



Northwest Pulp & Paper Association  
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June 8, 2012

Mr. Jim Pendowski  
Toxics Cleanup Program  
Washington Department of Ecology  
P.O. Box 47600 Olympia, WA 98504-7600

**RE:** NWPPA Comments on Determination of Significance and Scope of Environmental Impact Statement for Revisions to Sediment Management Standards (Chapter 173-204 WAC)

Dear Mr. Pendowski:

On behalf of the Northwest Pulp and Paper Association (NWPPA), we appreciate the opportunity to provide comments on the Department of Ecology's (Ecology) threshold determination and proposed scope of the Environmental Impact Statement (EIS) concerning the revisions to Sediment Management Standards (Chapter 173-204 WAC).

The NWPPA is a 56-year old regional trade association representing seven (7) member pulp and paper mills in Washington State. The average pulp and paper mill worker compensation is over \$65,000 annually, plus benefits. These are predominately union-represented jobs that provide family-wage employment. Many of these jobs are located in rural communities, faced with the highest unemployment rates in the state. These high-wage manufacturing jobs support a 3-to-1 job multiplier, and even higher in rural communities.

The pulp and paper sector operates in a highly competitive global market; overseas competition has significant cost advantages. As one of the most highly regulated, point-source discharge industries in the state and country, the pulp and paper sector is greatly affected by new water quality regulations and standards. Existing and new regulations, particularly during these extremely difficult economic times, affect the bottom line and make it that much more difficult for our members to retain existing jobs, not to mention creating new ones. For these reasons, NWPPA has great interest and concern with revisions to Sediment Management Standards.

NWPPA has an overarching procedural comment and a specific technical comment on the scope the Environmental Impact Statement.

I. NWPA objects to the lack of public outreach and the short public comment period.

NWPPA and our member companies have participated in the Department's development work Sediment Management and Surface Water Quality Standards for many years. We find the lack of public involvement in the current phase of the process to be unwarranted and confusing for the public and the regulated community. NWPPA believes the short notice with an extension conflicts with the spirit of Washington's policy of full and open debate on regulatory matters. NWPPA suggests that Ecology publicize its SEPA determination and proposed EIS to a larger stakeholder group and extend the time for public comment.

II. NWPPA believes the propose scope of the EIS is simply too narrow and should be expanded.

The draft EIS does not encompass public discussions of adding a default fish consumption rate into the SMS rule and the set of chaining consequences of such a change. NWPPA believes to start that, Ecology should create another "Human Health Alternative" for the purpose of evaluating the merits and probable adverse impacts of including a default FCR in the SMS rule versus relying on the default FCR (and other site-specific considerations) provided under the Model Toxics Control Act (MTCA). Secondly, NWPPA suggests that Ecology acknowledge and review (within the same EIS) the use of the FCR to set cleanup standards and affect water quality standards. We believe the rulemakings under consideration possibly using a revised fish consumption rate are integrated and should be evaluated using a comprehensive approach.

Thank you for considering NWPPA's comments. I can be reached to answer questions at 503-844-9540

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Sincerely,

Kathryn VanNatta

Kathryn VanNatta  
Director of Regulatory and Governmental Affairs  
Northwest Pulp and Paper Association