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Via Email – gillesjl@dhec.sc.gov

Jason Gillespie
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Re: 2013 Triennial Stakeholder Meeting #2

Thanks Jason. I believe it makes sense technically and programmatically to express the mercury water column number as an annual average value. This will facilitate annual average limits for point sources. Such limits are appropriate as point sources are likely 1-4% of statewide mercury loadings with the rest coming from ambient sources. Thus, annual average limits with very limited monitoring (how many times do we need to measure 1-2%?) should be where we want to end up.

NC just did a mercury tmdl and permitting strategy which features annual average mercury limits (in the few cases where limits are necessary).

Thank you for considering this clarification.

Paul

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