From:	Wrenn, Brian L
To:	"Andrew Sachs"; "Andy McDaniel (ahmcdaniel@ncdot.gov)"; "Anne Coan (anne.coan@ncfb.org)"; "Bill Kreutzberger (bill.kreutzberger@ch2m.com)"; "Carla Seiwert (seiwert.carla@epa.gov)"; "Dawn Padgett (dkpadgett@ci.charlotte.nc.us)"; "Doug Durbin (ddurbin@brwncald.com)"; "Douglas Wakeman (doug.wakeman@earthlink.net)"; "John Fear (jmfear@ncsu.edu)"; "Keith Larick (keith.larick@ncfb.org)"; "T. Lynch (tj.lynch@raleighnc.gov)"
Cc:	Banihani, Qais; Behm, Pamela; Brower, Connie; Deamer, Nora; Fensin, Elizabeth; Hawhee, Jim; Hill, Tammy; Hong, Bongghi; Lin, Jing; Manning, Jeff; Templeton, Mike; Ventaloro, Christopher; "Astrid Schnetzer"; "Bill Hall (bhall@hall-associates.com)"; "Charles Humphrey (humphreyc@ecu.edu)"; "Clifton Bell (cbell@brwncald.com)"; "Deanna Osmond (deanna_osmond@ncsu.edu)"; "Dr. Katie Martin"; "Hans Paerl"; "jdbowen (jdbowen@uncc.edu)"; "Linda Ehrlich"; "Marcelo Ardon (mlardons@ncsu.edu)"; "Martin Lebo"; "Michael O"Driscoll"; "Nathan Hall"; "Petter, Lauren <Petter.Lauren@epa.gov> (Petter.Lauren@epa.gov)"; "Rich McLaughlin (rich_mclaughlin@ncsu.edu)"
Subject:	Action items and questions from June CIC meeting
Date:	Monday, August 27, 2018 1:47:00 PM
Attachments:	Action Items and questions_CIC_06142018.docx 2018-0720 Reply to Questions for SAC regarding pH proposals from CIC.DOCX

CIC Members,

Please find attached replies to the CIC questions on the SAC's proposed pH criteria. The replies were developed by the main authors of the proposals. SAC and DWR continue to work toward completing the following action items:

- Guidance on establishing assessment units
- Statewide implementation of site specific criteria
- Revision of the proposal to include recent changes to the assessment method

In regards to the range of areas where a revised pH standard would be applied to regulated entities, there are very few areas of DWR programs that would be impacted by a revised pH standard for High Rock Lake. Application of the standard through development of the integrated report and impaired waters list could (but not likely) result in a TMDL or nutrient management strategy. However, regulated entities under the NPDES program would not be impacted. NPDES dischargers must meet technology-based effluent limitations (TBELS) which require pH of 6.0-9.0. These limits are included in the effluent limitations of a NPDES permit. NPDES or state stormwater permits include benchmark ranges for pH. However, they are not limitations, but pollutant levels that potentially trigger additional monitoring or best management practices. The benchmarks included in these permits would likely not be impacted by a standards change. Furthermore, 401 Water Quality Certifications and non-discharge permits for spray irrigation or land application do not include pH requirements for surface waters.

As additional responses are developed, we will provide them for CIC review. If you have any questions regarding these responses, please let me know.

Thanks,

Brian L. Wrenn
Ecosystems Branch Chief
Water Sciences Section
NC Division of Water Resources
919-743-8409 (office)
919-491-2616 (cell)

Physical Address:
4401 Reedy Creek Road
Raleigh, NC 27607

Mailing Address:
1621 Mail Service Center
Raleigh, NC 27699-1623