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October 24, 2016

Mr. Andrew Edwards
Bureau of Water
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Dear Mr. Edwards,

We appreciate the opportunity to comment on the Department's proposed updates of water quality criteria that are being considered for revision as part of the triennial review process. Making sure that the technical evaluation and resulting standards are both protective and achievable is critical to both protecting our natural resources and providing certainty to industries such as Resolute Forest Products with facilities in South Carolina.

Resolute operates a pulp and paper manufacturing facility in Catawba, SC, employing over 600 individuals from within predominantly 50 miles of the facility. The mill has been in operation since 1959, and has invested hundreds of millions of dollars in improvements since that time – most notably – the addition of a continuous pulp digester, representing over a 100 million dollar investment. The mill manufactures 720,000 metric tons of market pulp and commercial printing papers used in some of the most widely circulated magazine, catalog, and retail publications in the world.

Our most serious technical concerns are outlined in the comments provided by AFPA and NCASI on behalf of pulp and paper operations in South Carolina. However, we would also like to stress the critical importance of ensuring that the science used to develop the criteria for protection of human health reflect accurate technical assumptions and realistic lifestyle behavior for South Carolina.

Resolute understands its own responsibility and that of the state to protect the natural resources and the environment. However, we believe that many of the technical assumptions that the US EPA has used to base their HHWQC on are flawed and we are concerned about moving forward based on the technical merit of the criteria being proposed. There is too much at stake to get this wrong. We must get the science right. And if the science is right, the standards will be right for the state of South Carolina.



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Forest Products

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Compliance with these criteria as they are currently proposed by the state will be challenging, costly and for certain pollutants may be impossible. These costs will not only impact business and industry in South Carolina, but will also create hardship on municipalities and many other unintended targets, such as agriculture and other non-point sources. Before these entities are asked to assume a heavy burden of compliance, the state must be absolutely sure they have the right standards to achieve the required results. Standards that have measurable and corresponding health benefits.

The state has the ability and the flexibility to develop water quality criteria that are protective, achievable and affordable. Resolute welcomes the opportunity to provide additional information and technical expertise to the staff of DHEC as they take on this challenge.

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