

FACT SHEET FOR NPDES PERMIT WA-000109-1

FACILITY NAME GEORGIA PACIFIC WEST, BELLINGHAM

DATE OF THIS FACT SHEET – November 14, 2006

DATE OF EXPIRING PERMIT - April 1, 2006

Summary

SUMMARY

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INTRODUCTION

This proposed National Pollutant Discharge Elimination System (NPDES) permit is the renewal of an existing NPDES permit to Georgia-Pacific Bellingham.

The Federal Clean Water Act (FCWA, 1972, and later modifications, 1977, 1981, and 1987) established water quality goals for the navigable (surface) waters of the United States. One of the mechanisms for achieving the goals of the Clean Water Act is the National Pollutant Discharge Elimination System of permits (NPDES permits), which is administered by the Environmental Protection Agency (EPA). The EPA has delegated responsibility to administer the NPDES permit program to the State of Washington on the basis of Chapter 90.48 RCW which defines the Department of Ecology's authority and obligations in administering the wastewater discharge permit program.

The regulations adopted by the State include procedures for issuing permits (Chapter 173-220 WAC), water quality criteria for surface and ground waters (Chapters 173-201A and 200 WAC), and sediment management standards (Chapter 173-204 WAC). These regulations require that a permit be issued before discharge of wastewater to waters of the state is allowed. The regulations also establish the basis for effluent limitations and other requirements which are to be included in the permit. One of the requirements (WAC 173-220-060) for issuing a permit under the NPDES permit program is the preparation of a draft permit and an accompanying fact sheet. Public notice of the availability of the draft permit is required at least thirty days before the permit is issued (WAC 173-220-050). The fact sheet and draft permit are available for review (see Appendix A—Public Involvement of the fact sheet for more detail on the Public Notice procedures).

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in this review have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Comments and the resultant changes to the permit will be summarized in Appendix D—Response to Comments.

<u>GENERAL INFORMATION</u>	
Applicant	Georgia-Pacific West, Inc.
Facility Name and Address	300 West Laurel Street Bellingham, Washington 98227-1236
Type of Facility:	Paper (Tissue) Mill
SIC Code	2621
Discharge Location	Waterbody name: Bellingham Bay Latitude: 48°, 44', 05" N Longitude: 122°, 30', 55" W.

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

The Georgia-Pacific Corporation formerly operated a calcium based sulfite mill, a Chlor-alkali plant, and lignin's products plant at this location until the pulp mill and associated chemical plant was permanently closed on March 30, 2001. The operations at the adjoining tissue paper mill, converting facilities, and primary and secondary wastewater treatment systems were continued. This Fact Sheet is for the issuance of a permit renewal for the wastewater discharges from the tissue paper and converting operation.

INDUSTRIAL PROCESS

The current operation is a tissue manufacturing and converting operation consisting of two paper machines which were brought into service on the following dates: # 5 Paper machine – 1962, # 6 Paper Machine – 1964. The Permittee is currently producing 123 air dry tons per day of paper from purchased pulp. The purchased pulp fiber is manufactured into bath tissue and paper towel parent rolls that are then converted on-site into finished paper products.

The waste water treatment process consists of a primary clarifier followed by a twenty-nine acre aerated stabilization basin. The wastewater has an average flow of about 5.5 million gallons per day (MGD) consisting of the following:

- 2.0 MGD – Tissue mill – Receiving primary and secondary treatment
- 1.5 MGD – Warm Water By-pass – Receiving secondary treatment
- <0.1 MGD – Filter Plant Backwash – Receiving secondary treatment after neutralization
- 0.2 MGD (Average) – Stormwater – Receiving secondary treatment after neutralization
- 1.5 MGD – Cogeneration Plant – Receiving secondary treatment after neutralization
- <0.1 MGD (Average) – Stormwater Tissue Warehouse – Receiving secondary treatment
- <0.1 MGD – Woodwaste Landfill leachate – Receiving secondary treatment
- 0.6 MGD – Cooling Water – Receiving secondary treatment after neutralization

The mill currently receives cooling water from Puget Sound Energy's Encogen facility, a cogeneration facility adjacent to the Permittee regulated through a state waste discharge permit issued by the Department. In the future, Encogen may discharge their cooling water to the City of Bellingham sewer system. The Permittee also trucks in woodwaste leachate from the airport landfill. The mill discharges both its process wastewater and its landfill leachate directly to the primary clarifier and aerated stabilization basin for treatment. All stormwater from process areas, product storage areas and parking lots are diverted into the wastewater treatment system.

DISCHARGE OUTFALL

The treated mill wastewater is discharged continuously via a 60" diameter, 8000 foot long outfall pipe with a 500 port diffuser (Outfall 009). The diffuser section is 2000 feet long, and is located in Bellingham Bay at an average depth of 50 feet.

