Forestex Co.

MANUFACTURERS OF FORESTEX® SIDING

P.O. BOX 68, FOREST GROVE, OR 97116

September 2, 1993

DEPT. OF ENVIRONMENTAL QUALITY
RECEIVED:
SEP 3 1993
ENVIRONMENTAL CLEANUP DIVISION

Kevin Dana
Site Assessment Section
Environmental Cleanup Division
Oregon Department of Environmental Quality
811 S.W. Sixth Avenue
Portland, Oregon 97204

Re: Forestex Co.
ECSI #114

Dear Mr. Dana:

Thank you for sending the Site Summary Report for the Forestex Co. in your letter of July 12, 1993.

You indicated that DEQ recognizes that some of the information in the Site Summary Report may be outdated or incomplete. Also Leslie Kochan in her letter of July 1, 1993 to Forestex Co. stated that if an investigation or cleanup of these releases has been completed, the information should be forwarded to DEQ. Therefore Stimson Lumber Company/Forestex Co. would like to address some sections of the Site Summary Report that are incomplete or not entirely correct.

Starting on page 1 (Site Summary Report),

PROPERTY:

The SITE SIZE is listed as 0 acres. The actual acreage is 716 acres which is composed of 472 acres forestland, 123 acres farmland, 58 acres of ponds and a 63 acre mill site.

FACILITIES:

The complex is a Hardboard manufacturing and sawmill, not Hardwood manufacturing and sawmill.

SIC CODES:

The SIC Code for a hardboard plant is 2493; the SIC Code for a sawmill is 2421.

PERMITS:

Stimson Lumber Company/Forestex Co. have been issued the following permits by DEQ:

34-2143	AQ	ACDP	
34-2066	AQ	ACDP	copy enclosed
1200-W	WQ	NPDES	copy enclosed
100892	WQ	NPDES	copy enclosed

We believe that #100892 replaced #3856-J.

HAZARDOUS SUBSTANCES/WASTE TYPES:

Two of the four chemicals listed, i.e., pentachlorophenol and 2,3,4,6-tetrachlorophenol were from a chemical, Permatox 181, used in our lumber dipping operation. In May 1992 the Permatox 181 was replaced with a less hazardous sapstain control chemical, NP-1 (from Van Waters & Rogers Inc.). NP-1 does not contain pentachlorophenol or tetrachlorophenol.

During 1991 and 1992 Stimson Lumber Company/Forestex Co. had the following chemical analyses performed by Coffey Laboratories, Inc.:

Identification	Compound	Results(mg/kg)
Log Pond Sludge	Pentachlorophenol	ND
Soil-Walta Field	Total Phenols	0.5
Log Pond Sludge	Pentachlorophenol	ND
Log Pond Sludge	Tetrachlorophenol	ND
Process Wastewater	Total Phenols	0.06

These results indicate that no pentachlorophenol or tetrachlorophenol was detected at the detection limit of the test procedures in our log pond sludge. Only low levels of phenol were detected in our process wastewater which is spray irrigated onto our fields.

Copies of these test reports are enclosed.

CONTAMINATION INFORMATION:

The third sentence "Effluent is discharged to a log pond which discharges to Scoggins Creek during the winter months" is not correct. The sentence should read "Process wastewater (effluent) is stored in holding ponds from which it is spray irrigated onto company fields." As an added note, only our excess log pond water is discharged directly to Scoggins Creek and then from November 1 to April 30.

The fifth sentence "A number of times the company has discharged waste containing phenolic resins into Scoggins Creek in excess of its wastewater discharge permit" is not correct. The sentence should read "A number of times, because of upset conditions, the company has discharged process wastewater to Scoggins Creek - a non permitted action." Forestex Co. is not permitted to discharge any process wastewater to Socggins Creek.

On page 2 (Site Summary Report),

OTHER INFORMATION:

The Site Assessment Section of DEQ has probably not been informed of this, but on August 2, 1993 a report was sent to Raimond Peterson, Northwest Region, Oregon Department of Environmental Quality which summarizes the action taken by Stimson Lumber Company to cleanup the July 1992 diesel spill.

A copy of this report is enclosed.

During 1992 several changes were made to our spray irrigation facilities which reduce the probability of any wastewater effluent from getting into Scoggins Creek. These changes include:

- the risers were reduced in height, therefore less chance of them breaking off from the weight of the irrigation pipe and effluent.
- some of the risers for the underground effluent supply line in both our east and west fields were moved 400+ feet further away from Scoggins Creek.
- a concrete weir was built in the low area of our east field where the natural drainage to Scoggins Creek occurs. This weir is closed during the summer/fall months when we spray irrigate and is open during the rainy season.
- there used to be three crossings of Scoggins Creek with our effluent pipeline distribution system. This distribution system was changed so that there are now only two crossings of Scoggins Creek.
- a concrete junction box was installed that handles mainly storm water runoff, but in an upset condition mill effluent can get into this storm water system and ultimately into Scoggins Creek. This junction box has continuous monitoring for pH and turbidity. If predetermined limits are exceeded gates automatically close the drainage system and a pump then diverts the storm water flow to the hardboard mill's water treatment system.

George Davis, DEQ's Northwest Region Regional Engineer has seen most of the above changes.

In addition to what has already been installed, a capital project program has been started which will treat water from our log pond for use in the boiler plant. This water treatment program will greatly reduce the amount of log pond water that is currently released to Scoggins Creek between November 1 and April 30. This project should be completed during late 1993 or early 1994.

As additional information for our file, Stimson Lumber Company/Forestex Co. is classified as a small quantity hazardous waste generator. There were three hazardous waste streams at the Forest Grove mill site:

- waste petroleum Naphtha from a parts cleaning operation
- dip tank sludge (pentachlorophenol) from the lumber dipping operation
- used paint from a discontinued painting process

Stimson Lumber Company has eliminated all three of these hazardous waste streams and expects to be classified as a 'conditionally exempt generator' for 1993. The last shipment of a hazardous waste from our mill was September 29, 1992.

After reviewing this letter and its enclosures we would appreciate any comments that the Department has regarding the Stimson Lumber Company/Forestex Co. site. Based on this additional information do you still feel that a Preliminary Assessment is needed?

If you have any questions or need amplification of any point, please contact me at your convenience.

Yours very truly,

Gerald F. Hoerber
Director of R & D

Enclosures