From: David Caldwell
To: 15ANCAC02B_SWTriRev_Comments_2021
Subject: [External] It"s Time to Add Stronger Water Protections in North Carolina
Date: Tuesday, July 20, 2021 4:10:37 PM

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Manager Chris Ventoro,

Dear Mr. Christopher Ventalor, NC DEQ-DWR Planning Section,

I'm writing as a supporter of Waterkeepers Carolina. I am echoing their request for changes and updates to surface water quality standards. The changes in this Triennial Review period do not go far enough to protect our waters and communities. To adequately protect our waters and communities, DEQ should recommend that the EMC should consider the following:

Reclassify class C waters to class B if they are heavily used for recreation.

Establish a statewide E.coli standard as the pathogenic indicator in all surface waters

The EMC has proposed that 19 counties in the western part of North Carolina establish the E.coli standard, however, this proposal should be extended to the entire state. Fecal contamination is a statewide problem with public health implications. When people come into contact with water containing high levels of E.coli or fecal contamination, they can suffer from gastrointestinal illness, eye infections, and skin irritations. The presence of E.coli in water is the best available indicator of recent fecal waste contamination and has been the recommended standard for recreational waters by EPA since 2012.

Adopt standards to protect against harmful algal blooms

Many of North Carolina's rivers and lakes are overloaded with nitrogen and phosphorus, leading to algal blooms and in some cases harmful algal blooms that contain cyanotoxins that can adversely affect drinking water and endanger human health, pets and aquatic life. North Carolina does not have an ambient water quality standard for cyanobacteria or related cyanotoxins. EPA has recommended water quality criteria for two of the most common cyanotoxins, microcystins and cylindrospermopsin. The EMC should adopt the 2019 EPA-recommended cyanotoxin ambient water-quality criteria for recreational use.

Adopt a standard for PFAS as a class

There are currently no proposals to set a surface water standard for PFAS, despite the ongoing crisis with forever chemical contamination in North Carolina that has gained national attention. It's past time for our state agencies to set protective standards for PFAS as a class for our surface waters that is protective of human health. There are thousands of different specific per- and poly-fluoroalkyl substances (PFAS), so rather than adopting surface water quality standards for them one by one, the EMC should start by adopting a class standard for a total

allowed concentration of PFAS, for at least all Class A waters. Based on the available science, a standard of no more than 20 parts per trillion (ppt) for the sum of all PFAS should be adopted.

Thank you!

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