



2022 Triennial Review – Notice of Proposed Regulation
Summary of Public Comments and Department Responses

NAME	SECTION CITATION	PUBLIC COMMENT	DEPARTMENT RESPONSE
Charleston Water System	R.61-68.Appendix	<p>The notice of proposed regulation for R.61-68 (document 5119) references the adoption of EPA's "revised standard for aquatic life ambient water quality criteria for aluminum... in accordance with the CWA." However, EPA's 2018 Final Notice (EPA-822-R-18-001) stated, "As with the 1988 AWQC for aluminum, there are still insufficient data on estuarine and marine species to fulfill the [Minimum Data Requirements] as specified in the 1985 Guidelines. As a result, the EPA cannot recommend criteria for estuarine/marine waters at this time" (p. xv). This point was reiterated in EPA's Fact Sheet (EPA-822-F-18-003), "The EPA has published final updated aquatic life ambient water quality criteria recommendations for aluminum in freshwater under Section 3014(a)(1) of the Clean Water Act to reflect the latest scientific knowledge There are not enough data to support the development of estuarine/marine aluminum criteria at this time." The applicability to "freshwaters" is also captured in the Federal Register announcement (Vol. 83, No. 245, Dec. 21, 2018, 65663) and in EPA's aluminum criteria calculator used to determine the normalized aluminum acute and chronic criteria. This distinction about the applicability of the new criteria only to freshwater is not captured in the notice of proposed regulation or proposed R.61-68. We do not believe it is appropriate to extrapolate the freshwater standards to estuarine or marine water and thus, request that the distinction be adequately document in this review process and within the updated R.61-68.</p>	<p>The Department agrees with Charleston Water System that the proposed aluminum criteria is only appropriate for application in freshwater. This was the intent of the proposed language. As explained below, the Department has decided to delay the proposed adoption of the EPA recommended aluminum criteria. Future proposed regulatory changes to R. 61-68 will clarify that this criterion is for freshwater only.</p>
EPA Region 4	R.61-68.E.	<p>Thank you for meeting with EPA earlier this month to discuss our comments on SC's 2022 Triennial Review of Water Quality Standards. I appreciated you hosting the stakeholder meeting on September 20th, 2022, to review the final draft changes that will be presented to the Board in November. During that meeting, EPA noted the following existing provision in the State rules which had not been updated:</p> <p><i>E. GENERAL RULES AND STANDARDS APPLICABLE TO ALL WATERS</i></p> <p><i>2. The classes and standards described in Section G and H of this regulation implement the above State policy by protecting the waters of South Carolina. Consistent with the above policy, the Department adopts the following general standards in items 3-17 for all waters of South Carolina.</i></p> <p>While the provision notes that the provisions in items 3-17 apply, the rule has been updated in previous triennials to add the following provisions at E. 18 and 19:</p>	<p>The Department agrees with EPA. This technical correction had been missed by staff during the previous triennial review cycles. Thank you for bringing this to our attention. When the Department finalizes the proposed revisions to R.61-68 we will update E.2 to say items 3-19.</p>

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EPA Region 4 (continued)		<p>18. For the protection of human health, methylmercury concentration in fish or shellfish shall not exceed 0.3 mg/kg in wet weight of edible tissue. a. NPDES permit implementation for methylmercury will require mercury monitoring, assessment and minimization for discharges that meet the following conditions; (1) The receiving stream is impaired for methylmercury in fish or shellfish tissue, and; (2) The discharge or proposed discharge has consistently quantifiable levels of mercury. b. The need for a total mercury effluent limit, for the protection of aquatic life and/or human health, pursuant to R.61-9.122.44(d), shall be based on a reasonable potential analysis of the discharge compared to the mercury standards for ambient waters.</p> <p>19. The assessment of methylmercury in fish or shellfish for purposes of Section 303(d) listing determinations shall be based on the Department's Fish Consumption Advisories.</p> <p>EPA requests that SC update E.2. to include 'items 3-19,' when it goes to the Board in November.</p>	
