	Mar-02
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35	**AIR EMISSIONS (EXCLUDING PERMITS TO CONSTRUCT, UNLESS ANY ARE CURRENTLY PENDING)**	
36	**WASTEWATER (DISCHARGE TO SURFACE OR GROUNDWATER)**	
37	**WASTEWATER (DISCHARGE TO POTW)**	
38	**STORMWATER DISCHARGE**	
39	**HAZARDOUS WASTE STORAGE, TREATMENT OR DISPOSAL FACILITIES (E.G. PART B PERMIT)**	
40	**HAZARDOUS WASTE GENERATOR (E.G., EPA ID#)**	
41	**SOLID WASTE DISPOSAL FACILITIES**	
42	**SARA TITLE III (NO PERMITS APPLICABLE - BUT INCLUDE AS ENTRY TO SHOW COMPLIANCE STATUS INFO)**	
43	**AST's & UST's**	
44	**PCB EQUIPMENT**	
45	**PUBLIC WATER SUPPLY (E.G. DRINKING WATER)**	
46	**NUCLEAR MATERIALS**	
47	**OTHER APPLICABLE ENVIRONMENTAL PROGRAMS (E.G. RMP, SPCCP, OPA-90, ETC.)**	

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16	Full Compliance		
17	Full Compliance		
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16	RMP Chemical - Epichlorohydrin (WCS - 4.4 miles, ACS - 300 ft
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2	**ENVIRONMENTAL PERMITS/ LICENSES/ REGISTRATIONS/ PLANS/ETC. & COMPLIANCE STATUS**
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4	**PLANT NAME:**
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6	**PERMIT/ LICENSE/ REGISTRATION/ PLAN NAME & NUMBER**
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30	*** CHOOSE ONE OF THE FOLLOWING: FULL COMPLIANCE (NO VIOLATIONS FOR AT LEAST 1 YEAR),**
31	**SIGNIFICANT NON-COMPLIANCES/ DEFICIENCIES (CHRONIC, MAJOR OR MULTIPLE VIOLATIONS WHICH**
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33	**** COMPLETE THIS COLUMN ONLY IF CURRENT COMPLIANCE STATUS IS "SIGNIFICANT NON-**
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35	**AREAS TO BE COVERED:**
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6	**ISSUING AGENCY**
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35	**AIR EMISSIONS (EXCLUDING PERMITS TO CONSTRUCT, UNLESS ANY ARE CURRENTLY PENDING)**
36	**WASTEWATER (DISCHARGE TO SURFACE OR GROUNDWATER)**
37	**WASTEWATER (DISCHARGE TO POTW)**
38	**STORMWATER DISCHARGE**
39	**HAZARDOUS WASTE STORAGE, TREATMENT OR DISPOSAL FACILITIES (E.G. PART B PERMIT)**
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41	**SOLID WASTE DISPOSAL FACILITIES**
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43	**AST's & UST's**
44	**PCB EQUIPMENT**
45	**PUBLIC WATER SUPPLY (E.G. DRINKING WATER)**
46	**NUCLEAR MATERIALS**
47	**OTHER APPLICABLE ENVIRONMENTAL PROGRAMS (E.G. RMP, SPCCP, OPA-90, ETC.)**

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6	**EXPIRATION DATE**	**CURRENT COMPLIANCE STATUS***	**SUMMARY OF SIGNIFICANT NON-COMPLIANCE OR DEFICIENCY ISSUES & SCHEDULE TO CORRECT****
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6	**SUMMARY OF ACTIVE OR PENDING ENFORCEMENT ACTIONS, CONSENT ORDERS OR INFORMAL ADMIN ISSUES**	**COMMENTS**
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2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
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7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
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18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
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28			**Regu**
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30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
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5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
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28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
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41	Total
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46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
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69	**Category D:**		
70	**Not Reportable; Contained**		
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79			**Releases**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
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85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
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50	**Subtotal (Public Record)**	0	0	0	0	0	0
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56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
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79	**Subtotal (Internal Record)**	0	0	0	0	0	0
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81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
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82	**Total**
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91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

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103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
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106					**Amount (Thousand U**		
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	A	B	C
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2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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31	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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68							
69							
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71							
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73							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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96							
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105							
106							**Amount (Thousand U**
107							
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
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11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
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22	0
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26	0
27	0
28	0
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
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78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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49	0
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58	Total
59	5
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	5
80	
81	
82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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19							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
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26	0
27	0
28	0
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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103							
104							
105							
106							**Amount (Thousand U**
107							
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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16							
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18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
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11	0
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16	0
17	0
18	0
19	0
20	0
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26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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67							
68							
69							
70							
71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
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18							
19							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
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11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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65							
66							
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68							
69							
70							
71							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
62	0
63	0
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69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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58	Total
59	0
60	0
61	0
62	0
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69	0
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71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
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11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
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26	0
27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
59	0
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67	0
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71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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9	0
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17	0
18	0
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26	0
27	0
28	0
29	
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35	
36	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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73	0
74	0
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79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
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16	0
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20	0
21	0
22	0
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26	0
27	0
28	0
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36	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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70	0
71	0
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73	0
74	0
75	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
92							
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103							
104							
105							
106							**Amount (Thousand U**
107							
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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1	
2	
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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
51	
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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87	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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96							
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101							
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103							
104							
105							
106							**Amount (Thousand U**
107							
108							
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		1		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**0**	**0**	**5**
87				
88	"			
89				
90				
91				
92				
93				
94				
95				
96				
97				
98				
99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
2				
3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter

	F	G
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8		
9	**Corrective Action**	**12 Month Incident History**
10	None taken	
11	None taken	
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.	
13	Additional training, we are investigating the possibility of installing automatic valves	

