Smith, Chris B

From: Francis D. Slider <fslider@frontier.com>
Sent: Wednesday, July 27, 2016 2:45 PM
To: DEP Comments
Subject: re: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper:

As a lifelong West Virginian, I would like to thank you for the opportunity to comment. Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Francis D. Slider
fslider@frontier.com

239 Fluharty Rd

WV, West Virginia 26149

Smith, Chris B

From: Leigh Anne Keener <lakeener@frontier.com>
Sent: Wednesday, July 27, 2016 11:48 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.This is unacceptable!

Water is life and it seems that today, that fact is overlooked. Think of your grandchildren. Google "China Pollution" and click on images. Then think when you review what industry has planned for us. Humans are supposed to be better than this

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Leigh Anne Keener
lakeener@frontier.com
76 McCartney Ave
Morgantown, West Virginia 26505

Smith, Chris B

From: Lori Rose <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 10:18 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Lori Rose
fishnleo6969@yahoo.com

461 19th St.

Dunbar, West Virginia 25064

Smith, Chris B

From: Autumn Long <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 8:47 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Autumn Long
autumnlong11@gmail.com

2127 Big Elk Rd

Wallace, 26448

Smith, Chris B

From: Ellen Mueller <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 8:23 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Ellen Mueller
emueller9@hotmail.com

21 Crystal Dr

Buckhannon, West Virginia 26201

Smith, Chris B

From: Carli Maereneck <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 8:13 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Carli Maereneck
cmareneck@yahoo.com

1394 Sweet Springs Valley

Sweet Springs, West Virginia 24941

Smith, Chris B

From: Nori Onishi <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 8:05 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Nori Onishi
komushio@hotmail.com

252 highland ave

Morgantown, West Virginia 26505

Smith, Chris B

From: claire flanagan <claireflanagan1@comcast.net>
Sent: Wednesday, July 27, 2016 8:02 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
I have been a visitor to the Greenbrier Valley county seat of Lewisburg for the past twenty-five (25) years, spending months at a time living, shopping, eating, meeting, greeting, touring, studying, hiking, driving, swimming, rafting: anything that informs my soul through your special citizens and your natural treasures. I promote West Virginia as the most magnificent sets of mountains on this continent. I appreciate that this land is as it was going back generations. Let's honor our nation's heritage and let us keep these waters clean, clear and free of unnecessary chemicals. Let's do our ancestors proud.
Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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watersheds.

Thank you for the opportunity to comment.

claire flanagan
claireflanagan1@comcast.net
1688 Council Bluff Drive
Atlanta, Georgia 30345

Smith, Chris B

From: Carol Sheffield <deepwoodell@wildblue.net>
Sent: Wednesday, July 27, 2016 7:23 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Carol Sheffield
deepwoodell@wildblue.net

297 Upper Childers Run

Buckhannon, West Virginia 26201

Smith, Chris B

From: Jack Holmes <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 7:10 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Jack Holmes
catso56@aol.com

n/a

n/a, West Virginia 26554

Smith, Chris B

From: Tracy Asbury <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 6:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Tracy Asbury
tracyasbury99@gmail.com

PO Box 535

White Sulphur Springs, West Virginia 24986

Smith, Chris B

From: john brady <jkbrady@mac.com>
Sent: Wednesday, July 27, 2016 5:49 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Thank you for the opportunity to comment.

john brady
jkbrady@mac.com

77 singletree drive

shepherdstown, West Virginia 25443

Smith, Chris B

From: Barbara Humes <bhumes1@comcast.net>
Sent: Wednesday, July 27, 2016 5:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Barbara Humes
bhumes1@comcast.net

PO Box 1186

Harpers Ferry, West Virginia 25425

Smith, Chris B

From: Julie Martin <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 5:18 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Julie Martin
julamartin10@gmail.com

107 1st Ave N

Frederic, Wisconsin 54837

Smith, Chris B

From: Erik Melear <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 4:34 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Erik Melear
h20eng@hotmail.com

4008 Maguire Boulevard

Orlando, Florida 32803

Smith, Chris B

From: Christopher Craig <ccraig@laurellodge.com>
Sent: Wednesday, July 27, 2016 4:18 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Christopher Craig
ccraig@laurellodge.com

PO Box 1011

Harpers Ferry, Colorado 25425-1011

Smith, Chris B

From: Rachel Zorger <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 4:11 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

As a practicing physician in rural WV, I strongly believe that environmental factors play a large role in long term health of people today and future generations. Water quality is of utmost importance for health and recreation for our people and our state.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Thank you for the opportunity to comment.

Rachel Zorger
rszorger@gmail.com
30 Boyd St
Elkins, West Virginia 26241

Smith, Chris B

From: Patricia McNaull <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 3:55 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Patricia McNaull
trishmcnaull@yahoo.com

131 Drennen Ridge Rd

Marlinton, West Virginia 24954

Smith, Chris B

From: William Turner <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 3:42 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

William Turner
ichthyocentric@hotmail.com

531 Church St.

Lewisburg, West Virginia 24901

Smith, Chris B

From: Charles Marsh <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 3:25 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators. I appreciate the exposure E. Coli has recently received worldwide, but it is far from the only water born disease. This is especially true in rural areas. Increase sampling frequency to measure average values for more high-risk and priority watersheds as necessary.

Thank you for the opportunity to comment.

