From: Sally Clark
Date: Wednesday, July 15, 2009 4:40:36 PM
Posted At: Industrial Stormwater Comments
Conversation: Proposed Washington State Industrial Storm Water Permit
Subject: Proposed Washington State Industrial Storm Water Permit

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Dear Mr. Killelea,

TMI Forest Products, Inc. located in Morton, appreciates the opportunity to comment on the Draft of the Industrial Stormwater General Permit. As a business in the sawmill industry that will be covered by this permit we have the following concerns:

At a minimum, our best estimate is that this permit will cost us nothing less than $80,000 annually. This is only including a vacuum pump truck and a full time employee costing approximately $50,000 per year with benefits we are required to pay under the Union's rules!

We are probably going to be forced to hire an outside consultant who tells us that even they as consultants cannot guarantee we will be in compliance with the plan because they are not certain they understand all that is required. We will be forced to increase our man power by at least a full time employee to keep up with the requirements that we have yet to decipher from a 71 page report, and a 119 page fact sheet.

TMI Forest Products, Inc. is already struggling with the economic downturn. Our production has been decreased by 25% for the past several months and doesn't look to return to 100% anytime in the near future. In fact, the trends are continuing to decline. Morton is already a depressed area. We are now the ONLY sawmill working in Morton. We have worked hard at trying to keep approximately 125 employees employed. The monetary requirements that are involved in TRYING to stay in compliance with an already difficult set of rules and new regulations that are on the horizon with this plan may very well be the straw that breaks the camel's proverbial back for TMI.

Then, of course, the fear is always looming out there of some citizen's lawsuit ready to be unleashed upon a company that has done everything we can to NOT put pollutants, etc. into a river that we hold dear to the company, community and individuals who live and work next to it.

This permit changes the action levels at which I must increase my storm water management response. The new levels are so strict that based on industry norms it is probable that I will need to install extensive new treatment systems. There is no question, the cost of a treatment system would indeed put TMI on the rolls of yet another sawmill that has gone under because of the restrictions that continue to increase in the areas of the environment.

Thank you for considering our comments. If you have any questions, please contact the undersigned.

Sincerely,

Sally L. Clark
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