

The agencies and the Proposed Rule do not seem to recognize widespread groundwater situations such as the Floridan Aquifer, which underlies most of Florida, south Georgia, and parts of South Carolina and Alabama, with natural drainage systems into and out of levels of the aquifer from shallow to deep.

The agencies should not exclude groundwater. Instead, they should clarify how discharges to surface waters through groundwater are not exempt. They should also clarify how contamination of groundwater through surface waters is not exempt.

Further, EPA and the other agencies should do what Sierra Club proposed three years ago. They should declare the Floridan Aquifer a Sole Source Aquifer (SSA) with extra protections.¹ As that 1999 USGS report says (see Appendix A), the Floridan Aquifer “is the sole source of water supply for Valdosta, Georgia, and much of the surrounding area.” The surrounding area which uses groundwater as its sole source of water supply, for drinking, industry, and agriculture, most if not all of the Suwannee River Basin in Georgia and Florida, and much if not all of the Floridan Aquifer.

Thank you for the opportunity to submit these comments.

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¹“More Floridan Aquifer Protection Called for by Sierra Club Petition to EPA,” Press Release, Sierra Club, 5 May 2015, <http://www.sierraclubfloridanews.org/2015/05/more-floridan-aquifer-protection-called.html>