PERMIT STATUS

The previous permit for this facility was issued on April 1, 2001. That permit was amended on June 21, 2002, and on December 1, 2005. The permit expired on April 1, 2006, and is still in effect. The previous permit placed effluent limitations on:

OUTFALL 009 LIMITS

Parameter	Effluent Limitations		Monitoring
	Monthly Average	Daily Maximum	Requirements Frequency
Biochemical Oxygen Demand (5-day), lbs/day	3,200	5,836	Monday, Wednesday, and Friday
Total Suspended Solids, lbs/day	2,560	5,248	Monday, Wednesday, and Friday
pH	5.0 to 9.0		Continuous

An application for permit renewal was submitted to the Department on October 4, 2005, and a determination of completeness was made by the Department on December 21, 2005.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received a compliance inspection with sampling on April 19, 2006.

During the current permit, the Georgia-Pacific West has been in compliance based on Discharge Monitoring Reports (DMRs) submitted to the Department and inspections conducted by the Department.

During the history of the previous permit, the Permittee has demonstrated its compliance based on Discharge Monitoring Reports (DMR) submitted to the Department and inspections conducted by the Department.

WASTEWATER CHARACTERIZATION

The following data is based on the data collected on the final effluent from September, 2003 through August, 2005. The proposed wastewater discharge is characterized for the following regulated parameters:

Table 1: Wastewater Characterization

Parameter	Concentration	Mass
BOD (average)	3.4 ppm – (Max 6.7 ppm)	166 lbs/day – (Max 302 lbs/day)
TSS (average)	4.1 ppm – (Max 14 ppm)	203 lbs/day – (Max 794 lbs/day)

pH (Max/Min) 6.3/9.0
Flow (average) 5.9 MGD – Max 9 MGD

PROPOSED PERMIT LIMITATIONS

Federal and State regulations require that effluent limitations set forth in a NPDES permit must be either technology- or water quality-based. Technology-based limitations are based upon the treatment methods available to treat specific pollutants. Technology-based limitations are set by regulation or developed on a case-by-case basis (40 CFR 125.3, and Chapter 173-220 WAC). Water quality-based limitations are based upon compliance with the Surface Water Quality Standards (Chapter 173-201A WAC), Ground Water Standards (Chapter 173-200 WAC), Sediment Quality Standards (Chapter 173-204 WAC) or the National Toxics Rule (Federal Register, Volume 57, No. 246, Tuesday, December 22, 1992). The more stringent of these two limits must be chosen for each of the parameters of concern. Each of these types of limits is described in more detail below.

The limits in this permit are based in part on information received in the application. The effluent constituents in the application were evaluated on a technology- and water quality-basis. The limits necessary to meet the rules and regulations of the State of Washington were determined and included in this permit. Ecology does not develop effluent limits for all pollutants that may be reported on the application as present in the effluent. Some pollutants are not treatable at the concentrations reported, are not controllable at the source, are not listed in regulation, and do not have a reasonable potential to cause a water quality violation. Effluent limits are not always developed for pollutants that may be in the discharge but not reported as present in the application. In those circumstances the permit does not authorize discharge of the non-reported pollutants. Effluent discharge conditions may change from the conditions reported in the permit application. If significant changes occur in any constituent, as described in 40 CFR 122.42(a), the Permittee is required to notify the Department of Ecology. The Permittee may be in violation of the permit until the permit is modified to reflect additional discharge of pollutants.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

On April 15, 1998 EPA published revised effluent guidelines for the pulp and paper industry in the Federal Register (98 FR 18503). These guidelines, known as the “Cluster Rule,” replace the guidelines that were used to calculate the technology-based limitations in the mill’s 1991 permit. These requirements have remained the same and is listed as such in the July 1, 2005 40 Code of Federal Regulations (CFR) 430.120 Subpart L-Tissue, Filter, Non-Woven and Paperboard from Purchased Pulp Subcategory. EPA recently has reviewed the effluent guidelines for the pulp, paper, and paperboard category and recommended that “the record supports a decision” to not start an effluent guidelines rulemaking for the pulp, paper, and paperboard industry. Therefore, the effluent guidelines for the pulp and paper industry are considered current, and the State of Washington policy is that if the federal effluent regulations are less than 5 years old, these represent and satisfy Washington State “all known, available and reasonable methods of prevention, control and treatment” (AKART) requirements. These federal effluent guidelines can be found in 40 CFR Part 430.

The proposed effluent limitations are based on the maximum 24 month average production from September 2003 through August 2005, which was 123 air dry tons of tissue production. The pertinent regulatory basis to establish numeric effluent limitations for this mill process are found in 40 CFR 430.120 Subpart L- (Tissue, Filter, Non-Woven, and Paperboard from Purchased Pulp Subcategory), of the Code of Federal Regulations. The reference above establishes 11.4 pounds of BOD5 per 1,000 pounds of product for the maximum for any day and 6.25 pounds of BOD5 per 1,000 pounds of product for the average of daily values for 30 consecutive days. It also establishes 10.25 pounds of TSS per 1,000 pounds of product for the maximum for any day and 5 pounds of TSS per 1,000 pounds of product for the average of daily values for 30 consecutive days. The pH is required to be within a range of 5.0 to 9.0 at all times. For a daily production of 123 air dry tons per day the technology based limits for BOD and TSS will be:

Parameter	Daily Maximum	Monthly Average
BOD5	2,804	1,538
TSS	2,522	1,230
pH	>5.0 and <9.0	

