



Weyerhaeuser NR Company – Raymond Lumber Mill • 51 Ellis Street • Raymond, WA 98577

June 7, 2024

Mr. Jonathan Drygas
Compliance and Enforcement Specialist
Southwest Region Office
Water Quality Program
Washington State Department of Ecology

Subject: Response to May 30, 2024, Noncompliance Notification for State Waste Discharge Permit No. ST0006167 Letter
Weyerhaeuser Raymond Lumber Mill – 51 Ellis Street, Raymond, WA

Dear Mr. Drygas:

Weyerhaeuser NR Company (Weyerhaeuser) has prepared this response to Noncompliance Notification for State Waste Discharge Permit No. ST0006167 in a letter issued by the Department of Ecology (Ecology) to Weyerhaeuser, which was dated May 30, 2024.

Ecology's letter states that the December 2023 Discharge Monitoring Report (DMR) indicated missed sampling frequencies at Outfall 003 for the following:

- No BOD-5 (lbs/day) or Solids (Residue) samples were submitted for the week of December 24-30
- No Flow, pH Daily Max, or pH Daily Min samples were reported for December 27 or 28
- Weyerhaeuser has not explained the cause of the violation in the DMR

The Ecology letter states that Weyerhaeuser must submit a violation report in response.

Weyerhaeuser's Response

Regarding the first item, Weyerhaeuser collected BOD-5 and TSS samples on December 27, 2023; therefore, that alleged violation is incorrect. The results were reported with the December 2023 DMR as 14.7 milligrams per liter (mg/L) and 20.0 mg/L, respectively. However, due to the absence of flow data due to the power outage, the results could not be converted to mass loading concentrations of pounds per day (lbs/day), unless we were to estimate flows for those days.

Regarding the second and third items, on January 10, 2024, Weyerhaeuser submitted a cover letter with the December 2023 DMR with the following comments:

"Raymond Lumber had a plant wide shut down from December 23, 2023, to January 1, 2024. The facility was not operating or manufacturing lumber during this time period. Raymond Lumber continued to monitor flow and pH during the shutdown except for December 27, 2023 – December 28, 2023, when the facility experienced a power outage. Analytical samples were collected, however, flow and pH data is not available."

Therefore, the statement that Weyerhaeuser has not explained the cause of this violation is incorrect. The lack of flow and pH data was due to the loss of power to the facility, which was a situation beyond the control of Weyerhaeuser.

If you have questions about this notification, please contact me or Christine Yanik, Regional Environmental Manager, at 541-409-7770 or email at Christine.Yanik@weyerhaeuser.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete and I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

DocuSigned by:

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Spencer Headley

Weyerhaeuser Raymond Lumber Unit Manager

cc: Chrstine Yanik, Weyerhaeuser
Eric Weiberg, City of Raymond, Willapa Regional Wastewater Treatment Plant
Steve Ogle, P.E., Department of Ecology
Ellie Ott, P.E., Department of Ecology
Kamren Moen, Department of Ecology
John Diamant, P.E., Department of Ecology