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January 10, 2008

Mr. Lionel Klikoff
Department of Ecology
P.O. Box 47600
Olympia, WA 98540-7600

RE: Comments to Draft Industrial Stormwater General Permit

Mr. Klikoff;

Boise Building Solutions Manufacturing, L.L.C. (Boise), a subsidiary of Boise Cascade, L.L.C. appreciates the opportunity to submit comments on the Washington Department of Ecology's Draft Industrial Stormwater General Permit (Draft Permit) Boise operates two wood products plants in Kettle Falls, Washington, one of which is covered by the Industrial Stormwater General Permit issued in 2002 and modified in 2004.

In general, Boise believes the Draft Permit format is an improvement over the current permit format. Boise also supports the Draft Permit's streamlined approach to implementing corrective actions.

Boise has the following comments on specific facets of the Draft Permit.

Discharges to Ground

Condition S1.E provides that the terms and conditions of the Draft Permit shall apply to all stormwater discharges at sites that discharge to both surface water and ground water. However, it is not clear which parts of the Draft Permit apply to groundwater discharges. Condition S4 requires that only surface water discharges must be sampled. Therefore, we assume that the benchmarks and threshold values also do not apply to ground water discharges, though Condition S5.A.2 should be clarified to state that "The benchmarks, thresholds, and sampling requirements in Table 2 shall apply to all surface discharges, except as described in Condition S6." We also assume that the corrective actions identified in Condition S8 do not apply. Boise requests that Draft Permit clearly identify which conditions apply only to surface water discharges and which conditions apply to both surface and ground water discharges.

Level B Triggers

According to Table 10 in Condition S8, facilities that are in a Level 3 response under the permit issued August 15, 2007 are required to immediately implement a Level B Corrective Action in accordance with the Draft Permit. Boise is in the process of developing and implementing a Level 3 response at one facility. We have spent time and money on this response. Boise believes the Draft Permit should allow sufficient time to complete the Level 3 response and evaluate it's efficacy prior to implementing a Level B response in accordance with the Draft Permit. Boise recommends the Draft Permit allow a minimum of one to two years, depending on when the Draft Permit is issued before a Level B response is triggered if the facility is implementing a Level 3 response in accordance with the August 15, 2007 permit.

Employee Training

Condition S3.B.v.E. specifies that the Permittee shall attend at least one Ecology-approved training session. Without knowing the content of the training, the Permittee may not be the most appropriate person to attend the training. Boise suggests that Condition S3.B.v.E. be changed to state the Permittee or a facility employee with responsibilities for stormwater management shall attend the required training.

Conditionally Approved Non-Stormwater Discharges

Condition S5.D. conditionally authorizes certain non-stormwater discharges as allowed by the Federal MSGP. Boise supports inclusion of these discharges. However, Boise suggests that the dechlorination requirement for waterline flushing be removed. The Federal MSGP does not include the dechlorination requirement, and because these flushings are typically infrequent and relatively short in duration they are not likely to cause an exceedance of a water quality standard. Furthermore, most facilities are not likely to have a way to capture and dechlorinate this water at all points that flushing may occur.

Boise also suggests that the following additional discharges be included in the list of conditionally approved non-stormwater discharges. Each of these is allowed under the Federal MSGP, and in many cases these activities are performed in order to prevent stormwater pollution. The SWPPP should address how pollutants will be controlled during these activities, but the Permit should allow these wash waters to be discharged once pollutants have been controlled in accordance with BMPs.

1. Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless spilled material has been removed).
2. Routine external building washdown that does not use detergents.

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Boise also suggests that the Permit authorize discharge of fire prevention water in addition to fire fighting water. Many facilities routinely weld in areas where wood structures are located. In order to prevent fires, the wood structures are sprayed with water prior to welding in order to prevent fires. This practice is typically required by insurance carriers. Because welding occurs at various locations throughout the facilities, including outdoor locations, it is difficult to capture and control this water. Because this activity occurs infrequently, is of limited duration, and is not likely to impart significant quantities of pollutants, it is not likely to cause an exceedance of a water quality standard. Furthermore, without proper fire prevention, the facility may end up discharging significant quantities of fire-fighting water that could have a more significant impact on surface water, not to mention personal safety. In lieu of adding fire prevention water as a conditionally authorized discharge, it might be sufficient to state in the Fact Sheet that fire fighting water includes fire-prevention water, though this is not Boise's preference.

Thank you again for the opportunity to comment on the Draft Permit. Boise hopes our comments and suggestions prove helpful as Ecology finalizes the Permit.

Sincerely,



Russell Strader
Environmental Manager
Boise Building Solutions

cc: Jennifer Wasley
Brian King