Charles Marsh

marshbc@aol.com

138 Old Mill Manor Trail

Berkeley Springs, WV, West Virginia 25411

Smith, Chris B

From: Robert A. Mertz <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 3:19 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I am a retired science teacher. I spent thirty one years teaching Biology, Environmental Earth Science and Wildlife Management classes in the public school systems of three states. My education was first as a Biologist, teaching came later. I have a Master of Science degree in Biology. As a biologist I am concerned with the effects our large human population is having on the sustainability of our Earth's life support systems. Although there are some impressive natural systems that help to stabilize the living environment on our planet, there are limits to how much abuse these systems can withstand. The fossil records show that in the past there have been several major disruptions of these systems. Today the biggest threat to our space ship Earth comes from the activities of us humans. Our continued population growth combined with the crazy notion that there must always be an expanding economy is a sure-fired prescription for disaster. Misguided economic policies are in direct conflict with the natural limits of Earth. Our finite planet can not provide unlimited resources to allow us to continue on the path we are on.

We must make decisions based on sound ecological principles if we are to bequeath our children and grandchildren with a place to live that is both sustainable and interesting. It will be a tragedy of monstrous proportions if our shortsighted way of making decisions degrades the world that our children inherent. The wonderful diversity of living creatures and wild unspoiled natural places must be preserved for them. It seems that we are unaware that the wild natural places are the ultimate infrastructure of the planet. Our present economic systems of continued growth are nothing more than a Ponzi scheme in which our decedents will be left with nothing of value.

I am writing today to request that you help address one of the issues that will affect future generations, including our two sons and our wonderful seven year old granddaughter. Please

try to throw off the short term considerations and take action that will address the long term welfare of humankind. The welfare of all of our children are depending on us.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Robert A. Mertz
no1ramertz@gmail.com
1205 Mulberry Ridge
West Virginia, West Virginia 25276-8561

Smith, Chris B

From: Martha Mullett <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 3:17 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Martha Mullett
martha.mullett@gmail.com

Lakeside Estates

Morgantown, West Virginia 26508

Smith, Chris B

From: Joseph Wenzel <josephwenzel@msn.com>
Sent: Wednesday, July 27, 2016 3:00 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Joseph Wenzel
josephwenzel@msn.com

93 Midwest Ave. N

Lake Elmo, Minnesota 55042

Smith, Chris B

From: James Hansen <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 3:00 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

James Hansen
seinseifen@yahoo.com

802 Lake Ave.

Wilmette, Illinois 60091

Smith, Chris B

From: Michael Moore <moorem@marshall.edu>
Sent: Wednesday, July 27, 2016 2:34 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

We need Water Quality Standards that protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Please keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Thank you for the opportunity to comment.

Michael Moore
moorem@marshall.edu

RR2, Box 189

Ona, WV, West Virginia 25545

Smith, Chris B

From: Vivian Stockman <viv@spectrumz.com>
Sent: Wednesday, July 27, 2016 2:17 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Vivian Stockman
viv@spectrumz.com

249 Millstone Run

Spencer, West Virginia 25276

Smith, Chris B

From: Deborah Hancock <deborah@manicmeltdown.com>
Sent: Wednesday, July 27, 2016 2:08 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
Water protection has got to be one of the highest priorities with public policy. We are counting on you to make sure the protections get and stay strong NOT to allow more laxity for polluters.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Thank you for the opportunity to comment.

Deborah Hancock

Deborah Hancock
deborah@manicmeltdown.com
44 Little Queen Road
Clendenin, West Virginia 25045

Smith, Chris B

From: Judith Smith <axisdance@comcast.net>
Sent: Wednesday, July 27, 2016 2:08 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Judith Smith
axisdance@comcast.net

2712 Grande Vista Ave

Oakland, California 94601

Smith, Chris B

From: susan vanmeter <wolfmoon@citlink.net>
Sent: Wednesday, July 27, 2016 1:57 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

susan vanmeter
wolfmoon@citlink.net

rr1

Paw Paw, West Virginia 25434

Smith, Chris B

From: Ilene Sussman <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:56 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Ilene Sussman
zimajunkie@aol.com

235 Adams Street, 7F

Brookyn, New York 11201

Smith, Chris B

From: David Wooddell <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:46 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

My family has owned the Wooddell Farm on top of Allegheny Mountain, Pocahontas County since the 1870s. We maintain it in a very good ecological balance, and keep the waters that run off our mountain clean enough for native trout.

Your department is charged with keeping the waters of West Virginia clean. You must protect the water, for it is not replaceable. Once water is polluted, especially with fracking waste, it is gone forever.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial

indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment. - David W. Wooddell, land owner in Pocahontas County

David Wooddell
dwooddell@gmail.com
4924 Leeds Ave
Baltimore, Maryland 21227

Smith, Chris B

From: Kat Cooper <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:08 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Kat Cooper
katcooper304@yahoo.com

2928 Mtn Lake Rd

Hedgesville, West Virginia 25427

Smith, Chris B

From: Rhonda Marrone <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:45 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Rhonda Marrone
rmm164@yahoo.com

939 Somerset Dr.

wv, West Virginia 25302

Smith, Chris B

From: Karen Fedorov <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Karen Fedorov
karen.fedorov@gmail.com

8044 Tackett Ln

Bealeton, VA, Virginia 22712-7844

Smith, Chris B

From: Mary L. <mar3336@citynet.net>
Sent: Wednesday, July 27, 2016 1:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Mary L.
mar3336@citynet.net

Lee St.