	A	B
1		
2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

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4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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19							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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101							
102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

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91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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11							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
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16	0
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18	0
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27	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
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78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
59	5
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63	0
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72	0
73	0
74	0
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76	0
77	0
78	0
79	5
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82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
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10	0
11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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68							
69							
70							
71							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
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60	0
61	0
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63	0
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68	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

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91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
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17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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36	
37	
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	18-May	**Schnitzer email a**
88		18-May	**Schnitzer email a**
89		30-May	**Schnitzer email a**
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "black smoke"**						
88	**bout "black smoke"**						
89	**bout "noxious odors"**						
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	3	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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11							
12							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
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16	0
17	0
18	0
19	0
20	0
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22	0
23	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	6/7/2000	**Schnitzer email a**
88		6/7/2000	**Railroad called a**
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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69							
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71							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88	**bout "noxious odors"**						
89							
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58	Total
59	0
60	0
61	0
62	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	2	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
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12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
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24	0
25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	7/18/2000	**Schnitzer email a**
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
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69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
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46	0
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58	Total
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60	0
61	0
62	0
63	0
64	0
65	0
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69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
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22	0
23	0
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25	0
26	0
27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	8/22/2000	**Schnitzer email a**
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
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27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
62	0
63	0
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67	0
68	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
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16	0
17	0
18	0
19	0
20	0
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22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGU**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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62							
63							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
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76	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
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102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

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91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
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16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
13							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
70							
71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		8		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**0**	**0**	**5**
87				
88	"			
89				
90				
91				
92				
93				
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95				
96				
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98				
99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
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3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system
14	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
15	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
16	**X**	**5/30/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
17	**X**	**6/7/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
18	**X**	**6/7/2000**	**Complaint**	Railroad called about "noxious odors"
19	**X**	**7/18/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
20	**X**	**8/22/2000**	**Complaint**	Schnitzer emailed about "noxious odors".

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter
14	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
15	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
16	Blowing rosin line from storage tank to Neuphor
17	Heating a storage tank.
18	Heating a storage tank.
19	Blowing rosin line from storage tank to Neuphor
20	Blowing rosin line from storage tank to Neuphor

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9	**Corrective Action**
10	None taken
11	None taken
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.
13	Additional training, we are investigating the possibility of installing automatic valves
14	The neighors & DEQ were informed numerous times of pending work with the boiler.
15	The neighors & DEQ were informed numerous times of pending work with the boiler.
16	Limit the length of time needed to blow lines.
17	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
18	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
19	Limit the length of time needed to blow lines.
20	Limit the length of time needed to blow lines.

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9	**12 Month Incident History**
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	A	B
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2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

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4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
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17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
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27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
13							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
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18	0
19	0
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22	0
23	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
51	
52	
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57	
58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
85	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
95							
96							
97							
98							
99							
100							
101							
102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
107							
108							
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116							
117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
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46	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
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19							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
61							
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63							
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69							
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73							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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48	0
49	0
50	0
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58	Total
59	5
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	5
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82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
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74	0
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79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

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91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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11							
12							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
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19	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	18-May	**Schnitzer email a**
88		18-May	**Schnitzer email a**
89		30-May	**Schnitzer email a**
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "black smoke"**						
88	**bout "black smoke"**						
89	**bout "noxious odors"**						
90							

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46	0
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58	Total
59	0
60	0
61	0
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67	0
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69	0
70	0
71	0
72	0
73	0
74	0
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79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	3	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

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91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
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16	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
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74			
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76			
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78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	6/7/2000	**Schnitzer email a**
88		6/7/2000	**Railroad called a**
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88	**bout "noxious odors"**						
89							
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58	Total
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	2	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
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40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
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75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	7/18/2000	**Schnitzer email a**
88			
89			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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76							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
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58	Total
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61	0
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63	0
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73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
91							
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103							
104							
105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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1	
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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	8/22/2000	**Schnitzer email a**
88			
89			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
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67							
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69							
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71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B
1		
2	**PLANT NAME:**	Po rtland PPD
3	**MONTH/YEAR:**	September-00
4		
5		
6		
7		**Date**
8	**Category A:**	
9	**Agency-Identified Violations**	
10	**of Permits, Regs, other**	
11	**Enforceable Documents**	
12		
13		
14		
15		
16		
17		
18	**Category B:**	09/21/00
19	**Self-Reportable Violations**	
20	**of Permits, Regs, other**	
21	**Enforceable Documents**	
22		
23		
24		
25		
26		
27		
28		
29		
30	**Number of Category A in Month**	
31	**Number of Category B in Month**	1
32	**Total Number in Month**	1
33		
34	**Number of Water Violations in Month**	1
35	**Number of Air Violations in Month**	
36	**Number of Waste Violations in Month**	
37	**Number of Other Violations in Month**	
38		
39		
40		
41		**Date**
42	**Category A:**	
43	**Above Federal/ National RQ &**	
44	**Reportable to Authorities**	
45		

	C	D	E
1	**EIM - FORM 1**		
2			
3			
4			
5	**REGULATORY VIOLATIONS**		
6			
7	**Violation Identification**		#1
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18	Violation of NPDES permit - Total Residual Chlorine		0
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	**Regulatory Violations Subtotal**		0
29			
30			
31			
32			
33			
34			
35			
36			
37			
38			
39	**RELEASES - PUBLIC RECORD**		
40			
41	**Release Identification**		#1
42			
43			
44			
45			