IDEXX	R.61-68.G.	<p>IDEXX appreciates the opportunity from the South Carolina Department of Health & Environmental Control (Department) to submit our input on the proposed updates for the Triennial Review of Water Quality Standards. At this time, IDEXX would like to request the Department to consider the following comments.</p> <p>1) We suggest adding additional technical corrections by adding the missing comma after "fecal coliform" listed in the following tables under Section G.(4) Outstanding National Resource Waters (ONRW) are freshwaters or saltwaters which contribute an outstanding national recreational or ecological resource and Section G. (6) Outstanding Resource Waters (ORW) are freshwaters or saltwaters which constitute an outstanding recreational or ecological resource or those freshwaters suitable as a source of drinking water purposes with treatment levels specified by the Department.</p> <p>2) We suggest revising and removing the use of the bacteria indicator of fecal coliform as an acceptable indicator for the assessment of fecal contamination of surface waters and only utilizing the indicators of Escherichia Coli (E. coli) and/or enterococci.</p> <p>Fecal coliform bacteria are commonly identified as being thermotolerant bacteria (able to grow at 44.5°C) [4]. Thermotolerant bacteria consists of E. coli, Klebsiella, Enterobacter, and Citrobacter species [1,2]. When testing for fecal coliform, the population of the bacteria present can affect the fecal coliform results. For example, Klebsiella, Enterobacter, and Citrobacter species are false-positive indicators of fecal contamination as they are from non-fecal origin [2]. Studies have found, up to 15% of Klebsiella (nonfecal origin) are thermotolerant and up to 10% of E. coli are not thermotolerant, thus potentially causing an error rate of 25% when testing for fecal coliform [3]. E. coli are the only bacteria, of the coliform bacteria group, that come from the intestinal tract, have been found to be more</p>	<p>1) The Department agrees with IDEXX on the suggested technical corrections to sections G.4 and G.6. When the Department finalizes the proposed revisions to R.61-68 we will make these technical corrections.</p> <p>2) In addition to shellfish beds, fecal coliform is utilized as the bacteriological indicator for shellfish harvesting waters and for upstream or downstream waters for the protection of shellfish uses. At this time, the Department is not considering removing fecal coliform as a bacteriological indicator for shellfish</p>

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IDEXX (continued)		<p>specific to the detection of fecal contamination, and are the definitive indicator of fecal contamination in U.S. drinking water regulations and the recommended bacteria for recreational surface waters [3-5].</p> <p>Within marine waters, studies show enterococci as compared to other fecal contamination indicators, have a higher survival rate and enterococci show a direct association with risk of swimmer's illness [6,7]. The European Union (EU) uses enterococci as an indicator of fecal contamination for recreational and drinking water, and additionally, enterococci are part of the US EPA 2012 Recreational Water Quality Criteria and included by the World Health Organization as recommended bacteria indicator for fecal contamination for recreational water [5,7].</p> <p>We understand that federal regulations still require fecal coliforms as the bacteria indicator for shellfish beds, however, revising all other designated uses of surface water bacteria to either E. coli or enterococci would be more protective to public health by using indicators that are definitive of fecal contamination. We also understand that this suggested revision, removing fecal coliform as a bacteria indicator, maybe considered out of scope of the proposed changes, but we hope that the Department will consider this suggested edit in a future triennial review as an additional way to strengthen the standard and better protect public health. IDEXX appreciates the opportunity to provide these comments and we look forward to the next steps in the regulation process.</p>	harvesting waters and protection of shellfish uses.