COMPARISON OF EFFLUENT LIMITS WITH THE EXISTING PERMIT ISSUED June 21, 2002

	BOD (lbs/day)		TSS (lbs/day)	
	<u>MAX</u>	<u>AVE/month</u>	<u>MAX</u>	<u>AVE/month</u>
CURRENT LIMITS	5,836	3,200	5,248	2,560
PROPOSED LIMITS	2,804	1,538	2,522	1,230

SURFACE WATER QUALITY-BASED EFFLUENT LIMITATIONS

In order to protect existing water quality and preserve the designated beneficial uses of Washington’s surface waters, WAC 173-201A-060 states that waste discharge permits shall be conditioned such that the discharge will meet established Surface Water Quality Standards. The Washington State Surface Water Quality Standards (Chapter 173-201A WAC) is a state regulation designed to protect the beneficial uses of the surface waters of the state. Surface water quality-based effluent limitations may be based on an individual waste load allocation (WLA) or on a WLA developed during a basin wide total maximum daily loading study (TMDL).

NUMERICAL CRITERIA FOR THE PROTECTION OF AQUATIC LIFE

“Numerical” water quality criteria are numerical values set forth in the State of Washington’s Water Quality Standards for Surface Waters (Chapter 173-201A WAC). They specify the levels of pollutants allowed in a receiving water while remaining protective of aquatic life. Numerical criteria set forth in the Water Quality Standards are used along with chemical and physical data for the wastewater and receiving water to derive the effluent limits in the discharge permit.

When surface water quality-based limits are more stringent or potentially more stringent than technology-based limitations, they must be used in a permit.

NUMERICAL CRITERIA FOR THE PROTECTION OF HUMAN HEALTH

The U.S. EPA has promulgated 91 numeric water quality criteria for the protection of human health that are applicable to Washington State (EPA 1992). These criteria are designed to protect humans from cancer and other disease and are primarily applicable to fish and shellfish consumption and drinking water from surface waters.

NARRATIVE CRITERIA

In addition to numerical criteria, “narrative” water quality criteria (WAC 173-201A-030) limit toxic, radioactive, or deleterious material concentrations below those which have the potential to adversely affect characteristic water uses, cause acute or chronic toxicity to biota, impair aesthetic values, or adversely affect human health. Narrative criteria protect the specific beneficial uses of all fresh (WAC 173-201A-130) and marine (WAC 173-201A-140) waters in the State of Washington.

ANTIDegradation

The State of Washington’s Antidegradation Policy requires that discharges into a receiving water shall not further degrade the existing water quality of the water body. In cases where the natural conditions of a receiving water are of lower quality than the criteria assigned, the natural conditions shall constitute the water quality criteria. Similarly, when the natural conditions of a receiving water are of higher quality than the criteria assigned, the natural conditions shall constitute the water quality criteria. More information on the State Antidegradation Policy can be obtained by referring to WAC 173-201A-070.

CRITICAL CONDITIONS

Surface water quality-based limits are derived for the waterbody’s critical condition, which represents the receiving water and waste discharge condition with the highest potential for adverse impact on the aquatic biota, human health, and existing or characteristic water body uses.

MIXING ZONES

The State Water Quality Standards allow Ecology to authorize mixing zones for wastewater discharges that would otherwise exceed the water quality criteria for aquatic life or human health. Ecology can only authorize a mixing zone for those discharges which have been provided with the applicable technology-based treatment. Mixing zones are areas around treated wastewater discharges where the water quality standards may be exceeded but are small enough so as not to interfere with beneficial uses of the receiving water body. Ecology allows mixing zones because the concentrations and effects of most pollutants diminish rapidly after discharge, due to dilution. Ecology establishes mixing zones that limit the amount of time the discharge could potentially cause harm to water quality, plants, or fish. Ecology typically authorizes a standard sized mixing zone and protects water quality at the edges of the zone. All states have a mixing zone policy or regulation. Washington’s allowance is one of the most restrictive in the nation. Mixing zone conditions are described in Washington’s Water Quality Standards (Chapter 173-201A. WAC)

A mixing zone is a boundary in the receiving water around a point of discharge. The amount of mixing which occurs inside the zone is estimated through modeling to determine the potential for a violation of the water quality standards and to derive effluent limitations if necessary. Steady-state models are the most frequently used tools for conducting mixing zone analyses. Ecology chooses values for each effluent and receiving water variable that correspond to the time period when the most critical condition is likely to occur, (see Ecology's Permit Writer's Manual Page V1-26 and V11-12 & 13). Each critical condition parameter (by itself) has a low probability of occurrence and the resultant dilution factor is conservative. The term 'reasonable worst-case' is applied to these values.

The key products from a mixing zone analysis are the dilution factors or dilution ratios. Dilution ratios are unit-less. They are a measure of the amount of mixing of effluent and receiving water that occurs at the boundary of the mixing zone. Dilution ratios represent the available dilution in the mixing zone. For example, a dilution ratio of 10 means the effluent comprises 10% by volume and the receiving water 90%. Dilution ratios are used in conjunction with the water quality criteria for calculating reasonable potentials and effluent limits. There are aquatic life-based water quality criteria and human health-based water quality criteria. The former are applied at the acute and chronic mixing zone boundaries, the latter are applied at the chronic boundary. The methodology for conducting aquatic life-based analyses and human health-based analyses are similar.

