



October 24, 2016

Andrew J. Edwards
Water Quality Standards Coordinator
S.C. Dept. 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 ("DEHC") ("the Proposal")

Dear Mr. Edwards:

Sonoco appreciates the opportunity to comment on the Proposal and would like to use the opportunity to point out some fundamental oversights that exist in DHEC's proposed adoption of the lower Federal HHWQC. In reviewing the Statement of Need and Reasonableness associated with the proposal, specifically the determination of costs and benefits, DHEC stated that "The Department found that the overall impact to ... the regulated community as a whole was not likely to be significant...". Sonoco would like to respectfully disagree with this statement. Sonoco has reviewed the reductions to the water quality criteria as well as the technologies that are available to meet these lower standards, including the publication from HDR Engineering out of Bellvue, WA titled "Treatment Technology Review and Assessment," dated December 4, 2013. In reviewing this information, Sonoco believes that the cost to comply with these lower water quality standards will bring with it significant capital spending to retrofit existing wastewater treatment plants with very costly (and minimally effective) technology to meet these lowered standards. Table ES-2 in the HDR document indicates various costs for implementing advanced treatment on several pollutants that would range in cost from \$77,000 to \$290,000,000 per pound of pollutant removed. This is a significant cost for our manufacturing facilities. Because the HDR study deals with different concentrations and is applied to the state of WA, Sonoco would request that a similar effort be made by DHEC to understand the technologies required to meet these lower levels and the ultimate costs in both immediate capital and long term operating costs for discharges in SC. Sonoco believes that these additional costs continue to limit the competitiveness of SC businesses in our global economy.

While Sonoco agrees that "appropriately protective" water quality standards are necessary to maintain and improve the quality of waters of the state, Sonoco argues that the reductions in the water quality standards currently proposed by EPA in the Proposal are too aggressive and contain too many conservative layers in the estimates that do not apply to SC specifically. Sonoco would request that DHEC not approve the adoption of the national HHWQC as it has proposed at this time and rather take the opportunity to work with SC stakeholders to develop more defensible water quality criteria that reflect specific conditions in the State of SC while taking into account the cost of treatment for these criteria.

Thank you for the opportunity to comment on the Proposal. If you have any questions, please contact me at 843-383-7000 or edward.harrington@sonoco.com.

Sincerely,

Edward Harrington
Global Environmental Director

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SC Department of
Health and Environmental
Control