SUPPLEMENTAL FACT SHEET FOR NPDES PERMIT WA0991016

North Pacific Paper Company, LLC

Date of Public Notice: March 27, 2024

Permit Modification Effective Date: xx/xx/xxxx

Purpose of this supplemental fact sheet

This supplemental fact sheet explains and documents the decisions the Department of Ecology (Ecology) made in drafting the proposed National Pollutant Discharge Elimination System (NPDES) permit modification for North Pacific Paper Company, LLC (NORPAC).

This supplemental fact sheet complies with Section 173-220-060 of the Washington Administrative Code (WAC), which requires Ecology to prepare an accompanying fact sheet for public evaluation before issuing an NPDES permit.

Ecology makes the draft permit modification and supplemental fact sheet available for public review and comment at least thirty (30) days before issuing the final permit modification. Copies of the supplemental fact sheet and draft permit modification for NORPAC, NPDES permit WA0991016, are available for public review and comment from March 27 through May 1, 2024. For more details on preparing and filing comments about these documents, please see Appendix A - Public Involvement Information.

NORPAC reviewed the draft permit modification and supplemental fact sheet for factual accuracy. Ecology corrected any errors or omissions regarding the facility's location, history, discharges, or receiving water prior to publishing this draft supplemental fact sheet for public notice.

After the public comment period closes, Ecology will summarize substantive comments and provide responses to them. Ecology will include the summary and responses to comments in this supplemental fact sheet as Appendix D - Response to Comments and publish it when issuing the final NPDES permit modification. Ecology generally will not revise the rest of the supplemental fact sheet. The full document will become part of the legal history contained in the facility's permit file.

Summary

NORPAC is located within a larger 700+ acre industrial complex that includes various industries, including a Kraft pulp and paper mill, dimensional lumber mill, log sorting and export yard, various inorganic chemical manufacturers and handlers, and transportation maintenance facilities. Historically NORPAC's operations were owned and operated as a 50/50 joint venture between Weyerhaeuser NR Company (Weyerhaeuser) and Nippon Paper Industries (NPI). In 2016, Weyerhaeuser and NPI sold their portions of NORPAC to One Rock Capital Partners. The facility continued to operate under the

name North Pacific Paper Company LLC (NORPAC) and generally continued to operate the facility as it historically operated with respect to stormwater generation, management, and discharge. Due to the change in ownership at NORPAC, Ecology issued an individual NPDES Permit, No. WA0991016, to NORPAC on July 17, 2019 with an effective date of August 1, 2019. NPDES Permit No. WA0991016 authorizes discharges of wastewater to Nippon Dynawave Packaging Company, LLC's (NDP's) Wastewater Treatment Plants (WWTPs) and stormwater to Weyerhaeuser's stormwater conveyance and treatment systems.

On August 16, 2019, Weyerhaeuser appealed NPDES Permit No. WA0991016 to the Pollution Control Hearings Board (PCHB), Case No. 19-055c. Weyerhaeuser also appealed their own NPDES Permit (No. WA0991014) and NDP's permit modification to NPDES Permit No. WA0000124. On September 28, 2023, the PCHB issued their decision with respect to Case No. 19-055c. In that decision, the PCHB remanded NORPAC's NPDES Permit, No. WA0991016, to Ecology for modification to correct errors.

This draft permit modification corrects the errors to NPDES Permit No. WA0991016 the PCHB identified in their September 28, 2023 decision. Ecology proposes to add additional stormwater outfalls to NPDES Permit No. WA0991016 for three stormwater pipes that discharge to Weyerhaeuser's stormwater system. Ecology also proposes to modify the current outfall location for Outfall 002A (East Ditch) to a location closer to the boundary between NORPAC's and Weyerhaeuser's properties (Pipe B, Outfall 004A).

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I. Background

I.A. Site history and background

1. Operations

North Pacific Paper Company LLC (NORPAC) operates a thermo-mechanical pulping (TMP), secondary fiber deinking and non-deinking pulping, and newsprint, fine paper, and packaging paper mill in Longview, Washington along the northern shore of the Columbia River. NORPAC is co-located within a larger 700+ acre industrial complex, which also includes a Kraft pulp and paper mill, a dimensional lumber mill, a log sorting and export yard, various inorganic chemical manufacturers and handlers, and transportation maintenance facilities (truck and locomotives).

Operations began at the NORPAC facility in 1979 with a TMP mill and newsprint paper machine. NORPAC completed additional projects in 1981 and 1991 to increase capacity and recycling capabilities. NORPAC constructed a new recovered fiber drum pulper in 2021-2022 and began operating the new pulper in 2022. In November 2016, One Rock Capital Partners LLC purchased NORPAC.

Prior to 2016, Weyerhaeuser NR Company (Weyerhaeuser) and Nippon Paper Industries (NPI) operated NORPAC as a 50/50 joint venture. Weyerhaeuser also owned and operated many of the operations at the site, including the Kraft pulp and paper mill, as well as the dimensional lumber mill, log sorting and export yard, and truck maintenance facility. In August 2016, Weyerhaeuser sold the Kraft pulp and paper mill including various support services to NPI. NPI now owns and operates the Kraft pulp and paper mill under the name Nippon Dynawave Packaging Company, LLC (NDP). NDP also owns and operates the industrial and sanitary wastewater treatment plants (WWTPs) at the site, which receives and treats wastewaters from the various operations throughout the industrial complex.

Ecology historically permitted the various discharges associated with the Kraft pulp mill, TMP and recycled fiber mill (NORPAC), and lumber and log operations under a single National Pollutant Discharge Elimination System (NPDES) Permit, No. WA0000124. Following the change in ownership of the various facilities in 2016, NORPAC and Weyerhaeuser submitted individual NPDES permit and State Waste Discharge (SWD) permit applications for their various discharges. NDP and Weyerhaeuser also submitted a transfer of ownership notification to transfer NPDES Permit No. WA0000124 from Weyerhaeuser to NDP.

Ecology issued individual NPDES permits to NORPAC (WA0991016) and Weyerhaeuser (WA0991014) on July 17, 2019 with an effective date of August 1, 2019. Ecology also modified NPDES permit No. WA0000124 to change the permittee name to Nippon Dynawave Packaging Company, LLC, remove the various discharges now belonging to NORPAC or Weyerhaeuser, and

incorporate various other revisions to address the change in ownership at the site. Ecology issued this permit modification to NDP on July 17, 2019.

On August 16, 2019, Weyerhaeuser appealed their own NPDES Permit (No. WA0991014), as well as NORPAC's NPDES Permit (No. WA0991016), and NDP's modified NPDES Permit (No. WA0000124) to the Pollution Control Hearings Board (PCHB).

2. Stormwater discharges

Following the changes in ownership at the site, Weyerhaeuser continued to own and operate the two largest stormwater collection, conveyance, and treatment systems at the site. The majority of the stormwater at the industrial complex either flows to one of Weyerhaeuser's two stormwater systems or enters NDP's industrial WWTP for treatment. There are several smaller stormwater collection, conveyance, and treatment systems located throughout the site owned and operated by various parties.

NORPAC discharges stormwater from non-process areas to Weyerhaeuser's stormwater system through five different piping networks: Pipe A, Pipe B, Pipe D, Pipe J, and Pipe N. All five pipes ultimately flow to Weyerhaeuser's Northern Drainage Ditch which discharges to Consolidated Diking District Number 1's (CDID) Ditch #3 via Weyerhaeuser's Outfall 004B. All five piping networks ultimately receive stormwater runoff from at least one other neighboring facility prior to entering Weyerhaeuser's Northern Drainage Ditch (i.e., Weyerhaeuser, NDP, or Columbia and Cowlitz Railway).

At the time of drafting NORPAC's NPDES Permit, No. WA0991016, Ecology based NORPAC's stormwater requirements on the information provided in NORPAC's permit application and Weyerhaeuser's final *AKART Analysis Report* (AKART Report), dated May 18, 2016, for the stormwater discharges from the historic Outfalls 003 and 004 (now Weyerhaeuser's Outfalls 003B and 004B). NORPAC's NPDES Permit, No. WA0991016, issued July 17, 2019, identified two stormwater outfalls with monitoring, benchmarks, and corrective action requirements: Outfall 002A (East Ditch) and Outfall 003A (West Ditch or 'Loci' Ditch). NORPAC's Outfall 002A captures a portion of NORPAC's drainage that enters the Pipe B drainage network. NORPAC's Outfall 003A captures a portion of NORPAC's drainage that enters the Pipe N drainage network. Ecology permitted NORPAC's remaining discharges to Weyerhaeuser's stormwater system (Pipe A, Pipe D, Pipe J, and portions of the Pipe B and Pipe N drainages) under Special Condition S1.C.

3. Compliance and enforcement history

NORPAC has exceeded the applicable benchmark values at Outfall 002A 44 times and at Outfall 003A 57 times since NPDES Permit No. WA0991016 became effective on August 1, 2019, as summarized in Table 9 and Table 10 in Appendix C.

In addition to the 101 benchmark exceedances at NORPAC since August 1, 2019, NORPAC has also violated numerous permit requirements related to their stormwater discharges at least 92 times since the permit effective date. Table 11 in Appendix C summarizes these various permit violations.

Ecology has completed technical assistance with NORPAC, as well as issuing various enforcement actions in response to the stormwater issues at the site, including:

- Technical assistance
    - April 29, 2019 stormwater site visit at NORPAC and Weyerhaeuser before issuing NPDES Permit Nos. WA0991016, WA0991014, and WA0000124 (modification).
    - September 23, 2020 inspection, report issued January 26, 2021
    - December 2, 2021 inspection, report issued April 29, 2022
    - September 8, 2022 inspection, issued December 6, 2022
    - March 22 and April 10, 2023 inspections, report issued July 7, 2023
    - SWPPP & O&M manual review letters dated April 1, 2020, April 2, 2020, and March 8, 2021.
    - Numerous phone calls and emails between 2017 and 2023 related to stormwater issues at the site.
- Enforcement actions
    - January 16, 2020 warning letter regarding ongoing stormwater benchmark exceedances and Level 2 Corrective Action requirements for Outfall 003A.
    - January 24, 2020 NOV, Docket No. 17979, related to process and stormwater violations, including sampling frequency violations at Outfalls 002A and 003A and an unauthorized discharge to the stormwater system.
    - Joint administrative order, Docket No. 18227, issued August 7, 2020 to NORPAC, Weyerhaeuser and NDP, discussed in more detail in the following section.
    - April 12, 2021 NOV, Docket No. 19797, related to process wastewater and stormwater violations, including reporting violations at all outfalls, monitoring frequency violations at all outfalls, and a discharge violation at Outfall 002A.

- July 8, 2021 NOV, Docket No. 20075, related to violations of the corrective action requirements following numerous stormwater benchmark exceedances.
- February 14, 2022 NOP, Docket No. 20905, related to process wastewater and stormwater violations, including 17 stormwater corrective action violations, monitoring violations at Outfalls 002A and 003A, and violations of Joint Administrative Order Docket No. 18227.

4. Administrative Order No. 18227

On August 7, 2020, Ecology issued an administrative order, Docket No. 18227, jointly to NORPAC, Weyerhaeuser, and NDP (Joint Administrative Order). Ecology issued the Joint Administrative Order to the three parties based on various violations at all three facilities and ongoing compliance issues related to stormwater management at the industrial complex. The Joint Administrative Order required all three facilities to complete various actions, including a Stormwater System Evaluation and Stormwater Characterization Study, and also required each facility to submit an updated NPDES permit application based on the information gained from these actions.

Condition 1 of the Joint Administrative Order required the three parties to submit a Stormwater System Evaluation and Stormwater Characterization Study Sampling Plan to Ecology for review and approval by November 1, 2020. NORPAC submitted their Stormwater System Evaluation and Stormwater Characterization Study Plan via the WQWebPortal on October 29, 2020. Ecology issued a Conditional Approval letter for NORPAC's Stormwater Characterization Study Sampling Plan on December 3, 2020. NORPAC proposed, and Ecology approved, sampling at six locations in addition to the existing Outfalls 002A and 003A (ONP Warehouse, Pipe B, Pipe D, Pipe A, Pipe J, and Pipe N). Two of the proposed sampling locations (Pipe A and Pipe N) were located on neighboring facility's properties and included commingled stormwater from multiple facilities. Additionally, two of the proposed locations were located downstream of NORPAC's existing Outfalls 002A and 003A (Pipe B and Pipe N). Figure 1 shows the locations of NORPAC's eight sampling locations, including Outfalls 002A and 003A, for the Stormwater Characterization Study. Figure 2 through Figure 5 in Section II.A of this Supplemental Fact Sheet provide additional information on the five drainage basins located throughout NORPAC's property (Pipe A, Pipe B, Pipe D, Pipe J, and Pipe N).