Charleston, West Virginia 25323

Smith, Chris B

From: Kevin Eich <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:30 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Kevin Eich
shred_head@hotmail.com

113 Arnold drive

Middletown , Ohio 45044

Smith, Chris B

From: Kelly Irwin <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:26 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Kelly Irwin
kellyir01@yahoo.com

352 Valley Brook Rd #C1

Ambler, Pennsylvania 19002

Smith, Chris B

From: Dave Harshbarger <harshbargerd@wvumedicine.org>
Sent: Wednesday, July 27, 2016 1:24 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

For the sake of our economic future with tourism (clean water is at the heart of outdoor based tourism), our children, and our legacy, we need to protect our headwaters and waterways. We need to be the people on watch, not the ones who need to be watched for lessening quality. Please support protecting water quality standards.
thank you,
Dave

Dave Harshbarger
harshbargerd@wvumedicine.org
1009 Vandalia Road
Morgantown, West Virginia 26501

Smith, Chris B

From: Jan Darrah <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:21 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I frequently kayak and swim in our local rivers. Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Thank you for the opportunity to comment.

Jan Darrah
jldarrah@aol.com

HC 77 Box 352

Hinton, West Virginia 25951

Smith, Chris B

From: Robert Gall <rgall17@comcast.net>
Sent: Wednesday, July 27, 2016 1:17 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Robert Gall
rgall17@comcast.net

17 Damian Road

Wheeling, West Virginia 26003

Smith, Chris B

From: Nathan Justice <brookiebumwv@gmail.cim>
Sent: Wednesday, July 27, 2016 1:16 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Nathan Justice
brookiebumwv@gmail.cim

31 Barrcut Rd.

Spencer, West Virginia 25276

Smith, Chris B

From: Steven Vogel <steven.j.vogel@earthlink.net>
Sent: Wednesday, July 27, 2016 1:09 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you very much for this opportunity to comment.

Steven Vogel
steven.j.vogel@earthlink.net

449 Hampton Court

Falls Church, VA, Virginia 22046-4121

Smith, Chris B

From: Jeff Witten <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 1:06 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Jeff Witten
JBWitten@aol.com

2409 Lacewood Dr.

Columbia, Missouri 65201

Smith, Chris B

From: Charles Brabec <chuck@thebrabecs.com>
Sent: Wednesday, July 27, 2016 1:02 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Charles Brabec
chuck@thebrabecs.com

267 Ridgelawn Road

Canvas, West Virginia 26662

Smith, Chris B

From: Sue Julian <suejulian@suddenlink.net>
Sent: Wednesday, July 27, 2016 1:02 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Sue Julian
suejulian@suddenlink.net

PO Box 677

Pinch, West Virginia 25156

Smith, Chris B

From: Emily Keener <info@actionnetwork.org>
Sent: Wednesday, July 27, 2016 11:55 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Emily Keener
splishims@gmail.com

76 McCartney Avenue

Morgantown, West Virginia 26505

Smith, Chris B

From: Jody Ross <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 8:56 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Jody Ross
jody0660@gmail.com

2208 Donald Ave

Huntington, West Virginia 25701

Smith, Chris B

From: Cody Jones <jones756@marshall.edu>
Sent: Thursday, July 28, 2016 7:10 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

I would also like to propose stricter regulation regarding waste water injection; that it be made illegal in the state as a protection for the health and wellbeing of our citizens who should be able to enjoy the right to clean spring water sourced from their own backyards. Maintaining

clean water, our most valuable resource is the best investment we can make for the future of West Virginia and for the environment.

I live in Ona and have my water pumped to me via American waters, I then spend extra money just to ensure that I have clean spring water free of chlorine, fluoride and whatever else that could be in the public water.

Thank you for the opportunity to comment.

Cody Jones
jones756@marshall.edu
3 Country Glen Drive
Ona, West Virginia 25545

Smith, Chris B

From: Diana Greenhalgh <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 6:50 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Diana Greenhalgh
diana12759@gmail.com

2051 Red Lick Road

New Milton, West Virginia 26411

Smith, Chris B

From: Robert Stanley <robert-stanley@mocs.utc.edu>
Sent: Thursday, July 28, 2016 6:01 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment. I hope the WVDEP will apply and maintain strict standards in order to protect the health of all citizens.

Robert Stanley

robert-stanley@mocs.utc.edu

PO Box 126

St. Marys, Colorado 26170-0126

Smith, Chris B

From: Gary Parker <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 4:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds. Also...who wants lax standards...could it be industry...I say no to lax standards...would you want to drink a cold glass filled with carcinogens? Would you want to go to a cancer treatment center and receive chemotherapy? I think not!

Thank you for the opportunity to comment.

Gary Parker
icelightning777@yahoo.com
144 Rock Ridge Lane
Charmco, West Virginia 25958

Smith, Chris B

From: Kathryn Hawbaker <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 12:43 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water. I am concerned about strong water standards to protect human health and environmental safety for the present and future. Thank-you for your attention and care.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Kathryn Hawbaker
revkatgreen@gmail.com
650 Ferncliff Dr.
Marietta, Ohio 45750

Smith, Chris B

From: Cynthia Ellis <cdellis@wildblue.net>
Sent: Thursday, July 28, 2016 11:55 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment. I do so as a survivor of the 2014 water crisis and as someone who felt compelled to invest in a drilled well as a consequence. Yet I still would

like to promote and rely upon a local water system. Please do what you can to make it a good one.