	F	G	H	I	J	K
1						
2						
3						
4						
5						
6	**Impact Rating Criteria**					
7	#2	#3	#4	#5	#6	Total
8						0
9						0
10						0
11						0
12						0
13						0
14						0
15						0
16						0
17						0
18	0	0	0	5	0	5
19						0
20						0
21						0
22						0
23						0
24						0
25						0
26						0
27						0
28	0	0	0	5	0	5
29						
30	**Impact Rating Criteria**					
31	#1 = Health & Safety					
32	#2 = Environmental					
33	#3 = Community					
34	#4 = Facility Financial					
35	#5 = Regulatory					
36	#6 = Incident History					
37						
38						
39						
40	**Impact Rating Criteria**					
41	#2	#3	#4	#5	#6	Total
42						0
43						0
44						0
45						0

	A	B
46	**Category B:**	
47	**Reportable to Authorities**	
48		
49		
50		
51		
52	**Number of Category A in Month**	
53	**Number of Category B in Month**	
54	**Total Number in Month**	
55		
56		
57		
58		**Date**
59	**Category C:**	
60	**Not Reportable;**	
61	**Not Contained**	
62		
63		
64		
65		
66		
67		
68		
69	**Category D:**	
70	**Not Reportable; Contained**	
71		
72		
73		
74		
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78		
79		
80		
81	**Number of Category C in Month**	
82	**Number of Category D in Month**	
83	**Total Number in Month**	0
84		
85		
86		**Date**
87	**COMPLAINTS**	
88		
89		
90		

	C	D	E
46			
47			
48			
49			
50		**Releases Subtotal (Public Record)**	0
51			
52			
53			
54			
55			
56	**RELEASES - INTERNAL RECORD**		
57			
58	**Release Identification**		#1
59			
60			
61			
62			
63			
64			
65			
66			
67			
68			
69			
70			
71			
72			
73			
74			
75			
76			
77			
78			
79		**Releases Subtotal (Internal Record)**	0
80			
81			
82			**#1**
83		**MONTHLY TOTAL**	**0**
84			
85	**INCIDENT "TRACKING ONLY"**		
86		**Incident Identification**	
87			
88			
89			
90			

	F	G	H	I	J	K
46						0
47						0
48						0
49						0
50	0	0	0	0	0	0
51						
52						
53						
54						
55						
56						
57	**Impact Rating Criteria**					
58	#2	#3	#4	#5	#6	Total
59						0
60						0
61						0
62						0
63						0
64						0
65						0
66						0
67						0
68						0
69						0
70						0
71						0
72						0
73						0
74						0
75						0
76						0
77						0
78						0
79	0	0	0	0	0	0
80						
81						
82	**#2**	**#3**	**#4**	**#5**	**#6**	**Total**
83	**0**	**0**	**0**	**5**	**0**	**5**
84						
85						
86						
87						
88						
89						
90						

	A	B
91	**ENFORCEMENT ACTIONS (A):**	
92	**Consent orders, etc - enforcement**	
93	**documents requiring Hercules**	
94	**signature of concurrence**	
95	**ENFORCEMENT ACTIONS (B):**	
96	**documents received & not**	
97	**requiring Hercules**	
98	**signature of concurrence**	
99	**AGENCY INSPECTIONS/ VISITS**	9/21/2000
100		
101		
102		
103	**OTHER (Acts of God)**	
104		
105		
106		
107	**FINES/ PENALTIES/ MANDATORY**	
108	**ALTERNATIVE EXPENDITURES**	
109		
110		
111		
112	**Complaints Subtotal**	
113	**Enforcement Actions (A) Subtotal**	
114	**Enforcement Actions (B) Subtotal**	
115	**Agency Inspections/Visits Subtotal**	1
116	**Other Subtotal**	
117	**Fines/Penalties Subtotal**	

	C	D	E
91			
92			
93			
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96			
97			
98			
99	Annual DEQ air inspection. No violations were found.		
100			
101			
102			
103			
104			
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103						
104						
105						
106		**Amount (Thousand USD $)**				
107						
108						
109						
110						
111						
112						
113						
114						
115						
116						
117						

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**	10/11/00	Oil & Grease exce
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	1	
31	**Number of Category B in Month**		
32	**Total Number in Month**	1	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8	edance reported by	0	0	0	0	5	0
9							
10							
11							
12							
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22							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	5	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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6	
7	Total
8	5
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	5
29	
30	
31	
32	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**5**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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49	0
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58	Total
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60	0
61	0
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71	0
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73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
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102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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18							
19							
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21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
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14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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65							
66							
67							
68							
69							
70							
71							
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74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
107							
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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31	
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33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**	12/29/00	Overfilled Diesel S
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**	1	
54	**Total Number in Month**	1	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46	torage Tank	0	0	0	0	1	0
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	1	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**1**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	1
47	0
48	0
49	0
50	1
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**1**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:	2000		
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	1		
31	Number of Category B YTD	1		
32	Total Number YTD	2		
33				
34	Number of Water Violations YTD	1		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	5	0	5
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	5	0	5
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	10	0	10
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	1		
54	**Total Number YTD**	1		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	1	0	1
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	1	0	1
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		8		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		1		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**11**	**0**	**16**
87				
88	"			
89				
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91				
92				
93				
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95				
96				
97				
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99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
2				
3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system
14	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
15	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
16	**X**	**5/30/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
17	**X**	**6/7/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
18	**X**	**6/7/2000**	**Complaint**	Railroad called about "noxious odors"
19	**X**	**7/18/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
20	**X**	**8/22/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
21		**9/21/2000**	**Violation**	NPDES - Total Residual Chlorine

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter
14	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
15	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
16	Blowing rosin line from storage tank to Neuphor
17	Heating a storage tank.
18	Heating a storage tank.
19	Blowing rosin line from storage tank to Neuphor
20	Blowing rosin line from storage tank to Neuphor
21	Total residual chlorine reported at 0.6 mg/l (permit limit 0.5 mg/l)

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9	**Corrective Action**
10	None taken
11	None taken
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.
13	Additional training, we are investigating the possibility of installing automatic valves
14	The neighors & DEQ were informed numerous times of pending work with the boiler.
15	The neighors & DEQ were informed numerous times of pending work with the boiler.
16	Limit the length of time needed to blow lines.
17	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
18	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
19	Limit the length of time needed to blow lines.
20	Limit the length of time needed to blow lines.
21	Outfall was tested 5-days later and determined to be in compliance. If problem persits we will have to treat or modify permit.

