**From:** Stitt, Jim
**Date:** Friday, June 26, 2009 2:54:03 PM
**Posted At:** Industrial Stormwater Comments
**Conversation:** Comment on proposed Industrial Stormwater General Permit
**Subject:** Comment on proposed Industrial Stormwater General Permit

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Our company, Canfor USA, operates under an NPDES permit in Bellingham, WA.

Our site had a building with a deteriorating galvanized steel roof. The deteriorating roof apparently was contributing too much zinc to our stormwater. The resulting high sample test results prompted Canfor USA to a level 2 response after the fourth quarter of 2006.

In the third quarter of 2007, the landlord of our facility had the deteriorating metal roof replaced. Additionally, Canfor USA partnered with our landlord to reconstruct our stormwater retention pond. The reconstructed stormwater facility includes a constructed bioswale, a setlling pond, a pea gravel filter berm, an oil/water seperator and a naturually vegetated bioswale.

While we did not have any stormwater discharge during the third quarter of 2007, our sample results since then have shown a marked improvement. Our sample results have not only improved, they have shown a steady consistancy.

I am including a summary here of our sample results for the past 7 quarters.

| **Year** | **Sample Period** | **Sample Date** | **Report Date** | **Parameter** | **Turbidity** | **pH** | **Zinc** | **Oil & Grease** | **BOD5** |
|---|---|---|---|---|---|---|---|---|---|
| | | | | **Units** | **NTU** | | **mg/L** | **mg/L** | **mg/L** |
| | | | | **Benchmark Value** | *25* | *6 to 9* | *117* | *15* | *30* |
| | | | | **Action Level Value** | *50* | *6>pH>9* | *372* | *30* | *60* |
| *2007* | *Q3* | | | *NQSE* | | | | | |
| *2007* | *Q4* | *10/18/07* | *01/11/08* | | 6.1 | 6.2 | 100 | 5 | 3.7 |
| *2008* | *Q1* | *02/15/08* | *02/28/08* | | 12 | 6.4 | 40 | 5 | 4.6 |
| *2008* | *Q2* | *04/04/08* | *07/03/08* | | 13 | 6.4 | 27 | 1.8 | 2.3 |
| *2008* | *Q3* | *09/24/08* | *10/08/08* | | 3 | 6.6 | 25 | 1.6 | 6 |
| *2008* | *Q4* | *10/31/08* | *11/07/08* | | 7.5 | 6.3 | 26 | 1.4 | 4.3 |
| *2009* | *Q1* | *02/06/09* | *02/19/09* | | 2.1 | 6.4 | 47 | 1.6 | 2.4 |
| *2009* | *Q2* | *04/17/09* | *04/28/09* | | 2 | 6.5 | 25 | 2.1 | 2.7 |

Canfor USA has responded to a stormwater issue in a positive, proactive manner that is reflected in the sample results.

**Canfor USA should be removed from the Appendix 6 listing in the proposed Industrial Stormwater General Permit.**

Sincerely,

Jim Stitt
Maintenance Superintendent

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