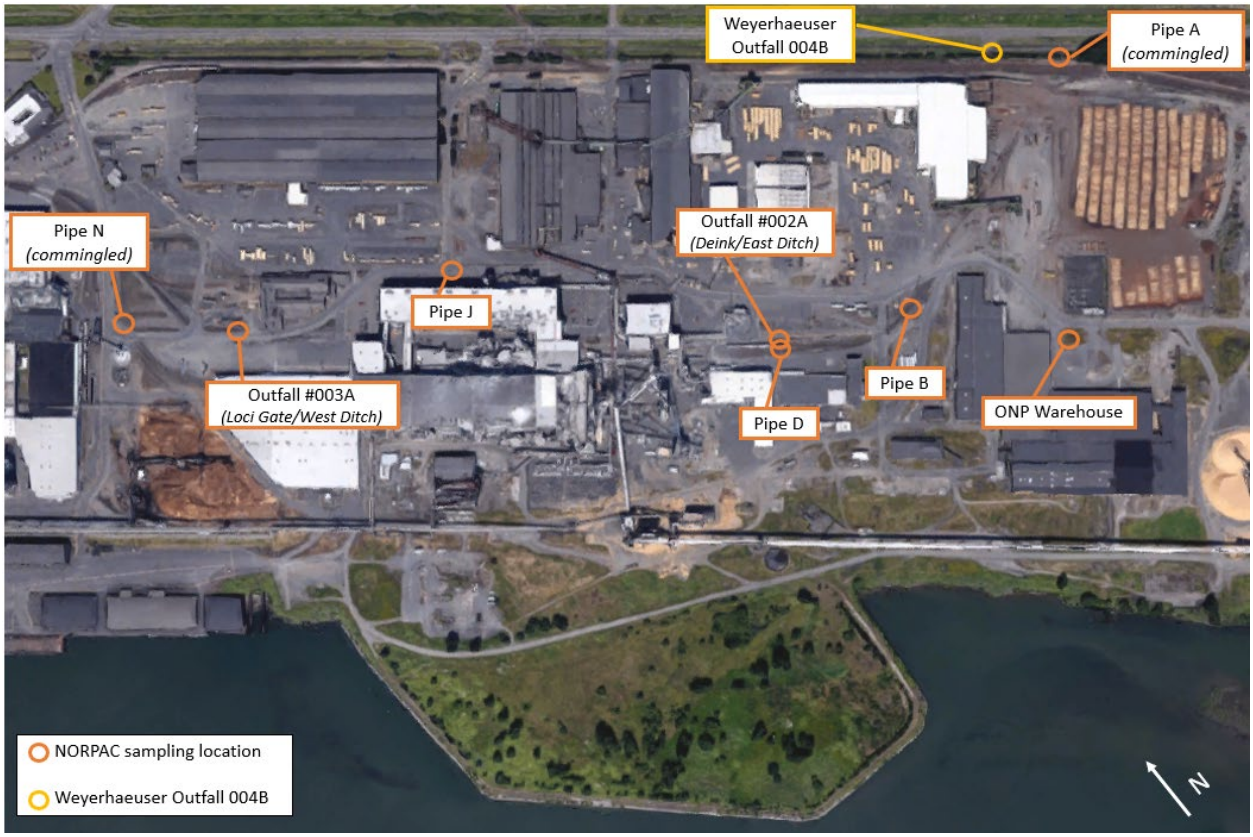

Figure 1: Approximate locations of NORPAC's 8 sample sites during the Stormwater Characterization Study.

Condition 3 of the Joint Administrative Order required submittal of an Updated NPDES Permit Application, including the results of the Stormwater Characterization Study, by March 15, 2021. NORPAC submitted their Stormwater Characterization Study and NPDES Permit Application Update via the WQWebPortal on March 15, 2021.

Ecology issued a comment letter on July 8, 2021 in response to NORPAC's March 15, 2021 submittals. The comment letter detailed required revisions to the Stormwater Characterization Study and NPDES Permit Application Update. The comment letter also specified that NORPAC must submit a revision to the Stormwater Characterization Study and NPDES Permit Application Update by August 31, 2021. NORPAC submitted the revisions via the WQWebPortal on September 24, 2021.

According to the information in NORPAC's initial and revised Stormwater Characterization Study, NORPAC collected seven to 14 samples at the various sampling sites between November 2020 and February 2021. Table 1 through Table 8 summarize NORPAC's results for the various sample locations during the Stormwater Characterization Study. NORPAC analyzed bacteria samples (fecal coliform and e. coli) using different methods which have different reporting

units. Standard Methods (SM) 9221 and 9223 for the multiple-tube fermentation and enzyme substrate methods presents results in most probable number per 100 milliliters(MPN/100 mL). SM 9222 for the membrane filter technique method presents results in colony forming units per 100 milliliters (CFU/100 mL). Because of this, bacteria results are reported in either units of MPN/100 mL or CFU/100 mL.

Table 1: Outfall 002A Stormwater Characterization Study Summarized Results

Parameter	Average/Geometric Mean Result [a]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.22 standard units (SU)	7.13 SU	7
Flow rate	149.5 gallons per minute (gpm)	99 gpm	200 gpm	2
Chemical oxygen demand (COD), concentration	33.3 milligrams per liter (mg/L)	7 mg/L	97 mg/L	7
COD, loading	16.1 pounds per day (lbs/day)	13.1 lbs/day	19.2 lbs/day	2
5-day biochemical oxygen demand (BOD_5), concentration	4.5 mg/L [b]	<2 mg/L	15.5 mg/L	6
BOD_5, loading	3.8 lbs/day [b]	<4.8 lbs/day	5.2 lbs/day	2
Turbidity	29.1 Nephelometric Turbidity Units (NTU)	9.05 NTU	75.1 NTU	7
Zinc, concentration	83.7 micrograms per liter (µg/L)	12.6 µg/L	270 µg/L	7
Zinc, loading	0.07 lbs/day	0.03 lbs/day	0.11 lbs/day	2
Copper, concentration	5.49 µg/L	1.81 µg/L	13.1 µg/L	7
Copper, loading	0.006 lbs/day	0.004 lbs/day	0.008 lbs/day	2
Fecal Coliform	183 most probable number per 100 milliliters (MPN/100 mL)	100 MPN/100 mL	760 MPN/100 mL	6
E. coli	19.4 MPN/100 mL [b]	<1 MPN/100 mL	239 MPN/100 mL	6
Oil & Grease, concentration	7.2 mg/L	2.5 mg/L	31.3 mg/L	7
Oil & Grease, loading	5.2 lbs/day	4.2 lbs/day	6.2 lbs/day	2
Settleable Solids	0.14 milliliters per liter (mL/L) [b]	<0.1 mL/L	0.4 mL/L	7

[a] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[b] NORPAC reported some sample results below the detection limit for this parameter. The average or geometric mean value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016 (i.e., one-half of the detection limit was used for those results reported below detection).

Table 2: Pipe B Stormwater Characterization Study Summarized Results (includes Outfall 002A discharge)

Parameter	Average/Geometric Mean Result [c]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.51 standard units (SU)	6.76 SU	8
Flow rate [d]	Unknown	Unknown	1,120 gallons per minute (gpm)	1
Chemical oxygen demand (COD), concentration	11.25 milligrams per liter (mg/L)	5 mg/L	25 mg/L	8
COD, loading [d]	Unknown	Unknown	Unknown	0
5-day biochemical oxygen demand (BOD_5), concentration	0 mg/L [e]	<2 mg/L	<2 mg/L	7
BOD_5, loading [d]	Unknown	Unknown	<26.9 pounds per day (lbs/day)	0
Turbidity	35.7 Nephelometric Turbidity Units (NTU)	21.8 NTU	63.2 NTU	8
Zinc, concentration	30.0 micrograms per liter (µg/L)	12.1 µg/L	62.6 µg/L	8
Zinc, loading [d]	Unknown	Unknown	Unknown	0
Copper, concentration	2.72 µg/L	1.28 µg/L	4.88 µg/L	8
Copper, loading [d]	Unknown	Unknown	Unknown	0
Fecal Coliform	53.3 colony forming units per 100 milliliters (CFU/100 mL) [e]	4 CFU/100 mL [f]	400 CFU/100 mL	7

[c] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[d] NORPAC only reported the maximum flow rate measured at Pipe B during the characterization study. Because of this the loading rates cannot be accurately calculated and are not included in this table, with the exception of BOD_5. Because all of the BOD5 results were below detection, the maximum loading rate was calculated and is reported.
[e] NORPAC reported some or all sample results below the detection limit for this parameter. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016.
[f] NORPAC reported a sample result of <20 CFU/100 mL on February 1, 2021; however, the minimum reported value during the monitoring period was 4 CFU/100 mL on January 11, 2021.

Parameter	Average/Geometric Mean Result [c]	Minimum Result	Maximum Result	Number of Valid Samples
E. coli	40.5 CFU/100 mL	2 CFU/100 mL	517 CFU/100 mL	7
Oil & Grease, concentration	2.9 mg/L	1.9 mg/L	3.4 mg/L	8
Oil & Grease, loading [d]	Unknown	Unknown	Unknown	0
Settleable Solids	0.17 milliliters per liter (mL/L) [e]	<0.1 mL/L	0.9 mL/L	8

Table 3: Outfall 003A Stormwater Characterization Study Summarized Results

Parameter	Average/Geometric Mean Result [g]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.17 standard units (SU)	6.8 SU	14
Flow rate [h]	236.6 gallons per minute (gpm)	3.2 gpm	470 gpm	2
Chemical oxygen demand (COD), concentration	32.9 milligrams per liter (mg/L) [i]	<4 mg/L	84 mg/L	7
COD, loading [g]	Unknown	Unknown	Unknown	0
5-day biochemical oxygen demand (BOD_5), concentration	3.1 mg/L [i]	<2 mg/L	10.9 mg/L	12
BOD_5, loading [h]	Unknown	Unknown	Unknown	0
Turbidity	200.4 Nephelometric Turbidity Units (NTU)	60 NTU	376 NTU	14
Zinc, concentration	148 micrograms per liter (µg/L)	46.7 µg/L	426 µg/L	14
Zinc, loading [h]	Unknown	Unknown	Unknown	0
Copper, concentration	18.8 µg/L	6.2 µg/L	26.8 µg/L	14
Copper, loading [h]	Unknown	Unknown	Unknown	0

[g] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[h] NORPAC reported the minimum and maximum flow rates measured during the characterization study but did not identify which dates they measured the flow rates. Because of this the loading rates cannot be accurately calculated and are not included in this table.
[i] NORPAC reported some sample results below the detection limit. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016 (i.e., one-half of the detection limit was used for those results reported below detection).

Parameter	Average/Geometric Mean Result [g]	Minimum Result	Maximum Result	Number of Valid Samples
Fecal Coliform	245 colony forming units per 100 milliliters (CFU/100 mL) [i]	<2 CFU/100 mL	16,600 CFU/100 mL	13
E. coli	47.5 CFU/100 mL	1 CFU/100 mL	>2,419.6 CFU/100 mL	12
Oil & Grease, concentration	4.0 mg/L	2.7 mg/L	5.9 mg/L	14
Oil & Grease, loading [h]	Unknown	Unknown	Unknown	0
Settleable Solids	0.23 milliliters per liter (mL/L) [i]	<0.1 mL/L	0.8 mL/L	14

Table 4: Pipe N Stormwater Characterization Study Summarized Results (commingled and includes Outfall 003A discharge)

Parameter	Average/Geometric Mean Result [j]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.08 standard units (SU)	7.07 SU	11
Flow rate [k]	Unknown	Unknown	Unknown	0
Chemical oxygen demand (COD), concentration	58 milligrams per liter (mg/L) [l]	<4 mg/L	321 mg/L	13
COD, loading [k]	Unknown	Unknown	Unknown	0
5-day biochemical oxygen demand (BOD_5), concentration	1.6 mg/L [l]	<2 mg/L	5.7 mg/L	12
BOD_5, loading [k]	Unknown	Unknown	Unknown	0
Turbidity	349.4 Nephelometric Turbidity Units (NTU)	44.4 NTU	710 NTU	13

[j] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[k] NORPAC did not report any flow rate measurements at Pipe N. Because of this the loading rates cannot be accurately calculated and are not included in this table.
[l] NORPAC reported some sample results below the detection limit. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016 (i.e., one-half of the detection limit was used for those results reported below detection).