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9	**12 Month Incident History**
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	A	B	C	D
22	**X**	**9/21/2000**	**Agency Vist**	Annual DEQ air inspection
23		**10/11/2000**	**Violation**	Oil & Grease @ 142ppm
24		**12/29/2000**	**Release**	Diesel Release into contanment area.

	E
22	Annual DEQ air inspection - no violations recorded
23	Discharging "Betz" wastewater too qucikly.
24	Overfilled diesel tank. Outage table calculated incorrectly due to incorrect tank dimension

	F
22	Limit the length of time needed to blow lines.
23	Reviewed with operators how to contol discharge rate. Resample confirmed that we are back into compliance.
24	Diesel was pumped into an adjacent storage tank. Corrected tank dimension and recalculated outage table.

	A	B
1		
2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

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4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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25	0
26	0
27	0
28	0
29	
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31	
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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65							
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67							
68							
69							
70							
71							
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74							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
47	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
95							
96							
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98							
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101							
102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
107							
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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62							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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69	0
70	0
71	0
72	0
73	0
74	0
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76	0
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79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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31	
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33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
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78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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58	Total
59	5
60	0
61	0
62	0
63	0
64	0
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66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	5
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81	
82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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93							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
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26	0
27	0
28	0
29	
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
47	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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17	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
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78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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76							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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61	0
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71	0
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73	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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11	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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71							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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74	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
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18							
19							
20							
21							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
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22	0
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26	0
27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
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68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
91							
92							
93							
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105							
106							**Amount (Thousand U**
107							
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118							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
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19							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
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11	0
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16	0
17	0
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20	0
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26	0
27	0
28	0
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35	
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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71							
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76							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
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11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
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26	0
27	0
28	0
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
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67							
68							
69							
70							
71							
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73							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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67	0
68	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
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18	0
19	0
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28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
51	
52	
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56	
57	
58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
95							
96							
97							
98							
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102							
103							
104							
105							
106							**Amount (Thousand U**
107							
108							
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115							
116							
117							

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106	**SD $)**
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117	

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGU**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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93							
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105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
13							
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18							
19							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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2	
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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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63							
64							
65							
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67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
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67	0
68	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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103							
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105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		1		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**0**	**0**	**5**
87				
88	"			
89				
90				
91				
92				
93				
94				
95				
96				
97				
98				
99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
2				
3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter

	F	G
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8		
9	**Corrective Action**	**12 Month Incident History**
10	None taken	
11	None taken	
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.	
13	Additional training, we are investigating the possibility of installing automatic valves	

	A	B
1		
2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

	C
1	
2	
3	
4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
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18							
19							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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2	
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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25	0
26	0
27	0
28	0
29	
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31	
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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67							
68							
69							
70							
71							
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74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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90							

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46	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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96							
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101							
102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
107							
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117							

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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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64							
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69							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
90							

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46	0
47	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
85	
86	
87	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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96							
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103							
104							
105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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117	

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
59	0
60	0
61	0
62	0
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73	0
74	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
20							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
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27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
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67							
68							
69							
70							
71							
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73							
74							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
62	0
63	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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16	0
17	0
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27	0
28	0
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36	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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73	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
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10	0
11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
70							
71							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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71	0
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73	0
74	0
75	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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69							
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71							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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9	0
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17	0
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26	0
27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
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76			
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78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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60	0
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67	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
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11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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61	0
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63	0
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70	0
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75	0
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78	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

	K
46	0
47	0
48	0
49	0
50	0
51	
52	
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56	
57	
58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
85	
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87	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
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96							
97							
98							
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102							
103							
104							
105							
106							**Amount (Thousand U**
107							
108							
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116							
117							

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106	**SD $)**
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117	

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGU**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
92							
93							
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105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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117	

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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1	
2	
3	
4	
5	
6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
47	0
48	0
49	0
50	0
51	
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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103							
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105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	0	0	0	0
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	0		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	0		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		1		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		2		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	0	0	0	0
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**0**	**0**	**0**	**0**
87				
88	"			
89				
90				
91				
92				
93				
94				
95				
96				
97				
98				
99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
2				
3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor

	F	G
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8		
9	**Corrective Action**	**12 Month Incident History**
10	None taken	
11	None taken	
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.	

	A	B
1		
2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

	C
1	
2	
3	
4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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1	
2	
3	
4	
5	
6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
51	
52	
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57	
58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
95							
96							
97							
98							
99							
100							
101							
102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
107							
108							
109							
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111							
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115							
116							
117							

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106	**SD $)**
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116	
117	

	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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18							
19							
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21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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1	
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
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34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
90							

	K
46	0
47	0
48	0
49	0
50	0
51	
52	
53	
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57	
58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
85	
86	
87	
88	
89	
90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
95							
96							
97							
98							
99							
100							
101							
102							
103							
104							
105							
106							**Amount (Thousand U**
107							
108							
109							
110							
111							
112							
113							
114							
115							
116							
117							

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106	**SD $)**
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117	

