



# Ohio Valley Environmental Coalition

*Supporting Organized Voices and Empowered Communities Since 1987*

P.O. Box 6753  
Huntington, WV 25773-6753

[www.ohvec.org](http://www.ohvec.org)

Ph. 304-522-0246  
Fax 304-522-4079

April 7, 2016

**To:** WV American Water Company-Huntington, WV

**Re:** Ohio Valley Environmental Coalition comments on Huntington Source Water Protection Plan (SWPP)

On behalf of the board of directors, staff and members of the Ohio Valley Environmental Coalition, a 501 C-3 grassroots environmental advocacy organization based in Huntington, WV, I wish to submit the following comments on the Source Water Protection Plan proposed for the Huntington, WV service area. We join with many of our allies expressing these comments.

## **COMMUNICATION REGARDING WATER LOSS**

We support regular reporting to the public on water loss and solutions and would encourage water use advisories made to all customers affected by water main breaks and leaks in an immediate fashion. Transparency and public access to information regarding the costs of such leaks, schedules for replacement of water mains, etc. would also be encouraged.

## **COMMUNICATION REGARDING POTENTIAL SOURCES OF CONTAMINATION**

We strongly recommend that WVAWC-Huntington advocate with the Ohio River Sanitation Commission (ORSANCO) for an additional monitoring station upstream of Huntington, but south of Parkersburg. One major reason for this is our understanding that the United States Coast Guard has recently stated intent to approve – on a “case by case basis” – the barging of potentially radioactive and highly toxic waste materials from gas fracking operations upstream of our intake. The seven testing parameters listed by WVAWC for routine testing do not cover most (if any) of the compounds and chemicals that can be found in frack waste. There are also numerous underground injection wells for fracking waste in the Ohio River watershed. These wells have been shown to leach toxic substances into nearby streams and ground water aquifers, and also to cause seismic activity. The potential water contamination threats from unconventional gas fracking and associated waste disposal and transportation networks is a looming threat to our source water and should be taken very seriously. Scientific testing is now beginning to show links between ground water contamination and endocrine disruption, as well as other human health problems.

We would strongly encourage WVAWC and ORSANCO to make information pertaining to bromide level testing available to the public; this information could be critical in tracking pollution from fracking waste. Bromide facilitates formation of brominated trihalomethanes, also known as THMs, when it is exposed to disinfectant processes in water treatment plants. THMs are volatile organic liquid compounds. Studies show a link between ingestion of and

exposure to THMs and several types of cancer and birth defects.

Another reason that we support greater public communication and testing on potential pollutants upstream from our intake comes from the experience of living through the 2014 MCHM contamination. We are aware that WVAWC knew about the diluted MCHM “plume” somewhat north of its entry into the zone of critical concern for our intakes, but did not report to the public either the presence of this plume as it made its way to Huntington’s water intake or the means the company was using to treat the pollutant.

This information was communicated to other source water providers downstream, however – via ORSANCO communications networks. Downstream source water providers closed intakes and/or advised their customers to use alternative water supplies for significant periods of time, as the measurable plume of pollutant passed intakes. We hope that Huntington WVAWC customers are informed better in the future of pollutants that could impact their drinking water quality, even if WVAWC believes these pollutants are being treated by their filtering processes.

We would also like to see increased sharing of information across county and state lines – within Local Emergency Planning Commissions (LEPC) and source water provider networks, as well as with the public and/or a representative board of citizens concerned about source water protection. We urge WVAWC-Huntington to continue to work with the Mason County LEPC to ensure that its Tier II reports are user-friendly for the water utilities and emergency responders. Additional work is needed to ensure that all manufacturers are filing comprehensive Tier II reports. We recommend that another part of the network-sharing include working with ORSANCO to ensure that states cooperate on filing Tier II reports and also sharing the information with other water utilities. The more communication on these issues the better.

Overall, we continue to have some major concerns about the amount of time it takes for WVAWC to detect potential pollutants, the kinds of pollutants that it monitors, and public communication processes about these pollutants when incidences occur. We encourage WVAWC to take a close look at their testing and communication processes and as well as to seek input from their customers on a regular (at least yearly) basis to improve those processes.

## **ALTERNATIVE SOURCES OF MUNICIPAL WATER**

We note that the website’s description of considerations stated that WV American Water Company has not yet made “a final determination on economic, technical, or environmental feasibility of options” regarding an alternative water supply for Huntington customers. We are highly concerned that there is no viable and concrete proposal for a back-up source water intake or for storage of enough water to provide emergency water service to the public during a water pollution crisis event. We are especially concerned that one option for a back-up intake being considered is a shared intake with Special Metals. If serious consideration of this intake is to be given, a full spectrum test for ALL possible pollutants manufactured or used by Special Metals should be undertaken. For the option of establishing a new intake on the Guyandotte upstream from Special Metals, we would like to express concern that there is a major potential source of bacterial pollution from the Pea Ridge PSD’s discharges. Please carefully test and evaluate any site that is considered for such pollutants. Please keep the public well informed about potential

alternative source water intakes.

### **UPDATING THE SOURCE WATER PROTECTION PLAN (SWPP)**

We also are interested in how WVAWC- Huntington plans to keep the SWPP up-to-date. One of the reasons that WVAWC- Charleston had difficulties in responding to the Elk River MCHM spill was that it no longer was keeping the original plan current. Laws that have been passed since the Elk River spill should help water utilities keep their plans current, but we would appreciate knowing the frequency of updates and how the public can be involved.

Thanks for your time and serious consideration of these important matters!

-Robin L. Blakeman, on behalf of  
Ohio Valley Environmental Coalition  
[Main office on 14<sup>th</sup> Street West]  
Mailing address: PO Box 6753  
Huntington, WV 25773

304-522-0246

robin@ohvec.org