Parameter	Average/Geometric Mean Result [j]	Minimum Result	Maximum Result	Number of Valid Samples
Zinc, concentration	119.9 micrograms per liter (µg/L)	39.6 µg/L	205 µg/L	13
Zinc, loading [k]	Unknown	Unknown	Unknown	0
Copper, concentration	27.7 µg/L	5.15 µg/L	54.5 µg/L	13
Copper, loading [k]	Unknown	Unknown	Unknown	0
Fecal Coliform	591.1 colony forming units per 100 milliliters (CFU/100 mL) [l]	<20 CFU/100 mL	22,000 CFU/100 mL	12
E. coli	73.4 CFU/100 mL	2 CFU/100 mL	>2,419.6 CFU/100 mL	8
Oil & Grease, concentration	4.3 mg/L	1.7 mg/L	10.6 mg/L	12
Oil & Grease, loading [k]	Unknown	Unknown	Unknown	0
Settleable Solids	0.68 milliliters per liter (mL/L) [l]	<0.1 mL/L	7.5 mL/L	13

Table 5: ONP Warehouse Stormwater Characterization Study Summarized Results

Parameter	Average/Geometric Mean Result [m]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.29 standard units (SU)	6.74 SU	13
Flow rate [n]	Unknown	Unknown	Unknown	0
Chemical oxygen demand (COD), concentration	22.1 milligrams per liter (mg/L)	7 mg/L	50 mg/L	13
COD, loading [n]	Unknown	Unknown	Unknown	0

[m] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[n] NORPAC did not report any flow rate measurements at ONP Warehouse. Because of this the loading rates cannot be accurately calculated and are not included in this table.

Parameter	Average/Geometric Mean Result [m]	Minimum Result	Maximum Result	Number of Valid Samples
5-day biochemical oxygen demand (BOD_5), concentration	1.79 mg/L [o]	<2 mg/L	5.6 mg/L	11
BOD_5, loading [n]	Unknown	Unknown	Unknown	0
Turbidity	57.0 Nephelometric Turbidity Units (NTU)	11.2 NTU	150 NTU	13
Zinc, concentration	30.8 micrograms per liter (µg/L)	12.9 µg/L	71.5 µg/L	13
Zinc, loading [n]	Unknown	Unknown	Unknown	0
Copper, concentration	2.16 µg/L	0.62 µg/L	8.36 µg/L	13
Copper, loading [n]	Unknown	Unknown	Unknown	0
Fecal Coliform	45.1 most probable number per 100 milliliters (MPN/100 mL) [o]	<20 MPN/100 mL	360 MPN/100 mL	12
E. coli	21.7 MPN/100 mL	0 MPN/100 mL	488 MPN/100 mL	10
Oil & Grease, concentration	2.8 mg/L	1.5 mg/L	3.9 mg/L	13
Oil & Grease, loading [n]	Unknown	Unknown	Unknown	0
Settleable Solids	0.23 milliliters per liter (mL/L) [o]	<0.1 mL/L	1.1 mL/L	13

Table 6: Pipe A Stormwater Characterization Study Summarized Results (commingled and includes ONP Warehouse discharge)

Parameter	Average/Geometric Mean Result [p]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.17 standard units (SU)	6.79 SU	14

[o] NORPAC reported some sample results below the detection limit. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016 (i.e., one-half of the detection limit was used for those results reported below detection).
[p] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.

Parameter	Average/Geometric Mean Result [p]	Minimum Result	Maximum Result	Number of Valid Samples
Flow rate [q]	818.5 gallons per minute (gpm)	20 gpm	1,617 gpm	2
Chemical oxygen demand (COD), concentration	196.8 milligrams per liter (mg/L)	35 mg/L	651 mg/L	14
COD, loading [q]	Unknown	Unknown	Unknown	0
5-day biochemical oxygen demand (BOD_5), concentration	37.5 mg/L	9.4 mg/L	182 mg/L	13
BOD_5, loading [q]	Unknown	Unknown	Unknown	0
Turbidity	214 Nephelometric Turbidity Units (NTU)	70 NTU	408 NTU	14
Zinc, concentration	67.5 micrograms per liter (µg/L)	45.3 µg/L	129 µg/L	14
Zinc, loading [q]	Unknown	Unknown	Unknown	0
Copper, concentration	10.2 µg/L	3.21 µg/L	23 µg/L	14
Copper, loading [q]	Unknown	Unknown	Unknown	0
Fecal Coliform	66.4 colony forming units per 100 milliliters (CFU/100 mL) [r]	<20 CFU/100 mL	1,101 CFU/100 mL	13
E. coli	24.9 CFU/100 mL	0 CFU/100 mL	455 CFU/100 mL	10
Oil & Grease, concentration	6.1 mg/L	2.5 mg/L	16.7 mg/L	14
Oil & Grease, loading [q]	Unknown	Unknown	Unknown	0
Settleable Solids	0.68 milliliters per liter (mL/L) [r]	<0.1 mL/L	7 mL/L	14

[q] NORPAC reported the minimum and maximum flow rates measured during the characterization study but did not identify which dates they measured the flow rates. Because of this the loading rates cannot be accurately calculated and are not included in this table.
[r] NORPAC reported some sample results below the detection limit. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016 (i.e., one-half of the detection limit was used for those results reported below detection).

Table 7: Pipe D Stormwater Characterization Study Summarized Results

Parameter	Average/Geometric Mean Result [s]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.06 standard units (SU)	6.63 SU	14
Flow rate [t]	99.05 gallons per minute (gpm)	0.1 gpm	198 gpm	2
Chemical oxygen demand (COD), concentration	17.1 milligrams per liter (mg/L)	6 mg/L	34 mg/L	14
COD, loading [t]	Unknown	Unknown	Unknown	0
5-day biochemical oxygen demand (BOD_5), concentration	1.3 mg/L [u]	<2 mg/L	4.5 mg/L	12
BOD_5, loading [t]	Unknown	Unknown	Unknown	0
Turbidity	59.3 Nephelometric Turbidity Units (NTU)	3.24 NTU	231 NTU	14
Zinc, concentration	28.3 micrograms per liter (µg/L)	6.4 µg/L	79.2 µg/L	14
Zinc, loading [t]	Unknown	Unknown	Unknown	0
Copper, concentration	3.03 µg/L	1.16 µg/L	10.7 µg/L	14
Copper, loading [t]	Unknown	Unknown	Unknown	0
Fecal Coliform	43.0 colony forming units per 100 milliliters (CFU/100 mL) [u]	<20 CFU/100 mL	220 CFU/100 mL	13
E. coli	83.1 most probable number per 100 milliliters (MPN/100 mL)	5.2 MPN/100 mL	770 MPN/100 mL	7
Oil & Grease, concentration	3.6 mg/L	1.9 mg/L	17.6 mg/L	14

[s] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[t] NORPAC reported the minimum and maximum flow rates measured during the characterization study but did not identify which dates they measured the flow rates. Because of this the loading rates cannot be accurately calculated and are not included in this table.
[u] NORPAC reported some sample results below the detection limit. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016 (i.e., one-half of the detection limit was used for those results reported below detection).

Parameter	Average/Geometric Mean Result [s]	Minimum Result	Maximum Result	Number of Valid Samples
Oil & Grease, loading [t]	Unknown	Unknown	Unknown	0
Settleable Solids	1.98 milliliters per liter (mL/L) [u]	<0.1 mL/L	15 mL/L	14

Table 8: Pipe J Stormwater Characterization Study Summarized Results

Parameter	Average/Geometric Mean Result [v]	Minimum Result	Maximum Result	Number of Valid Samples
pH	n/a	6.28 standard units (SU)	7.32 SU	12
Flow rate [w]	99.05 gallons per minute (gpm)	0.1 gpm	198 gpm	2
Chemical oxygen demand (COD), concentration	17.2 milligrams per liter (mg/L)	5 mg/L	39 mg/L	12
COD, loading [w]	Unknown	Unknown	Unknown	0
5-day biochemical oxygen demand (BOD_5), concentration	0 mg/L [x]	<2 mg/L	<2 mg/L	11
BOD_5, loading [w]	Unknown	<0.002 pounds per day(lbs/day)	<4.76 lbs/day	2
Turbidity	52.0 Nephelometric Turbidity Units (NTU)	16.0 NTU	137 NTU	12
Zinc, concentration	66.9 micrograms per liter (µg/L)	26.8 µg/L	197 µg/L	12
Zinc, loading [w]	Unknown	Unknown	Unknown	0
Copper, concentration	6.46 µg/L	2.61 µg/L	12.8 µg/L	12
Copper, loading [w]	Unknown	Unknown	Unknown	0

[v] Geometric mean results calculated and reported for bacteria parameters (i.e., fecal coliform and e. coli). Average results reported for all other parameters, except pH. In accordance with footnote f of Special Condition S2.A. of NPDES Permit No. WA0991016, pH results are not averaged.
[w] NORPAC reported the minimum and maximum flow rates measured during the characterization study but did not identify which dates they measured the flow rates. Because of this the loading rates cannot be accurately calculated and are not included in this table, with the exception of BOD_5. Because all of the BOD_5 results were below detection, the maximum and minimum loading rates were calculated and are reported.
[x] NORPAC reported some or all sample results below the detection limit for this parameter. The average value is calculated based on the methodology identified in Special Condition S3.A.8. of NPDES Permit No. WA0991016.

Parameter	Average/Geometric Mean Result [v]	Minimum Result	Maximum Result	Number of Valid Samples
Fecal Coliform	129.8 colony forming units per 100 milliliters (CFU/100 mL) [x]	<20 CFU/100 mL	1,400 CFU/100 mL	11
E. coli	6.84 most probable number per 100 mL (MPN/100 mL)	1 MPN/100 mL	37.9 MPN/100 mL	9
Oil & Grease, concentration	4.1 mg/L	2.8 mg/L	5.4 mg/L	12
Oil & Grease, loading [w]	Unknown	Unknown	Unknown	0
Settleable Solids	0.08 milliliters per liter (mL/L) [x]	<0.1 mL/L	0.3 mL/L	12

I.B. PCHB Case No. 19-055c decision

As mentioned in Section I.A. of this Supplemental Fact Sheet, Ecology issued NPDES Permit No. WA0991016 to NORPAC on July 17, 2019 with an effective date of August 1, 2019. Ecology simultaneously issued NPDES Permit No. WA0991014 and a modification of NPDES Permit No. WA0000124 to Weyerhaeuser and NDP, respectively, on the same date. Weyerhaeuser filed an appeal of NPDES Permit Nos. WA0991014, WA0991016, and WA0000124 (modification) on August 16, 2019 with the Pollution Controls Hearing Board (PCHB, or Board), Case No. 19-055. During the proceedings of PCHB Case No. 19-055, Ecology issued a Notice of Penalty (NOP) to Weyerhaeuser on February 14, 2022, Docket #20932, for various stormwater and process wastewater violations, including numeric effluent limit violations at Weyerhaeuser's Outfalls 003B and 004B. Weyerhaeuser appealed NOP Docket No. 20932 to the PCHB on March 11, 2022, Case No. 22-021, and requested that the PCHB consolidate the two appeals. The PCHB consolidated the appeals, collectively becoming Case No. 19-055c. The PCHB, Weyerhaeuser, and Ecology also agreed to NDP and NORPAC joining PCHB Case No. 19-055c as intervenors. Ecology, Weyerhaeuser, NORPAC, and NDP are collectively referred to as "the Parties" throughout this section of the Supplemental Fact Sheet.

Weyerhaeuser submitted a Motion for Partial Summary Judgment for 5 of the 14 issues on November 29, 2022. The PCHB issued their, "Order on Weyerhaeuser's Motion for Partial Summary Judgment on Issues 1, 2, 6, 8, and 10," on March 3, 2023 denying Weyerhaeuser's request on four issues and granting Weyerhaeuser's request on one issue (Issue 6), related to NDP's permit (March 3, 2023 Order). Ecology filed a Motion for Reconsideration or Clarification on March 6, 2023 in response to the PCHB's March 3, 2023 Order. The PCHB issued their, "Order Granting Ecology's Motion for Reconsideration or Clarification of the Board's Order on Weyerhaeuser's Motion for Summary Judgment on Issues 1, 2, 6, 8, and 10," on April 7, 2023 (Reconsideration Order). In the Reconsideration Order, the PCHB granted summary judgment in favor of Ecology on Issues 1, 2, and 8, and dismissed those issues.

