



**STATE OF WASHINGTON**  
**DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

February 3, 2025

Richard Bassett  
Cosmo Specialty Fibers, Inc.  
PO Box 539  
Cosmopolis, WA 98537

**Re: Notice of Violation**

<b>Notice of Violation (NOV) Docket #</b>	23222
<b>Site Name</b>	Cosmo Specialty Fibers Located in Grays Harbor
<b>County</b>	
<b>Site Location</b>	1701 First St, Cosmopolis WA 98537

Dear Richard Bassett:

The Department of Ecology (Ecology) is issuing the enclosed Notice of Violation to you for non-payment of water permit fees for the fiscal years 2023 and 2024 and other water quality violations. This Notice of Violation is issued under the authority of Revised Code of Washington (RCW) 90.48.120(1).

If you have questions, please contact Ha Tran at [ha.tran@ecy.wa.gov](mailto:ha.tran@ecy.wa.gov) or (360) 790-6276.

Sincerely,

James DeMay, P.E.  
Industrial Section Manager  
Washington State Department of Ecology

Enclosure: Notice of Violation Docket #23222

By Certified Mail: 9489 0090 0027 6381 5458 22

cc: Arne Peterson, Cosmo Specialty Fibers

State of Washington  
Department of Ecology

In the Matter of Compliance By  
Cosmo Specialty Fibers, Inc.  
With Chapter 90.48 RCW and the Rules and Regulations  
Of the Department of Ecology  
Notice of Violation Docket #23222

To: Richard Bassett  
Cosmo Specialty Fibers, Inc.  
PO Box 539  
Cosmopolis, WA 98537

Notice of Violation (NOV) Docket #	23222
Site Name County	Cosmo Specialty Fibers Located in Grays Harbor
Site Location	1701 First St, Cosmopolis, WA 98516

The Department of Ecology (Ecology) is issuing this Notice of Violation to you for violating provisions of Chapter 90.48 Revised Code of Washington (RCW) Water Pollution Control. This notice contains Ecology's determination that a violation has or will occur.

Ecology has the authority to issue this Notice of Violation under RCW 90.48.120(1) which reads in part:

"Whenever in the opinion of Ecology, any person shall violate or create a substantial potential to violate the provisions of the chapter, or fails to control the polluting content of waste discharged, or to be discharged into any waters of the state, the department shall notify such persons of its determination by registered mail...."

## 1. Site Location

Cosmo Specialty Fibers

1701 First St, Cosmopolis, WA 98516

## 2. Determination of Violations

Notice is hereby given in accordance with RCW 90.48.120(1), as follows:

Cosmo Specialty Fibers, Inc has violated NPDES permit no. WA0000809 as follows:

**Violation 1:** Permit Condition S2.A(4) requires Cosmo to sample their sludge annually and analyze it for 2,3,7,8-TCDD and 2,3,7,8-TCDF (dioxin and furan). Cosmo did not submit the dioxin and furan sludge analysis result for the year 2022, which were due January 15, 2023.

**Violation 2:** Cosmo has not paid their NDPES permit fees, as required by Permit Condition G13. The total amount of unpaid fees to date is **\$110,438.25**. A summary of the unpaid permit fees is provided in the table below.

Fee period	Fee invoice mail date	Date of violation*	Fee amount	Payment status
July 1, 2022-June 30, 2023 (Fiscal Year 2023)	February 20, 2023	April 7, 2023	\$44,174.25	Unpaid as of the date of this NOV
July 1, 2023 – June 30, 2024 (Fiscal Year 2024)	August 10, 2023	September 25, 2023	\$22,088.00	Unpaid as of the date of this NOV
July 1, 2023 – June 30, 2024 (Fiscal Year 2024)	February 23, 2024	April 9, 2024	\$22,088.00	Unpaid as of the date of this NOV
July 1, 2024 – June 30, 2025 (Fiscal Year 2025)	July 26, 2024	September 10, 2024	\$22,088.00	Unpaid as of the date of this NOV

\*The date of violation is the day after the fee due date on the invoice.

**Violation 3:** Cosmo has not properly maintained the Outfall 002 flow meter as needed for accurate measurement per Permit Condition S2.C. Cosmo's flow measurement weir is out of alignment, as noted during Ecology's July 8, 2022 and September 15, 2023 water quality inspection.

**Violation 4:** The dump tank containing red liquor in the pulping area is continually leaking to the sour sewer and eventually to outfall 001. This is an unpermitted discharge in violation of Permit Condition S1.A, as identified by Ecology during the Sept 15, 2023 water quality inspection.

**Violation 5:** Cosmo has not updated their Spill Control Plan to reflect the current conditions at the site, as required by Permit Condition S8.

**Violation 6:** Cosmo has not updated their Stormwater Pollution Prevention Plan (SWPPP) to reflect current conditions at the site, as required by Permit Condition S9.

**Violations 7-9:** Cosmo has not submitted quarterly AOX sampling results for outfall 001 for the 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> quarters of 2024, as required by Permit Condition S2.F.

This determination does not constitute an Order or directive under RCW 43.21B.310.

### 3. File a Report with Ecology

Pursuant to RCW 90.48.120(1), within thirty (30) days from receipt of this Notice of Violation, Cosmo Specialty Fibers must file a full report with Ecology stating:

1. What steps **HAVE BEEN** taken to comply with this determination of Ecology.
2. What steps **ARE BEING** taken to comply with this determination of Ecology.

Send the report to:

Ha Tran, P.E.  
Industrial Section, Solid Waste Management Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

### 4. Contact Information

Please direct all questions about this Notice of Violation to:

Ha Tran  
Industrial Section, Solid Waste Management Program  
Department of Ecology  
PO Box 47600, Olympia WA 98504-7600

Phone: (360) 790-6276  
Email: ha.tran@ecy.wa.gov

### 5. More Information

- **Chapter 90.48 RCW – Water Pollution Control**  
<https://apps.leg.wa.gov/rcw/default.aspx?cite=90.48>

## 6. Signature



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James DeMay, P.E.  
Industrial Section  
Washington State Department of Ecology

February 3, 2025

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Date