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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1	
2	
3	
4	
5	
6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
30	
31	
32	
33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
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90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
61							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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49	0
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58	Total
59	5
60	0
61	0
62	0
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66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	5
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81	
82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
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21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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26	0
27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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68							
69							
70							
71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
62	0
63	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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12							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
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26	0
27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	18-May	**Schnitzer email a**
88		18-May	**Schnitzer email a**
89		30-May	**Schnitzer email a**
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "black smoke"**						
88	**bout "black smoke"**						
89	**bout "noxious odors"**						
90							

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58	Total
59	0
60	0
61	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	3	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	6/7/2000	**Schnitzer email a**
88		6/7/2000	**Railroad called a**
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88	**bout "noxious odors"**						
89							
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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66	0
67	0
68	0
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71	0
72	0
73	0
74	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	2	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
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18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
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27	0
28	0
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37	
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	7/18/2000	**Schnitzer email a**
88			
89			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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69							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
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58	Total
59	0
60	0
61	0
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63	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
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7	Total
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41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
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7	Total
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27	0
28	0
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40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
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102			
103	**OTHER (Acts of God)**		
104			
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107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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25	0
26	0
27	0
28	0
29	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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68							
69							
70							
71							
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74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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26	0
27	0
28	0
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37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
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76			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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67							
68							
69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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49	0
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58	Total
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60	0
61	0
62	0
63	0
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67	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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23							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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32	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
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62	0
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73	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		7		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**0**	**0**	**5**
87				
88	"			
89				
90				
91				
92				
93				
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96				
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98				
99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
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4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system
14	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
15	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
16	**X**	**5/30/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
17	**X**	**6/7/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
18	**X**	**6/7/2000**	**Complaint**	Railroad called about "noxious odors"
19	**X**	**7/18/2000**	**Complaint**	Schnitzer emailed about "noxious odors".

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
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8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter
14	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
15	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
16	Blowing rosin line from storage tank to Neuphor
17	Heating a storage tank.
18	Heating a storage tank.
19	Blowing rosin line from storage tank to Neuphor

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9	**Corrective Action**
10	None taken
11	None taken
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.
13	Additional training, we are investigating the possibility of installing automatic valves
14	The neighors & DEQ were informed numerous times of pending work with the boiler.
15	The neighors & DEQ were informed numerous times of pending work with the boiler.
16	Limit the length of time needed to blow lines.
17	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
18	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
19	Limit the length of time needed to blow lines.

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9	**12 Month Incident History**
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	A	B
1		
2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

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4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
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78			
79			**Releases**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

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46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
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65							
66							
67							
68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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95							
96							
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101							
102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
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69							
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71							
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73							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
89							
90							

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46	0
47	0
48	0
49	0
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58	Total
59	0
60	0
61	0
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66	0
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73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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102							
103							
104							
105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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1	
2	
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6	
7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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31	
32	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
61							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
47	0
48	0
49	0
50	0
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58	Total
59	5
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	5
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81	
82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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105							
106							**Amount (Thousand U**
107							
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
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11	0
12	0
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16	0
17	0
18	0
19	0
20	0
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22	0
23	0
24	0
25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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67	0
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71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	18-May	**Schnitzer email a**
88		18-May	**Schnitzer email a**
89		30-May	**Schnitzer email a**
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
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67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "black smoke"**						
88	**bout "black smoke"**						
89	**bout "noxious odors"**						
90							

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46	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	3	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**	6/7/2000	**Schnitzer email a**
88		6/7/2000	**Railroad called a**
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88	**bout "noxious odors"**						
89							
90							

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46	0
47	0
48	0
49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	2	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
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96							
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103							
104							
105							
106							**Amount (Thousand U**
107							
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117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
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11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
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26	0
27	0
28	0
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
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68							
69							
70							
71							
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75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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48	0
49	0
50	0
51	
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
91							
92							
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105							
106							**Amount (Thousand U**
107							
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118							

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106	**SD $)**
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118	

	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
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17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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31	
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33	
34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

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46	0
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48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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93							
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106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
45							

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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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18							
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22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
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16	0
17	0
18	0
19	0
20	0
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22	0
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27	0
28	0
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
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11	0
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16	0
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18	0
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27	0
28	0
29	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
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78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
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	D	E	F	G	H	I	J
46							
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49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
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12	0
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16	0
17	0
18	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
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74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
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90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
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73	0
74	0
75	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
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105							
106							**Amount (Thousand U**
107							
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106	**SD $)**
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	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		6		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**0**	**0**	**5**
87				
88	"			
89				
90				
91				
92				
93				
94				
95				
96				
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99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
2				
3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system
14	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
15	**X**	**5/18/2000**	**Complaint**	Schnitzer emailed about "black smoke" from boiler.
16	**X**	**5/30/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
17	**X**	**6/7/2000**	**Complaint**	Schnitzer emailed about "noxious odors".
18	**X**	**6/7/2000**	**Complaint**	Railroad called about "noxious odors"

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter
14	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
15	We were tuning the B&W boiler to operate using diesel as the primary fuel resulting in conditions suitable for black smoke.
16	Blowing rosin line from storage tank to Neuphor
17	Heating a storage tank.
18	Heating a storage tank.

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9	**Corrective Action**
10	None taken
11	None taken
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.
13	Additional training, we are investigating the possibility of installing automatic valves
14	The neighors & DEQ were informed numerous times of pending work with the boiler.
15	The neighors & DEQ were informed numerous times of pending work with the boiler.
16	Limit the length of time needed to blow lines.
17	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.
18	Limit the length of time needed to tank; also we later determined that it helpd reduced odor if the tank was circulated while heating. Note: The neighbors were informed prior to heating tank.

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9	**12 Month Incident History**
10	
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	A	B
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2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

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4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."