South Carolina Chamber of Commerce	R.61-68.Appendix	<p>The South Carolina Chamber of Commerce (the Chamber) is a statewide organization that represents a broad cross-section of companies in South Carolina. Chamber member companies employ thousands of South Carolinians in high-paying jobs and lead the way on recycling, environmental protection, renewable energy generation and sustainable manufacturing operations. The Chamber promotes pro-job and pro-business policies at the state and federal level and bring together businesses across the state through coordinated strategies, training opportunities, and networking events. With a unified voice, we can make the biggest impact. Our goal is to create the best business climate, so businesses can be at their best. We pride ourselves in accomplishing this goal while balancing environmental protection required by state laws and regulations.</p> <p>We have reviewed the State Register notice published August 26, 2022, regarding the proposed adoption of freshwater aquatic life criteria in Regulation 61-68. From our view, DHEC has not done an adequate review of EPA's criteria and seeks to adopt the federal criteria without any assessment of the validity of its use in South Carolina. At best, adoption is premature because DHEC has not collected ambient data to determine what impact it would have on state point and non-point source discharges. Additionally, DHEC has not evaluated how many new surface waters will become added to the list of impaired waters (i.e., 303(d) List pursuant to the federal Clean Water Act).</p>	The Department has decided to delay the proposed adoption of the EPA recommended aluminum criteria for freshwater until the next triennial review. This will allow Department staff additional time to evaluate the Chamber's comments and the impacts of the proposed regulatory change on state point and non-point sources and the listing of impaired waters.

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South Carolina Chamber of Commerce (continued)		<p>Prior to adopting the current freshwater e-coli bacteria standard, DHEC took the time to collect ambient water quality data to determine what was an appropriate standard to balance protection of classified and existing uses, without undo economic impact in South Carolina. This type of work should be done for aluminum. In stakeholder meetings earlier this year, DHEC said this type of information had not yet been developed. Georgia EPD has started their triennial and notes that they are collecting aluminum and DOC data to evaluate the recommended criteria calculator. EPD also notes that Georgia has naturally occurring aluminum in many streams, like South Carolina.</p> <p>The State's Pollution Control Act requires a unique review of a new standard and must recognize "... safety and welfare of its citizens, maximum employment, the industrial development of the State..." (SECTION 48-1-40). To date, DHEC seeks to blindly adopt a federal criterion without a state-specific evaluation required in SECTION 48-1-60. Regarding the section in the notice entitled "Determination of Costs and Benefits", the following is stated:</p> <p style="padding-left: 40px;">Existing Department staff and resources will be utilized to implement these amendments to the regulation. No anticipated additional cost will be incurred by the State if the revisions are implemented, and no additional State funding is being requested. Overall cost impact to the State's political subdivisions and regulated community is not likely to be significant. Existing standards would have incurred similar cost. Furthermore, standards required under the amendments will be substantially consistent with the current guidelines and review guidelines utilized by the Department.</p> <p>It is hard to agree with these statements because DHEC has not determined the increase workload on both the ambient monitoring program as well as the need to develop TMDLs. As we understand it, this criterion is a function of hardness and dissolved organic carbon, as well as the aluminum data itself. DHEC has not even estimated the impact to NPDES permittees (e.g., political subdivisions and regulated community). The potential impacts relate to traditional NPDES wastewater discharges as well as stormwater NPDES permits. Also, since drinking water systems (municipal and industrial) often use aluminum-based chemicals to clean surface waters for public consumption, it would be good to know the potential impacts on this sector since these systems also have NPDES permits.</p> <p>Therefore, the Chamber requests that DHEC hold off adoption until:</p> <ul style="list-style-type: none"> • Ambient data for aluminum is reviewed, • The impact on the ambient monitoring program and TMDL program is considered, and • The impact on NPDES permits is evaluated. 	