Ecology submitted a Motion for Partial Summary Judgement for 4 of the 14 issues on November 29, 2022. The PCHB issued their, "Order Granting Respondent Department of Ecology's Motion for Partial Summary Judgment on Issues 3, 4, 5 and 7," on March 7, 2023 (March 7, 2023 Order). Weyerhaeuser filed a Motion for Reconsideration or Modification on March 9, 2023. In response, the PCHB amended their March 7, 2023 Order and issued their, "Amended Order Granting Respondent Department of Ecology's Motion for Partial Summary Judgment on Issues 3, 4, 5, and 7," on April 6, 2023 (Amended Order). In the Amended Order, the PCHB granted Ecology's request for summary judgment on Issues 5 and 7 and agreed to dismiss Issues 3, 4, 5, and 7. Issues 5 and 7 were related to conducting a reasonable potential analysis (RPA) for NORPAC's and NDP's discharges to Weyerhaeuser's stormwater system. In the amended order, the PCHB affirmed

Ecology's argument that an RPA is not necessary for NORPAC's and NDP's discharges to Weyerhaeuser's stormwater system. As discussed in Section II.A., Ecology has historically completed an RPA for Weyerhaeuser's discharges from Outfall 004B, which includes NORPAC's stormwater discharges. Ecology will continue to complete an RPA during future permitting actions for Weyerhaeuser's discharges to CDID Ditch #3.

Following the PCHB's March 3, 2023 Order, the Parties agreed to resolve the remaining issues through cross motions for summary judgment rather than proceeding with the hearing schedule. Weyerhaeuser moved for summary judgment on the four remaining issues (Issues 9, 10, 11, and 13). Ecology cross moved for summary judgment on the same remaining issues, and NORPAC joined Ecology's Motion. NDP filed a Motion for Summary Judgment on Issues 10 and 11. The PCHB issued their "Order on Cross Motions for Summary Judgment on Issues 9, 10, 11 and 13," on September 28, 2023 (September 28, 2023 Order). In the September 28, 2023 Order, the PCHB granted summary judgment to Weyerhaeuser on Issues 9 and 11, and in part Issue 10. The PCHB granted summary judgment to Ecology on Issue 13, and in part Issue 10.

Issue 9 questioned the validity of NORPAC's permit, NPDES Permit No. WA0991016, because it allows NORPAC to monitor only a subset of its discharge points. The PCHB determined that Ecology did not issue the permit in accordance with 40 CFR 122.21(g)(7)(i) because NPDES Permit No. WA0991016 and its supporting Fact Sheet do not include an analysis that the unmonitored discharge locations are "substantially identical effluents".

Issue 10 asked the PCHB to decide whether to remand NPDES Permit Nos. WA0991014, WA0991016, and WA0000124 to Ecology for modification and reissuance. In the PCHB's September 28, 2023 Order, the Board determined that Weyerhaeuser's permit, NPDES Permit No. WA0991014, is valid and should not be remanded to Ecology for modification. The Board decided that NORPAC's permit, NPDES Permit No. WA0991016, should be remanded to Ecology for modification in accordance with the September 28, 2023 Order and 40 CFR 122.21(g)(7)(i). The Board also concluded that the NDP permit should be remanded in accordance with the Board's March 3, 2023 Order. This proposed permit modification addresses the Board's September 28, 2023 Order remanding NORPAC's permit, NPDES Permit No. WA0991016, to Ecology for modification and reissuance.

On October 30, 2023, Weyerhaeuser filed a Petition for Review in response to the PCHB's September 28, 2023 Order.

II. Proposed permit changes

Ecology is proposing the following modifications to NPDES Permit No. WA0991016 in response to the PCHB's decision regarding Case No. 19-055c:

1. Adding three stormwater outfalls to Special Conditions S1.B. and S2.A.: ONP Warehouse (Outfall 005A), Pipe D (Outfall 006A), and Pipe J (Outfall 007A). These discharges are existing, and Ecology previously permitted them under Special Condition S1.C. of NPDES Permit No. WA0991016.
2. Modifying the location for Outfall 002A (East Ditch) to a location closer to the boundary between NORPAC's and Weyerhaeuser's properties. The proposed permit changes Outfall 002A (East Ditch) to Outfall 004A (Pipe B) in Special Conditions S1.B. and S2.A.

II.A. Stormwater discharge locations

As discussed in Section I.A.2., NORPAC discharges stormwater offsite to Weyerhaeuser's property via five individual drainage basins and piping networks (Pipe A, Pipe B, Pipe D, Pipe J, and Pipe N). Following NORPAC's Stormwater Characterization Study in November 2020 through March 2021, Ecology evaluated NORPAC's discharges to determine the appropriate monitoring locations to capture the majority, or all, of the discharges within each specific drainage basin. In some cases, a single monitoring point does not exist that captures all of the discharges within a single drainage basin. In those cases where a single monitoring point does not capture the entire discharge from a specific drainage basin, Ecology performed an analysis to evaluate if the proposed monitoring location and the unmonitored discharges are substantially identical discharges. Section II.A.2 of this Supplemental Fact Sheet documents this evaluation and analysis. Figure 2 through Figure 5 show the individual drainage basins and the approximate proposed sampling location. Figures 2 through 5 are based on maps provided by NORPAC in their August 18, 2023 revised Stormwater Pollution Prevention Plan (SWPPP).

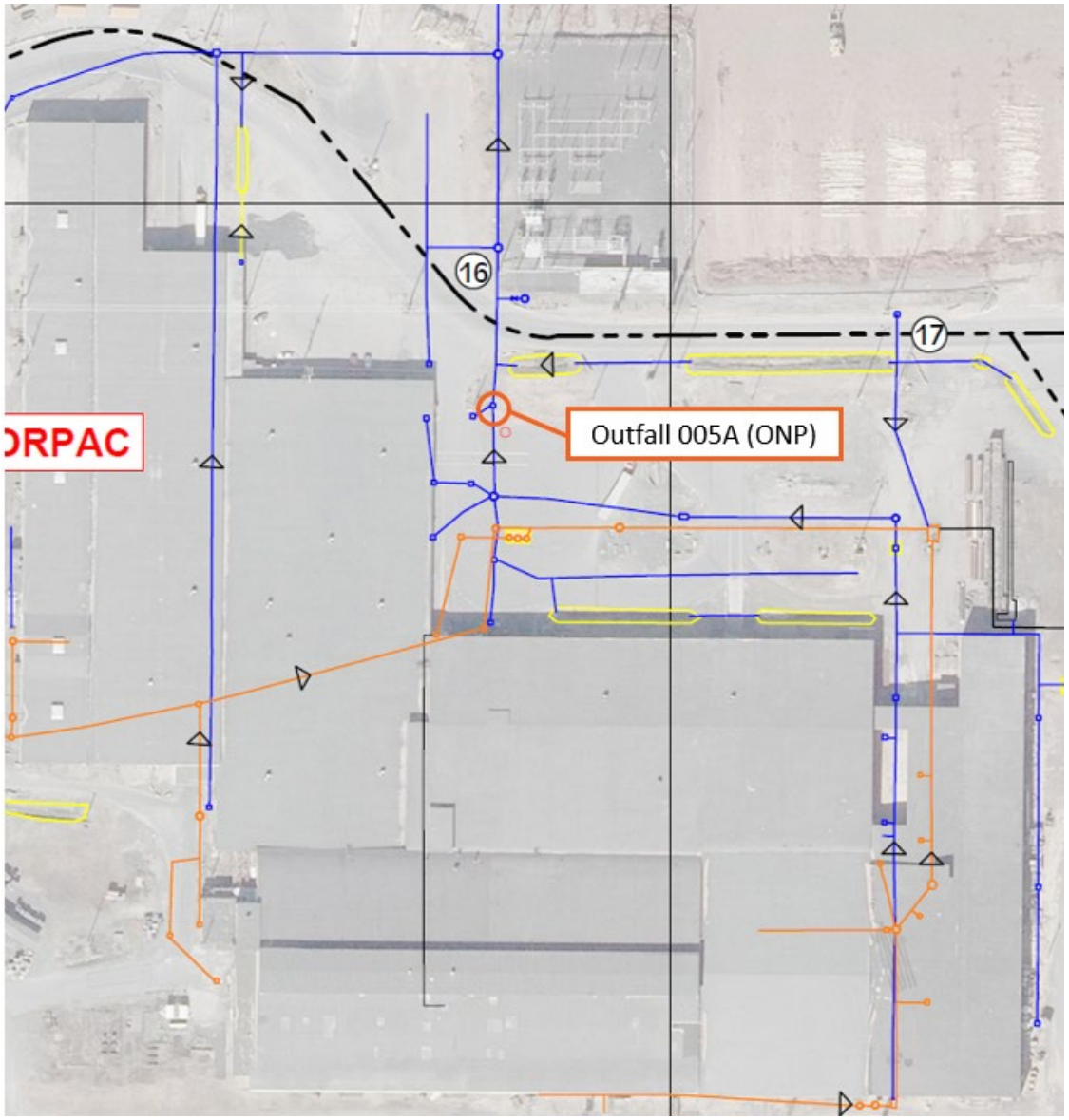

Figure 2: Pipe A drainage basin map and approximate location of proposed Outfall 005A.

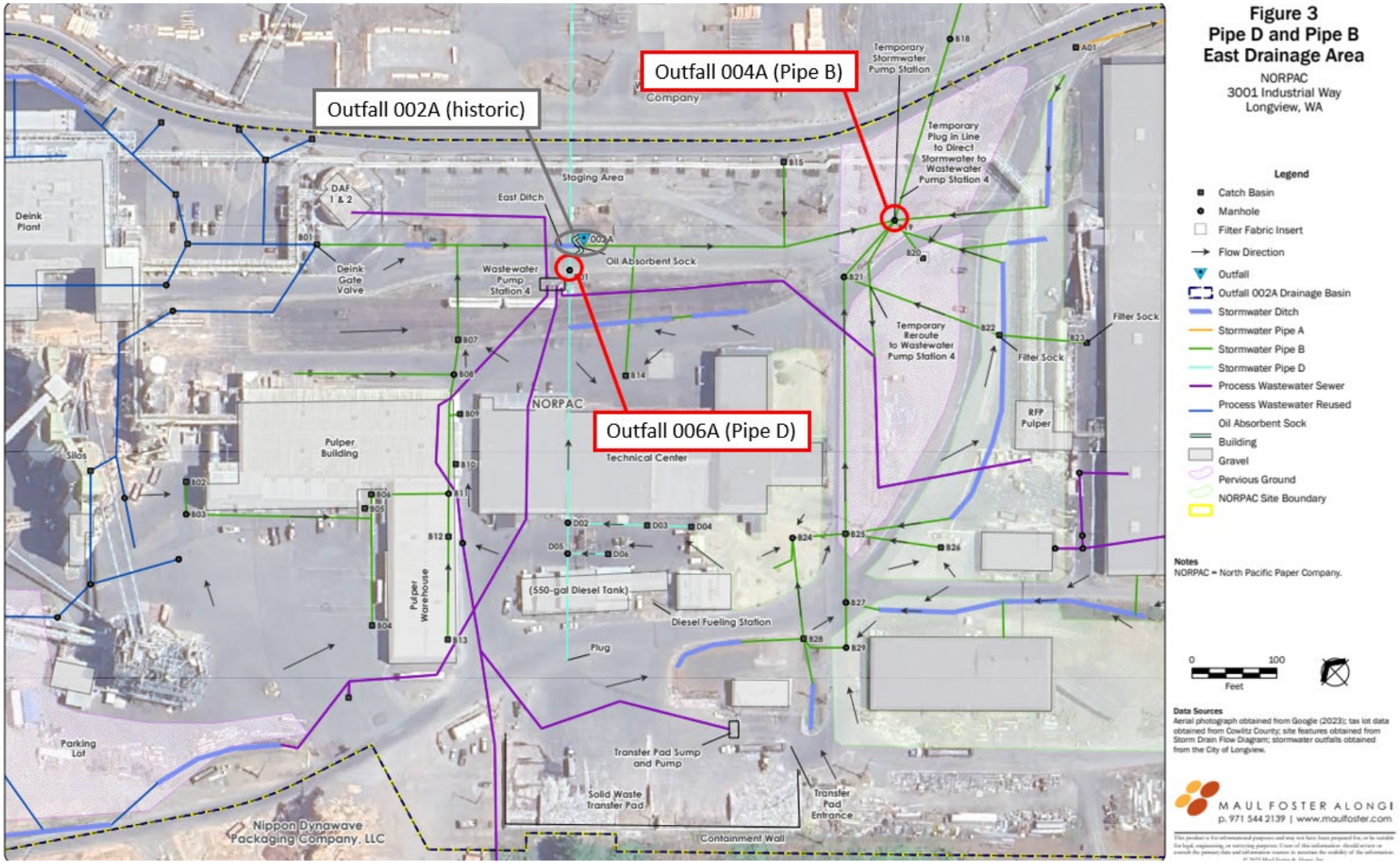

Figure 3: Pipe D drainage basin and portions of the Pipe B drainage basin with approximate locations of proposed Outfalls 004A and 006A and historic Outfall 002A.

