

Boise Cascade Wood Products, LLC

Boise Cascade Wood Products, LLC owns and operates three wood products facilities in Washington State. These facilities convert logs into plywood, lumber, and a variety of wood based byproducts. These byproducts include bark for fuel and/or landscaping, wood chips for paper manufacturing, sawdust, shavings, and plytrim for particle board manufacturing, and log yard sort material.

We have concerns about the application of Section 320 Piles Used for Storage for our operations. Specifically the Wood Waste and Wood Derived Fuel requirements in Table 320-A. We interpret that a pile of log yard sort material prior to conversion into individual hog fuel, rock, mulch, or manufactured soil piles is subject to the piles section. It may not always be possible to use or dispose of 50% of the wood waste generated during a calendar year plus what was stockpiled and remain under the 2000 cubic yard permit threshold.

While we recognize the Department's concern about accumulation of waste materials, we do not believe piles of log sort materials that are routinely sorted, and not allowed to accumulate over long periods of time, should be subject to a solid waste permit. We believe the Department should develop quantity or accumulation rules for log yard sort material piles similar to those developed for the asphalt and concrete piles.

Opinions vary on how much material should be stockpiled and required to be removed or used from a facility and how often and we are willing to work with the Department to create a reasonable accumulation rule specific to wood waste at wood products facilities. But more importantly, what are the environmental concerns with a stock pile of log yard sort materials waiting to be processed that suggests a solid waste permit is needed? As the department noted during the March 9, 2018 webinar Q&A session, the concern is surface water runoff. Water quality impacts including surface water runoff at our facilities are already managed under a site specific State Waste Discharge Permit, a site specific NPDES Waste Water Discharge Permit, and/or an Industrial Stormwater General Permit. These permits address water quality concerns from these piles and prevent development of a clean-up site. An additional solid waste permit at these facilities will not provide additional water quality protection. We propose it is reasonable to apply the similar exemption requirement of "no upper volume limit" being set for asphalt and concrete piles to wood waste piles at facilities with existing water quality permits.