Cynthia Ellis
cdellis@wildblue.net
3114 Steel Ridge Rd
Red House, West Virginia 25168

Smith, Chris B

From: Ciera Pennington <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 10:21 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Ciera Pennington
cnpennington17@gmail.com

1210 Garvin Avenue

Charleston, West Virginia 25302

Smith, Chris B

From: Cassie Moats <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 9:42 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Cassie Moats
cassmoats@gmail.com

412 Hunter Ridge Rd.

Crawford, West Virginia 26343

Smith, Chris B

From: JB Witten <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 9:22 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

JB Witten
JBWitten@aol.com

578 Faulkner Rd. Rt 1 Box 113

Elkins, West Virginia 26241-9713

Smith, Chris B

From: Garth Lindley <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 9:07 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Garth Lindley
lindleyjunk@yahoo.com

3215 Bermuda Ave #22
Davis, California 95616

Smith, Chris B

From: Bert Lustig <buybook@earthlink.net>
Sent: Thursday, July 28, 2016 8:06 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Bert Lustig
buybook@earthlink.net

3476 Mauzy Rd

BerkeleySprings, West Virginia 25411

Smith, Chris B

From: Danette Brandy-Condon <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 7:27 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. I am a solar powered organic homesteader. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment. Please protect our water from pollution!

Danette Brandy-Condon
danettecondon@yahoo.com
7958 Lobelia Rd
Hillsboro, West Virginia 24946

Smith, Chris B

From: Edward Savage <info@actionnetwork.org>
Sent: Thursday, July 28, 2016 9:08 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Edward Savage
nedsavage@gmail.com

228 Richfield Ave.

Salem, Virginia 24153

Smith, Chris B

From: paul e alloway <info@actionnetwork.org>
Sent: Friday, July 29, 2016 8:56 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

paul e alloway
pealloway@gmail.com

151 Wood St

Buckhannon, West Virginia 26201

Smith, Chris B

From: John Brewer <brwrj1@msn.com>
Sent: Friday, July 29, 2016 3:57 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

John Brewer
brwrj1@msn.com

409 Aurora Street

Marietta, Ohio 45750

Smith, Chris B

From: Mark Redd <info@actionnetwork.org>
Sent: Friday, July 29, 2016 3:27 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Mark Redd
usredds@gmail.com

513 Tupper Street

Marietta, Ohio 45750

Smith, Chris B

From: Stacey Wolfe <info@actionnetwork.org>
Sent: Friday, July 29, 2016 3:12 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Stacey Wolfe
narpet7@aol.com

8225 Bodkin Ave

Lake Shore, Maryland 21122

Smith, Chris B

From: Pamela Ellis <info@actionnetwork.org>
Sent: Friday, July 29, 2016 10:51 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permits must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Pamela Ellis
dr.pamelaellis@gmail.com

122 Glory Ridge Place

Kearneysville, West Virginia 25430

Smith, Chris B

From: Debbie Royalty <info@actionnetwork.org>
Sent: Friday, July 29, 2016 9:17 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Debbie Royalty
dar.royalty@gmail.com

199 Brannon Ln

Charles Town, West Virginia 25414

Smith, Chris B

From: Jeff Iliff <info@actionnetwork.org>
Sent: Friday, July 29, 2016 8:50 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
As a member of two watershed associations I am concerned with keeping our water quality standards as strict as reasonably possible.
Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Jeff Iliff

pfpjeff@gmail.com

21 Riggs LN

Berkeley Springs WV, West Virginia 25411

Smith, Chris B

From: Niris Bharathae <nrb@wsims.com>
Sent: Friday, July 29, 2016 8:34 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

The changes proposed by WVDEP to the Water Quality Standards are a clear indication of collusion between your department and fracking interests who seek easy access to in-state resources. This is counter to the will of the people and is already perceived as a betrayal. West Virginians have a long memory and will not forget who fought for their rights nor those who shrank against the corporations. My hope is that you will do the right thing and cease your attempt to contravene the Water Quality Standards.

Thank you for the opportunity to comment.

Niris Bharathae
nrb@wsims.com
P.O.Box 229
Alderson, West Virginia 24910

Smith, Chris B

From: Nicole Casebolt <info@actionnetwork.org>
Sent: Friday, July 29, 2016 7:59 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Nicole Casebolt
ncasebolt23@gmail.com

RR1 Box 192D

Poca, West Virginia 25159

Smith, Chris B

From: Lela Erb <erbl@suddenlink.net>
Sent: Friday, July 29, 2016 9:43 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Because my family owns land in WV, I work in WV and have been looking to move to WV, the Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit. Permittees must follow the rules outlined in the Clean Water Act which require use attainability analysis in order to remove Category A use designation from our rivers and streams. Allowing removal of Category A use through the NPDES permit process will endanger public health and reduce protections for drinking water users downstream.

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Thank you for the opportunity to comment.
Thank you, Sincerley,

Lela Erb
228 Ingleside Ave.,
Marietta, OH 45740

Lela Erb
erbl@suddenlink.net
228 Ingleside Ave.,
Marietta, Ohio 45750

Smith, Chris B

From: Kerren Hall <info@actionnetwork.org>
Sent: Monday, August 01, 2016 10:57 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Thank you for the opportunity to comment.

Kerren Hall
kerrengh@yahoo.com

167 hess rd

Fayetteville, West Virginia 25840

Smith, Chris B

From: Paul Hancock <paul@bouncinghedgehog.com>
Sent: Friday, August 05, 2016 11:16 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

In my opinion, the aim of any regulatory body for water standards should be water with zero

pollution and that, of course, means stricter not slacker standards. Water is precious and should be treated as such.

Thank you for the opportunity to comment.

