

**From:** [Hugh Rogers](#)  
**To:** [DEEP WQS](#)  
**Subject:** Comments on water quality standards regulations  
**Date:** Tuesday, April 02, 2019 9:52:38 AM

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Dear DEEP,

With regard to the updates to numeric water quality criteria:

If a federal water quality criteria recommendation is stricter or more complete than the current standard, so that it would better protect our water, it should be adopted. Any of EPA's standards that are less protective should not be adopted.

With regard to revising the low flow statistic applicable to fresh waters: The 7Q10 flow should be changed to using the Q99 flow, because the Q99 flow is posted on the USGS website and is available for everyone to access. As to whether DEEP will use annual Q99, or seasonal or monthly Q99, I support using whichever value will most protect the rivers.

With regard to extended disinfection period:

The disinfection period for treatment plants north of I-95 should be extended. We want people using the rivers to be safe. Non-chlorine disinfection should be required.

With regard to defining the highest attainable use:

Does this mean that if a river is now polluted, that "polluted" is regarded as its highest attainable use? If so, this could lead to abandoning efforts to clean up rivers that are polluted.

Highest attainable use should be an absolute standard of total purity, and should remain the goal, even of now-polluted rivers.

With regard to downstream protection:

The goal of downstream protection should always be to preserve the purity of the river at its source; all segments downstream should stay that pure. The standard should be to prohibit introduction of contaminants anywhere on the watercourse.

With regard to water quality classification maps:

Aquifer Protection Areas should have the appropriate groundwater designation. The areas on a river upstream of a public water well field that is adjacent to the river and in its recharge area should also be designated as A, with the goal of maintaining A.

Current and potential shellfishing areas are an important part of the state's economy and should be protected as SA. Also, slash

classifications, such as SA/SB, should be restored, in order to accurately areas that need improvement.

Sincerely,

Hugh Rogers