



March 25, 2019

By Electronic Mail (edwardaj@dhec.sc.gov)

Mr. Andrew Edwards  
Water Quality Standards Coordinator  
Bureau of Water  
S.C. DHEC  
2600 Bull Street  
Columbia, S.C. 29201

**Re: Notice of Drafting – Water Classifications and Standards  
R. 61-68**

Dear Mr. Edwards:

I am writing on behalf of the SC Water Quality Association to provide a few suggested topics for the Department's consideration as part of the upcoming triennial review of water quality standards.

The SCWQA comprises public water, sewer, and storm water utilities statewide. We strive to provide public water, sewer, and storm water services which fully meet applicable requirements in an affordable and cost-effective manner. Our suggestions are offered from that perspective.

Bacteria. With the impending electronic reporting, we believe the POTW bacteria provisions are too complicated and worry about how EPA's ECHO database will accommodate them. Quite frankly, many of our members find the provisions – especially for e.coli - to be complicated both in the regulations and within members' NPDES permits. EPA's databases have consistently had erroneous data leading EPA to include disclaimers about the invalidity of its data for entire states (such as North Carolina). Accordingly, we believe it is prudent for the Department to transition POTWs to monthly/weekly geometric mean bacteria limits in accordance with 40 CFR Part 122.45(d)(2).

The SCWQA would also support DHEC's adoption of EPA's most recent recreational criteria for bacteria which feature a longer averaging period (90 versus 30 days) and a higher statistical threshold value. However, we are also fine with deferring consideration of those criteria to a subsequent triennial review.

Mercury. The SCWQA believes that DHEC should consider changes in the mixing zone requirements to allow for a case-specific mixing zone where the impairment is based on a fish consumption advisory. This approach would provide some appropriate flexibility in mercury permitting. The vast majority of mercury in SC's waters comes from air deposition, and in North Carolina, for example, the State and EPA determined that 99% of mercury was from air deposition. North Carolina adopted a TMDL for mercury east of I-95 which allocated two percent of the allowable mercury loading to all point sources. We understand they remain below that allocation. Further, it is the SCWQA's opinion that the little mercury discharged from POTWs is primarily due to dental amalgam – which is being addressed through EPA's 2018 dental amalgam rule.

Deferral/Waiver of Reporting During Natural Disasters/Emergencies. Section E.4.b. We ask that DHEC add into this section a statement memorializing that the Department can defer and/or waive these reporting requirements during natural disasters, major storm events, or other extenuating circumstances.

Clarify Duration of Criteria for Lakes. We suggest that the Department clarify the application of the lake numeric criteria as being seasonal geometric mean criteria. We suggest the following clarification wording:

b. Numeric nutrient criteria for lakes are based on an ecoregional approach which takes into account the geographic location of the lakes within the State and are listed below. All of the criteria are seasonal (April through September) geometric means.

Thank you for considering our suggested topics for the upcoming triennial review. Please let us know should the Department have questions or require additional information.

Sincerely,

A handwritten signature in blue ink that reads "F. Paul Calamita". The signature is written in a cursive style.

F. Paul Calamita

C: SCWQA Members