

California Regional Water Quality Control Board
North Coast Region

ATTACHMENT A

TO

COMPLAINT NO. R1-2005-0028
FOR ADMINISTRATIVE CIVIL LIABILITY
IN THE MATTER OF
STOCKTON PACIFIC ENTERPRISES, INC.
SAMOA PULP MILL

Humboldt County

The Regional Water Board is required to consider economic benefits derived from the acts that constitute the violations of permit conditions. The permittee did realize significant cost savings for violations of permit conditions. Cost savings includes the costs of not constructing secondary treatment units leading to significantly reduced effluent quality and a greater frequency of violations of permit effluent limitations.

The State Water Resources Control Board (SWRCB) Office of Statewide Initiatives prepared an Economic Benefit Analysis dated March 2, 2005.

The estimated cost of constructing secondary treatment units is \$15,000,000, with an estimated operational life span of 25 years. The estimated cost for maintenance and operation of secondary treatment units is \$1,000,000 per year. The permittee operated the Samoa Pulp Mill for 20 months from the period of August 2003 to March 2005. Total avoided costs over a twenty-month period for not constructing secondary treatment units is \$1,655,635.

Details of the SWRCB's analysis are contained in a SWRCB Office of Statewide Initiatives interoffice memorandum dated March 2, 2005.

(042205_05_0028_RRO_tmk_stockton_acl_attachmentA.doc)