

April 10, 2008

Stormwater Permitting Unit  
Division of Water Quality  
1617 Mail Service Center  
Raleigh, NC 27699-1617  
Attn: Sarah Young

Re: General Permit for Stormwater Discharge from  
Timber Product Facilities (NCG000021)

Dear Ms. Young:

The NC Forestry Association (NCFA) appreciates the opportunity to comment on the proposed renewal of the general stormwater discharge permit for timber products (NCG000021). The NCFA is the state's oldest forest conservation organization representing some 4,000 private landowners, forest managers, wood suppliers, and manufacturers of wood and paper products. The forest products industry is North Carolina's largest manufacturing industry accounting for a total annual economic impact of over 272,000 jobs and more than \$30 billion.

#### Analytical Monitoring

While much of the proposed permit is similar to the previous one approved in 2003, there is one substantial change – a new requirement for semi-annual analytical monitoring. We are **strongly opposed** to this new requirement. We believe the Department's decision to include this is based on very limited information and incorrect assumptions about the operation of typical forest product operations. In addition, this will put a new and costly burden on manufacturers at a time where the entire industry is struggling to survive.

The proposed permit information sheet states that this new requirement is based on staff field inspections that "...identified a pattern of problems at facilities in this category, particularly at sites with large sawdust piles and/or mulch sites." The footnote references 3 particular sites – Scott Sawmill, Mulch Masters and Carolina Bark. Certainly 2 of these facilities – Mulch Masters and Carolina Bark – are not typical sawmill or primary forest product manufacturing facilities. Further, it is extremely unlikely that any sawmill or primary product manufacturer has large sawdust or bark piles sitting around. Both are valuable commodities that are collected and sold. I've attached a recent article on sawdust that illustrates this fact. Bark is typically collected and sold/moved to another location or another facility or company such as Mulch Masters or Carolina Bark. No primary manufacturer can afford to let this material collect and lay around for long. Consequently, we do not believe the Department's rationale for this new requirement is valid nor is it appropriate to apply it to the entire timber products sector.

This requirement will impose significant new costs on manufacturers at a time when the entire forest products industry is struggling. Attached is a recent article that highlights the tough economic conditions faced by the US forest products industry. Given the general lack of justification for this new requirement, we believe it is unreasonable to impose such new costs.

#### Recommendation

DWQ should use its existing authority and deal with facilities, such as mulch operations, separately and individually rather than imposing new costly requirements on the entire timber products sector. The permit could require a certification by a facility that it did not have exposed piles of sawdust, bark, etc. in order to be exempt from the analytical monitoring provisions. Alternatively, we believe the permit could be written to

include specific requirements and/or best management practices (BMP's) that must be followed IF the facility has exposed piles of sawdust or bark/mulch. This would be much like the existing requirements for vehicle maintenance operations. This would be far more targeted and cost-effective approach.

For facilities that do not have exposed piles of sawdust, bark and mulch, we recommend retaining the visual monitoring requirements currently in NCG000021. Analytical monitoring should only be required for sites that have vehicle maintenance operations as identified in the current permit.

#### Other Permit Changes

1. Requirement to identify if receiving waters are on the state's 303(d) list of impaired waters. Comment: None
2. Revised response action commitment based on qualitative monitoring. If a permittee identifies that BMP's are ineffective or there is evidence of stormwater contamination problems, the permittee must document the potential causes and correction action. Comment: None
3. The Stormwater Pollution Prevention Plan (SPPP) shall be reviewed and updated on an annual basis. Comment: None
4. Self-inspections of the facility and all stormwater systems shall occur at a minimum on a semi-annual schedule. Comment: None
5. Sample collection and qualitative monitoring shall be performed at all stormwater discharge outfall locations. Comment: Qualify "sample collection" to state that this is only if required due to special circumstances.
6. Removal of the provision that if a detention pond discharged only in response to a storm event exceeding a ten-year design storm, no analytical monitoring was required. Comment: This provision should be retained.

We appreciate the opportunity. Please let me know if you have any questions.

Sincerely,

Robert W. Slocum, Jr.  
Executive Vice President