Each aquatic life acute criteria is based on the assumption that organisms are not exposed to that concentration for more than one-hour not to be exceeded more than once in three years. Each aquatic life chronic criteria is based on the assumption that organisms are not exposed to that concentration for more than four days not to be exceeded more than once in three years.

There are two types of human health-based water quality criteria: those based on non-cancer effects (non-carcinogenic) and those based on cancer effects (carcinogenic). The human health-based water quality criteria incorporate several exposure and risk assumptions. These include: (1) a 70-year lifetime of daily exposures, (2) an ingestion rate for fish or shellfish in kg/day, (3) 2 liters/day ingestion rate for drinking water, and (4) a one-in-one million excess cancer risk for carcinogenic chemicals. In general, these exposure assumptions will provide a safe level of protection for most individuals.

The Water Quality Standards allow the Department of Ecology to authorize mixing zones around a point of discharge in establishing surface water quality-based effluent limits. Both "acute" and "chronic" mixing zones may be authorized for pollutants that can have a toxic effect on the aquatic environment near the point of discharge. The concentration of pollutants at the boundary of these mixing zones may not exceed the numerical criteria for that type of zone. Mixing zones can only be authorized for discharges that are receiving all known, available, and reasonable methods of prevention, control and treatment (AKART) and in accordance with other mixing zone requirements of WAC 173-201A-100.

The National Toxics Rule (EPA, 1992) allows the chronic mixing zone to be used to meet human health criteria.

A mixing zone study was conducted in February 1994, in accordance with WAC 173-201A-100. This study determined that the acute dilution ratio was 57 to 1 and the chronic dilution ratio was 140 to 1. With the closure of the pulping process and the large reduction in effluent flow Ecology requested that Georgia-Pacific West analyze the dilution based on the current conditions. An updated dilution analysis dated January 3, 2002 was received and evaluated and approved by Ecology. This study determined that the acute ratio is 89 to 1 and the chronic dilution ratio is 265 to 1.

DESCRIPTION OF THE RECEIVING WATER

The facility discharges to Bellingham Bay which is designated as a Class A receiving water in the vicinity of the outfall. Characteristic uses include the following:

fish migration; fish rearing, spawning and harvesting; wildlife habitat; primary contact recreation; sport fishing; boating and aesthetic enjoyment; commerce and navigation.

Water quality of this class shall meet or exceed the requirements for all or substantially all uses.

SURFACE WATER QUALITY CRITERIA

Applicable criteria are defined in Chapter 173-201A WAC for aquatic biota. In addition, U.S. EPA has promulgated human health criteria for toxic pollutants (EPA 1992). Criteria for this discharge are summarized below:

Fecal Coliform	14 organisms/100 mL maximum geometric mean
Dissolved Oxygen	6 mg/L minimum
Temperature	16 degrees Celsius maximum or incremental increases above background
pH	7.0 to 8.5 standard units
Turbidity	less than 5 NTU above background
Toxics	No toxics in toxic amounts

CONSIDERATION OF SURFACE WATER QUALITY-BASED LIMITS FOR NUMERIC CRITERIA

Pollutant concentrations in the proposed discharge exceed water quality criteria with technology-based controls which the Department has determined to be AKART. A mixing zone is authorized in accordance with the geometric configuration, flow restriction, and other restrictions for mixing zones in Chapter 173-201A WAC and are defined as follows:

With the closure of the pulping process at the mill there has been a significant decrease in the discharge flow (from \approx 50 MGD to \approx 10 MGD); therefore, Georgia-Pacific submitted revised dilution ratio study (dated December 12, 2001). The following dilution factors were determined as a result of this study:

	Acute	Chronic
Aquatic Life	89:1	265:1

The existing dilution ratios were used when evaluating the affect of this discharge on the receiving water but the facility was assigned the most recent dilution ratios as a conservative approach.

Pollutants in an effluent may affect the aquatic environment near the point of discharge (near field) or at a considerable distance from the point of discharge (far field). Toxic pollutants, for example, are near-field pollutants—their adverse effects diminish rapidly with mixing in the receiving water. Conversely, a pollutant such as BOD is a far-field pollutant whose adverse effect occurs away from the discharge even after dilution has occurred. Thus, the method of calculating surface water quality-based effluent limits varies with the point at which the pollutant has its maximum effect.

The derivation of surface water quality-based limits also takes into account the variability of the pollutant concentrations in both the effluent and the receiving water.

The impacts of dissolved oxygen deficiency, temperature, pH, and other toxics were determined as shown below, using the dilution factors described above.

BOD₅—This discharge with technology-based limitations results in a small amount of BOD loading relative to the large amount of dilution occurring in the receiving water at critical conditions. Technology-based limitations will be protective of dissolved oxygen criteria in the receiving water.

Temperature—The impact of the discharge on the temperature of the receiving water was modeled by mixing analysis at the critical condition by $T_f = (T_e + 140T_{rw})/141$. Where T_f is the final temperature at the edge of dilution due to the influence of the effluent, T_e is the effluent temperature, and T_{rw} is the temperature of the receiving water before mixing. The receiving water temperature at the critical condition is 16°C and the effluent temperature is 30°C. The predicted resultant temperature at the boundary of the chronic mixing zone is 16.1°C as such incremental rise is 0.1°C. There is no predicted violation of the water quality standard for temperature for surface waters.