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South Carolina Chamber of Commerce (continued)		<p>Without this work, DHEC has no idea of the economic impact on state businesses and is unaware of the potential increased workload of its own staff. Without this review, South Carolina doesn't really know both the benefits and impacts to the proposed regulation.</p> <p>Finally, it is our understanding that DHEC used to have an aluminum stream standard, but many years ago removed the standard. Please summarize the basis for that action and why now is an appropriate time to add a standard back. For example, if many state waters are naturally high in aluminum, adoption of this standard may not aid in protection the classified and existing uses of our waters. To the extent that DHEC proceeds with the proposal, it would be good to have the text clarify that this is a freshwater standard.</p>	
South Carolina Environmental Law Project	R.61-69.H	<p>The South Carolina Environmental Law Project appreciates the opportunity to submit comments on the Department of Health and Environmental Control's (DHEC) proposed amendments to S.C. Code Reg. 61-69, in particular the proposal to extend the water quality designation of Outstanding Resource Water (ORW) for the Atlantic Intracoastal Waterway (AICW) from Venning Creek to its confluence with Morgan Creek, located at the northern end of the Isle of Palms. We are fully in support of this elevation of this area's water quality standards from Shellfish Harvesting to ORW and ask DHEC to move forward with its promulgation process and to include this regulatory amendment.</p> <p>ORW waters (the second-highest water quality designation identified by the EPA and DHEC) are "freshwaters or saltwaters which constitute an outstanding recreational or ecological resource or those freshwaters suitable as a source for drinking water supply purposes with treatment levels specified by the Department." R. 61-68.G.6. Where a waterbody is so designated, the existing water quality conditions must be maintained and protected to the full extent of DHEC's authority, including the prohibition of discharges from domestic, industrial or agricultural waste treatment systems. There are higher protections for a waterbody designated as ORW when it comes to stormwater and other nonpoint source runoff from upland development. See R. 61-68.G.7, 8.</p> <p>Significantly, adjacent and nearby waterbodies carry this important designation, including Bulls Bay, Price Inlet, and all of Cape Romain Harbor. The AICW at this location receives flow from several deep creeks such as Venning Creek and Bull Creek. The Intracoastal Waterway from the confluence of Venning Creek south to the northern end of Isle of Palms at Morgan Creek has some of the cleanest water in the State, according to the South Carolina Department of Natural Resources shellfish monitoring programs. Additionally, this stretch of the AICW runs adjacent to the Cape Romain National Wildlife Refuge and provides a significant resource for the existing wildlife in the area. Designating this portion as ORW would not only protect the downstream waters, but would also provide an indirect level of protection for sensitive upland areas along the AICW shoreline. We are pleased that DHEC is proposing this change and support your efforts.</p>	Thank you for supporting the decision to reclassify these waters as Outstanding Resource Waters.

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South Carolina Water Quality Association	R.61-68.G.	<p>As the Department moves forward with the current triennial review, the SC Water Quality Association wants to renew our request for the following two changes to the regulation:</p> <p>First, we ask that DHEC revise the POTW permit implementation language in the regulation to specify Monthly/Weekly geometric mean limits for bacteria in POTW permits (at least those with design capacities of 1 MGD or greater). We have previously commented on the unnecessary complexity of DHEC's current bacteria permitting approach for POTWs as well as the fact that the permit limits should be expressed as monthly/weekly limits per federal regulation. <i>40 CFR § 122.45(d)(2)</i>. Federal regulations require that POTW permits be expressed as monthly/weekly limits unless such limits cannot be calculated. We know that is not the case because many other states – such as North Carolina and Tennessee impose monthly/weekly bacteria limits in their permits for POTWs. Other states follow EPA's criterion – which specifies that the monthly geometric mean is what provides the intended level of swimmer protection – by imposing monthly limits only on their POTWs. Virginia, Maryland, and the District of Columbia are examples of this approach. Notably, the disinfection performance of facilities in VA, MD and DC (Blue Plains Advanced Wastewater Treatment Plant) are just as good as the facilities here in South Carolina who are inappropriately required to meet daily maximum limits. The take away from this is that the disinfection technology is what it is and we don't need daily maximum limits as a way to get better disinfection performance. The technology is what it is. Moving to monthly/weekly average limits is more appropriate, consistent with federal regulation, and fairer to SC POTWs who are properly operating their disinfection systems but the nature of the technology may result in a somewhat elevated, end-of-pipe, value that has not environmental or public health significance.</p> <p>South Carolina's approach forces POTWs to overapply chlorine (which is the real risk to receiving waters) as well as chemicals to neutralize excess chlorine (such as SO₂ – which in itself can present toxicity concerns). Monthly/weekly average permit limits for bacteria are appropriate and will strike a better environmental balance.</p> <p>Accordingly, we ask that DHEC revise the POTW permit implementation language in the regulation to specify monthly and weekly geometric mean limits for bacteria in POTW permits (at least for major POTWs).</p> <p>Second, we propose that DHEC revise the regulation to specify the use of the harmonic mean flow for applying human health criteria. EPA's national human health criteria (carcinogenic and non-carcinogenic) are based upon an assumed exposure period of 70 years (lifetime). Logically, when implementing such criteria, it makes sense to use a long-term average instream flow value rather than a short-term, drought-based value such as the 7Q10 – South Carolina DHEC's current practice. Accordingly, the SCWQA proposes that DHEC follow EPA and</p>	<p>The Department will not adopt the Association's proposed changes at this time. The bacteria limits noted by the Association have been consistent since 2012. Department staff require additional time to review its permitting approach for POTWs and use of a harmonic mean flow before committing to such significant changes. The Department will evaluate these comments further and consider these changes during the next triennial review.</p>

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South Carolina Water Quality Association (continued)		virtually every other state and revise the WQS regulation to specify the use of the harmonic mean flow (roughly the annual average flow value) when implementing human health criteria in NPDES permits.	
