

Public Comments

The Regional Water Board received 10 letters from members of the public, all in opposition to the adoption of the draft NPDES permit (Order No. R1-2009-0033) for the Freshwater Tissue Company, Samoa Pulp Mill. The comments identified errata, requested clarification of certain provisions of the draft Order, or requested changes to the draft Order. The following are staff responses to significant comments from the Discharger:

General Comment 1: Pulp Mill has Poor Compliance History. Numerous commentors raised the issue of the poor compliance history of the pulp mill and believe the change in ownership will not result in an improvement in compliance or a reduction of pollution.

Response: The draft Order

General Comment 2: Immediate Compliance with Permit. Many commentors objected that Freshwater Tissue Company will be granted a time schedule, up to 3 years, to meet permit requirements and federal effluent standards.

Response: The draft Order has been revised to reflect this request.

General Comment 3: Air Pollution and Site Contamination. Many commentors cited health problems suffered by themselves and/or family members from air emissions and the ongoing threat of health problems from exiting and unresolved soil and groundwater contamination at the pulp mill site.

Response: A reasonable p

General Comment 4: Hearing Location. Page 11, Section IV.A.1,

Response: One commentor objected to the decision to hold the public hearing in Santa Rosa when

Poor compliance history
Past owners did not complete upgrades that they had committed to do.

Need to enforce environmental laws
Must meet permit conditions at startup
Where is authority to grant schedules of compliance when the standard can't be met?
Air pollution resulted in health problems for family member
More frequent monitoring if result exceeds limit
Mill shut down in event of noncompliance is not certain, places burden on the public to sue
Ongoing issues with site contamination
Poor compliance (air and water) after unplanned shutdowns

Mill is undercapitalized and cannot meet requirements
Hearing location is undue hardship on interested parties