Under critical conditions there is no predicted violation of the Water quality Standards for Surface Waters.

pH—Because of the high buffering capacity of marine water, compliance with the technology-based limits of 5 to 9 will assure compliance with the Water quality Standards for pH for Surface Waters.

Turbidity—The impact of turbidity was evaluated based on the range of turbidity in the effluent and turbidity of the receiving water. Due to the large degree of dilution, it was determined that the turbidity criteria would not be violated outside the designated mixing zone.

Toxic Pollutants—Federal regulations (40 CFR 122.44) require NPDES permits to contain effluent limits for toxic chemicals in an effluent whenever there is a reasonable potential for those chemicals to exceed the surface water quality criteria. This process occurs concurrently with the derivation of technology-based effluent limits. Facilities with technology-based effluent

limits defined in regulation are not exempted from meeting the Water Quality Standards for Surface Waters or from having surface water quality-based effluent limits.

The only toxic, with Water Quality or Human Health Standards that was determined to be present in measurable quantities was Zinc and that was at a concentration of 8 ppb.

Limited valid ambient background data was available. A determination of reasonable potential to exceed the standard resulted in no reasonable potential for zinc to exceed the standard.

A determination of reasonable potential using over 5 years of data resulted in no reasonable potential to exceed water quality standards. Technology based limits used in past and enforced at the chlorine production facility where mercury was used are no longer valid. The production of chlorine has permanently ceased, and the discharge of mercury has been apparently eliminated.

The sampling data for mercury has demonstrated that the discharge has not had mercury contamination. The last permit included steps for reducing monitoring for mercury based on the sampling results. Those steps were followed, and this proposed permit does not include a monitoring requirement for mercury at the final outfall.

WHOLE EFFLUENT TOXICITY

The Water Quality Standards for Surface Waters require that the effluent not cause toxic effects in the receiving waters. Many toxic pollutants cannot be detected by commonly available detection methods. However, toxicity can be measured directly by exposing living organisms to the wastewater in laboratory tests and measuring the response of the organisms. Toxicity tests measure the aggregate toxicity of the whole effluent, and therefore this approach is called whole effluent toxicity (WET) testing. Some WET tests measure acute toxicity and other WET tests measure chronic toxicity.

Acute toxicity tests measure mortality as the significant response to the toxicity of the effluent. Dischargers who monitor their wastewater with acute toxicity tests are providing an indication of the potential lethal effect of the effluent to organisms in the receiving environment.

Chronic toxicity tests measure various sublethal toxic responses such as retarded growth or reduced reproduction. Chronic toxicity tests often involve either a complete life cycle test of an organism with an extremely short life cycle or a partial life cycle test on a critical stage of one of a test organism's life cycles. Organism survival is also measured in some chronic toxicity tests. Accredited WET testing laboratories have the proper WET testing protocols, data requirements, and reporting format. Accredited laboratories are knowledgeable about WET testing and capable of calculating an NOEC, LC₅₀, EC₅₀, IC₂₅, etc. All accredited labs have been provided the most recent version of the Department of Ecology Publication # WQ-R-95-80, Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria which is referenced in the permit. Any Permittee interested in receiving a copy of this publication may call the Ecology Publications Distribution Center 360-407-7472 for a copy. Ecology recommends that Permittees send a copy of the acute or chronic toxicity section(s) of their permits to their laboratory of choice.

HUMAN HEALTH

Washington's water quality standards now include 91 numeric health-based criteria that must be considered in NPDES permits. These criteria were promulgated for the state by the U.S. EPA in its National Toxics Rule (Federal Register, Volume 57, No. 246, Tuesday, December 22, 1992). With the substantial decrease in flow and marked increase in the chronic dilution ratio it was determined that there are no human health effects because there is not a reasonable potential to exceed water quality criteria for the protections of human health.

SEDIMENT QUALITY

Georgia-Pacific has completed phase II of the sediment study requirement as required in the previous permit. The data has demonstrated the sediment around outfall 009 has been adequately characterized. Therefore, this permit does not include a requirement for a sediment sampling and analysis plan.

GROUND WATER QUALITY LIMITATIONS

The Department has promulgated Ground Water Quality Standards (Chapter 173-200 WAC) to protect beneficial uses of ground water. Permits issued by the Department shall be conditioned in such a manner so as not to allow violations of those standards (WAC 173-200-100). This permittee has no discharge to ground and therefore no limitations are required. The waste water treatment lagoon is bounded on three sides by Bellingham Bay and has no potential to affect ground water.

MONITORING REQUIREMENTS

The BOD and TSS monitoring frequency was reduced during the last permit period to Monday, Wednesday, and Friday because as noted in the original permit, monitoring frequency may be reduced after two years if Georgia-Pacific West remains in compliance with these limitations and meets the other criteria in the Ecology guidance for monitoring reduction for exemplary performance. The facility has greatly reduced the amount of BOD and TSS in their discharge since the closing of the pulp mill portion of the facility. As allowed in the guidance provided in the Department of Ecology's Water Quality Permit Writer's manual, the monitoring frequency was reduced effective December 1, 2005. The monitoring frequency will remain the same in the new permit.