	A	B	C
1			I
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Jan-00	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
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17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**	0	
31	**Number of Category B in Month**	0	
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**	0	
35	**Number of Air Violations in Month**	0	
36	**Number of Waste Violations in Month**	0	
37	**Number of Other Violations in Month**	0	
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**	0	
53	**Number of Category B in Month**	0	
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	0	
82	**Number of Category D in Month**	0	
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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67							
68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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46	0
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58	Total
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61	0
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74	0
75	0
76	0
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78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**	1/7/2000	**Schnitzer email a**
104		1/27/2000	**Schnitzer email a**
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	2	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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93							
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95							
96							
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102							
103	**bout "noxious odors"**						
104	**bout "noxious odors"**						
105							
106					**Amount (Thousand U**		
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Feb-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
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15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87		2/1/2000	**Railroad called a**
88	**COMPLAINTS**		
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87	**bout "noxious odors"**						
88							
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46	0
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58	Total
59	0
60	0
61	0
62	0
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67	0
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69	0
70	0
71	0
72	0
73	0
74	0
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76	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	1	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
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104							
105							
106							**Amount (Thousand U**
107							
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116							
117							

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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
14							
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16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	
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31	
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34	
35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**	3/17 - 3/18	Released ~100K l
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**	1	
82	**Number of Category D in Month**		
83	**Total Number in Month**	1	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59	os Kymene557LX into				5		
60							
61							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	5	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**5**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	5
60	0
61	0
62	0
63	0
64	0
65	0
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67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	5
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81	
82	**Total**
83	**5**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	5	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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18							
19							
20							
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23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
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26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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62							
63							
64							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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71	0
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73	0
74	0
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79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	May-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
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16	0
17	0
18	0
19	0
20	0
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22	0
23	0
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27	0
28	0
29	
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36	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
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	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
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63	0
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70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
13							
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18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
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26	0
27	0
28	0
29	
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31	
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35	
36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
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67							
68							
69							
70							
71							
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73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
47	0
48	0
49	0
50	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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81	
82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
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11							
12							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
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17	0
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19	0
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26	0
27	0
28	0
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
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67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
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78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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71	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	
118			

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
8	0
9	0
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11	0
12	0
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16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
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25	0
26	0
27	0
28	0
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
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69							
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71							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
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63	0
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71	0
72	0
73	0
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75	0
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78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	September-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
9							
10							
11							
12							
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18							
19							
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21							
22							
23							
24							
25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
9	0
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11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
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26	0
27	0
28	0
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40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
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68							
69							
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71							
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73							
74							
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76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
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46	0
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49	0
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58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
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78	0
79	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
91							
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105							
106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Oct-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
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18	0
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26	0
27	0
28	0
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35	
36	
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38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
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58	Total
59	0
60	0
61	0
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69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
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82	**Total**
83	**0**
84	
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**	Nov-99	
4			
5			**REGUI**
6			
7		**Date**	**Violatic**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**		
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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25							
26							
27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
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7	Total
8	0
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16	0
17	0
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19	0
20	0
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22	0
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27	0
28	0
29	
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36	
37	
38	
39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases S**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
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78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
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58	Total
59	0
60	0
61	0
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63	0
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70	0
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82	**Total**
83	**0**
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	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**		
113	**Enforcement Actions (A) Subtotal**		
114	**Enforcement Actions (B) Subtotal**		
115	**Agency Inspections/Visits Subtotal**		
116	**Other Subtotal**		
117	**Fines/Penalties Subtotal**		

	D	E	F	G	H	I	J
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106							**Amount (Thousand U**
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106	**SD $)**
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	A	B	C
1			
2	**PLANT NAME:**	Po rtland PPD	
3	**MONTH/YEAR:**		
4			
5			**REGU**
6			
7		**Date**	**Violatio**
8	**Category A:**		
9	**Agency-Identified Violations**		
10	**of Permits, Regs, other**		
11	**Enforceable Documents**		
12			
13			
14			
15			
16			
17			
18	**Category B:**		
19	**Self-Reportable Violations**		
20	**of Permits, Regs, other**		
21	**Enforceable Documents**		
22			
23			
24			
25			
26			
27			
28			**Regu**
29			
30	**Number of Category A in Month**		
31	**Number of Category B in Month**		
32	**Total Number in Month**	0	
33			
34	**Number of Water Violations in Month**		
35	**Number of Air Violations in Month**		
36	**Number of Waste Violations in Month**		
37	**Number of Other Violations in Month**		
38			
39			**RELEAS**
40			
41		**Date**	**Releas**
42	**Category A:**		
43	**Above Federal/ National RQ &**		
44	**Reportable to Authorities**		
45			

	D	E	F	G	H	I	J
1	**EIM - FORM 1**						
2							
3							
4							
5	**LATORY VIOLATIONS**						
6			**Impact Rating Criteria**				
7	**on Identification**	#1	#2	#3	#4	#5	#6
8							
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27							
28	**latory Violations Subtotal**	0	0	0	0	0	0
29							
30			**Impact Rating Criteria**				
31			#1 = Health & Safety				
32			#2 = Environmental				
33			#3 = Community				
34			#4 = Facility Financial				
35			#5 = Regulatory				
36			#6 = Incident History				
37							
38							
39	**SES - PUBLIC RECORD**						
40			**Impact Rating Criteria**				
41	**e Identification**	#1	#2	#3	#4	#5	#6
42							
43							
44							
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7	Total
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16	0
17	0
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19	0
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22	0
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26	0
27	0
28	0
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37	
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39	
40	
41	Total
42	0
43	0
44	0
45	0

