

Boise Cascade Wood Products, LLC

S3.B Operational source control bmp's: "Storm proof" lids will be required for dumpsters. Storm proof (worst case) could be interpreted to mean one solid lid without a seam down the middle to prevent any and all water from dripping inside and the lid latched down to prevent it from blowing up in a big wind event. Most standard dumpsters serviced by a commercial garbage truck are two piece plastic lids with the seam down the middle. 99% of water is kept out but a little can infiltrate the seam and they don't have any sort of latch. Costs to upgrade all dumpsters to storm proof will be significant. At a minimum Ecology needs to define storm proof in the permit, but ideally the term storm proof should be removed or changed. Maybe "storm resistant".

S4.B.7: If a facility can qualify for reduced sampling (once/year), the annual sample must be collected during 4th quarter. This doesn't address facilities that only discharge in the late winter/spring. Some facilities have containment/settling ponds/swales that fill throughout the winter and only discharge in 1st and/or 2nd quarters. As drafted, these facilities will not be able to take advantage of reduced sampling because they don't discharge in the 4th quarter.