



Water Quality Standards 2019 Triennial Review
Summary of Public Comments and Department Responses

NAME	SECTION CITATION	PUBLIC COMMENT	DEPARTMENT RESPONSE
Gerrit Jöbssis, American Rivers; South Carolina Rivers Forever; Megan Chase, Upstate Forever	N/A	Stream flow protection is a critical issue for South Carolina. Given its environmental and economic values, it is imperative that the Department explicitly recognize stream flow protection through narrative standards.	The Department recognizes the importance of stream flow protection. The Department is currently working to determine appropriate narrative stream flow standards. Following this Triennial Review, the Department plans to initiate a separate rulemaking process focused on stream flow standards.
South Carolina Rivers Forever; Megan Chase, Upstate Forever	N/A	The Department should prioritize the establishment of instream nutrient standards for all SC rivers and streams.	The Department has a phased nutrient promulgation schedule. This phased approach is part of a plan submitted to EPA consistent with the CWA. Previously the Department focused resources on establishing nutrient criteria for estuaries because of substantial data to support that effort. Currently the Department is in the process of shifting resources to focus on the development of site specific nutrient criteria for the Catawba watershed.

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Paul Calamita, South Carolina Water Quality Association	R.61-68.E.14.c.(8)ii., R.61-68.E.14.c.(9)ii., R.61-68.E.14.c.(10)ii., R.61-68.E.14.c.(11)ii., R.61-68.E.14.c.(12)	The POTW bacteria provisions are too complicated. The Department should transition POTWs to monthly/weekly geometric mean bacteria limits.	The Department established the referenced bacteria standards to protect recreational uses in freshwaters and saltwaters and to protect human health through the consumption of shellfish from shellfish harvesting waters. The Department does not intend to propose changes to the existing bacteria sampling and reporting requirements during this triennial review.
Paul Calamita, South Carolina Water Quality Association	R.61-68.C.10	The Department should consider changes in the mixing zone requirements to allow for a case-specific mixing zones for mercury where the impairment is based on a fish consumption advisory. This approach would provide some appropriate flexibility in mercury permitting.	The Department does not intend to propose changes to the existing mixing zone regulations during this triennial review.
Paul Calamita, South Carolina Water Quality Association	R.61-68.E.4.b.	The Department should consider including a statement that would defer and/or waive these reporting requirements during natural disasters, major storm events, or other extenuating circumstances.	The Department will consider adding a statement for waiving reporting requirements during this triennial review.
Paul Calamita, South Carolina Water Quality Association	R.61-68.E.11.b.	The Department should clarify the application of the lake numeric criteria as being seasonal geometric mean criteria.	The Department does not intend to propose changes to the existing numeric nutrient criteria for lakes during this triennial review.

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Megan Chase, Upstate Forever	R.61-68 Appendix	The Department should reconsider the adoption of criteria for 94 toxic pollutants in accordance with the EPA's updated human health and aquatic life criteria.	The Department does not intend to adopt the nationally recommended human health criteria into the State's water quality standards during this triennial review. The Department will retain these comments for consideration during future triennial reviews.