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Andrew J. Edwards
Water Quality Standards Coordinator
S.C. Department of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

Re: Proposed Revisions to Section 61-68, Water Classifications and Standards, Department of Environment Health and Environmental Control

Dear Mr. Edwards:

Domtar appreciates the opportunity to comment on DHEC's amendments to the *Water Classifications and Standards*. Domtar is a leading provider of a wide variety of fiber-based products including communication, specialty and packaging papers, market pulp and absorbent hygiene products. With approximately 10,000 employees serving more than 50 countries around the world, Domtar is driven by a commitment to turn sustainable wood fiber into useful products that people rely on every day. Domtar's principal executive office is in Fort Mill, South Carolina, making us the only Fortune 500 Company headquartered in the Palmetto State.

In South Carolina alone, Domtar employs over 1,000 men and women at our pulp and paper mill in Bennettsville, converting sites in Rock Hill and Tatum, and our head office in Fort Mill. We are proud of the host communities we call home. Our mill in Bennettsville sits on the Great Pee Dee River, and we have a shared interest in keeping its waters clean. Pulp and Paper manufacturing is a resource intensive process, using millions of gallons of water every day, most of which gets returned back to its original source after it is thoroughly cleaned and treated. In many cases we return the water cleaner than when we withdrew it.

Domtar urges DHEC to not adopt the Proposal's Human Health Water Quality Criteria (HHWQC). In the submission to the State Register it is stated that: "no cost to the State or significant cost to its political subdivisions as a whole should be incurred by these amendments." What DHEC did not consider is that lifting the already stringent water classification and standards would place an undue burden on manufacturers like Domtar, all while doing so using unnecessarily conservative risk parameters that go far beyond dangers to human health.



Domtar encourages the State to review the HHWQC, and not blindly accept EPA's onerous recommendation. DHEC needs to apply a scientifically defensible approach, as permitted by EPA in developing water quality criteria. Such an approach will be able to balance the need to protect human health while maintaining South Carolina's business friendly approach that has brought so many manufacturing and other companies to the state.

Domtar also takes issue with reducing the maximum allowable limit on many of the 94 pollutants EPA has identified by a factor of 10,000. In some cases, such a reduction then falls below any detectable limit that we can measure with current technology. If technology is not available to measure below a detectable limit, how does the State expect us to purify water below such a difficult to measure metric? The retro-fitting of manufacturing facilities to install measuring and purification equipment that is not even available with current technology presents a tremendous capital cost with disproportionately small benefit towards overall human health. With many of the 2015 HHWQC more stringent, and in some cases many times more stringent, than the previous national HHWQC, even with the expenditure of significant funds for advanced treatment technologies, many of the more stringent discharge limits will not be achieved.

In its calculation, the EPA, and by extension DHEC, use an overly conservative approach in calculating the risks to human health. While it is everybody's responsibility to keep our water clean, applying the "compounded conservatism" approach makes unrealistic assumptions about human behavior. Few people drink what is generally considered a healthy amount of water every day (~2.4 liters), certainly not directly from lakes or rivers, as the risk model assumes. The same can be applied to the EPA assumption that people eat fish from contaminated waters daily, while conveniently omitting the widely documented benefits to eating fish.


We ask that DHEC consider a balance between the need to protect human health and placing overly onerous government regulations on the State's manufacturers. EPA recommendations concerning the adoption of HHWQC have been very controversial in the states of Oregon, Washington, Idaho, Maine, and Florida. The matter of scientific debate in these states is also relevant in South Carolina. Prior to adopting EPA's 2015 HHWQC, South Carolina needs to conduct detailed economic and technical feasibility studies to determine the impact to regulated entities and the communities in which they operate.

It is important to note states have departed from EPA's national recommended water quality criteria. These departures reflect significant efforts on the part of states to carefully consider the basis for the derivation of the criteria recommendations that were updated by EPA in 2015. Such consideration is important because the scientific underpinnings for some parameters used to derive the updated criteria are suspect to a degree that caused some states to reject them and, instead, employ alternative approaches.

Domtar supports and incorporates by reference the comments submitted by American Forest & Paper Association (AF&PA) the National Council of Air and Stream Improvement (NCASI) and the South Carolina Pulp and Paper Association (SCPPA).

Please let me know if there are any questions or if there is a need to further discuss the issues raised in these comments, I can be reached at 843-454-8955 or via email at athena.strickland@domtar.com

Thank you,

A handwritten signature in black ink, appearing to read "Athena Strickland". The signature is fluid and cursive, with the first name being more prominent.

Athena Strickland

Technical Services Manager

Marlboro Mill