



Recommendation No. 134

November 14, 2000

Water Quality Standards 2000 Revisions

Background:

The South Carolina Department of Health and Environmental Control (SCDHEC) is proposing to revise South Carolina's water quality standards regulations (R.61-68). Section 303(c)(2)(B) of the Federal Clean Water Act (CWA) requires that SCDHEC review this regulation once every three years. This triennial review is performed in order to ensure that the standards are current with the most recent Environmental Protection Agency's (EPA) CWA criteria and any changes to its water quality policies and practices. This regulation defines the water quality goals of a water body, or segment thereof, by classifying the use or uses of the water, setting both numeric and narrative criteria necessary to protect the uses, and protecting water quality through antidegradation provisions (Ref. 1).

Since 1950, South Carolina's water quality standards program has evolved from a narrow focus on establishing water body uses and adopting basic water quality criteria for the most obvious sources of pollution to a more comprehensive program. In recent years, SCDHEC has received differing comments from both environmental and regulated communities. Some stakeholders believe the regulation should be revised to continue improvements in water quality. Other stakeholders believe changes are needed to allow more flexible, cost-effective approaches and still others believe that no changes to the regulation are needed at all (Ref 2). A public hearing on the proposed revisions is scheduled before the SCDHEC Board on December 14, 2000. Stakeholders are requested to send written comments no later than November 27, 2000.

Comment:

The Savannah River Site (SRS) Citizens Advisory Board (CAB) normally favors a cost-effective approach to environmental stewardship and takes a similar position in regard to the proposed revisions to the water quality regulations. Of particular concern to the SRS CAB is the proposed selection of a more stringent hardness value which would significantly decrease allowable metal concentration in SRS NPDES discharges. SCDHEC is proposing to use a range of hardness values proposed by EPA in 1992 under its National Toxics Rule. The hardness range, expressed as mg CaCO₃/L, was from a low of 25 mg/l to a high of 400 mg/l in this rule. The current water quality regulation uses a minimum value of 50 mg/l.

SCDHEC does not provide any scientifically defensible rationale that supports the theory that by lowering the hardness value, overall water quality will improve measurably. If there are no current adverse affects at the 50 mg/l value, the SRS CAB questions the need to spend excessive amounts of taxpayer money to meet a new standard with no demonstrated or technically-defensible improvement in the overall quality of the water. Lowering contaminant levels just for the sake of doing so, but without adequate technical and cost/benefit justification, is neither scientifically rational nor economically sound. The SRS CAB does not want to see SRS transfer funds from current projects and missions, which are actually being protective of human health and the environment, to costly wastewater projects with no or only incremental improvements to the environment.

Recommendation:

The SRS CAB recommends that the Water Classification and Standards Regulation 61-68 remain the same for the hardness value until an environmental gain can be demonstrated to justify the economic expense.

References:

1. Water Classification and Standards Regulation 61-68, presentation to the ER Committee by Vernon Osteen, November 6, 2000.
2. Triennial Review and Revisions to S.C. Regulation 61-68, Water Classifications and Standards –

Supplement to the Notice of Drafting and Invitation to Stakeholders Meeting, March 31, 2000.

Agency Responses

Department of Health and Environmental Control