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May 19, 2021

Avril Wood-McGrath  
Water Quality Standards Program  
Division of Environmental Assessment and Restoration  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
[Avril.Wood-McGrath@FLORIDADEP.gov](mailto:Avril.Wood-McGrath@FLORIDADEP.gov)

**Re: Proposed Changes to Florida Water Quality Standards - Triennial Review**

Dear Ms. Wood-McGrath:

Thank you for the opportunity to provide comments on potential changes to Florida's Water Quality Standards. Under the Federal Clean Water Act, states are required to periodically conduct a comprehensive review of their surface water quality standards. Tampa Bay Water participated in the Florida Department of Environmental Protection (Department) online "Triennial Review" workshop on May 5, 2021.

During the public workshop, the Department responded to questions regarding the proposed rule changes, received public comments, and requested written comments by May 19, 2021. Tampa Bay Water respectfully submits comments on the proposed changes to Chapter 62-302 (Surface Water Quality Standards). Our comments focus on protection of Florida's water quality and public drinking water supplies.

As part of a rule-making effort to meet statutory requirements about five years ago, the Department established a "Class I-Treated" designated use category for seven Florida waters (or portions). This included the Tampa Bypass Canal and the Alafia River, which are source waters for Tampa Bay Water's regional water supply system. Water quality criteria for these waters were approved by the Florida Environmental Regulation Commission in 2016, but subsequently withdrawn by the Department.

As part of the current rule-making effort, the Department now proposes to further delay implementation of the "Class I-Treated" use category and associated water quality criteria by adding the following language to 62.302.400(17)(b), F.A.C:

*"Waters listed as Class I-Treated have not been submitted to or approved by the U.S. Environmental Protection Agency and will remain Class III until the reclassification is approved by EPA."*

Tampa Bay Water respectfully requests the Department reconsider this proposed delay because water quality criteria for “Class I-Treated” waters, as defined in 403.061(30)(b), F.S., considers the ability of water treatment facilities to meet drinking water standards (i.e., in addition to “Class III” criteria). Tampa Bay Water believes this level of water quality protection ensures the reliability of these water sources to meet current and future public drinking water quality and supply needs in the state.

Tampa Bay Water also respectfully requests the Department consider protection of Florida’s public drinking water supplies when making changes to “Class III” water quality criteria. The Department is currently considering relaxing cadmium concentrations based on USEPA 2016 recommendations for aquatic life (hardness-based freshwater criterion). However, the current federal and Florida maximum contaminant level (MCL) for cadmium in drinking water is 0.005 mg/L.

Tampa Bay Water recommend the potential impacts of a proposed “Class III” water quality criterion change for cadmium be assessed for impact on downstream drinking water uses. In addition, if the Department anticipates the use of this revised “Class III” criterion for the “Class I-Treated” designated use category, Tampa Bay Water believes the ability of permitted water treatment facilities to meet drinking water standards with existing treatment processes should also be assessed as part of the Department’s decision-making for change given these serve as drinking water supplies.

Tampa Bay Water would welcome an opportunity to assist the Department with the development of these important water quality criteria. Tampa Bay Water stands ready to provide source water quality data, treatment process information, and other assistance as-needed for the development of “Class I-Treated” water quality criteria.

Please contact Bob McConnell at 727-791-2376 ([rmcconnell@tampabaywater.org](mailto:rmcconnell@tampabaywater.org)), or the undersigned with questions, or if you would like more information. Thank you.

Sincerely,



Stephen J. Fleischacker, P.E., BCEE  
Water Quality Services Senior Manager

cc: K. Herd, P.E., Chief Science and Technical Officer  
R. McConnell, Source Water Assessment Manager  
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