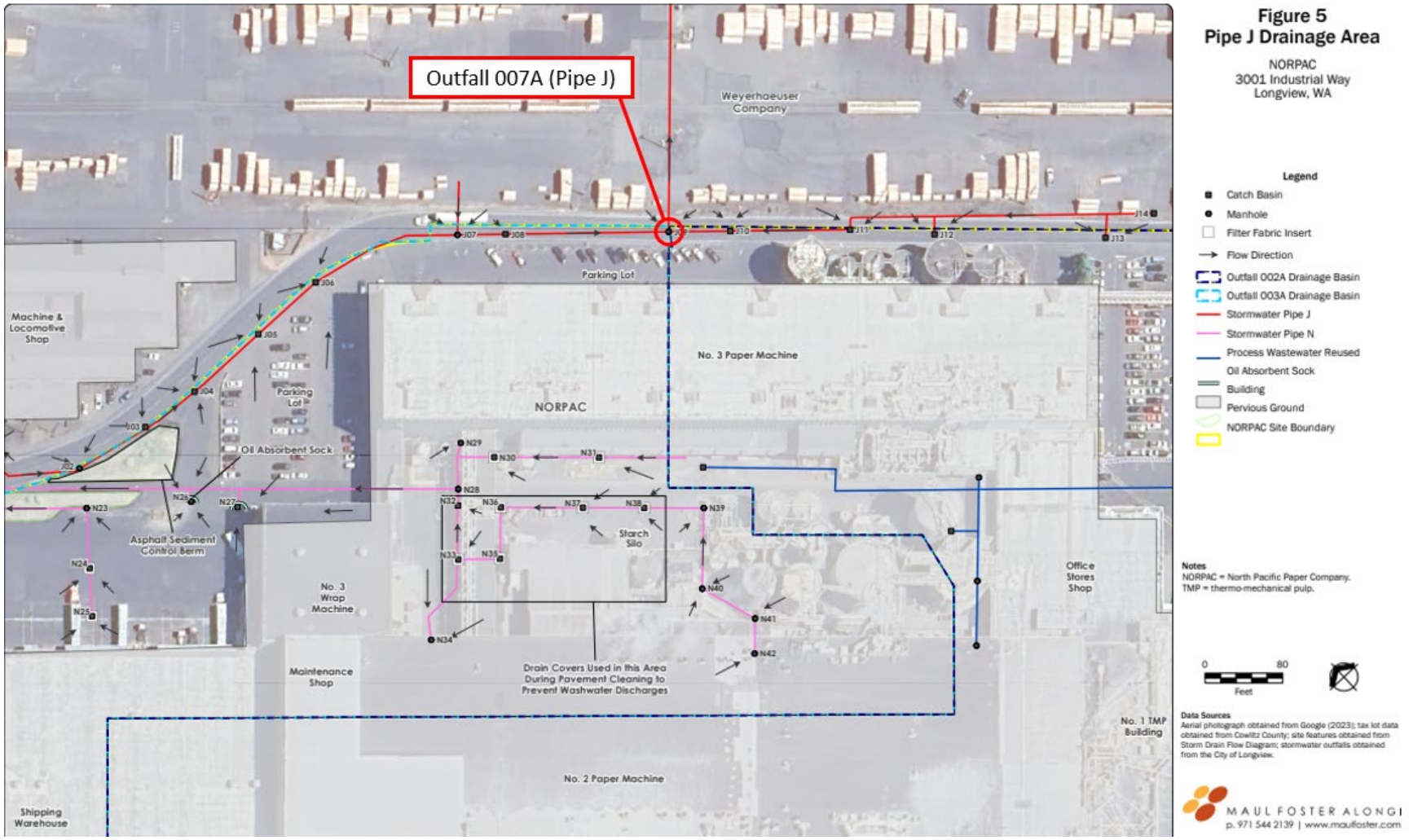

Figure 4: Pipe J drainage basin, and portions of the Pipe N and Pipe B drainage basins, with the approximate location of proposed Outfall 007A.

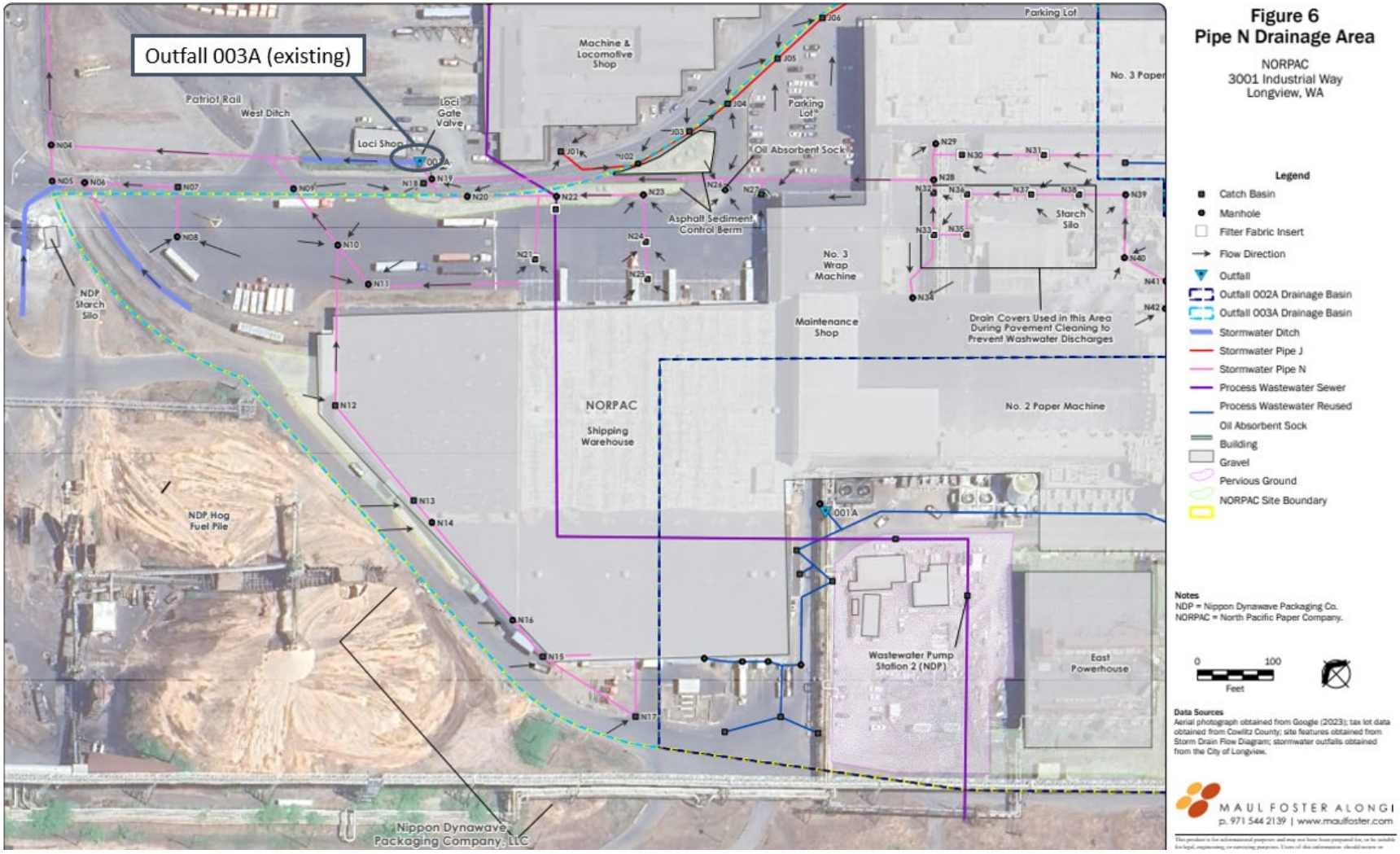

Figure 5: Pipe N drainage basin, and portions of the Pipe J and Pipe B drainage basins, with the approximate location of existing Outfall 003A.

1. Proposed limits

NORPAC's currently issued NPDES Permit, No. WA0991016, effective August 1, 2019, includes various discharge limitations for NORPAC's stormwater discharges to Weyerhaeuser's stormwater system including, but not limited to, benchmarks with corrective actions and monitoring requirements for two of the discharge locations (Outfalls 002A and 003A). As discussed previously in this Supplemental Fact Sheet, Ecology is proposing to add additional specific outfall locations for three drainage basins and to modify the outfall location for the Pipe B drainage basin. In addition to these outfall additions and modifications, Ecology is also proposing to apply the benchmarks and corrective actions identified in Special Condition S1.B. and monitoring requirements in Special Condition S2.A. to the proposed Outfalls 005A (ONP Warehouse), 006A (Pipe D), and 007A (Pipe J) and the modified Outfall 004A (Pipe B, including historic Outfall 002A). Ecology is basing these technology-based limitations on AKART, as described in further detail in Section III.B. of the April 25, 2019 Fact Sheet for NPDES Permit No. WA0991016. Additionally, Ecology is proposing to include the proposed Outfalls 005A, 006A, and 007A, and modified Outfall 004A to the Annual Stormwater Report requirement in Special Condition S15.

Ecology is not proposing any modifications to the other existing stormwater discharge limitations, including those limitations identified in Special Conditions S1.C., S1.D., S3.J., S5.C., S7., and S12. These technology-based limitations applied to all of NORPAC's stormwater discharges offsite, including those discharges at the proposed Outfalls 005A, 006A, and 007A and modified Outfall 004A. These limitations will continue to apply to all stormwater discharges offsite, including those discharges not captured at the existing, proposed, or modified stormwater outfall locations (See Section II.A.2 for additional information on these substantially identical discharges).

Washington Administrative Code (WAC) 173-220-130(2) requires that Ecology evaluate the proposed discharge and confirm it will not violate applicable water quality standards. Ecology typically performs a reasonable potential analysis (RPA) to determine if a discharge to a water of the state has the potential to violate applicable water quality standards in the receiving water body. As mentioned in Section I.B. of this Supplemental Fact Sheet, Ecology performed an RPA on the final combined discharge from Weyerhaeuser's Outfall 004B to CDID Ditch #3 during the drafting of NPDES Permit No. WA0991014, effective August 1, 2019. Ecology's RPA for the final combined discharge from Weyerhaeuser's Outfall 004B is described in detail in Section II.G. and Appendix D of the April 25, 2019 Fact Sheet for NPDES Permit WA0991014.

Weyerhaeuser's combined discharge from Outfall 004B includes all of NORPAC's stormwater discharges from the five drainage basins (Pipes A, B, D, J, and N). Additionally, because Ecology's initial individual permitting actions for Weyerhaeuser and NORPAC (under NPDES Permit Nos. WA0991014 and

WA0991016, respectively) incorporated Weyerhaeuser's Outfall 004B numeric effluent limitations as benchmarks for NORPAC's Outfalls 002A and 003A, Ecology believes this ensures that NORPAC's discharges will not violate the applicable water quality standards within CDID Ditch #3 given that NORPAC complies with the requirements of NPDES Permit No. WA0991016. Ecology is not proposing to modify the existing benchmark values included in Special Condition S1.B. Ecology will complete an RPA for the total combined discharge from Weyerhaeuser's Outfall 004B during the permit renewal process.