Sullivan's Island	R.61-68.G	<p>Sullivan's Island objects to any bacteria limits from adjacent water bodies being imposed on our NPDES permit other than the water body classification we discharge to.</p> <p>We discharge to SB waters not SFH waters. Our miniscule discharge amount into the large harbor body of water via the ICWW has little to no impact on adjacent SFH waters.</p>	Fecal coliform limits for shellfish harvesting waters are also applied to upstream and downstream waters for protection of shellfish uses. As noted above, the Department is not currently considering removing fecal coliform as a bacteriological indicator for shellfish harvesting waters and protection of shellfish uses. However, the Town may submit a written request for the Department to review its NPDES permit to ensure that appropriate effluent limitations are specified.
Molly Ball	R.61-69.H	<p>I was born in Charleston in 1950 and have lived in Awendaw on Sewee Bay for 21 years now. Over my lifetime and more recently I have watched the degradation of our waterways as well as of our cities/towns. Please help save and protect the waters from Venning through Sewee Bay from further development detriment. There is a large parcel (1254 acres) called The King Tract in Awendaw which runs through my neighborhood and drains into the ICW. Once developed it will destroy the water quality and affect all wildlife in and around the waterway. The runoff is already an issue for our neighborhood! The clock is ticking on this one. Please stop it before the damage is done!</p> <ul style="list-style-type: none"> • All waters in South Carolina are classified by the Federal Clean Water Act • This area is connected to areas already classified as ORW. This area is special and deserves our protection. The higher the classification, the greater the protection • Bulls Bay, Cape Romain Harbor, and Price's inlet are already designated the highest level (Outstanding Resource Water) and share water through daily tides with the ICW • The Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay are also rated as the cleanest water in the State, based on DHEC Shellfish monitoring programs, but 	The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.

