



NORTHWEST PULP & PAPER ASSOCIATION  
1300 114TH AVENUE SOUTHEAST, SUITE 200  
BELLEVUE, WASHINGTON 98004  
(425) 455-1323 FAX (425) 451-1349

Sent via: industrialstormwatercomments@ecy.wa.gov

July 14, 2009

Mr. Jeff Killelea  
Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: Public Comments on Department of Ecology Draft Industrial Stormwater General Permit

The Northwest Pulp and Paper Association (NWPPA) appreciates the opportunity to comment on the Department of Ecology's Draft Industrial Stormwater General Permit.

NWPPA is a 53-year old regional trade association representing pulp and paper manufacturing sites in the states of Washington, Oregon and Idaho on environmental and energy public policy issues. NWPPA routinely comments on: public policy matters before government advisory committees, administrative rule makings at state agencies and legislation under consideration in state legislatures. The intersection of environmental and energy issues and public policy development is the mainstay our trade association's work. NWPPA members and staff participated in the Department's advisory committee and attended recent permit workshops.

NWPPA represents eight pulp and/or paper mills in Washington subject to stormwater regulation and covered under the proposed draft permit. NWPPA has four overarching general comments. First, NWPPA is gravely concerned with the scope and new requirements of the proposed draft permit, and questions whether the implementation costs for regulated sources will generate proportional environmental benefits. Second, NWPPA objects to establishing overly stringent pollutant parameter benchmarks (e.g. turbidity and TSS) and believes that such targets are unrealistic and unnecessarily costly to the regulated community. Third, NWPPA believes that logical steps should be made to control stormwater discharges including adaptive management steps/loops that are achievable given the current state of our built environment and the reliability and costs of stormwater control technologies. Finally, in this economic environment, NWPPA believes that Ecology should rethink their proposal to realistically assess whether the draft permit requirements are cost-effective regulation or whether requirements could be streamlined to reduce both the permit holders' and Department's costs.

NWPPA wholeheartedly supports the specific comments submitted by Weyerhaeuser Company, Association of Washington Business, Boeing Company and the Copper Development Council.

Thank you for the opportunity to comment on the proposed draft general permit. I can be contacted at 503-844-9549 to answer any questions.

Kathryn VanNatta  
Governmental Affairs Manager  
Northwest Pulp and Paper Association