



18 June 2009

The Honorable Jay Manning, Director
Washington Dept of Ecology
POB 47600
Olympia, WA 98504-7600

RE: Proposed Industrial Stormwater Permit

Dear Director Manning:

The Department of Ecology is currently proposing to substantially revise the Industrial Stormwater Permit. This revision comes at a time when the Forest Products Industry is under extreme economic stress, arguably the worst in our lifetime. It appears that the economic consequences of the proposal have not been seriously considered in its development.

The costs of implementing the proposed new regulations are significant. At the least these costs will be difficult to absorb, and at the extreme could be a significant factor in the failure of some companies. They may not, in themselves, cause a business to close its doors but they are a factor.

While we see some benefits, for our operation, we see some troubling provisions.

Hiring consultants to conduct the required testing will be very expensive. Installing required technology could run to tens of thousands of dollars. These expenses would be to monitor problems, such as turbidity and biological oxygen demand, which have not been shown to be a problem in log yard and sawmill storm water run off. As a side note we have been told that these two items cannot be met at forest products facilities.

We ask that you personally intervene in a process with the potential to push many forest products businesses into a decision that would result in more folks in the unemployment line. We feel the current permit should be extended until such time as a scientifically documented problem is shown to exist.

Thank you for the opportunity to comment on the proposed rule change. Hopefully our input will be seriously considered.

Yours truly,

A handwritten signature in black ink, appearing to read 'Ron Smith', is written over a horizontal line.

Ron Smith
President

Cc: Governor Gregoire