



Ohio Valley Environmental Coalition

Supporting Organized Voices and Empowered Communities Since 1987

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Ohio River Sanitation Commission (ORSANCO)
5735 Kellogg Avenue
Cincinnati, OH 45230
Attn: PCS Comments

PCS@orsanco.org

To whom this may concern:

I am writing on behalf my employer, the Ohio Valley Environmental Coalition (OVEC), based in Huntington, WV. We are a nonprofit, 501 C-3 grassroots organization concerned with water and air quality issues that affect West Virginia and neighboring states; we are also concerned with broader social justice issues in the state, Central Appalachia and beyond. I also am a co-coordinator of a new multi-state grassroots alliance called the Ohio River Citizens' Alliance, which is primarily concerned with gas fracking effects on the water quality of the entire Ohio River Basin. More mercury and other toxic emissions may be coming from unconventional gas drilling operations to the Ohio River, but this is not the subject at hand today.

In reviewing the variance application information posted on your website, I am concerned for the seeming ease with which these corporations and others are able to apply for variances from pre-set standards. I urge you to consider the fact that many people who live along the river consume both the water and wildlife (primarily fish) as a large part of their diet. This is especially true in the case of impoverished families and individuals in our region. By your own estimate, approximately three million people consume water from intakes along the Ohio River. Many residents of river communities also fish in the river and consume their catches.

I'm sure you are also aware of fish advisories that already exist for the Ohio River and its tributaries. For instance, WVDHHR and WVDNR post advisories:

http://www.wvdhhr.org/fish/Current_Advisories.asp

http://www.wvdnr.gov/fishing/Regs12/regs_Consumption.pdf

And ORSANCO itself seems to participate in hosting this advisory:

<http://216.68.102.178/comm/fishconsumption/default.asp>

What is perplexing is the lack of mercury advisories on these sites for fish caught in the Ohio River, while there are abundant mercury advisories for fish caught in tributaries of the Ohio River. Most advisories for the Ohio center on PCB advisories and omit any mention of mercury. So, a primary ask we have for ORSANCO at this time is to post all information available concerning mercury levels in fish in the Ohio River as soon as possible on these publicly accessible sites. Please make it clear to us, and anyone else who accesses these sites, how much mercury is in our fish.

We believe there is already far more mercury in the Ohio River ecosystem than is healthy for the millions of people who depend upon it for water and food. Please deny the variance applications for the following reasons:

- Enough delays in enforcing the current standards on mercury in our water supply have already occurred. We want these standards fully enforced with noncompliant corporations held accountable immediately. There should be consequences for companies who don't comply with regulations, not a pass to continue to violate the law.
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- These corporations were given 12 years to clean up their act, allowing them more time to dump high amounts of mercury isn't fair.
- The Ohio River already suffers the most industrial pollution in the nation, now must be the time to change that.

Thanks for your time and attention to these issues.

Sincerely,

Robin L Blakeman
Ohio Valley Environmental Coalition Organizer
Ohio River Citizens' Alliance Co-coordinator