



January 16, 2003

Industrial Permit Coordinator  
Department of Ecology  
Southwest Regional Office  
Post Office Box 47775  
Olympia, Washington 98504-7775  
Via email: lcon461@ecy.wa.gov

In Re: Draft Permit Number WA0041017, Sierra Pacific Industries, Aberdeen Division

FOGH (Friends of Grays Harbor) is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of a healthy Grays Harbor estuary. The goal of FOGH is to protect the natural environment and human health in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

We appreciate this opportunity to comment on the above referenced Draft Permit. We are pleased that Sierra Pacific Industries has decided to locate in the Grays Harbor area and hope that they will take this opportunity to make sure that the health of the Grays Harbor Estuary and the Chehalis River are improved by their actions.

FOGH is concerned, however, that the Public Notice published in the Daily World is confusing and insufficient in its description to adequately inform the general public of the significance of this proposed permit. We therefore find the Notice defective and request that a Public Hearing be held. For example but not limited to, we find no mention that the effluent will be discharged to the Chehalis River, nor do we see quantities or source of water use to run the power plant and its resultant discharge.

The location for the proposed NPDES is in a receiving waterway that supports coho salmon, bull trout, white and green sturgeon and sea-run cutthroat trout populations, some of which are nationally threatened species.

Fish are ectotherms or poikilotherms, terms that describe animals that have a body temperature that is dependent on the environmental temperature. Because of this dependence, environmental temperatures have a profound effect on many aspects of aquatic health. Every species has its own minimum and maximum temperature range and the animal's health is likely to be affected at temperatures outside that range. The solubility of oxygen in water reduces as temperatures rise. Conversely, because of an increased metabolic rate the oxygen requirement increases as water temperatures increase. Clearly, if the total oxygen demand of the system, which includes fish, bacteria and submerged plants, exceeds the dissolved oxygen levels the fish are likely to suffer.

As you are aware, the Grays Harbor Estuary was first proposed as a candidate for the EPA's 303d list of impaired waterways in 1996. It remains impaired to this date. At the present time the receiving waters of the Harbor are compromised by the effluents produced by the Cities of Hoquiam and Aberdeen and the Cosmopolis operation of Weyerhaeuser. Fecal Coliform and other pollution upsets still shut down the oyster growers for a minimum of one week for each incident. This is a great economic and personal loss to them and the general public. Another primary water quality problem in the Chehalis River basin is high water temperature. It is therefore critical that any new NPDES permit must be carefully conditioned to protect the public's health, welfare and safety.

The facility covers approximately 45 acres and there is significant log storage on the property. During the dry summer months, the logs will undoubtedly be sprinkled with water to prevent the development of stain and end checking. This water runoff (and that which develops during wet weather systems) will contain bark, sawdust, tannins and lignins, dissolved organics, settleable and suspended solids. There doesn't seem to be a discussion as to whether this log deck runoff will be part of the NPDES permit or whether there will be a separate permit required for this and the waters discharged to the collection sump. This water can contain concentrations of sodium, sulfate, chloride and dissolved solids.

Biomass combustion, particularly waste wood has often been implicated in the production of dioxins and furans. The creation of ash is a by-product of the combustion process and it will require temporary on-site storage. Possible components of the ash may be arsenic, cadmium, hexavalent chromium, lead, manganese and nickel.

These are important impacts to the water quality of an already challenged waterway. We request a Public Hearing, at which time the proponent can more fully discuss the water discharge impacts to the environment. It is important that this NPDES be conditioned to assure the continued prosperity and survival of the marine resource industries that have been the anchor for our Grays Harbor economy.

Thank you for this opportunity to comment.



Arthur (R.D.) Grunbaum  
FOGH (Friends of Grays Harbor)

