

Weyerhaeuser Longview
NPDES Permit WA0000124
Supplemental Fact Sheet
March 20, 2015

The Department of Ecology (Ecology) issued the National Pollution Discharge Elimination System (NPDES) permit for Weyerhaeuser Longview on October 15, 2014. Weyerhaeuser Longview filed an appeal of the NPDES permit on November 18, 2014. Ecology has made revisions to the draft permit in response to the NPDES permit appeal; additional revisions have been made to address typographical errors, clarify monitoring requirements, and improve compliance reporting practicality.

This fact sheet explains and documents the decisions Ecology has made in drafting the modifications to the NPDES permit for Weyerhaeuser Longview. Ecology makes the draft permit modification and supplemental fact sheet available for public review and comment at least thirty (30) days before issuing the final permit modification. Copies of the draft permit modification and supplemental fact sheet for Weyerhaeuser Longview NPDES permit WA 0000124 are available for public review and comment from March 20, 2015 until April 22, 2105.

PROPOSED PERMIT CHANGES

Weyerhaeuser Longview NPDES Permit - Appeal Settlement

1. *Interim Performance-based Stormwater Limits – Outfall 003 and 004*

On November 18, 2014, Weyerhaeuser NR Company appealed NPDES Permit No. WA0000124 issued on October 15, 2014. The appeal concerned the interim, performance-based limit established for fecal coliform at Outfall 003. Weyerhaeuser NR Company contended that the performance-based limit was not representative of the discharge because it was calculated using censored data. This data included laboratory results for fecal coliform which exceeded the quantifiable range (>160000 CFU/100 mL). The actual data values for these results remain unknown and calculating a performance-based limit using the data set was potentially flawed.

In light of the above, Ecology has replaced the interim performance-based limits for fecal coliform at Outfalls 003 and 004 with a BMP approach. In doing so Ecology drew on its experience administering the Industrial Stormwater General Permit (ISGP), which utilizes non-numeric, narrative effluent limitations for bacteria (see RCW 90.48.555.(7)(b)). Although the non-numeric, narrative approach for fecal coliform management in the ISGP is not typically incorporated into an individual NPDES permit, Ecology has determined, on a best-professional-judgment basis, that the BMP approach is the most appropriate for this permit, given the similarities of the stormwater issues. The BMPs have been added in footer “d” of their respective tables in Special Condition S1.A. Additional monthly monitoring for E. coli and Klebsiella is also required and can be found in Special Condition S2.A.

Weyerhaeuser Longview NPDES Permit - Administrative Changes and Corrections

1. *Bleach Plant Effluent Limits – Certification in lieu of monitoring for chloroform*
Ecology is correcting a typographical error in Special Conditions S1.A. Footer “f” of the “Effluent Limits: Bleach Plant Discharge Monitoring Point” table includes a pH operating parameter. The pH parameter was incorrectly stated to be 5.2 standard units. The typographical error has been corrected to read 5.7 standard units.
2. *Flow and Temperature Monitoring – Outfall 001 and 002*
Clarifying language has been added to the flow and temperature monitoring requirements for the final effluent in Special Condition S2.A.
3. *Mass Loading Reporting Requirements – Secondary Treatment Wastewater Effluent*
Ecology previously omitted the requirement of the monitoring and reporting of mass loading from the secondary treatment wastewater effluent. Mass loading calculation/monitoring requirements have been added for BOD₅, TSS, and AOX in Special Condition S2.A.
4. *Mass Loading Reporting Requirements – Outfall 005*
Ecology previously omitted the requirement of the monitoring/reporting of mass loading from Outfall 005. Mass loading calculation/monitoring requirements at Outfall 005 have been added for BOD₅ and TSS in Special Condition S2.A.
5. *Turbidity Monitoring – Outfall 003 and 004*
Ecology previously omitted the requirement of turbidity monitoring at Outfalls 003 and 004. Ecology has updated the permit to include monthly monitoring of turbidity at Outfalls 003 and 004. These changes can be found in Special Condition S2.A.
6. *Quarterly DMR Reporting*
In order to accommodate laboratory restrictions, Ecology has changed the reporting schedule for quarterly DMRs. Quarterly DMRs are now due 45 days following the end of the quarter instead of the previous 15 days. The change can be found in Special Condition S3.A(9)(b).

PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to modify the NPDES permit for Weyerhaeuser Longview. Ecology will publish a Public Notice of Draft (PNOD) on March 20, 2015 in *The Daily News* to inform the public that a draft modified permit and supplemental fact sheet are available for review.

Interested persons are invited to submit written comments regarding the proposed changes to the draft permit. The revised draft permit, supplemental fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the Ecology office listed below.

Department of Ecology
Industrial Section
300 Desmond Drive
Lacey, WA 98503

The documents are also available at the Longview Public Library and online at <https://fortress.wa.gov/ecy/industrial/UIPermit/DraftPermits.aspx>.

Written comments should be sent to:

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Comments should reference specific text followed by the requested change or concern when possible. **Ecology will only consider comments that pertain to the proposed permit changes.**

Ecology will consider all comments received within thirty (30) days from the date of public notice of the draft indicated above, in formulating a final determination to revise and reissue the permit. Ecology's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from Ecology by telephone at (360) 407-7563 or by writing to the address listed above.

RESPONSE TO COMMENTS

Weyerhaeuser NR Company Comment:

Weyerhaeuser supports the modifications as proposed. The use of language consistent with the Industrial Stormwater General Permit for Outfalls 003 and 004 is reasonable and appropriate. The administrative changes and corrections clarify the permit's requirements and correct inadvertent omissions.

Response to Comment: Comment noted.