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Sent by electronic mail to: industrialstormwatercomments@ecy.wa.gov

Jeff Killelea  
Water Quality Program  
Washington Dept of Ecology

Subject: WPPA/Washington State Marine Terminal AKART and ISGP Corrective Action  
Guidance Manual

The Weyerhaeuser Company has a number of questions and comments on this *WPPA/Washington State Marine Terminal AKART and ISGP Corrective Action Guidance Manual* (hereafter, the "Guidance Manual"), all focused on understanding the regulatory significance of the document.

- 1) Did the WPPA and/or Ecology intend this Guidance Manual to be consistent with the regulatory requirements in the current Industrial Stormwater NPDES permit (2012); i.e., not add procedural or substantive requirements beyond what is in the ISWGP?
- 2) Does Ecology intend to approve and incorporate into the ISWGP this Guidance Manual, per S3.A.3. of the ISWGP? We presume the answer is no, given the lack of any mention of this Guidance Manual in the revised ISWGP (2014) now out for public review/comment.
- 3) The intent/coverage of this Guidance Manual extends to "Waterfront Log Yards" (SIC 2411 - Logging). Does Ecology suggest this Guidance Manual has relevance for all ISWG permittees with SIC 2411 – Logging activity, or only those associated with WPPA/Washington State Marine Terminals?
- 4) Paragraph 5 on page 7 of the Guidance Manual includes a statement that is not necessarily consistent with S8.D.5. of the ISWGP (2012), in particular that "Ecology anticipates ... that Permittees address all steps in the accompanying flowchart before a Modification of Permit Coverage will be considered." It is noted that the Guidance Manual flowchart presents the Permit Coverage Modification process only at the tail end of Treatment BMP evaluation, BMP installation, assessment of Benchmark achievement, etc.

Yet the ISWGP provides that installation of Treatment BMPs may be waived if "not feasible or not necessary to prevent discharges that may cause or contribute to violation of a water quality standard." There is no precondition to complete each of the treatment technology

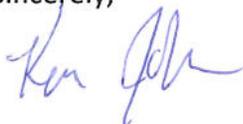
evaluation steps in S8.5.D. 1-4 to support a waiver request. AKART, of course, is always required on all NPDES discharges.

We note that Sections 4.1 and 7.3 of the Guidance Manual faithfully presents the ISWGP S8.5.D. language.

To conclude this letter, if Ecology were to answer that this Guidance Manual does intend to add procedural/substantive requirements beyond the current ISWGP (2012), the agency has an obligation to explain those differences and allow for a public comment period.

Thank you for considering these questions/comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Johnson". The signature is cursive and somewhat stylized.

Ken Johnson  
Regulatory Affairs Manager