

SUPPLEMENTAL FACT SHEET FOR NPDES PERMIT WA0000809
COSMO SPECIALTY FIBERS, INC.
PERMIT MODIFICATION
MARCH 1, 2018

The Department of Ecology (Ecology) issued National Pollutant Discharge Elimination System (NPDES) Permit No. WA0000809 to Cosmo Specialty Fibers, Inc. (Cosmo) on November 15, 2015 for their mill in Cosmopolis, WA. On December 11, 2015, Cosmo appealed the permit requirements. In November 2017, Ecology and Cosmo signed a settlement agreement allowing the appeal to be dismissed. Based on the settlement agreement, Ecology proposes to modify the permit to:

- Clarify the Department of Health shellfish trigger of 113,000 cfu daily geomean.
- Provide further definition for Tier II pulp production.
- Clarify the monitoring frequency of enterococci.
- Replace the submittal of the Plan for Maintaining Adequate Capacity with the Clarifier Efficiency Study.
- Correct typos and incorrect references in the footnotes

The substantive changes are discussed in this fact sheet.

PROPOSED PERMIT CHANGES

The substantive permit changes are described in the section below. These changes do not include corrections to typos/errors or incorrect references.

Shellfish Bed Closure by the Department of Health:

The shellfish bed closure trigger of 113,000 coliform forming units (cfu) of fecal coliform as a daily geomean was established by the Department of Health (DOH) for Cosmo's discharge from outfall 001. Cosmo must notify DOH if their discharge exceeds this trigger, which will result in DOH's closure of downstream shellfish beds. The permit originally specified that the discharge of fecal coliform at a level that resulted in the closure of downstream shellfish harvesting was a violation of the permit. The value of 113,000 cfu was discussed in the November 15, 2015 fact sheet but was not specified in the permit. In this modification, Ecology specifies the 113,000 cfu daily geomean in the permit, rather than a narrative standard. Exceedance of this trigger is considered a violation of the NPDES permit. Affected permit conditions are S1.A (footnote e) and S3.F.a.

Tiered Production:

The establishment of the production trigger for the Tier II limits is based on EPA's 1984 guidance for "Calculation of Production-Based Effluent Limits." The calculation considered the fact that Cosmo produces one grade at the time and acetate grade production results in 20% more BOD₅ loading than other grades of pulp. The Tier II limits previously applied when Cosmo produced a monthly average of more than 529 air-dried short tons per day or they produced acetate grade for fifteen (15) or more consecutive days within the calendar month.

Based on the loading analysis provided by Cosmo, they demonstrated that acetate grade production at 20 or more non-consecutive days during a month is equivalent to 15 or more consecutive days of acetate production. Therefore, Ecology modified the permit to add 20 or more days of non-consecutive acetate grade production to of the Tier II limit production trigger. The affected permit condition is S1.A (footnote d).

Enterococci Monitoring

The permit requires Cosmo to monitor enterococci four (4) times a week. The current holding time for a sample taken for enterococci analysis is 24 hours, which is relatively short. The number of accredited and available labs to perform the analysis is limited by the short holding time. Currently, the only lab available to analyze for enterococci within the holding time is Grays Harbor County Water Testing Lab. This lab is not always open for four days in a week.

Ecology modified the enterococci monitoring frequency to reflect the limitations in holding time and lab availability. In the future, Cosmo may seek accreditation for in-house enterococci analysis. The affected permit condition is S2.A (footnote j).

Clarifier Efficiency Study

Facilities that have exceeded or are close to exceeding their treatment plant capacity have the potential to violate permit limits. In these cases, Ecology may require a Plan to Maintain Adequate Capacity. Ecology required Cosmo to submit such a plan in the issuance of the November 15, 2015 NPDES permit.

Cosmo has alternatively proposed to improve their sludge settling capability by modifying their clarifiers. In June 2017, the facility submitted an engineering report to modify clarifier no. 2 with some retrofits. The facility installed a new baffle system and sludge removal system on the clarifier in September 2017. To evaluate the effectiveness of the new systems, Ecology is proposing to require the submittal of a Clarifier Efficiency Study. The clarifier retrofits and efficiency study have a similar objective as the Plan to Maintain Adequate Capacity. Therefore, the Plan to Maintain Adequate Capacity is not required concurrent to Clarifier Efficiency Study. The affected permit condition is S11.

PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to modify NPDES No. WA0000809. We will publish a Public Notice of Modification (PNOM) on December 19, 2017 in the Daily World to inform the public that a draft permit modification and supplemental fact sheet are available for review.

Interested persons are invited to submit written comments regarding the draft permit modification. The draft permit modification, 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

Call (360) 407-6916 to make an appointment.

Documents are also available:

- At the Timberland Regional Library's Aberdeen Branch, 121 Market Street, Aberdeen, WA.
- Online at <https://fortress.wa.gov/ecy/industrial/UIPermit/DraftPermits.aspx>

Submit written comments:

- Using the online comment form available at <http://wt.ecology.commentinput.com/?id=kF7UQ>
- By mail or fax to:

Ha Tran
Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Fax: (360) 407-6102

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

We 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 modify the permit. Response(s) to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

If you have questions, or need additional information, you may also call Ha Tran at (360) 407-6064.

Supplemental Fact Sheet for Cosmo Specialty Fibers Inc.
NPDES Permit No. WA0000809
March 1, 2018

RESPONSE TO COMMENTS

The public comment period on the modification of this permit took place December 19, 2017 – January 22, 2018

No comments were received.