Monitoring, recording, and reporting are required (WAC 173-220-210 and 40 CFR 122.41) to verify that the treatment process is functioning correctly and the effluent limitations are being achieved.

The monitoring schedule is detailed in the proposed permit under Condition S.2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and costs of monitoring.

LAB ACCREDITATION

With the exception of certain parameters the permit requires all monitoring data to be prepared by a laboratory registered or accredited under the provisions of Chapter 173-50 WAC, Accreditation of Environmental Laboratories.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3. are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-220-210).

NON-ROUTINE AND UNANTICIPATED DISCHARGES

Occasionally, this facility may generate wastewater which is not characterized in their permit application because it is not a routine discharge and was not anticipated at the time of application. These typically are waters used to pressure test storage tanks or fire water systems or leaks from drinking water systems. These are typically clean waste waters but may be contaminated with pollutants. The permit contains an authorization for non-routine and unanticipated discharges. The permit requires a characterization of these waste waters for pollutants and examination of the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and opportunities for reuse, Ecology may authorize a direct discharge via the process wastewater outfall or through a stormwater outfall for clean water, require the wastewater to be placed through the facilities wastewater treatment process or require the water to be reused.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop beset management plans to prevent this accidental release under section 402(a) (1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.\

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the solid waste plan designed to prevent solid waste from causing pollution of the waters of the state. The plan must be submitted to the local permitting agency for approval, if necessary, and to the Department.

OUTFALL EVALUATION

Proposed permit condition S11. requires the Permittee to conduct an outfall inspection and submit a report detailing the findings of that inspection. The purpose of the inspection is to determine the condition of the discharge pipe and diffusers and to evaluate the extent of sediment accumulation in the vicinity of the outfall.

TREATMENT SYSTEM OPERATING PLAN

In accordance with state and federal regulations, the Permittee is required to take all reasonable steps to properly operate and maintain the treatment system (40 CFR 122.41(e)) and WAC 173-220-150(1)(g). An operation and maintenance manual is to be submitted as required by state regulation for the construction of wastewater treatment facilities (WAC 173-240-150). It has been determined that the implementation of the procedures in the Treatment System Operating Plan is a reasonable measure to ensure compliance with the terms and limitations in the permit.

GENERAL CONDITIONS

General Conditions are based directly on state and federal law and regulations and have been standardized for all individual industrial NPDES permits issued by the Department.

PERMIT ISSUANCE PROCEDURES

PERMIT MODIFICATIONS

The Department may modify this permit to impose numerical limitations, if necessary, to meet Water Quality Standards for Surface Waters, Sediment Quality Standards, or Water Quality Standards for Ground Waters, based on new information obtained from sources such as inspections, effluent monitoring, outfall studies, and effluent mixing studies.

The Department may also modify this permit as a result of new or amended state or federal regulations.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics, protect human health, aquatic life, and the beneficial uses of waters of the State of Washington. The Department proposes that this proposed amended permit be issued for the remainder of the existing permit term.

REFERENCES FOR TEXT AND APPENDICES

Environmental Protection Agency (EPA)

1992. National Toxics Rule. Federal Register, V. 57, No. 246, Tuesday, December 22, 1992.

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Wright, R.M., and A.J. McDonnell.

1979. In-stream Deoxygenation Rate Prediction. Journal Environmental Engineering Division, ASCE. 105(E2). (Cited in EPA 1985 op.cit.)

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to issue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

The Department will publish a Public Notice of Draft (PNOD) on December 26, 2006 in the Bellingham Herald to inform the public that a draft amended permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, 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. Written comments should be mailed to:

Marc Crooks
Department of Ecology
Industrial Section
P.O. Box 47706
Olympia, WA 98504-7706

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interests of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department'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 the Department by telephone, 360-407-6934, or by writing to the address listed above.

APPENDIX B—GLOSSARY

Acute Toxicity—The lethal effect of a compound on an organism that occurs in a short period of time, usually 48 to 96 hours.

AKART—An acronym for “all known, available, and reasonable methods of treatment.”

Ambient Water Quality—The existing environmental condition of the water in a receiving water body.

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month’s time.

Best Management Practices (BMPs)—Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅—Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of a treatment facility.

Chlorine—Chlorine is used to disinfect wastewaters of pathogens harmful to human health. It is also extremely toxic to aquatic life.

Chronic Toxicity—The effect of a compound on an organism over a relatively long time, often 1/10 of an organism’s lifespan or more. Chronic toxicity can measure survival, reproduction or growth rates, or other parameters to measure the toxic effects of a compound or combination of compounds.

Clean Water Act (CWA)—The Federal Water Pollution Control Act enacted by Public Law 92-500, as amended by Public Laws 95-217, 95-576, 96-483, 97-117; USC 1251 et seq.

Compliance Inspection – Without Sampling—A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection – With Sampling—A site visit to accomplish the purpose of a Compliance Inspection – Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be “time-composite” (collected at constant time intervals) or “flow-proportional” (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring—Uninterrupted, unless otherwise noted in the permit.