	A	B	C
46	**Category B:**		
47	**Reportable to Authorities**		
48			
49			
50			**Releases**
51			
52	**Number of Category A in Month**		
53	**Number of Category B in Month**		
54	**Total Number in Month**	0	
55			
56			**RELEASE**
57			
58		**Date**	**Releas**
59	**Category C:**		
60	**Not Reportable;**		
61	**Not Contained**		
62			
63			
64			
65			
66			
67			
68			
69	**Category D:**		
70	**Not Reportable; Contained**		
71			
72			
73			
74			
75			
76			
77			
78			
79			**Releases**
80			
81	**Number of Category C in Month**		
82	**Number of Category D in Month**		
83	**Total Number in Month**	0	
84			
85			**INCIDE**
86		**Date**	
87	**COMPLAINTS**		
88			
89			
90			

	D	E	F	G	H	I	J
46							
47							
48							
49							
50	**Subtotal (Public Record)**	0	0	0	0	0	0
51							
52							
53							
54							
55							
56	**ES - INTERNAL RECORD**						
57			**Impact Rating Criteria**				
58	**e Identification**	#1	#2	#3	#4	#5	#6
59							
60							
61							
62							
63							
64							
65							
66							
67							
68							
69							
70							
71							
72							
73							
74							
75							
76							
77							
78							
79	**Subtotal (Internal Record)**	0	0	0	0	0	0
80							
81							
82		**#1**	**#2**	**#3**	**#4**	**#5**	**#6**
83	**MONTHLY TOTAL**	**0**	**0**	**0**	**0**	**0**	**0**
84							
85	**NT "TRACKING ONLY"**						
86	**Incident Identification**						
87							
88							
89							
90							

	K
46	0
47	0
48	0
49	0
50	0
51	
52	
53	
54	
55	
56	
57	
58	Total
59	0
60	0
61	0
62	0
63	0
64	0
65	0
66	0
67	0
68	0
69	0
70	0
71	0
72	0
73	0
74	0
75	0
76	0
77	0
78	0
79	0
80	
81	
82	**Total**
83	**0**
84	
85	
86	
87	
88	
89	
90	

	A	B	C
91	**ENFORCEMENT ACTIONS (A):**		
92	**Consent orders, etc - enforcement**		
93	**documents requiring Hercules**		
94	**signature of concurrence**		
95	**ENFORCEMENT ACTIONS (B):**		
96	**documents received & not**		
97	**requiring Hercules**		
98	**signature of concurrence**		
99	**AGENCY INSPECTIONS/ VISITS**		
100			
101			
102			
103	**OTHER (Acts of God)**		
104			
105			
106			
107	**FINES/ PENALTIES/ MANDATORY**		
108	**ALTERNATIVE EXPENDITURES**		
109			
110			
111			
112	**Complaints Subtotal**	0	
113	**Enforcement Actions (A) Subtotal**	0	
114	**Enforcement Actions (B) Subtotal**	0	
115	**Agency Inspections/Visits Subtotal**	0	
116	**Other Subtotal**	0	
117	**Fines/Penalties Subtotal**	0	

	D	E	F	G	H	I	J
91							
92							
93							
94							
95							
96							
97							
98							
99							
100							
101							
102							
103							
104							
105							
106							**Amount (Thousand U**
107							
108							
109							
110							
111							
112							
113							
114							
115							
116							
117							

	K
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106	**SD $)**
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108	
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114	
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116	
117	

	A	B	C	D
1		EIM - FORM 1 - YTD		
2	PLANT NAME:	Po rtland PPD		
3	YEAR:			
4				
5		REGULATORY VIOLATIONS		
6				Impac
7		#1	#2	#3
8	Category A:	0	0	0
9	Agency-Identified Violations	0	0	0
10	of Permits, Regs, other	0	0	0
11	Enforceable Documents	0	0	0
12		0	0	0
13		0	0	0
14		0	0	0
15		0	0	0
16		0	0	0
17		0	0	0
18	Category B:	0	0	0
19	Self-Reportable Violations	0	0	0
20	of Permits, Regs, other	0	0	0
21		0	0	0
22		0	0	0
23		0	0	0
24		0	0	0
25		0	0	0
26		0	0	0
27	Enforceable Documents	0	0	0
28	Regulatory Violations YTD	0	0	0
29				
30	Number of Category A YTD	0		
31	Number of Category B YTD	0		
32	Total Number YTD	0		
33				
34	Number of Water Violations YTD	0		
35	Number of Air Violations YTD	0		
36	Number of Waste Violations YTD	0		
37	Number of Other Violations YTD	0		
38				
39		RELEASES - PUBLIC RECOR		

	E	F	G	H
1				
2				
3				
4				
5				
6	**t Rating Criteria**			
7	#4	#5	#6	Total
8	0	0	0	0
9	0	0	0	0
10	0	0	0	0
11	0	0	0	0
12	0	0	0	0
13	0	0	0	0
14	0	0	0	0
15	0	0	0	0
16	0	0	0	0
17	0	0	0	0
18	0	0	0	0
19	0	0	0	0
20	0	0	0	0
21	0	0	0	0
22	0	0	0	0
23	0	0	0	0
24	0	0	0	0
25	0	0	0	0
26	0	0	0	0
27	0	0	0	0
28	0	0	0	0
29				
30	**Impact Rating Criteria**			
31	#1 = Health & Safety			
32	#2 = Environmental			
33	#3 = Community			
34	#4 = Facility Financial			
35	#5 = Regulatory			
36	#6 = Incident History			
37				
38				
39	**D**			

