



September 23, 2019

Drew Edwards  
SC DHEC, Bureau of Water  
2600 Bull St.  
Columbia, SC 29201

Re: 2019 Triennial Review

Mr. Edwards,

I am writing on behalf of Congaree Riverkeeper to submit comments on DHEC's 2019 Triennial Review.

First, while we commend the Department for working to quickly adopt new criteria for microcystins and cylindrospermopsin, the proposed criteria are essentially double the recommended criteria from EPA<sup>1</sup>. We ask that the department adopt the criteria of 4 µg/L for Microcystins, and 8 µg/L for Cylindrospermopsin as recommended by EPA.

While the Department has again chosen not to address narrative or numeric flow standards in this triennial review cycle, we understand that the Department does plan to pursue a separate rulemaking for flow standards in 2020. We look forward to engaging in the process in the coming year and hope the Department works through the process diligently and expeditiously.

Finally, it is disappointing that the Department has still failed to make any meaningful progress on adopting numeric nutrient criteria for South Carolina's rivers and streams. The Department had originally established a plan for adoption of numeric nutrient criteria for estuaries, rivers, and streams by 2008<sup>2</sup>, and is now 11 years behind schedule with no clear timeline or plan for establishing numeric nutrient criteria for all waters of the state. This is a significant failing and addressing this issue must be a priority moving forward.

Thank you for the opportunity to provide these comments.

Sincerely,

Bill Stangler  
Congaree Riverkeeper

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<sup>1</sup> Fact Sheet: Draft Human Health Recreational Ambient Water Quality Criteria/Swimming Advisories for Microcystins and Cylindrospermopsin.  
<https://www.epa.gov/sites/production/files/2016-12/documents/draft-hh-rec-ambient-water-swimming-factsheet.pdf>

<sup>2</sup> The State of South Carolina's Adoption Plan for Numeric Nutrient Water Quality Criteria (2007). [http://aquaterra.com/pub/EPA\\_WA18\\_archive/SC-2007.pdf](http://aquaterra.com/pub/EPA_WA18_archive/SC-2007.pdf)

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