



Georgia-Pacific LLC
Traylor Champlon
Vice President, Environmental Affairs
133 Peachtree Street NE
Atlanta, Georgia 30303
btchampi@gapac.com
(404) 652-4776

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Jeff Killelea
Water Quality Division
Washington Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

Subject: Comments Regarding Proposed Industrial Stormwater General Permit

Mr. Killelea:

Georgia-Pacific LLC (GP) appreciates the opportunity to submit comments on Washington Department of Ecology's (DOE's) proposed Industrial Stormwater General Permit (ISGP). Georgia-Pacific is one of the world's leading manufacturers of tissue, pulp, paper, packaging, food service, building products and related chemicals. We have over 150 manufacturing facilities across North America, South America and Europe, ranging from large facilities, such as pulp, paper and tissue operations; to moderately sized facilities, such as gypsum plants, chemical plants, and building products complexes; to small facilities, such as Dixie® product plants and box plants. Georgia-Pacific has several operating facilities in Washington including a pulp and paper mill, a gypsum plant, and a corrugated container plant. The gypsum plant and corrugated container plant are currently covered by the existing ISGP and will be directly affected by decisions and changes that the DOE makes regarding reissuance of this permit.

Georgia-Pacific is a member of the Association of Washington Businesses (AWB), the state's oldest and largest statewide business association, which serves as both the state's chamber of commerce and the manufacturing and technology association. Georgia-Pacific fully supports, and as a member, incorporates the comments submitted by the AWB as part of GP's comments.

We do, however, wish to emphasize certain concerns about the proposed permit based on our own review of the provisions, and are as follows:

Effective Dates: The current permit expires on January 1, 2015, and the new permit is effective on January 1, 2015. So essentially, for that one day (January 1), both the expiring and the new permits will be applicable creating conflicting requirements and industrial facilities will not be able to maintain compliance with both permits simultaneously.

Appendix 2: In several places throughout the permit, for example S4.B(6)(c), permittees are instructed to compare the average value to the benchmark value if more than one sample is taken in a sampling quarter. The term "average" is a generic term that can refer to a number of different mathematic equations that calculate the mid-point of a series of numbers. With the current language, it is not clear what method of averaging (Arithmetic Mean, Geometric Mean, etc.) is required. GP suggests adding a definition to Appendix 2 to define the method of averaging a permittee should employ. GP would also like to suggest use of the geometric mean which is a more accurate averaging technique for a series of numbers that can span a wide range (ex. metals results) when compared to other methods like the arithmetic mean.

S4.B(6): The consistent attainment portion of the permit does not allow permittees to use any samples collected during the previous stormwater permit term to apply toward the consistent attainment rule. Therefore, permittees that have already achieved consistent attainment in the current (2010-2015) permit are essentially penalized for good behavior. It creates a double standard because the requirements from Level 2 or Level 3 corrective actions under the current (2010-2015) permit carry over to the new permit. GP recognizes that there is an understanding that we must re-demonstrate that conditions are still the same and that we still meet the consistent attainment standard, but finds it reasonable that some of the previous samples would apply. GP suggests adding a condition allowing those facilities that qualified for a sampling waiver in the 2010-2015 permit term to use the first four consecutive quarterly samples in determining eligibility for suspension of future sampling. This would demonstrate that conditions and pollution prevention practices at the facility remain effective.

We appreciate the opportunity to submit comments on the above proposed amendments. If you have any questions regarding our comments, please contact Joe Gorski at (404) 652-6455.

Sincerely,

A handwritten signature in black ink that reads "Traylor Champion". The signature is written in a cursive, flowing style.

Traylor Champion
Vice President – Environmental Affairs
Georgia-Pacific Corporation, LLC