



Submitted to: [Triennial Review of Washington Surface Water Quality Standards, Chapter 173-201A WAC.](#)

September 16, 2021

Marla Koberstein
Department of Ecology, Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

RE: Comments on *Department of Ecology's 2021 Triennial Review of Surface Water Quality Standards, Draft Work Plan to Update the Water Quality Standards for 2022-2024, July 2021*

Ms. Koberstein,

Thank you for the opportunity for the Northwest Pulp & Paper Association (NWPPA) to provide comments on Washington Department of Ecology's *2021 Triennial Review of Surface Water Quality Standards, Draft Work Plan to Update the Water Quality Standards for 2022-2024, July 2021*. We appreciate the ability to participate in the public hearing on September 9, 2021.

Background

NWPPA is a 65-year-old regional trade association representing 10-member companies and 14 pulp and paper mills and various forest product manufacturing facilities in Washington, Oregon and Idaho. Our members hold various water permits issued by DEQ including individual and general NPDES permits and stormwater permits.

NWPPA staff are long-standing-stakeholder participants in numerous Department of Ecology processes including: stakeholder groups establishing regulatory programs, providing comments on administrative rules and agency work items like Triennial Review.

Overarching comments

Washington's pulp and paper sector has been recognized as an essential business by state and federal governments. Without fail, our Washington mills' essential workers have been making the vital paper products we all use every day to help fight against COVID-19. Our essential

paper products are used by Washington consumers as well as being distributed within the Western US and abroad.

NWPPA has been a consistent advocate for Washington Department of Ecology developing and implementing achievable Washington water quality standards that allow facility compliance while being protective of Washington's beneficial uses. NWPPA believes that a measured, rational, science-based approach to standards development results in achievable water standards that are protective – while fulfilling the environmental goal of continuous improvement and avoiding unintended environmental and economic consequences.

Specific comments

- NWPPA comments that the Department of Ecology has correctly identified the draft project list for water quality program triennial review consideration in years 2022-2024¹.
- NWPPA comments that Department of Ecology has correctly prioritized completion of the rulemaking to adopt updates to freshwater criteria for dissolved oxygen and fine sediment.
- NWPPA comments that Department of Ecology has correctly prioritized the project to update aquatic life criteria for toxics.
 - NWPPA comments that “Option 4: Review and update all necessary criteria in one rulemaking” is the appropriate approach to conduct the rulemaking to update aquatic life criteria for toxics.
- NWPPA comments that Department of Ecology has correctly prioritized projects to respond to requests for rule related actions.
- NWPPA comments that the Department of Ecology has correctly prioritized short-term priorities and that long-term priorities should include any new projects arising in the next several years.
- NWPPA agrees with and supports the Department of Ecology's statement/approach on prioritizing updates to water quality standards:

For example, we may find that we can complete four moderate-value projects in the same time as one large-value project, and thus have greater overall benefits. This approach also allows us to consider the costs and benefits of an action and select the least costly course of action.²
- NWPPA comments that completion of these priority projects in 2022-2024 will be very challenging for the Department. Therefore, Department of Ecology should fully concentrate their resources and staff time on NWPPA's suggested priority projects before considering any other new projects.

¹ [Draft Work Plan to Update the Water Quality Standards for 2022-2024, July 2021](#), starting on p. 4.

² [Dept. of Ecology 2021 Triennial Review website](#). Downloaded Sept. 16, 2021.

Thank you for the opportunity to participate in and comment on *2021 Triennial Review of Surface Water Quality Standards, Department of Ecology's Draft Work Plan to Update the Water Quality Standards for 2022-2024, July 2021*. I would be happy to answer any questions.

Sincerely,

A handwritten signature in blue ink that reads "Kathryn VanNatta". The signature is written in a cursive, flowing style.

Kathryn VanNatta
Director of Regulatory Affairs
Northwest Pulp & Paper Association