

To whom it may concern,

In regard to the following proposed amendments:

Proposed Amendment: Amend 61-68.E.14 c(10) to change the daily maximum enterococci NPDES permit effluent limitation from 501 MPN/100ml to 104 MPN/100ml for the protection of uses in Class SB advisory.

Proposed Amendment: Amend 61-68.G.13 ... to change the daily maximum enterococci standard from 501 MPN/100ml to 104 MPN/100ml for the protection of uses in Class SB saltwaters.

“A reduction in the daily maximum enterococci from 501 MPN/100ml to 104 MPN/100mL is a substantial reduction from the current permit limits that is likely to add significant capital burden to the utility with limited environmental gain given the relatively small discharge volume released from Plum Island to a large receiving body. Especially in light of this substantial reduction, POTW should be transitioned to monthly/weekly geometric mean bacteria limits for NPDES compliance prior to implementation of the proposed amendment should it be passed. This comment was also made regarding our recently issued NPDES permit comment period.”

Proposed Amendment: Add 61-68.E.14.d(8) to specify when the Department would list a surface waterbody as impaired for recreational uses due to microcystins.

Proposed Amendment: Add 61-68.E.14.d(10) to specify when the Department would list a surface waterbody as impaired for recreational uses due to cylindrospermopsin.

“Though cyanotoxin screening methods may be appropriate for determining swimming advisories, EPA approved methods (such as EPA method 544, 545, and 546) should be used to confirm positive hits for either microcystins or cylindrospermopsin given the potential ramifications of taking a water body into impaired status. It is also important to clarify what conditions would cause the body of water to be removed from the impaired status list.”

Sincerely,

Jason Thompson
Source Water Manager
Charleston Water System
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