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Molly Ball (continued)		<p>do not have the ORW designation. The ICW in this area should also have the ORW designation</p> <ul style="list-style-type: none"> • We want DHEC to reclassify those waters to the highest level, Outstanding Resource Water (ORW) 	
Susan Cox	R.61-69.H	<p>I am forwarding a letter authored by Dr. Charles Mauro, a homeowner in Awendaw, regarding DHEC's review to reclassify the waters in this area to ORW. Dr. Mauro's logic is sound. This area should be reclassified as ORW. DHEC has the responsibility to make decisions that protect the residents and the environment of our state. That includes our fishermen, oystermen and shrimpers, all of whom depend on these waters for their livelihood. Since the entire area is connected and tides flow throughout, reclassification is the only logical decision to make to preserve this environmental system.</p>	<p>The Department is reclassifying the waters noted by Dr. Mauro as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.</p>
Laura Dixon	R.61-69.H	<p>I am writing today to plead with you to please reclassify the Intracoastal Waterway from Venning Creek to Isle of Palms as Outstanding Resource Waters (ORW). If the Intracoastal Waterway and Sewee get reclassified to ORW it will require local areas and the Town of Awendaw to provide greater protection for these waters and not allow developers and others to pollute and degrade this waterway.</p> <ul style="list-style-type: none"> • All waters in South Carolina are classified by the Federal Clean Water Act • This area is connected to areas already classified as ORW. This area is special and deserves our protection. The higher the classification, the greater the protection • Bulls Bay, Cape Romain Harbor, and Price's inlet are already designated the highest level (Outstanding Resource Water) and share water through daily tides with the ICW • The Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay are also rated as the cleanest water in the State, based on DHEC Shellfish monitoring programs, but do not have the ORW designation. The ICW in this area should also have the ORW designation • We want DHEC to reclassify those waters to the highest level, Outstanding Resource Water (ORW) <p>Thank you for your consideration in protecting the Cape Romain National Wildlife Refuge, and our waters.</p>	<p>The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.</p>
John & Lynn Hodapp	R.61-69.H	<p>I would like to humbly request your consideration and DHEC's consideration for the Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay be given the designation of Outstanding Resource Water, ORW. This area is connected to areas already classified as ORW. This area is very special and deserves our protection before it is too late.</p> <p>Bulls Bay, Cape Romain Harbor, and Price's inlet are already designated the highest level (Outstanding Resource Water) and share water through daily tides with the ICW.</p>	<p>The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for</p>

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John & Lynn Hodapp (continued)		<p>The Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay are also rated as the cleanest water in the State, based on DHEC Shellfish monitoring programs, but do not have the ORW designation. The ICW in this area should also have the ORW designation.</p> <p>All waters in SC are classified by the Federal Clean Water Act. I would like to request DHEC to reclassify the ICW from Venning Creek to IOP and Sewee Bay waters to the highest level, Outstanding Resource Water (ORW).</p>	supporting the decision to reclassify these waters as Outstanding Resource Waters.
Bonny Luthy	R.61-69.H	<p>We are very concerned about recent potential development in the pristine Cape Romain and Bull's Bay Area. We appreciate your efforts to designate the ICW from Venning Creek to Isle of Palms as ORW.</p> <ul style="list-style-type: none"> • All waters in South Carolina are classified by the Federal Clean Water Act • This area is connected to areas already classified as ORW. This area is special and deserves our protection. The higher the classification, the greater the protection • Bulls Bay, Cape Romain Harbor, and Price's inlet are already designated the highest level (Outstanding Resource Water) and share water through daily tides with the ICW • The Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay are also rated as the cleanest water in the State, based on DHEC Shellfish monitoring programs, but do not have the ORW designation. The ICW in this area should also have the ORW designation • We want DHEC to reclassify those waters to the highest level, Outstanding Resource Water (ORW) <p>Thank you very much for your efforts to keep Cape Romain a pristine and vital part of the Lowcountry. By making this area an Outstanding Resource Water we can preserve this amazing food source for generations to come.</p>	The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.
Tom Powell	R.61-69.H	<p>Please accept this letter in support of reclassifying the waters of Sewee Bay and the ICW from Vening Creek to Morgan Creek from Shellfish Harvesting Water to Outstanding Resource Water.</p> <p>I am a property owner and resident of Awendaw and am deeply concerned about protection of a resource that can't simply be remediated after the harm has occurred. Do you really need more evidence of what happens when these delicate areas are not protected?</p> <p>Please stand up and be proactive in protecting and reclassifying these waters.</p>	The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.