2. Substantially identical discharges

As identified in Section I.B of this Supplemental Fact Sheet, the PCHB determined that Ecology violated the requirements of 40 CFR 122.21(g)(7)(i) because NPDES Permit No. WA0991016 and its supporting Fact Sheet do not include an analysis that NORPAC's unmonitored discharge locations are "substantially identical effluents". In response to this decision, and as discussed previously in this Supplemental Fact Sheet, Ecology is proposing to add three new outfall locations: Outfalls 005A (ONP Warehouse), 006A (Pipe D), and 007A (Pipe J). Ecology is also proposing to modify the location of existing Outfall 002A to be closer to the property boundary with Weyerhaeuser and re-name this outfall as Outfall 004A (Pipe B). While these proposed additional or modified outfalls capture the majority of NORPAC's stormwater discharges to Weyerhaeuser's stormwater system, there are still some stormwater discharges from NORPAC that may not be captured. As such, Ecology evaluated these unmonitored discharge locations to determine if the discharges are "substantially identical effluents". Figure 6: ONP Warehouse (Pipe A) drainage basin and discharges. through Figure 9 identify the areas that Ecology is not proposing monitoring because Outfalls 003A, 004A, 005A, 006A, or 007A are substantially identical discharges, as detailed below. These figures also identify the proposed, modified, or existing locations for Outfalls 003A, 004A, 005A, 006A, and 007A.

Special Condition S1.C. will continue to authorize these substantially identical discharges. Additionally, by identifying these discharges as "substantially identical effluents", Ecology expects NORPAC to include these drainage areas in its corrective action response to any future benchmark exceedances at the respective drainage basin outfall. NORPAC must also comply with Special Conditions S1.D., S3.J., S5.C., S7, and S12 with respect to these substantially identical discharges.

Ecology's Industrial Stormwater General Permit (ISGP), effective January 1, 2020, and Ecology's "Stormwater Sampling Manual: A guide for the Industrial Stormwater General Permit" (December 2015) defines substantially identical discharges as follows:

> *"A discharge point that shares the following characteristics with another discharge point: 1) the same general industrial activities conducted in the*

drainage area of the discharge point, 2) the same Best Management Practices conducted in the drainage area of the discharge point, 3) the same type of exposed materials located in the drainage area of the discharge point that are likely to be significant contributors of pollutants to the stormwater discharges, and 4) the same type of impervious surfaces in the drainage area that could affect the percolation of stormwater runoff into the ground (e.g., asphalt, crushed rock, grass).”

Ecology based its analysis of substantially identical discharges on information provided in NORPAC’s initial and renewal permit applications, Administrative Order #18227 submittals, the Stormwater Pollution Prevention Plan (SWPPP), and Ecology’s inspections and site visits at the industrial complex.

Figure 6: ONP Warehouse (Pipe A) drainage basin and discharges. shows NORPAC’s Old Newsprint (ONP) Warehouse area which drains to Weyerhaeuser’s Pipe A, including the proposed location for Outfall 005A (ONP Warehouse) (highlighted in orange). The areas identified in black are locations within NORPAC’s Pipe A drainage basin that will not be monitored at the proposed Outfall 005A. Ecology determined that NORPAC’s discharges from the ONP Warehouse area are substantially identical discharges to the discharges monitored at Outfall 005A based on the following:

1. NORPAC conducts the same general industrial activity throughout the ONP Warehouse area. Industrial activities in this area primarily includes heavy machinery and vehicle use and traffic and material unloading and loading.
2. NORPAC utilizes similar Best Management Practices (BMPs) throughout the ONP Warehouse area, including the following operational and structural source control BMPs and treatment BMPs:
    a. Operational Source Control BMPs: good housekeeping (e.g., regular sweeping, regular equipment maintenance, employee training), preventive maintenance, spill prevention and cleanup, and inspections.
    b. Structural Source Control BMPs: curbing and grading around potential areas of stormwater pollution (e.g., process and sanitary sewer pump stations), jersey barriers to prevent soil erosion near high-traffic areas, and silt fences and other structural controls to reduce entry of pollutants into open conveyance ditches.
    c. Treatment BMPs: oil booms and absorbent socks and catch basin filter inserts.
3. NORPAC’s ONP Warehouse area includes the same types of exposed materials throughout the area. The primary exposed materials that are

likely to be significant contributors of pollutants to stormwater discharges include trash and debris from recycled paper transportation and unloading, wood chips and other woody debris, soil or dirt, oil or other petroleum products, and metals from machinery and vehicles.

4. NORPAC's ONP Warehouse area includes portions of paved area as well as vegetated areas. The types of surfaces are similar between the proposed Outfall 005A sampling location and the other locations where NORPAC discharges stormwater offsite from the ONP Warehouse area.

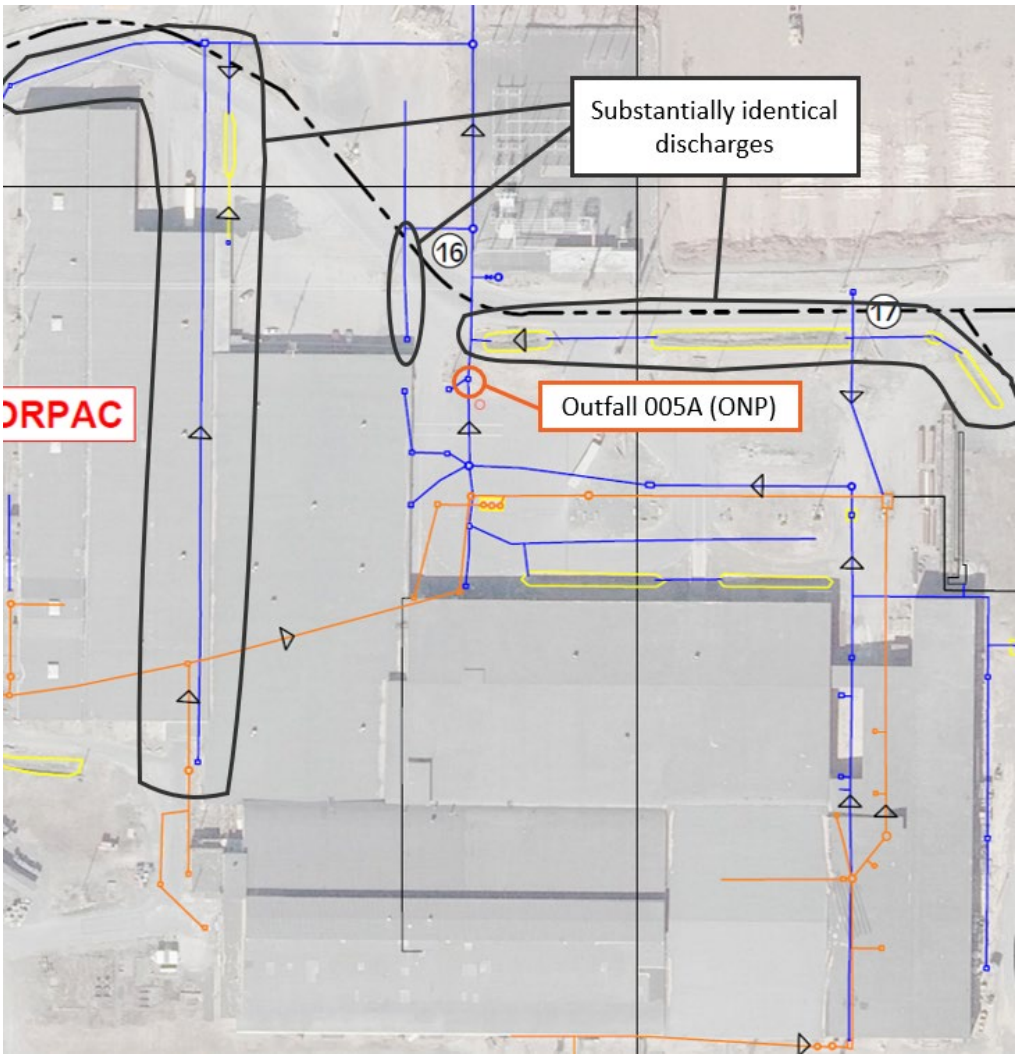

Figure 6: ONP Warehouse (Pipe A) drainage basin and discharges.

Figure 7 shows NORPAC's Pipe J drainage area, including the proposed location for Outfall 007A (Pipe J) (highlighted in yellow). According to NORPAC's provided map from their August 18, 2023 SWPPP (also included in Figure 4), it appears that NORPAC potentially receives commingled stormwater from Weyerhaeuser within the Pipe J drainage basin; however, Weyerhaeuser's

provided stormwater maps identify that NORPAC discharges stormwater to Weyerhaeuser's stormwater system at these locations (Figure 8, highlighted in dark red). Additionally, Ecology has observed discharges from NORPAC to Weyerhaeuser at these locations. Because the fate of stormwater in these areas is unclear, Ecology evaluated these areas to determine if the discharges are substantially identical to the discharge at Outfall 007A. The areas identified in black are locations within NORPAC's Pipe J drainage basin that may not be captured at the proposed Outfall 007A. Ecology determined that NORPAC's discharges from the Pipe J area are substantially identical discharges to the discharges monitored at Outfall 007A based on the following:

1. NORPAC conducts the same general industrial activity throughout the Pipe J drainage area. Industrial activities in this area primarily includes heavy machinery and vehicle use and traffic.
2. NORPAC utilizes similar BMPs throughout the Pipe J drainage area, including the following operational and structural source control BMPs and treatment BMPs:
    a. Operational Source Control BMPs: good housekeeping (e.g., regular sweeping, employee training), preventive maintenance, spill prevention and cleanup, and inspections.
    b. Structural Source Control BMPs: curbing and grading around potential areas of stormwater pollution and structural controls to reduce entry of pollutants into catch basins (i.e., straw bales, wattles, etc.).
    c. Treatment BMPs: straw bales.
3. NORPAC's Pipe J drainage area includes the same types of exposed materials throughout the area. The primary exposed materials that are likely to be significant contributors of pollutants to stormwater discharges include wood chips and other woody debris, oil or other petroleum products, metals from machinery and vehicles, and soil or dirt.
4. NORPAC's Pipe J drainage area is comprised of primarily paved areas, with a small portion of vegetated area surrounded by curbing. The types of surfaces are similar between the proposed Outfall 007A sampling location and the other locations where NORPAC could potentially discharge stormwater offsite from the Pipe J drainage area.

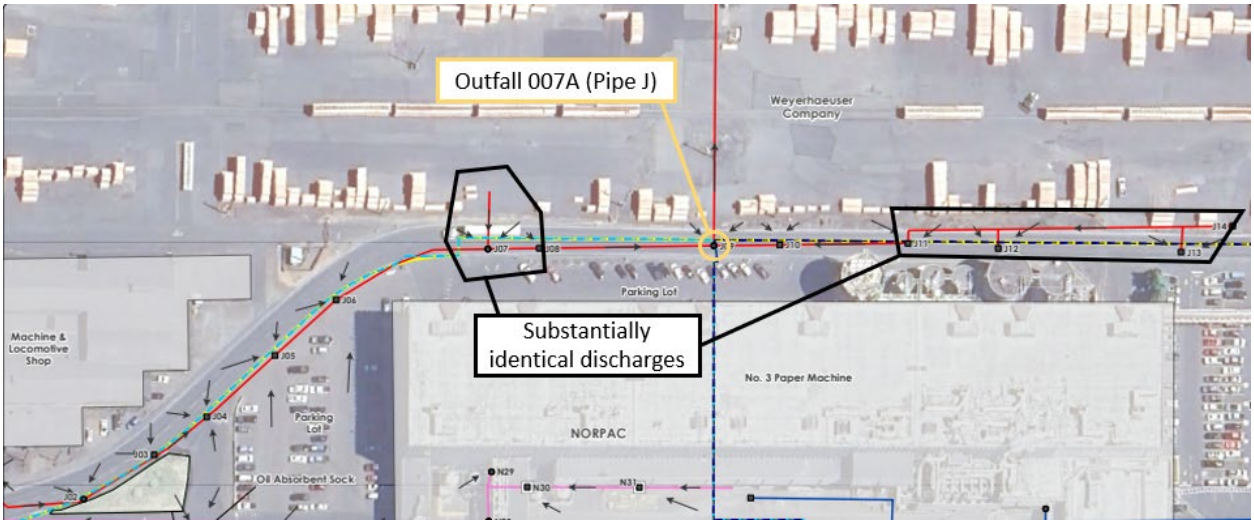

Figure 7: Pipe J drainage basin and discharges.