Critical Condition—The time during which the combination of receiving water and waste discharge conditions have the highest potential for causing toxicity in the receiving water environment. This situation usually occurs when the flow within a water body is low, thus, its ability to dilute effluent is reduced.

Dilution Factor—A measure of the amount of mixing of effluent and receiving water that occurs at the boundary of the mixing zone. Expressed as the inverse of the percent effluent fraction e.g., a dilution factor of 10 means the effluent comprises 10% by volume and the receiving water 90%.

Engineering Report—A document which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Fecal Coliform Bacteria—Fecal Coliform bacteria are used as indicators of pathogenic bacteria in the effluent that are harmful to humans. Pathogenic bacteria in wastewater discharges are controlled by disinfecting the wastewater. The presence of high numbers of fecal coliform bacteria in a water body can indicate the recent release of untreated wastewater and/or the presence of animal feces.

Grab Sample—A single sample or measurement taken at a specific time or over a short period of time as is feasible.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Major Facility—A facility discharging to surface water with an EPA rating score of >80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)—The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Minor Facility—A facility discharging to surface water with an EPA rating score of <80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

Mixing Zone—An area that surrounds an effluent discharge within which water quality criteria may be exceeded. The area of the authorized mixing zone is specified in a facility's permit and follows procedures outlined in state regulations (Chapter 173-201A WAC).

National Pollutant Discharge Elimination System (NPDES)—The NPDES (Section 402 of the Clean Water Act) is the Federal wastewater permitting system for discharges to navigable waters of the United States. Many states, including the State of Washington, have been delegated the authority to issue these permits. NPDES permits issued by Washington State permit writers are joint NPDES/State permits issued under both State and Federal laws.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Quantitation Level (QL)—A calculated value five times the MDL (method detection level).

Responsible Corporate Officer—A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures (40 CFR 122.22).

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Suspended Solids (TSS)—Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Upset—An exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, lack of preventative maintenance, or careless or improper operation.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—RESPONSE TO COMMENTS

The Department of Ecology prepared a draft National Pollutant Discharge Elimination System (NPDES) Permit for the Georgia-Pacific West, Inc. tissue mill located in Bellingham, Washington. The draft permit was placed on thirty-day public notice on December 26, 2006. The public comment period ended on February 21, 2007. The only written comments received were from Georgia-Pacific West.

Comment:

Georgia-Pacific West Comments on NPDES Permit No. WA-000109-1 and Fact Sheet

PERMIT

We are surprised to see a draft permit for a relatively simple tissue making operation that is 42 pages long. After careful review, we find multiple instances throughout the permit where conditions are repetitive and could benefit from some consolidation. Specifically, these relate to operations plans, recording and reporting bypasses, and routine and non-routine discharges, and modification of treatment facilities or other planned changes to the facility.

REPORTING PLANNED CHANGES: Condition S1.F requires an engineering report prior to making changes in the treatment system. Condition G4 requires prior notice to the Department of “planned physical alternations or additions to the permitted facility, production increases, or process modification...” Condition G22 requires notification of the Department “when any activity has occurred or will occur which would result in the discharge ... of any toxic pollutant which not limited by this permit...” These conditions together limit the potential for changes occurring at the facility which have not previously been reported to the Department. At a minimum, we request Ecology delete S1.F. Engineering study requirements for treatment plant modifications are outlined in other Ecology guidance available to GP. Further, Ecology should consider consolidating G4 and G22 into one condition.

OPERATING PLANS: There are two operating plan requirements—one at S4.A and another at S15. Ecology should consolidate the conditions in these requirements into one condition.

BYPASS: S4.B contains language that is nearly identical conditions to G27. The bypass provision is a long-standing requirement in the Federal Water Pollution Control Act and does not need to be repeated outside of the boilerplate conditions. We suggest deleting S4.B.

NON-ROUTINE AND UNANTICIPATED DISCHARGES: GP takes issue with the multiple references to non-routine and unanticipated discharges (see S4.A, S6, S7, G4, G20, G22, G26).

Conditions G4, G20, and G22 are redundant. These need to be consolidated into one condition.

Condition S6.A is a new requirement in this permit. GP believes this is an unrealistic and unnecessary condition. First, Georgia-Pacific objects to obtaining prior approval on a case-by-

case basis (S6.A) for the discharge of non-routine wastewaters. We have attempted to identify all potential materials and wastes that could be discharged in the permit application, both generated from normal process operations and from intermittent or non-routine activities. Further, these materials are continuously documented through the facility's Spill plan (required under permit condition S7) and through the Local Emergency Planning Committee reporting requirements under EPCRA. Second, it is unrealistic for a manufacturing facility to collect and sample non-routine wastewaters, and then await sampling results and finally approval from the Department prior to discharging. This added step to collect and store non-routine wastewater merely adds to facility costs, increases safety risks to workers and contractors, and does nothing to protect water quality. Georgia-Pacific is already required to prepare a spill plan that will prevent, contain, and control spills of dangerous or hazardous wastes, and is subject to enforcement action if GP proceeds to discharge materials that are not covered by its NPDES permit or are not amenable to treatment through its primary and secondary treatment processes. Georgia-Pacific suggests that this issue, along with many of the other problems noted regarding redundant language above, is to provide a blanket allowance for non-routine discharges page 8. GP is recommending inserting after first paragraph at S1.B the following language:

“In addition to the normal wastewater discharge, this NPDES permit authorizes discharges associated with or resulting from essential maintenance, regularly scheduled maintenance, during startup and shutdown, spills and releases (whether anticipated or unanticipated) from anywhere in the permitted facility, as long as they are amenable to treatment, routed to the plant's wastewater treatment system and effluent limitations are met. In addition, discharges that are necessary to prevent loss of life, personal injury or severe property damage, as long as there are no feasible alternatives available, are also authorized by this permit, so long as effluent limitations are met.”

