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Mr. Jason Gillespie  
Standards Coordinator  
South Carolina Department of  
Health and Environmental Control-Bureau of Water  
2600 Bull Street  
Columbia, SC 29201

Subject: SC Water Quality Standards Triennial Review Process  
Duke Energy Comments

Carolina Power & Light Company, doing business as Progress Energy Carolinas, Inc., and Duke Energy Carolinas, LLC (hereafter referred to as the Duke Energy) are regulated electric utilities operating in North and South Carolinas that serve approximately 3.9 million homes, businesses and industries. These Duke Energy companies are subsidiaries of Duke Energy Business Services, LLC, which is the largest electric holding company in the United States, supplying and delivering energy to approximately 7.1 million electric customers located in six states in the Southeast and Midwest. It owns a diverse mix of approximately 58,200 megawatts of electric generating capacity in the U.S. that includes coal, nuclear, natural gas, oil and renewable resources. Duke Energy appreciates the opportunity to participate in the Water Quality Standards triennial review process.

I. **Methylmercury**

Duke Energy is supportive of the reasonable approach proposed by SC DHEC regarding methylmercury. Based on years of air quality monitoring and modeling, it is evident that the majority of mercury received in South Carolina is from air borne deposition, with the majority emitted from sources outside South Carolina. Therefore, it would be counterproductive to burden South Carolina NPDES permitted wastewater dischargers with onerous restrictions that they would have little or no ability to effectively remedy. However, Duke Energy does encourage SC DHEC to re-evaluate the receiving streams already listed as impaired for mercury before imposing mercury monitoring, assessment and minimization requirements on dischargers. This evaluation should consider the source of the mercury and the ability of the discharger to actually mitigate it.

II. **Flow**

Aside from the proposed clarification regarding the use of critical flows in R.61-68 C. (4) (a), Duke Energy believes that additional modifications of stream flows, including adopting narrative and numeric standards, is unwarranted at this juncture. In 2010, SC DHEC commenced a statewide initiative to evaluate the water use and withdrawal. During this process, broad stakeholder input

was solicited and actively considered. The culmination of this initiative was the South Carolina Surface Withdrawal, Permitting, Use, and Reporting Act (2011) and the associated Surface Water Withdrawal, Permitting and Reporting Regulation (effective date June 22, 2012). Given the time and effort expended by SC DHEC and the many stakeholders to develop these regulations and the permitting process, Duke Energy recommends that SC DHEC refrain from considering additional flow requirements until these new requirements are given ample time to perform an objective evaluation to ascertain a true need for additional regulation.

Please contact Allen Stowe at (704)382-4309 or [Allen.Stowe@duke-energy.com](mailto:Allen.Stowe@duke-energy.com) should you have any questions regarding these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A. Ruhe". The signature is written in a cursive style with a large initial "M".

Michael A. Ruhe  
Director, Environmental Affairs  
Duke Energy South Carolina