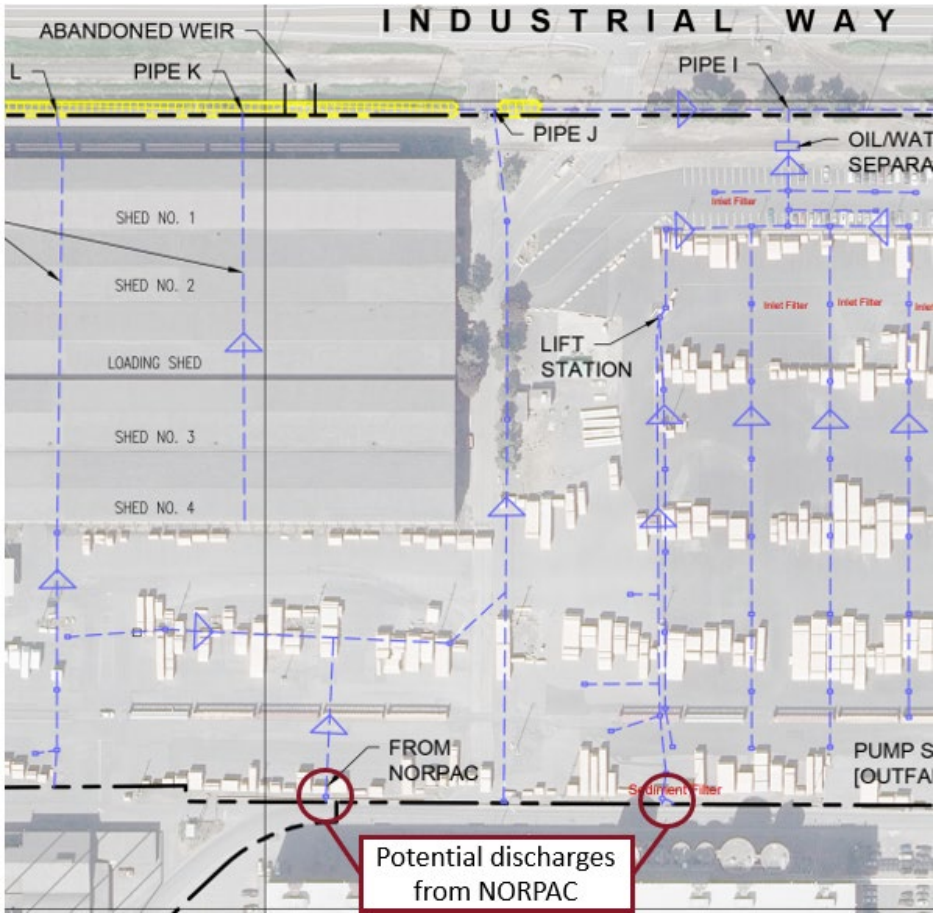

Figure 8: Weyerhaeuser's Pipe I and Pipe J drainage basins and potential discharges from NORPAC.

Figure 9 shows NORPAC's Pipe N drainage area, including the existing location of Outfall 003A (highlighted in orange). The area identified in black is locations

within NORPAC's Pipe N drainage basin that are not monitored at Outfall 003A. Ecology determined that NORPAC's discharges from the Pipe N drainage area are substantially identical discharges to the discharges monitored at Outfall 003A based on the following:

1. NORPAC conducts the same general industrial activity throughout the Pipe N drainage area. Industrial activities in this area primarily includes heavy machinery and vehicle use and traffic, material storage, and material unloading and loading.
2. NORPAC utilizes similar BMPs throughout the Pipe N drainage area, including the following operational and structural source control BMPs and treatment BMPs:
    a. Operational Source Control BMPs: good housekeeping (e.g., regular sweeping, regular equipment maintenance, employee training), preventive maintenance, spill prevention and cleanup, and inspections.
    b. Structural Source Control BMPs: curbing and grading around potential areas of stormwater pollution (e.g., unpaved areas), jersey barriers to prevent soil erosion near high-traffic areas, and structural controls to reduce entry of pollutants into catch basins and open conveyance ditches.
    c. Treatment BMPs: oil absorbent socks and catch basin filter inserts.
3. NORPAC's Pipe N drainage area includes the same types of exposed materials throughout the area. The primary exposed materials that are likely to be significant contributors of pollutants to stormwater discharges include trash and debris from recycled paper transportation and unloading, wood chips and other woody debris, soil or dirt, oil or other petroleum products, and metals from machinery and vehicles.
4. NORPAC's Pipe N drainage area includes portions of paved area as well as vegetated areas. The types of surfaces are similar between the existing Outfall 003A sampling location and the other locations where NORPAC discharges stormwater offsite from the Pipe N drainage area.

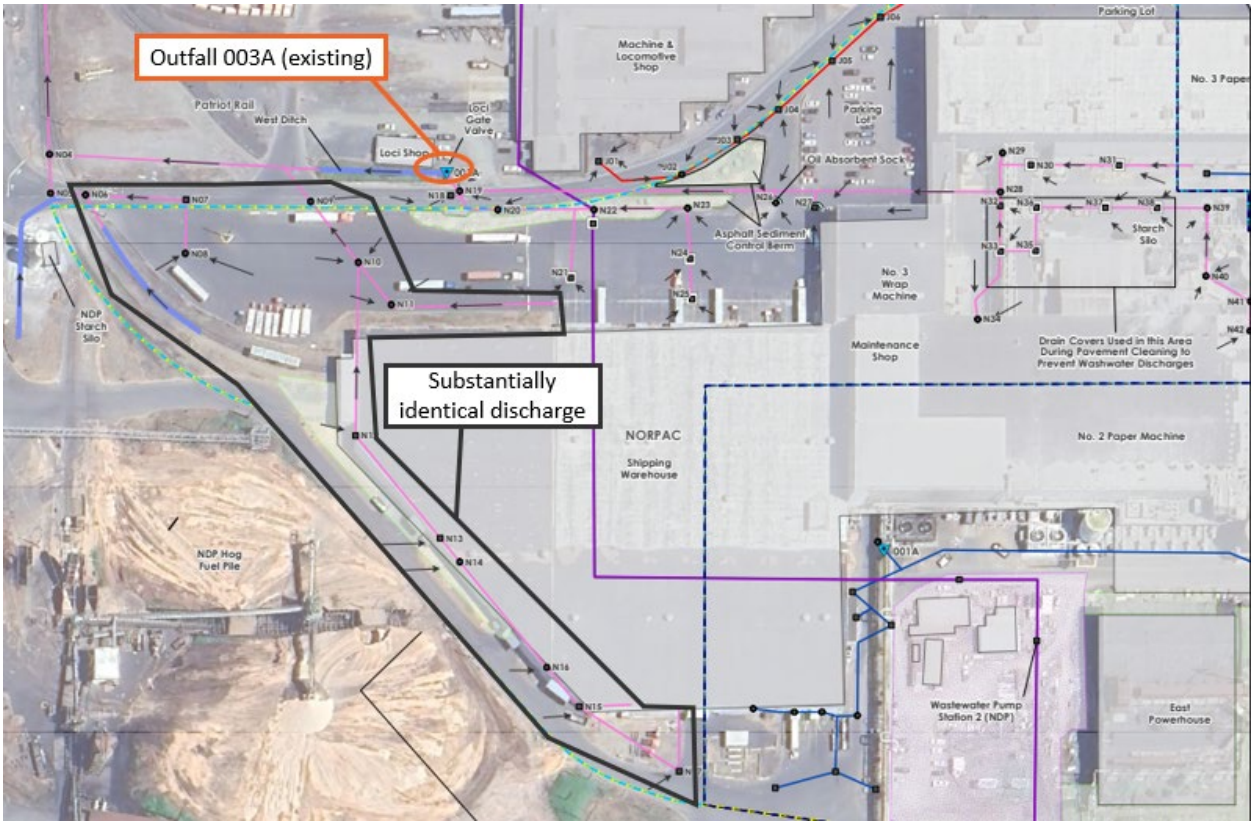

Figure 9: Pipe N drainage basin and discharge locations.

The proposed monitoring locations for the Pipe D and Pipe B drainage basins (Outfalls 006A and 004A, respectively) appear to include all of NORPAC's discharges from these drainage basins. Therefore, Ecology did not include its analysis for 'substantially identical discharges' for these drainage basins in this Supplemental Fact Sheet.

3. State environmental policy act (SEPA) compliance

State law exempts the issuance, reissuance, or modification of any wastewater discharge permit from the SEPA process as long as the permit contains conditions that are no less stringent than federal and state rules and regulations (RCW 43.21C.0383). The exemption applies only to existing discharges, not to new discharges. Because the discharges associated with the proposed and modified Outfalls 004A, 005A, 006A, and 007A are existing discharges, this permitting action is exempt from the SEPA requirements.

Appendix A – Public Involvement Information

Ecology proposes to modify a permit to North Pacific Paper Company LLC (NORPAC). The modified permit includes wastewater discharge limits and other conditions. This supplemental fact sheet describes the facility and Ecology's reasons for requiring the modified permit conditions.

Ecology will place a Public Notice of Draft on March 26, 2024 in "The Daily News" to inform the public and to invite comment on the proposed draft National Pollutant Discharge Elimination System permit modification and supplemental fact sheet.

The notice:

- Tells where copies of the draft Permit Modification and Supplemental Fact Sheet are available for public evaluation (a local public library, the closest Regional or Field Office, posted on our website).
- Offers to provide the documents in an alternate format to accommodate special needs.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed NPDES permit modification.
- Explains the next step(s) in the permitting process.

Frequently Asked Questions about Effective Public Commenting[y]

You may obtain further information from Ecology by telephone, (360) 280-2668, or by writing to the address listed below.

Water Quality Permit Coordinator Department of Ecology

Industrial Section

PO Box 47706

Olympia, WA 98504-7600

The primary author of this permit modification and supplemental fact sheet is Kelsey Brotherton.

[y] https://apps.ecology.wa.gov/publications/SummaryPages/0307023.html

Appendix B – Your Right to Appeal

You have a right to appeal this permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of the final permit. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. “Date of receipt” is defined in RCW 43.21B.001(2) (see glossary).

To appeal you must do the following within 30 days of the date of receipt of this permit:

File your appeal and a copy of this permit with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.

Serve a copy of your appeal and this permit on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

Department of Ecology (street address)

Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Department of Ecology (mailing address)

Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

Pollution Control Hearings Board (street address)

1111 Israel RD SW
STE 301
Tumwater, WA 98501

Pollution Control Hearings Board (mailing address)

PO Box 40903
Olympia, WA 98504-0903

Appendix C – Compliance and Enforcement History

Table 9: Outfall 002A benchmark exceedances since August 1, 2019.

Date(s) of Exceedance	Parameter	Corrective Action Level
9/16/2019	5-day biochemical oxygen demand (BOD_5), daily maximum	Level 1
9/16/2019	Settleable solids (SS), daily maximum	Level 1
September 2019	BOD_5, average monthly	Level 1
September 2019	Turbidity, average monthly	Level 1
10/3/2019	SS, daily maximum	Level 1
10/17/2019	SS, daily maximum	Level 1
October 2019	BOD_5, average monthly	Level 1
November 2019	BOD_5, average monthly	Level 1 & 2
December 2019	BOD_5, average monthly	Level 1 & 2 (ongoing)
1/8/2020	BOD_5, daily maximum	Level 1 & 2 (ongoing)
1/10/2020	SS, daily maximum	Level 1
1/27/2020	Turbidity, daily maximum	Level 1
1/27/2020	SS, daily maximum	Level 1
January 2020	BOD_5, average monthly	Level 1 & 2 (ongoing)
January 2020	Turbidity, average monthly	Level 1
9/18/2020	BOD_5, daily maximum	Level 1
September 2020	BOD_5, average monthly	Level 1
9/18/2020	Dissolved oxygen (DO), daily minimum	Level 1
9/18/2020	SS, daily maximum	Level 1
11/30/2020	SS, daily maximum	Level 2
11/30/2020	Oil and grease (O&G), daily maximum	Level 1
November 2020	BOD_5, average monthly	Level 1 & 2 [z]
November 2020	O&G, average monthly	Level 1
2/22/2021	SS, daily maximum	Level 1 & 2 (ongoing)
May 2021	BOD_5, average monthly	Level 1 & 2 (ongoing)
9/28/2021	SS, daily maximum	Level 1
September 2021	Turbidity, average monthly	Level 1
October 2021	BOD_5, average monthly	Level 1
11/15/2021	SS, daily maximum	Level 2 [aa]
12/6/2021	Turbidity, daily maximum	Level 1
12/9/2021	Turbidity, daily maximum	Level 1

[z] NORPAC did not complete the Level 2 corrective actions for the 2019 BOD_5 benchmark exceedances as required in Special Condition S1.B.b. Therefore, the November 2020 BOD_5 benchmark exceedance triggered Level 2 corrective action requirements because NORPAC exceeded the applicable BOD_5 benchmark values in three months during the 2020 calendar year (January, September, and November).
[aa] NORPAC did not complete the Level 2 corrective actions for the 2020 SS benchmark exceedances as required in Special Condition S1.B.b. Therefore, the November 2021 SS benchmark exceedance triggered Level 2 corrective action requirements because NORPAC exceeded the applicable SS benchmark value in three months during the 2021 calendar year (February, September, and November).