Paul Hancock
paul@bouncinghedgehog.com
44 Little Queen Road
Clendenin, West Virginia 25045

Smith, Chris B

From: Steven Runfola <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:27 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Steven Runfola
stevenrunfola@gmail.com
45 Park Ridge Dr
Morgantown, West Virginia 26508-4032

Smith, Chris B

From: Nancy Ward <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:15 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Nancy Ward
naward57@gmail.com
703 Laurel road
Charleston , West Virginia 25314

Smith, Chris B

From: Tom Nagle <tom@tnagle.com>
Sent: Friday, August 05, 2016 11:05 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

The reason we moved to Great Cacapon WV was BECAUSE of the beautiful Cacapon River and its high quality water.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Tom Nagle

Tom Nagle
tom@tnagle.com
362 Fishers Bridge Lane
Great Cacapon, West Virginia 25422

Smith, Chris B

From: Carroll Bassett <bmsrescue@frontiernet.net>
Sent: Friday, August 05, 2016 11:20 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Carroll Bassett
bmsrescue@frontiernet.net
HC 68 Box 64B
Friars Hill, West Virginia 24938

Smith, Chris B

From: Janet Zerbe <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:15 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Janet Zerbe
janetjz.1234@gmail.com
106 Shafer Road
Dunbar, West Virginia 25064

Smith, Chris B

From: Luke Rostocki, MD <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:18 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I cannot think of a more important issue than protecting the waters in West Virginia.
Please ,help
luke a. rostocki, md

Luke Rostocki, MD
rostocki@aol.com
435 Dominick Circle
Summersville, WV, West Virginia 26651

Smith, Chris B

From: Aaron Jewell <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:13 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sincerely,

Aaron Jewell

Aaron Jewell
ajewell82@gmail.com
30 Pappy Court
Bunker Hill, West Virginia 25413

Smith, Chris B

From: Jean McAulay <chesbayretr@juno.com>
Sent: Friday, August 05, 2016 11:54 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Jean McAulay
chesbayretr@juno.com
10315 Geranium Ave
Adelphi, Maryland 20783-1231

Smith, Chris B

From: Ross Andrew <randrew4@mix.wvu.edu>
Sent: Friday, August 05, 2016 12:13 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Ross Andrew
randrew4@mix.wvu.edu
971 Valley View Ave
Morgantown, West Virginia 26505

Smith, Chris B

From: Linda Christopher <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:53 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Linda Christopher
lchristopher615@gmail.com
P.O. Box 225
Snowshoe, West Virginia 26209

Smith, Chris B

From: Marilyn Mcgeorge <mandw@suddenlink.net>
Sent: Friday, August 05, 2016 12:11 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Marilyn Mcgeorge
mandw@suddenlink.net
1529 Virginia st east
Charleston wv, West Virginia 25311

Smith, Chris B

From: Judy E. Hamilton <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:51 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Judy E. Hamilton
annasmomjudy@yahoo.com
907 Mathews Ave
Charleston, West Virginia 25302

Smith, Chris B

From: Ben Badger <info@actionnetwork.org>
Sent: Friday, August 05, 2016 12:04 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Ben Badger
badger_benjamin@yahoo.com
216 Eastland Ave
Morgantown, West Virginia 26505

Smith, Chris B

From: Eric Engle <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:47 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

P.S. I live next to the Ohio River. The Ohio is considered one of if not the most polluted rivers in the country for the last 7 years running. West Virginians deserve cleaner, safer water than what we've become accustomed to.

Eric Engle
ericengle85@yahoo.com
324 Point Drive
Parkersburg, West Virginia 26101

Smith, Chris B

From: Sandra Osbourn <info@actionnetwork.org>
Sent: Friday, August 05, 2016 12:04 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sandra Osbourn
ssosbourn301@gmail.com
134 Hensel Drive
Shepherdstown, West Virginia 25443

Smith, Chris B

From: Rachael Pappano <info@actionnetwork.org>
Sent: Friday, August 05, 2016 11:39 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Rachael Pappano
shamrock.magic@yahoo.com
330 River Rd.
Mattawamkeag, Maine 04459

Smith, Chris B

From: Michael Klausing <info@actionnetwork.org>
Sent: Friday, August 05, 2016 12:02 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Michael Klausing
mike_klausing@hotmail.com
624 Cross Lanes Dr Apt 11
Nitro, West Virginia 25143

Smith, Chris B

From: Art Glick <omb00900@mail.wvnet.edu>
Sent: Friday, August 05, 2016 11:37 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Art Glick
omb00900@mail.wvnet.edu
HC 67 Box 539BB
Renick, West Virginia 24966

Smith, Chris B

From: David Schles <schles_law@wirefire.com>
Sent: Friday, August 05, 2016 12:00 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

David Schles
schles_law@wirefire.com
815 Quarrier Street, #306
Charleston, WV, West Virginia 25301

Smith, Chris B

From: Paul Burke <paul@numbersinstitute.com>
Sent: Friday, August 05, 2016 1:22 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Paul Burke
paul@numbersinstitute.com
PO Box 1320
Shepherdstown, West Virginia 25443

Smith, Chris B

From: Chris Preperato <info@actionnetwork.org>
Sent: Friday, August 05, 2016 1:04 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Chris Preperato
chrispreperato@gmail.com
4101 Medford Drive Apt 3
Annandale, Virginia 22003

Smith, Chris B

From: Mark Leonard <mleonard8181@gamil.com>
Sent: Friday, August 05, 2016 1:14 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Mark Leonard
mleonard8181@gamil.com
19499 Coshocton Rd.
Mount Vernon, Ohio 43050

Smith, Chris B

From: James Dixon <james@harehill.com>
Sent: Friday, August 05, 2016 12:54 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

