



# Focus

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## Cascade Pole and Lumber Company final stormwater permit

The Washington Department of Ecology (Ecology) has developed a final stormwater discharge permit for the Cascade Pole and Lumber Company of Tacoma.

Under the new final permit, Cascade Pole will discharge small amounts of pentachlorophenol (also known as penta) into the Puyallup River and the Lincoln Avenue Ditch. Pentachlorophenol is a toxic compound that concerned many citizens who commented on the draft version of the permit. While Ecology does not have the authority to ban use of this chemical, the agency does have a responsibility to make sure discharges are managed to protect public health and the environment.

Pentachlorophenol discharges concerned many citizens who commented on the draft version of the permit. For discharges to the Puyallup River, the new permit requires Cascade Pole to meet discharge limits for pentachlorophenol that are 90 percent lower than limits now in effect.

Ecology currently manages about 700 stormwater permits in Southwest Washington alone. Storm water from city streets, parking lots and residential properties can carry pollution into streams, lakes and marine waters. Most of the 700 stormwater permits Ecology manages fall into the "general" category. That is, they have no specific requirements for systems or facility designs. The permits require facilities to use BMPs – or best management practices – to control stormwater runoff.

Ecology pays special attention to the wood treatment industry when it comes to storm water. Under terms of stormwater permits issued by Ecology, wood treaters must limit the amount of pollutants they discharge in their storm water.

### Answers to commonly asked questions

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#### *How does the final permit differ from the previous permit?*

For the discharge to the Puyallup River estuary, the new permit:

- Reduces Cascade Pole's pentachlorophenol discharge limit by 90 percent. This new limit goes into effect in March 2003. An interim limit applies until then.
- Sets a new discharge limit for arsenic.
- Reduces the copper discharge limit by 30 percent. The permit also establishes a procedure for setting final, lower limits for copper and chromium three years from now.

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For the discharge to the Lincoln Avenue ditch, final effluent limits are also lower than limits now in effect – 60 percent lower for pentachlorophenol, 80 percent lower for copper, and 90 percent lower for chromium.

***Why is the Department of Ecology allowing Cascade Pole to put toxic pollutants into the Puyallup River estuary?***

Pollutants are generally toxic when they are present at high concentrations for short periods of time or at low concentrations for long periods of time. The concentrations Cascade Pole will be discharging should not be toxic under any circumstance. Ecology is requiring Cascade Pole to test the effluent to prove that the discharge is not toxic.

***What's an estuary? Why are estuaries important?***

An estuary is where salt and freshwater meet, where the river meets the sea and, in this case, where the Puyallup River meets Puget Sound. The Puyallup River estuary is the area of the river from I-5 to the river mouth at Commencement Bay.

River estuaries are nursery areas for juvenile salmon. Juvenile Chinook salmon feed and grow and adjust to saltwater conditions in these environments. Life in estuaries is stressful for juvenile salmon. As juveniles enter the estuary, they must adjust to a new, salty environment and a new set of predators. Puget Sound chinook salmon are listed as a threatened species under the federal Endangered Species Act. Recent federal regulations prohibit actions that affect the species or its habitat. Because of this, Ecology took special care in developing the final permit.

***Is the Department of Ecology allowing a mixing zone?***

Yes. And, in the new permit Ecology considered low water conditions. That means that although the size of the mixing zone won't change greatly, the amount of pollution in Cascade Pole's discharge will.

***How does the new permit address human health issues?***

The new permit addresses human health by requiring Cascade Pole to limit its discharge of arsenic and pentachlorophenol. The new limits on pentachlorophenol will ensure that the Puyallup River meets Washington's human-health based standard for surface waters. The new limits on arsenic are designed to control discharges while discussion continues state-wide and at the national level on health-based standards for arsenic.

***How does the new permit protect Chinook salmon?***

The new permit protects Chinook salmon by requiring Cascade Pole to reduce its discharge of toxic pollutants, and by requiring Cascade Pole to meet standards at a wider range of river flows, including low flows.

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***Did Ecology consider chronic effects to fish?***

Yes. Ecology considered both short- and long-term effects to aquatic life. The short term acute effects turned out to be the most critical and drive the new discharge limits.

***Are there dioxins in this discharge?***

Yes, at very low levels. The most toxic forms of dioxin are absent. The new permit requires Cascade Pole to sample for dioxins.

***Is the new permit back-sliding?***

No. Cascade Pole will discharge less pollution under this permit than under the old permit. Nor is this permit “back-sliding” as that term is specifically defined in the Clean Water Act. Ecology based the new permit on information that was not available when the previous permit was issued. Ecology believes the new permit is a step in the right direction and is consistent with Clean Water Act back-sliding provisions.

***Why didn't Ecology propose these more-protective final limits in the draft permit?***

Ecology responded to public comment and re-examined the draft permit. We decided that the draft limits, based upon seasonal average flows in the river, were not sufficiently protective. Often, flows in the river are below seasonal averages, especially when upstream hydropower facilities are operating. The importance of estuarine habitat to juvenile Chinook salmon, the limited amount of estuarine habitat now left near the mouth of the Puyallup River, and Cascade Pole's most recent data are additional factors that Ecology reviewed in developing the final discharge limits.

***Why can't you just require Cascade Pole to collect and treat all its storm water?***

Ecology requires a discharger to meet water quality standards. There are many ways to reduce pollutant discharges to meet standards. We allow the discharger to find the solution that works best for them.

***Is Ecology singling out Cascade Pole and Lumber Company?***

No. Cascade Pole and Lumber Company's final permit limits are within the range of limits Ecology has established for other wood treaters in the state (Table 1).

Table 1  
Comparison of Effluent Limits  
for Wood-Treating Facilities

	Outfall	Arsenic	Copper	Chromium	PentaCP
Allweather Wood, Washougal	001	340	36	48	--
	003	340	254	605	--
Exterior Wood, Washougal	001	140	160	210	
Western Wood Sumner	001	360	90	100	
	002	360	90	100	
Oiser Co., Bellingham	001	--	--	--	9
	002	--	--	--	9
Cascade Pole, Tacoma	Lin. Ditch	360	159	138	81
	Puy. River	360	156	137	20

### **For more information**

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