



Ohio Valley Environmental Coalition

Supporting Organized Voices and Empowered Communities Since 1987

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August 8, 2016

Laura Cooper
601 57th St SE
Charleston, WV 25304

Dear Ms. Cooper:

Comment Re: Triennial review proposed amendments to existing water quality standards

We join with many of our allies, including WV Rivers Coalition, to strongly oppose these proposed rule changes. We oppose any weakening of the Category A classification for our potential (future) or actual (current) source water streams. We also oppose changing the stream flows used in pollution limit calculations from one using low-flow conditions to one using average flow; this is an action that even agency officials acknowledge allows greater levels of cancer-causing chemicals to flow into our streams and rivers.

WV already has some of the highest cancer rates in the nation, according to the Center for Disease Control (CDC): <http://www.cdc.gov/cancer/dcpc/data/state.htm>. Given this, it seems imperative to tighten regulations on known or potentially carcinogenic chemical releases, and to fully enforce those regulations throughout our state using every regulatory tool at our disposal. This is *not* the direction the DEP seems to be moving with these proposed rule changes.

As DEP officials have admitted, there is great uncertainty about how much more chemicals would be allowed into our streams with these rule changes. A study to assess this potential and to survey exactly what kinds of chemicals would be added in greater quantities to our streams should be done prior to any further consideration of these rule changes. The data from this study should be put into an accessible public record. Also, a geological survey must be carried out to accurately assess the correct calculations for a so-called "harmonic mean." Again, we are strongly opposed to a transition to use of the harmonic mean standard from the low-flow standards.

This proposed rule change seems to clearly preference industry demands over human health, which seems strongly in opposition with the published mission of the WV DEP to "promote a healthy environment" presumably for the citizens and communities of WV.

On the subject of bacteria, we support DEP's recommendation to utilize the E. coli standards, but would encourage establishment of monthly testing procedures to adequately monitor our streams for that pollutant. We also encourage frequent sampling and monitoring for both E. coli and fecal coliform indicators during the transition period while these standards are being implemented, to ensure that our streams are safe for recreational use.

Thanks for considering these comments and adding them to your public record regarding these issues.

Sincerely,

Robin Blakeman, Ohio Valley Environmental Coalition