James Dixon
james@harehill.com
206 W. Washington Ave.
Terra Alta, West Virginia 26764

Smith, Chris B

From: Jenni Kovich <jjkov1ch-charity@live.com>
Sent: Friday, August 05, 2016 1:09 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Jenni Kovich
jjkov1ch-charity@live.com
50 Dud Bennett Rd
Leon, West Virginia 25123

Comments On The Proposed Changes To The Amendment to Water Quality Standards Rule
Prepared by Carpenter Environmental Associates, Inc.
On behalf of the Affiliated Construction Trade Foundation
August 2016

The West Virginia Department of Environmental Protection (WVDEP) Water Resources Division of Water and Waste Management as part of the triennial review has proposed changes related to regarding the critical design flow for compliance with human health water quality criteria. Specifically, WVDEP proposes replacing the use of the lowest 7-day average flow occurring on average once every 10 years (7Q10) with harmonic mean flow as the critical design flow for human health criteria effluent limits for carcinogens. We disagree with the WVDEP proposed change to allow Harmonic Mean Flow to be the critical design flow for determining the amount of a carcinogen an industry can legally discharge to the State's waters.

Critical Design Flow For Human Health Carcinogens

We believe that adoption of the harmonic mean flow as the critical design flow for carcinogens is inappropriate for at least two reasons. First, the State has not adequately investigated the impact on all the streams of West Virginia of abandoning the use of a low design flow, such as the 7Q10, in favor of the harmonic mean flow. The effect of the rule change on our rivers has not been determined.

The harmonic mean flow is always greater than the 7Q10 for a particular stream, therefore, the adoption of the harmonic mean flow as the critical design flow necessarily results in an increase in the amount of cancer causing chemicals allowed in all rivers and streams. The State must determine the magnitude of the increase in each river and stream in order to make a fully informed decision.

Second, the rationale for embracing harmonic mean flow as the critical design flow, as discussed in previous revision recommendations, is based upon the assumption that the linear lifetime exposure model for carcinogens is correct for all cancer causing substances (see Rationale Document, Water Resources Board of West Virginia, August 19, 1991). While the use of the linear lifetime exposure model for cancer may in many cases be conservative, we believe that applying such an assumption across-the-board for all cancer causing substances fails to account for valid alternative models for cancer.

Establishing the harmonic mean flow as design flow rather than the 7Q10 would allow polluters to discharge up to 8 times (and perhaps more as would be determined in needed investigations) more cancer causing substances to West Virginia's rivers and streams and would increase cancer risk. The increased cancer risk which would result by establishing harmonic mean flow as the design flow can and must be determined before allowing such a change. Therefore, we believe that the use of harmonic mean flow as the critical stream flow for carcinogens should not be allowed until it is fully investigated and the legislature determines that the increased cancer risk to the citizens of West Virginia is acceptable.

Critical Design Flow for Non-Carcinogenic Human Health Criteria

WVDEP has proposed that the critical design flow for human health criteria effluent limits for noncarcinogens be the minimum mean thirty consecutive day drought flow with a five year return frequency (30Q5). The recommended critical design flow would result in a less stringent design flow for non-carcinogenic human health criteria (30Q10 rather than 7Q10). Prior to changing the design flow for non-carcinogenic human health criteria from 7Q10 to 30Q10, an analysis must be conducted to evaluate the increased health risk to citizens of West Virginia of allowing increased levels of non-carcinogenic toxic pollutants to be discharged to the waters of West Virginia and the legislature must determine that the increased health risk is acceptable. This evaluation must take into

account that the neighboring Commonwealths of Kentucky and Pennsylvania both utilize the 7Q10 flow to determine discharge limitations for these pollutants.

Smith, Chris B

From: MaryLois Gannon-Miller <info@actionnetwork.org>
Sent: Friday, August 05, 2016 2:41 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

MaryLois Gannon-Miller
marialouisa2001@yahoo.com
502 S George St
Charles Town, West Virginia 25414

Smith, Chris B

From: jerry carson <jcarson1@suddenlink.net>
Sent: Friday, August 05, 2016 1:46 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

jerry carson
jcarson1@suddenlink.net
5215 beechcrest dr
cross lanes, West Virginia 25313

Smith, Chris B

From: William Hicks <whicks@bethanywv.edu>
Sent: Friday, August 05, 2016 3:08 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

As a West Virginian and ecologist, I love this state in large part because of its forests and streams. I agree with the WV Rivers Coalition as described below:

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Thank you for the opportunity to comment.

William Hicks
whicks@bethanywv.edu
101 Roosevelt Ave
Bethany, West Virginia 26032

August 7, 2016

Comment on WV DEP Proposed Modifications to 47 CSR 2 WQS Rules:

My name is Philip C. Price. I have a PhD in Analytical Chemistry, with over 40 years' experience in industrial chemistry, trace analyses, spill/release incident investigations, and Superfund Site remediation. I have comments on two areas of the proposed changes:

Drinking Water Use Designation

DEP proposes to remove these designations of ***potential*** future source water use. One prediction we can all agree with is that WV will see more change in the future: new industries, shifting populations, economic challenges, and new environmental events (algae blooms, spill events, floods). Last summer's sudden algae bloom events clearly demonstrated the usefulness of an alternate clean emergency water source for Huntington. Degrading our currently-available alternate water supplies increases future risks to Public Health.

This change seems driven mainly by WV manufacturers. Are there any data to demonstrate specific WV economic benefits "if we could only degrade the water quality of this specific stream"?