	A	B	C	D
40				**Impac**
41		#1	#2	#3
42	**Category A:**	0	0	0
43	**Above Federal/ National RQ &**	0	0	0
44	**Reportable to Authorities**	0	0	0
45		0	0	0
46	**Category B:**	0	0	0
47	**Reportable to Authorities**	0	0	0
48		0	0	0
49		0	0	0
50	**Releases YTD Subtotal (Public Record)**	0	0	0
51				
52	**Number of Category A YTD**	0		
53	**Number of Category B YTD**	0		
54	**Total Number YTD**	0		
55				
56	**RELEASES - INTERNAL RECO**			
57				**Impac**
58		#1	#2	#3
59	**Category C:**	0	0	0
60	**Not Reportable;**	0	0	0
61	**Not Contained**	0	0	0
62		0	0	0
63		0	0	0
64		0	0	0
65		0	0	0
66		0	0	0
67		0	0	0
68		0	0	0
69	**Category D:**	0	0	0
70	**Not Reportable; Contained**	0	0	0
71		0	0	0
72		0	0	0
73		0	0	0
74		0	0	0
75		0	0	0
76		0	0	0
77		0	0	0
78		0	0	0

	E	F	G	H
40	**t Rating Criteria**			
41	#4	#5	#6	Total
42	0	0	0	0
43	0	0	0	0
44	0	0	0	0
45	0	0	0	0
46	0	0	0	0
47	0	0	0	0
48	0	0	0	0
49	0	0	0	0
50	0	0	0	0
51				
52				
53				
54				
55				
56	**RD**			
57	**t Rating Criteria**			
58	#4	#5	#6	Total
59	5	0	0	5
60	0	0	0	0
61	0	0	0	0
62	0	0	0	0
63	0	0	0	0
64	0	0	0	0
65	0	0	0	0
66	0	0	0	0
67	0	0	0	0
68	0	0	0	0
69	0	0	0	0
70	0	0	0	0
71	0	0	0	0
72	0	0	0	0
73	0	0	0	0
74	0	0	0	0
75	0	0	0	0
76	0	0	0	0
77	0	0	0	0
78	0	0	0	0

	A	B	C	D
79	**Releases YTD Subtotal (Internal Record)**	0	0	0
80				
81	**Number of Category C YTD**	1		
82	**Number of Category D YTD**	0		
83	**Total Number YTD**	1		
84				
85		**#1**	**#2**	**#3**
86	**YTD TOTAL**	**0**	**0**	**0**
87				
88		**INCIDENT "TRACKING ONLY**		
89	**COMPLAINTS**			
90		1		
91	**ENFORCEMENT ACTIONS (A):**			
92	**Consent orders, etc - enforcement**			
93	**documents requiring Hercules**			
94	**signature of concurrence**	0		
95	**ENFORCEMENT ACTIONS (B):**			
96	**documents received & not**			
97	**requiring Hercules**			
98	**signature of concurrence**	0		
99	**AGENCY INSPECTIONS/ VISITS**			
100		0		
101	**OTHER (Acts of God)**			
102		7		
103	**FINES/ PENALTIES/ MANDATORY**			
104	**ALTERNATIVE EXPENDITURES**	0		

	E	F	G	H
79	5	0	0	5
80				
81				
82				
83				
84				
85	**#4**	**#5**	**#6**	**Total**
86	**5**	**0**	**0**	**5**
87				
88	"			
89				
90				
91				
92				
93				
94				
95				
96				
97				
98				
99				
100				
101				
102	**Amount (Thousand USD $)**			
103				
104	$0			

	A	B	C	D
1				
2				
3				
4				
5	Business Division:		PPD	
6				
7	Plant Name:		Portland PPD	
8				
9	**Tracking Only**	**Date**	**Type**	**Incident**
10	**X**	**1/7**	**Other**	Schnitzer emailed about "noxious odors".
11	**X**	**1/27**	**Other**	Schnitzer emailed about "noxious odors".
12	**X**	**2/1/2000**	**Complaint**	Railroad called about "noxious odors"
13		**3/17 -3/18**	**Release**	Released ~100K lbs Kymene557LX into wastetreatment system

	E
1	**EIM - FORM 2**
2	
3	**ENVIRONMENTAL INCIDENT DESCRIPTION**
4	**2000 INCIDENT DESCRIPTION FORM**
5	
6	
7	
8	
9	**Cause**
10	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
11	There was no incident. Wind direction was the opposing Schnitzer complex at the time the incident allegedly occurred.
12	Blowing rosin line in Neuphor
13	Valve left open on Kymene filter

	F	G
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4		
5		
6		
7		
8		
9	**Corrective Action**	**12 Month Incident History**
10	None taken	
11	None taken	
12	Finished blowing line. Contacted railroad, asked if we should contact them whenever blowing rosin line. They stated "no" this was an unusual situation.	
13	Additional training, we are investigating the possibility of installing automatic valves	

	A	B
1		
2	**FORM 2 INSTRUCTIONS**	
3		
4	Tracking Only:	
5		
6		
7	Date:	
8		
9	Type:	
10		
11	Incident:	
12		
13		
14	Cause:	
15		
16	Corrective Action:	
17		
18	12 Month Incident	
19	History:	

	C
1	
2	
3	
4	Put an X in this column if the incident is one included for "Tracking Only" (i.e., enforcement action, fine/penalty, complaint,
5	Act of God-type, Agency Inspection/Visit)
6	
7	The date upon which the incident occurred or the facility was made aware of the incident, as appropriate
8	
9	Water, Air, Waste, Other or Release
10	
11	Brief description of what occurred including any disruption to production (i.e., non-precautionary shutdown of a process,
12	non-precautionary evacuation and/or emergency response). Note, information must be sufficient to show basis of scoring.
13	
14	Brief description of root & secondary causes of incident
15	
16	Brief description of the corrective action(s) that were taken to remedy situation and prevent reoccurrence
17	
18	Dates of each prior identical incident which occurred within the last 12 months. If no identical incidents
19	have occurred, indicate "none."