

# Upstate Forever

Promoting Sensible Growth and  
Protecting Special Places in the Upstate

July 30, 2007

Ms. Amy M. Bennett  
Standards Coordinator  
South Carolina Department of Health and Environmental Control  
Bureau of Water  
2600 Bull Street  
Columbia, SC 29201

Re: SC Water Quality Standards Triennial Review Process

Ms. Bennett,

Upstate Forever appreciates the opportunity to participate in the Water Quality Standards triennial review process. We would like to comment on specific water quality standards and other matters addressed in R. 61-68, Water Classifications and Standards.

For the past four years, Upstate Forever has been the project manager and core partner in the Saluda Reedy Watershed Consortium (SRWC). The SRWC is a collaborative effort by organizations and individuals concerned about the impacts of changing land use on the purity and abundance of water in the Saluda-Reedy basin (the portion of the Saluda watershed ending at Lake Greenwood). The goals of the Consortium are threefold:

- To promote increased knowledge and changed perceptions about the watershed and its value
- To improve water quality policies and land development regulations throughout the watershed
- To build local capacity for engaging in integrated watershed conservation and management

Through the research completed as part of the SRWC, Upstate Forever has identified sediment as the most significant water quality problem in the watershed. We have no doubt that this is also true for the other watersheds in South Carolina that are experiencing rapid growth and development. Sediment is both a primary source of regulated pollutants into our waterways and a major pollutant in its own right. Thus, the presence of excess sediment is both a direct impairment to and an indicator of the overall condition of water quality in a given waterway, serving as a proxy for many other pollutants.

First, **Upstate Forever strongly recommends that a numerical standard for Total Suspended Solids (TSS) be incorporated into the South Carolina Water Quality Standards.** At minimum, a TSS standard should apply to ONRW, ORW, TN, TPGT, and TPT waterways in order to protect these most pristine streams from sedimentation and associated pollution. However, given the role of sediment in transporting and introducing many other pollutants, we believe all waterways within South Carolina should be afforded protection from this pollutant by the establishment of a TSS standard for all waterbody classifications. Regulating sediment itself via a TSS standard would treat causes rather than symptoms, allowing DHEC to get to the root cause of impairment in many of South Carolina's waterways.

While all waterways are afforded some degree of protection through R61-68's antidegradation policy, this policy and the existing standards do not protect our waterways from degradation by sedimentation and associated contaminants. Subsection 3 of the Antidegradation clause states that the quality of ONRW and

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ORW waters “shall be maintained through the applications of the standards for these classifications as described in Section G.” However, water quality standards for ONRW, ORW, and Trout waters as described in Section G do not afford thorough protection for these waters from sedimentation as there is no standard for TSS. Each classification includes a standard for turbidity, but turbidity is a partial and indirect measurement of the presence of excess sediment. Turbidity is a partial measurement for sediment in that numerous variables – seasonally variable biological growth and tannins, for example – contribute to the turbidity of water. It is an indirect indicator of sediment in that it measures only one impact of sedimentation in a waterbody – water clarity – and overlooks a multitude of other impairments such as the physical impacts on fish health and benthic habitat as well as the role of sediment as a vehicle for other regulated pollutants such as nutrients, pathogens, and heavy metals).

Second, other deficiencies within the water quality standards of Section G include a lack of consistent standards for ONRW and ORW waterways and the allowance of stormwater and NPS pollution in ORW and Trout waters. As written, the multiple standards for ONRW and ORW are determined by “the classification of the waterbody immediately prior to reclassification to Class ONRW [or ORW].” This standard allows for numeric and narrative standards to vary significantly from one ONRW/ORW waterbody to another, resulting in varied levels of protection for the highest quality waterways in our state. For example, reclassifying a freshwater waterbody to a ORW would result in a turbidity standard of 50 NTUs – as contrasted with 10 NTUs if a Trout water were reclassified to ORW. **Upstate Forever therefore recommends that SC DHEC stipulate specific numerical and narrative standards for all ONRW and ORW waterbodies to ensure a consistent standard of protection for our most pristine waterways.**

Third, standards for both ORW and Trout waterways stipulate that stormwater and nonpoint source runoff is “allowed if water quality necessary for existing and classified uses shall be maintained and protected consistent with Antidegradation Rules.” Given that sedimentation is a significant source of regulated pollutants and a detrimental pollutant in and of itself and that the antidegradation policy currently overlooks impairments due to sedimentation, this allowance of stormwater and nonpoint source pollution has the potential to allow a significant amount of degradation to ORW and Trout waterways. **Thus, Upstate Forever recommends a more stringent regulation of stormwater and nonpoint source pollution for ORW and Trout waterways to reduce the impact of sedimentation on these waterways.**

We thank you for your consideration of these comments and look forward to participating in the remainder of the Triennial Review process.

Sincerely,



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Director, Clean Air and Water Program  
Upstate Forever

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