



Northwest Pulp & Paper
ASSOCIATION

Northwest Pulp & Paper Association • 212 Union Avenue SE, Suite 103 • Olympia, WA 98501-1302
360.529.8638 • Fax 360.529.8645 • www.nwppa.net

September 20, 2013

Oregon DEQ
Attn: Ms. Andrea Matzke
811 SW 6th Ave.
Portland, OR 97204

RE: OAR Chapter 340 – Corrections and Clarifications to Toxic Water Quality Standards

Dear Ms. Matzke:

Formed in 1954, the Northwest Pulp & Paper Association (NWPPA) represents 13 member companies and 17 paper mills in Washington, Oregon and Idaho. NWPPA members produce nearly eight million tons of paper products providing family wage jobs.

NWPPA members have six pulp and/or paper mills in Oregon and are permitted to operate and regulated by the Department of Environmental Quality (DEQ). On behalf of NWPPA, I work with the DEQ and the U.S. Environmental Protection Agency (EPA) on environmental policy and regulatory issues of interest to our members in Oregon. I work extensively on water quality issues in DEQ policy advisory committees and the Oregon Legislature.

On behalf of NWPPA, I participated in the DEQ's original 1999-2003 Policy Advisory Committee developing revisions to Oregon's aquatic life water quality standard rules and also in the 2013 advisory groups on corrections and clarifications to the toxics standards. I have reviewed the rule package and offer the following comments for your consideration.

NWPPA supports adoption of the corrections and clarifications of the toxics water quality standards rule package as written. It is NWPPA's understanding that there are no new substantive numeric water quality criteria or narrative standards in the proposal – only corrections and clarifications based on EPA Region 10 action on Oregon aquatic life toxic criteria on January 31, 2013 and other items that have previously been accidentally omitted or unintentional incorrect cross-references in narrative standards. These rule proposals address EPA approval actions and also consolidate Oregon rules for clarification purposes. Please inform NWPPA promptly if our understanding is incorrect – or if EPA signals a future water quality criteria approval action of a substantive nature – that would have the effect of altering numeric or narrative criteria.

Thank you for the opportunity to participate in the rulemaking process and comment on the rule package.

Sincerely,

Kathryn VanNatta

Director of Government and Regulatory Affairs
Northwest Pulp and Paper Association