Implement EPA-recommended Harmonic mean flow

DEP proposes ***increasing*** the amount of permissible carcinogens (and other pollutants) in WV waters by changing the flow/dilution calculation factors. Some of the increases would be more than 10-fold, based on stream flow data. However, there is a lack of data on carcinogen and polutant identities, current concentrations, and proposed future concentrations. Without this data, the rule would be changed, but without any information as to its impact on Public Health or specific aquatic toxicity increase.

Philip C. Price
1391 Nottingham Rd.
Charleston, WV 25314
PriceWV@gmail.com

Smith, Chris B

From: Steven Presley <Presley.Steven@mail.com>
Sent: Monday, August 08, 2016 8:29 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Steven Presley
Presley.Steven@mail.com
1838 Lovely Lane
Letart, wv, West Virginia 25253

Smith, Chris B

From: Larry & Evelyn Dadisman <info@actionnetwork.org>
Sent: Sunday, August 07, 2016 6:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Larry & Evelyn Dadisman
ldadisman@yahoo.com
912 Greendale Dr
Charleston, West Virginia 25302-3224

Smith, Chris B

From: Christopher Benison <cbenison@gmail.com>
Sent: Sunday, August 07, 2016 12:44 PM
To: DEP Comments
Subject: Laura Cooper, Water Quality Standards

33 Maple Avenue

Morgantown, West Virginia 26501

August 7, 2016

Laura Cooper
Water Quality Standards
DWWM
WV Department of Environmental Protection
601 57th St. S.E.
Charleston, WV 25304

As a proud West Virginia resident, I am interested in protecting and even strengthening safe water resource standards. The WVDEP is considering relaxing current regulations governing the protection and use of West Virginia's water resources. Such a decision is the wrong course for our state. Current regulations should be maintained and, in some cases, even strengthened. At a minimum, I suggest the WVDEP take the following actions to protect our water resources, now and in the
future:

1. The WV-DEP should adopt a 300 uS/com standard for electrical conductivity in West Virginia Water Quality Standards. Water with higher conductivity than 300 uS/com is acutely toxic to many species of aquatic life and therefore undermines biodiversity in a given water source. Biodiversity is a key indicator for the overall health of a water system. Since conductivity is easily measured, numerous scientific studies and EPA have concluded that electrical conductivity greater than 300 uS/com is harmful to aquatic life.

2. The WV-DEP should more aggressively protect Category A Drinking Water Streams that can serve as a source of public drinking water. It is my understanding that WV-DEP proposes allowing pollution discharge permits to remove the Category A designation from a number of rivers and streams in the state. WV-DEP should reverse itself on this position and, at a minimum, delete sections 6.3 through 6.9 of the applicable proposed rule. The language in the referenced sections would explicitly enable active pollution of the streams, which no West Virginian should have to tolerate.

3. The WV-DEP should reject proposed changes to the "Critical Design Flow." The current proposal would allow higher rates of carcinogenic substances in current streamflows. Higher carcinogen flow rates is particularly inappropriate during drought or other low flow periods but ideally should not be allowed at all.

4. The WV-DEP should work toward a higher level of E. coli monitoring in West Virginia water resources. Such E. coli monitoring is especially important for water resources used for recreational purposes.

5. The WV-DEP should adopt the proposed EPA standards for five organic compounds (acrolein, carbaryl, diazinon, nonylphenol, and tributylin) in terms of their impacts on the quality of aquatic life systems in West Virginia's water resources.

These proposed steps represent a meaningful commitment to protect the quality of our state's water resources and the overall beauty of West Virginia. Thank you for the opportunity to express my opinion on this important issue.

Yours in good faith,

Christopher J. Benison

Smith, Chris B

From: Julie Archer <julie@wvcag.org>
Sent: Sunday, August 07, 2016 9:18 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Julie Archer
julie@wvcag.org
PO Box 207
Sumerco, West Virginia 25567

Smith, Chris B

From: Steve Malafy <info@actionnetwork.org>
Sent: Monday, August 08, 2016 7:52 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Steve Malafy
smalafy@gmail.com
280 Centerville Harp Rd
French Creek, West Virginia 26218

Smith, Chris B

From: Gale Simplicio <galesviento@comcast.net>
Sent: Sunday, August 07, 2016 6:30 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Gale Simplicio
galesviento@comcast.net
1275 Tartan Lane
Morgantown, West Virginia 26505

Smith, Chris B

From: Grace Lynch <info@actionnetwork.org>
Sent: Sunday, August 07, 2016 11:19 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Thank you for the opportunity to comment.

Grace Lynch
gglynch@gmail.com
PO Box 114
Rock Cave, 26234

Smith, Chris B

From: April Pierson-Keating <info@actionnetwork.org>
Sent: Sunday, August 07, 2016 8:23 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
I am a citizen of West Virginia. I was born here. My mother, Iris Bell, wrote our state and centennial song, "This is My West Virginia." Iris loved our state and I have become an advocate for her environment and citizens. We are proud of our state and our heritage, and we don't want to see West Virginia's water quality and citizen health be destroyed in favor of corporations and industry.

West Virginia is a national treasure. We have been abusing the environment and people for over a century. The new standards would undo national protective measures and make it harder to hunt, fish, and live in our state. It will also foul the water for those downstream.

West Virginia is a water-producing state. Our water goes to 13 states and 46 rivers. We have a duty to keep it clean, not only for future generations of West Virginians, but for all those living downstream, and those who depend on the streams for their food, water, and livelihood.