GP believes the above language, together with other conditions contained in the permit covering monitoring, treatment plant operation and maintenance, and spill control, are more than adequate to assure protection of receiving water quality and beneficial uses.

Ecology's response to comment:

The Industrial Section agrees with Georgia-Pacific West and has submitted your comments to Ecology's Water Program for consideration when revising the boiler plate language.

FACT SHEET

1. P. 2, last paragraph:

G-P uses that heated water in “~~cooking~~” wood and pulp to change it into manufacturing tissue paper. *[GP West does not “cook” wood and pulp as it no longer operates a pulping operation.]*

G-P discharges both its process wastewater and its landfill leachate directly to the primary clarifier and the aerated stabilization basin for treatment.

~~When the t~~Treated wastewater poses no risk of harm, Georgia-Pacific West can be discharged it to Bellingham Bay.

Ecology’s response to comment:

The Industrial Section agrees, and has changed the fact sheet.

2. P. 5, first paragraph:

Therefore, the effluent guidelines for the pulp and paper industry are considered current, and the State of Washington policy is that, if the federal effluent regulations are less than 5 years old, these represent and satisfy Washington State “all known, available and reasonable methods of prevention, control and treatment” (AKART) requirements. These federal effluent guidelines can be found in 40 CFR Part 430.

Ecology’s response to comment:

The Industrial Section agrees, and has changed the fact sheet.

3. P. 6, last paragraph:

Mixing zones are defined areas that surround treated wastewater discharges where pollution levels may exceed ~~go over the limits imposed by~~ water quality standards, but these areas are small enough so the mixing zone contents don’t interfere with beneficial uses of the receiving water body—including recreation (such as swimming, water skiing, or sailing), a source of drinking water, ~~does anyone drinks water from Bellingham Bay?~~ and including passive uses such as ~~maintaining fish habitat~~. *[Redundant. The specific beneficial uses for Bellingham Bay are identified on page 8.]*

Ecology’s response to comment:

The Industrial Section agrees, and has changed the fact sheet.

4. P. 8, 2nd full paragraph:

Eliminate “***” at the end of the 4th line (typo).

Under “surface water quality criteria” delete the words “measured?” and “dose?”.

Ecology's response to comment:

The Industrial Section agrees, and has changed the fact sheet.

5. P. 10, 4th paragraph:

The only toxic, with Water Quality or Human Health Standards, that was determined to be present in measurable quantities was Zinc and that was at a concentration of 8 ppb.

Ecology's response to comment:

The Industrial Section agrees, and has changed the fact sheet.

6. P. 10, 6th paragraph:

The sampling data for mercury has demonstrated that mercury is no longer present in the discharge ~~has not had mercury contamination~~.

Ecology's response to comment:

The Industrial Section disagrees. The mill site has known capped mercury contaminated soils. There is the possibility that during demolition of the former Georgia-Pacific pulp mill, some mercury contaminated soil could be exposed which might find its way into the wastewater treatment system. So the sampling data for mercury has really only shown that the discharge had not been contaminated with mercury. The fact sheet was not changed.

7. P. 11, Monitoring Requirements

GP West appreciates Ecology's efforts to reduce monitoring frequency for conventional pollutants from 7 days per week to 3 days per week. GP believes further reductions in monitoring frequency are achievable given the enormous amount of residence time available in the mill's secondary treatment ponds. Ecology has communicated to us that 3 sampling events per week is the minimum required for pulp and paper facilities in the State of Washington. We request Ecology reconsider its previous position and allow further reduction in monitoring for BOD and TSS to 1 day per week. GP would continue to continuously monitor flow and pH.

Ecology's response to comment:

The Industrial Section has been, and will continue to be, open to discuss any and all terms of a Permittee's permit. The Industrial Section looks forward to meeting with Georgia-Pacific to discuss monitoring frequency if Georgia-Pacific wishes to schedule a meeting.

8. P. 12, Non-Routine and Unanticipated Discharges

See comments on NPDES permit.

Language is proposed for a blanket allowance for non-routine discharges as may occur during startups and shutdowns, tank cleaning, de-scaling, and other maintenance-related discharges, as long as the discharge is routed to the wastewater treatment system and is amenable to treatment.

Georgia-Pacific believes upset and bypass conditions are captured adequately in the General Conditions, and don't need to be repeated in the reporting and recordkeeping conditions.

Ecology's response to comment:

The Industrial Section disagrees. With the closure and demolition of the pulp mill, there is a potential for non-routine discharges. These potential discharges need to be analyzed prior to discharge to confirm that adequate treatment of the wastewater occurs prior to discharge. The fact sheet was not changed.