

November 14, 2018

To: Washington Department of Ecology

From: Western Wood Preservers Institute

Re: Comments on Stormwater Management Manual for Western Washington

Western Wood Preservers Institute (WWPI) is a non-profit trade association founded in 1947 to serve the interests of the preserved wood industry in western North America. WWPI works with federal, state and local agencies, as well as designers, contractors and users over the entire preserved wood life cycle, ensuring that preserved wood is used in a safe, responsible and environmentally friendly manner.

We appreciate the opportunity to comment on the Stormwater Management Manual for Western Washington. We apologize that we were not able to format our comments in an Excel file. Please contact us should you have any questions.

Page 677 Pollutant Control Approach Line 4:

“Individual covering wood treatment areas...” We suggest removing the word *areas* and replacing it with facilities. Areas is too vague.

Page 678 first bulleted paragraph beginning “Relocate the wood...”:

We suggest beginning the sentence with “*If incidental drip page is discovered in the storage yard*, relocate the wood...”

In the same sentence, the word *clean* should be stricken as it is not defined and not relevant to protecting stormwater. The words *surface dry* should also be deleted, since current regulation only requires that wood be drip free.

Page 678 Applicable Structural Source Control BMPs bullet 1:

We suggest deleting the word *all* and *areas*, and inserting the words *equipment and drip pad*. “...the wood treatment equipment and drip pad.”

Bullet 2:

Delete sentences 2 and 3. Alternatively, insert the sentence:

Waterborne facilities do not generate process water or waste water.

Delete bullet 3 that begins with “Seal any holes or cracks...”

Remove this sentence as this would not be practicable or nearly impossible task at some facilities.

Bullet 4 beginning with “Elevate stored...”:

Insert “*Where feasible*” at the beginning of the sentence so that it reads “Where feasible, elevate stored...”

The final item under Applicable Structural Source Control BMPs, bullet 6 should be modified in the following ways:

Strike the first sentence and replace it with the following sentence. *Freshly treated lumber from dip tanks or retorts must be placed on a containment area until drippage has ceased prior to placement in outside storage areas.*

Remove second sentence as this is not relevant to all treated material. Delete the words *surface dry* at the end of the paragraph.

Page 713 Wood Treatment

The first sentence in the paragraph discusses wood moisture content and drying. This statement is not correct and should be removed as some wood should not be conditioned prior to treatment and some wood does not need conditioning.

Sentence 8 in the same paragraph appears to confuse oil type and waterborne preservatives. We suggest after copper naphthenate adding “, which are oil type preservatives...”

Page 674 Bullet 16:

We suggest the following revision: "Store new creosote-treated railroad ties located within an area of permitted industrial activity in locations that reduce the potential to impact stormwater runoff." ~~railroad freight cars, in a building, or on an impervious surface covered by a tarp.~~"