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Bob Raynor	R.61-69.H	<p>I am writing to you to advocate for the reclassification of the Intracoastal Waterway waters from Venning Creek to Isle of Palms to Outstanding Resource Waters (ORW). I have lived in Awendaw for the last forty years in Romain Retreat, the properties of which bound on the ICW. I understand that Bulls Bay and Price's Inlet already have the ORW classification.</p> <p>For many years I have sailed these waters in my Sunfish out to Bulls Bay, Bull Island, and Price's inlet, and in 2005 published Exploring Bull Island: Sailing and Walking Around a South Carolina Sea Island. I have had to become most familiar with the tide's movement through the creeks and marshes of Cape Romain, and I know the directions of the outgoing tide from the ICW to the more protected waters. The adjacent ICW waters should also have this higher classification and protection. The waters, marshes, and marine life are rich but delicate, and all efforts should be made to provide the necessary protection for this invaluable resource.</p> <p>As a resident in this locale, I feel a strong responsibility to protect Cape Romain National Wildlife Refuge. Thank you for your consideration of this reclassification proposal, another step in the refuge's protection.</p>	<p>The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.</p>
Sue Self	R.61-69.H	<p>My name is Susan Self. I am a SC citizen who lives in Awendaw SC. I am joining other neighbors and citizens in Awendaw to plea for reclassifying certain waterways to obtain enhanced protection hazards and harms from future development in the Marion Forest. Now more than ever we have to do what we can to protect this precious environment.</p> <p>Our neighbor, Dr. Charles Mauro, has made a request to you via DHEC that the agency reclassify the Intracoastal Waterway from Venning Creek to Isle of Palms as Outstanding Resource Waters (ORW). As defined by DHEC, Outstanding Resource Waters are waters which are of exceptional recreational or ecological importance or of unusual value. Such waters may include waters in national or state parks or wildlife refuges, such as the Cape Romain National Wildlife Refuge. And waters with the Outstanding Water Resource classification are given greater protection from pollution and other sources of degradation that would damage this unique ecosystem.</p> <p>We all know, and all government studies show, that Venning Creek, Anderson Creek, Price Inlet and the Intracoastal Waterway (ICW) are all connected and the tides push the water from the ICW through these creeks and inlets and out to Bulls Bay and beyond. You may NOT know that Price Inlet, Bulls Bay and Cape Romain Harbor are all already designated as Outstanding Resource Waters. Logic and DHEC's own rules require that DHEC give this same designation to the ICW from Venning Creek to IOP, affording greater protection to these important waterways that we all love.</p> <p>So that is what we are asking DHEC to do, classify this area as Outstanding Resource Waters. If the Intracoastal Waterway and Sewee get reclassified to ORW it will require local</p>	<p>The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.</p>

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Sue Self (continued)		<p>areas and the Town of Awendaw to provide greater protection for these waters and not allow developers and others to pollute and degrade this waterway.</p> <ul style="list-style-type: none"> • All waters in South Carolina are classified by the Federal Clean Water Act • This area is connected to areas already classified as ORW. This area is special and deserves our protection. The higher the classification, the greater the protection • Bulls Bay, Cape Romain Harbor, and Price's inlet are already designated the highest level (Outstanding Resource Water) and share water through daily tides with the ICW • The Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay are also rated as the cleanest water in the State, based on DHEC Shellfish monitoring programs, but do not have the ORW designation. The ICW in this area should also have the ORW designation • We want DHEC to reclassify those waters to the highest level, Outstanding Resource Water (ORW) <p>We know there are big lobbyists groups that are fighting this, but why? What do they have to gain. This is much greater than money, profit and greed. Please citizens do not think this is okay. Please help us to protect the cleanest water and air literally in the country.</p>	
Janet & Dan Stuchlak	R.61-69.H	<ul style="list-style-type: none"> • All waters in South Carolina are classified by the Federal Clean Water Act • This area is connected to areas already classified as ORW. This area is special and deserves our protection. The higher the classification, the greater the protection • Bulls Bay, Cape Romain Harbor, and Price's inlet are already designated the highest level (Outstanding Resource Water) and share water through daily tides with the ICW • The Intracoastal Waterway from Venning Creek to Isle of Palms and Sewee Bay are also rated as the cleanest water in the State, based on DHEC Shellfish monitoring programs, but do not have the ORW designation. The ICW in this area should also have the ORW designation • We want DHEC to reclassify those waters to the highest level, Outstanding Resource Water (ORW). 	The Department is reclassifying the waters of Sewee Bay and the portion of the Atlantic Intracoastal Waterway from Venning Creek to Morgan Creek as Outstanding Resource Waters. Thank you for supporting the decision to reclassify these waters.