Date(s) of Exceedance	Parameter	Corrective Action Level
12/9/2021	SS, daily maximum	Level 1 & 2 (ongoing)
December 2021	Turbidity, average monthly	Level 1
December 2021	BOD_5, average monthly	Level 1 & 2 [bb]
1/6/2022	SS, daily maximum	Level 1 [cc]
2/14/2022	SS, daily maximum	Level 1 [cc]
2/28/2022	SS, daily maximum	Level 1 [cc]
February 2022	BOD_5, average monthly	Level 1 [cc]
February 2022	Turbidity, average monthly	Level 1
3/1/2022	SS, daily maximum	Level 1 & 2
March 2022	Turbidity, average monthly	Level 1
11/4/2022	SS, daily maximum	Level 1 & 2 (ongoing)
November 2022	Turbidity, average monthly	Level 1 & 2
April 2023	BOD_5, average monthly	Level 1

Table 10: Outfall 003A benchmark exceedances since August 1, 2019.

Date(s) of Exceedance	Parameter	Corrective Action Level
9/16/2019	Turbidity, daily maximum	Level 1
September 2019	Turbidity, average monthly	Level 1
10/17/2019	Turbidity, daily maximum	Level 1
October 2019	Turbidity, average monthly	Level 1
November 2019	Turbidity, average monthly	Level 1 & 2
12/11/2019	Turbidity, daily maximum	Level 1 & 2
12/20/2019	5-day biochemical oxygen demand (BOD_5), daily maximum	Level 1
December 2019	Turbidity, average monthly	Level 1 & 2
December 2019	BOD_5, average monthly	Level 1
1/8/2020	Turbidity, daily maximum	Level 1 & 2 (ongoing)
1/10/2020	pH, daily minimum	Level 1
1/10/2020	Turbidity, daily maximum	Level 1 & 2 (ongoing)
1/23/2020	Turbidity, daily maximum	Level 1 & 2 (ongoing)
1/27/2020	Settleable solids (SS), daily maximum	Level 1
January 2020	Turbidity, average monthly	Level 1 & 2 (ongoing)
2/14/2020	BOD_5, daily maximum	Level 1
2/14/2020	Turbidity, daily maximum	Level 1 & 2 (ongoing)
February 2020	BOD_5, average monthly	Level 1
February 2020	Turbidity, average monthly	Level 1 & 2 (ongoing)

[bb] NORPAC did not complete the Level 2 corrective actions for the 2020 BOD_5 benchmark exceedances as required in Special Condition S1.B.b. Therefore, the December 2021 BOD_5 benchmark exceedance triggered Level 2 corrective action requirements because NORPAC exceeded the applicable BOD_5 benchmark values in three months during the 2021 calendar year (May, October, and December).
[cc] NORPAC reportedly completed a Level 2 corrective action in December 2021.

Date(s) of Exceedance	Parameter	Corrective Action Level
3/6/2020	Turbidity, daily maximum	Level 1 & 2 (ongoing)
March 2020	Turbidity, average monthly	Level 1 & 2 (ongoing)
April 2020	Turbidity, average monthly	Level 1 & 2 (ongoing)
July 2020	BOD_5, average monthly	Level 1
9/18/2020	BOD_5, daily maximum	Level 1 & 2
September 2020	BOD_5, average monthly	Level 1 & 2
10/13/2020	Turbidity, daily maximum	Level 1 & 2 [dd]
October 2020	Turbidity, average monthly	Level 1 & 2 [dd]
11/10/2020	Turbidity, daily maximum	Level 1 & 3
11/17/2020	Turbidity, daily maximum	Level 1 & 3
11/17/2020	SS, daily maximum	Level 1
11/30/2020	Turbidity, daily maximum	Level 1 & 3
November 2020	Turbidity, average monthly	Level 1 & 3
12/11/2020	Turbidity, daily maximum	Level 1 & 3 (ongoing)
12/11/2020	SS, daily maximum	Level 1 & 2
12/17/2020	Turbidity, daily maximum	Level 1 & 3 (ongoing)
12/21/2020	Turbidity, daily maximum	Level 1 & 3 (ongoing)
12/30/2020	Turbidity, daily maximum	Level 1 & 3 (ongoing)
December 2020	Turbidity, average monthly	Level 1 & 3 (ongoing)
1/11/2021	Turbidity, daily maximum	Level 1 & 3 (ongoing)
1/27/2021	Turbidity, daily maximum	Level 1 & 3 (ongoing)
1/27/2021	SS, daily maximum	Level 1 & 2 (ongoing)
January 2021	Turbidity, average monthly	Level 1 & 3 (ongoing)
2/1/2021	Turbidity, daily maximum	Level 1 & 3 (ongoing)
2/1/2021	SS, daily maximum	Level 1 & 2 (ongoing)
2/11/2021	Turbidity, daily maximum	Level 1 & 3 (ongoing)
2/19/2021	Turbidity, daily maximum	Level 1 & 3 (ongoing)
2/19/2021	SS, daily maximum	Level 1 & 2 (ongoing)
February 2021	Turbidity, average monthly	Level 1 & 3 (ongoing)
3/5/2021	SS, daily maximum	Level 1 & 2 (ongoing)
March 2021	BOD_5, average monthly	Level 1 & 2 (ongoing)
March 2021	Turbidity, average monthly	Level 1 & 2 (ongoing)
2/28/2022	SS, daily maximum	Level 1
October 2022	BOD_5, average monthly	Level 1
11/22/2022	SS, daily maximum	Level 1
12/20/2022	SS, daily maximum	Level 1 & 2
December 2022	Turbidity, average monthly	Level 1

[dd] NORPAC did not complete the Level 2 corrective actions for the 2019 turbidity benchmark exceedances as required in Special Condition S1.B.b. Therefore, the October 2020 turbidity benchmark exceedances triggered Level 2 corrective action requirements because NORPAC exceeded the applicable turbidity benchmark values in more than 3 months during the 2020 calendar year (January, February, March, April, and October).

Date(s) of Exceedance	Parameter	Corrective Action Level
2/7/2023	SS, daily maximum	Level 1 & 2 (ongoing)

Table 11: Summary of miscellaneous stormwater-related permit violations.

Date(s) of Violation	Permit Condition(s) Violated	Summary of Permit Violation
August 20, 2019	S1.C., S4, S5.C., and S7	Overflow and unauthorized discharge of process wastewater to Weyerhaeuser's stormwater system from NORPAC's cooling tower.
September 2019	S2.A.	Klebsiella monitoring frequency violation at Outfall 002A.
September 2019	S2.A.	Klebsiella monitoring frequency violation at Outfall 003A.
September 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for 5-day biochemical oxygen demand (BOD_5), turbidity, and settleable solids (SS).
September 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity.
October 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for SS and BOD_5.
October 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity.
November 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5.
November 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity.
December 2, 2019	S1.C., S4, S5.C. and S7	Overflow and unauthorized discharge of process wastewater to Weyerhaeuser's stormwater system from NORPAC's solid waste pad.
December 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5.

Date(s) of Violation	Permit Condition(s) Violated	Summary of Permit Violation
December 2019	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for BOD_5 and turbidity.
January 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5, SS, and turbidity.
January 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity, pH, and SS.
February 2-8, 2020	S2.A.	pH monitoring frequency violation at Outfall 003A.
February 2-8, 2020	S2.A.	BOD_5 monitoring frequency violation at Outfall 003A.
February 2-8, 2020	S2.A.	Chemical oxygen demand (COD) monitoring frequency violation at Outfall 003A.
February 2-8, 2020	S2.A.	Turbidity monitoring frequency violation at Outfall 003A.
February 2-8, 2020	S2.A.	SS monitoring frequency violation at Outfall 003A.
February 15, 2020	S1.C., S4, S5.C. and S7	Overflow and unauthorized discharge of calcium carbonate to Weyerhaeuser's stormwater system.
February 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for BOD_5 and turbidity.
March 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity.
April 21, 2020	S1.C., S4, S5.C. and S7	Overflow and unauthorized discharge of process wastewater to Weyerhaeuser's stormwater system from a stock spill.
April 19-25, 2020	S2.A.	BOD_5 monitoring frequency violation at Outfall 003A.
July 2020	S2.A.	Fecal coliform monitoring frequency violation at Outfall 003A.
July 2020	S2.A.	Klebsiella monitoring frequency violation at Outfall 003A.
July 2020	S2.A.	E. coli monitoring frequency violation at Outfall 003A.

Date(s) of Violation	Permit Condition(s) Violated	Summary of Permit Violation
July 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for BOD_5.
August 31, 2020	S1.B.b.	Failure to complete required Level 2 corrective actions in the Outfall 002B drainage basin for BOD_5.
August 31, 2020	S1.B.b.	Failure to complete required Level 2 corrective actions in the Outfall 003A drainage basin for turbidity.
September 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5, dissolved oxygen (DO), and SS.
September 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for BOD_5.
October 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity.
November 20, 2020	S5.C.2. and S3.F.e.	Prohibited discharge of an oil sheen from Outfall 002A and failure to report the prohibited discharge to Ecology.
November 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5, oil and grease (O&G), and SS.
November 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity and SS.
December 20-26, 2020	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of the weekly stormwater inspection of the site.
December 2020	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity and SS.
January 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for turbidity and SS.
February 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for SS.

Date(s) of Violation	Permit Condition(s) Violated	Summary of Permit Violation
February 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for SS and turbidity.
March 2021	S2.A.	Klebsiella monitoring frequency violation at Outfall 003A.
March 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 003A drainage basin for BOD_5, turbidity, and SS.
May 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5.
June 27 – July 3, 2021	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of the weekly stormwater inspection at the site.
July 11-17, 2021	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of the weekly stormwater inspection of the site.
July 25-31, 2021	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of the weekly stormwater inspection at the site.
August 31, 2021	S1.B.b.	Failure to complete required Level 2 corrective actions in the Outfall 002A drainage basin for BOD_5 and SS.
August 31, 2021	S1.B.b.	Failure to complete required Level 2 corrective actions in the Outfall 003A drainage basin for BOD_5.
September 30, 2021	S1.B.c.	Failure to complete required Level 3 corrective actions in the Outfall 003A drainage basin for turbidity.
September 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for turbidity and SS.
October 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for BOD_5.
November 2021	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for SS.
December 2021	S2.A.	Klebsiella monitoring frequency violation at Outfall 002A.
December 2021	S2.A.	Klebsiella monitoring frequency violation at Outfall 003A.

Date(s) of Violation	Permit Condition(s) Violated	Summary of Permit Violation
December 26, 2021 to January 1, 2022	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of the weekly stormwater inspection at the site.
January 2022	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for SS.
February 20-26, 2022	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of the weekly stormwater inspection at the site.
March 13 – June 18, 2022	S12.C.1., S12.C.2.g., or S3.C.	Failure to conduct, document, or maintain documentation of 14 weekly stormwater inspections at the site.
March 2022	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for SS and turbidity.
May 2022	S2.A.	Fecal coliform monitoring frequency violation at Outfall 003A.
May 2022	S2.A.	Klebsiella monitoring frequency violation at Outfall 003A.
May 2022	S2.A.	E. coli monitoring frequency violation at Outfall 003A.
November 2022	S2.A.	Klebsiella monitoring frequency violation at Outfall 002A.
November 2022	S1.B.a.	Failure to complete required Level 1 corrective actions in the Outfall 002A drainage basin for SS and turbidity.

Appendix D — Response to Comments

[Ecology will complete this section after the public notice of draft period.]