

Response to Comments on the Draft Permit Reissuance for Warm Springs Forest Products and Warm Springs Biomass

NPDES Permit Number OR0024058

September 2008

Background

On August 24, 2007, EPA issued a draft permit for this facility for public comment. As stated in the revised fact sheet, during the public comment period, EPA determined that the Tribe's temperature criteria had not been properly applied in developing the draft permit. EPA has corrected the errors made in the original draft permit. On May 20, 2008, EPA reopened the public comment period for this permit to accept comments on the changes resulting from the corrected application of the temperature water quality standards. EPA received comments on the draft permits.

Comment #1

The commenter stated that neither the draft permit nor the fact sheet indicate what type of manufacturing facility this is, and asked if the facility is a sawmill or a plywood or particleboard plant.

Response #1

This facility is a sawmill. While this fact is not directly stated in either the 2007 or 2008 fact sheets, both fact sheets explain that technology-based effluent limits for sawmills and planing mills (40 CFR 429, subpart K) are applicable to the facility.

Comment #2

The commenter stated that the presence of a steam boiler on site indicates that the facility has lumber drying kilns, and asked if there were, in fact, lumber drying kilns at the facility.

Response #2

There are seven steam-heated lumber drying kilns on the WSFPI mill site.

Comment #3

The commenter asked if process wastewater is generated from the lumber drying kilns, and, if so, what is the disposition of that wastewater.

Response #3

The steam heating coils in the dry kilns are a closed-loop system that returns the steam condensate back to the boiler. The moisture that is evaporated from the lumber inside of

the dry kilns is discharged through roof vents to the atmosphere. There is no wastewater generated from the lumber drying process.

Comment #4

The commenter asked if the pond ahead of outfall 003 is treated with calcium hypochlorite, why wouldn't any discharge be considered process wastewater?

Response #4

The fact that the fire protection pond (outfall 003) may contain hypochlorite does not mean that it is process wastewater. Addition of hypochlorite does not change the fact that the water did not come into contact with any raw material, intermediates, by products or waste products during manufacturing (40 CFR 122.2) nor does it change the exclusion of fire control water from the definition of process wastewater in 40 CFR 429.11(c).

Revisions to the Draft Permit

The final permit includes two minor changes relative to the most recent draft permit. A typographical error was corrected in Table 1 of the permit, and minor changes were made to the surface water monitoring requirements (*See* permit at page 7). Specifically, the reference to flow rate was deleted, because the permit does not require monitoring for receiving water flow rate, and the permit now requires that the surface water monitoring report include effluent data for temperature and flow rate coincident with the dates of surface water sample collection.