There could be no other reason for loosening the standards set in place by the Clean Water Act than to favor industry. We know that we can do better with a diversified economy, not a mono-economy. Coal, oil, and gas are killing the planet and poisoning the water, causing earthquakes, and putting radionuclides into our water. Your agency is one of those that is charged with protecting the streams and all those who depend on them, which is about 1/3 of the country, not to mention all the creatures in the food chain of this diverse state. Our biodiversity is second only to the Amazon Rain Forest, which we are also destroying at an alarming rate.

Please consider the following as you make your decision:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The

provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Thank you for the opportunity to comment.

April Pierson-Keating
apkeating@hotmail.com
115 shawnee dr
Buckhannon, Colorado wv 26201

Smith, Chris B

From: Doyle Coakley <dcoakley@frontiernet.net>
Sent: Sunday, August 07, 2016 10:55 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Doyle Coakley
dcoakley@frontiernet.net
P O Box 245
Cowen, West Virginia 26206

Smith, Chris B

From: Kent Higgins <info@actionnetwork.org>
Sent: Sunday, August 07, 2016 4:14 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I appreciate the opportunity to comment on the Water Standards. Some of what follows is the wording of the West Virginia Rivers Coalition, whose positions I support in general. I have left out some of their points in order to say to you that I view clean, safe water as critical to the future of West Virginia - it is in fact the last natural resource which we have in abundance and which is desired by others - we would be fools to adopt standards which allowed further degradation of water quality. We should be improving quality.

I am from Fayetteville, which now relies on tourism as its industry. The coal business, which supported my family and many others for so long, is declining and not coming back. Tourism is our current growth industry, and we desperately need it.

In my youth (I am nearly 72) a significant obstacle to tourism was that one could not purchase liquor by the drink. The point was made over and over than tourists would look at the beauty of our state during the day, but they wanted a drink with dinner. Churches preached against it as sinful, but eventually rational minds prevailed and tourism increased. Do you think that tourists want to encounter polluted water as part of their West Virginia experience?

I realize that some see the proposed changes as incremental and not significant, but I think the issue is so important that any slippage is bad. For too long, the people of this state have traded their right to a clean and safe working environment for current jobs. Now that the jobs are gone, we're left with the environmental mess. Let's not repeat that part of our history.

Here are some of WVRC's points:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The

provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Kent Higgins

Kent Higgins
revkenthiggins@gmail.com
1520 Dogwood Rd
Charleston, West Virginia 25314

Smith, Chris B

From: codya.jones10@gmail.com
Sent: Sunday, August 07, 2016 11:22 AM
To: DEP Comments
Subject: WV-DEP Water Standards Hearing Aug. 9

Laura Cooper, WV-DEP,

As a member of the US Army currently stationed in Fort Benning, GA. I'm from Ona, WV where my wife still currently lives, and we'd like to have a family in WV but we want our children to have a better WV than we inherited. We know that the grass is greener on the other-side especially in Maryland but West Virginia is home. I'd like to ask for five favors to improve the quality of the water in my home state.

Five Key "Asks"

1) Include a 300 uS/cm standard for electrical conductivity in West Virginia Water Quality Standards. Electrical conductivity is abroad measure of the level of chemical ions such as sulfate, bicarbonate, calcium, chlorides, and many other dissolved solids. Sources include mining operations, gas well development, road salts, and other activities. Water high in conductivity is acutely toxic to many species of aquatic life. Since conductivity is easily measured, numerous scientific studies and EPA have concluded that electrical conductivity greater than 300 uS/cm is harmful to aquatic life.

2) Protect "Category A Drinking Water". Streams that can serve as sources of public drinking water are designated "Category A". Current standards apply this designation to almost all waters in West Virginia, thereby protecting those streams for current and future water supplies. WV-DEP proposes to allow pollution discharge permits to remove this Category A designation from a stream. Urge DEP to delete sections 6.3 through 6.9 of the proposed rule. This proposed language is entirely focused on allowing more pollution. Tell WV-DEP that Water Quality Standards should be about protecting drinking water and other water uses!

3) Reject proposed changes to the "Critical Design Flow". The Critical design Flow is used to estimate the water's flow rate in receiving streams. WV-DEP proposes to change this calculation to allow higher rates of carcinogens in water. While EPA has supported this in some cases, it is not appropriate during drought or low flow periods because that will allow higher concentrations of carcinogens. Demand that WV-DEP establish procedures to reduce the amount of carcinogens during low flow periods.

4) Require increased monitoring of E. coli and fecal coliform bacterial contamination. Water with high levels of fecal coliform bacteria is unsafe for recreation. Ask WV-DEP to increase the required sampling frequency to assure safety for swimming and boating.

5) Adopt as proposed EPA's recommended standards for aquatic life criteria for five organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin. These compounds are toxic and West Virginia needs these water quality standards.

Thank you for helping to protect West Virginia's water.

Sincerely,
2LT Cody A. Jones

Smith, Chris B

From: Mary A Borchers <abigail@raven-villages.net>
Sent: Sunday, August 07, 2016 12:44 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Mary A Borchers
abigail@raven-villages.net
1801 Middle Ridge Rd
Romney, West Virginia 26757

Smith, Chris B

From: Lori Magana <info@actionnetwork.org>
Sent: Sunday, August 07, 2016 7:32 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Please protect our water. Please keep Category A standards as we have utilized over these last years.
Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Lori Magana
lorimagana@gmail.com
304 Gail Drive
Charleston, West Virginia 25314

Smith, Chris B

From: Helen Gibbins <gibbins@frontier.com>
Sent: Sunday, August 07, 2016 3:24 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

The League of Women Voters of WV wishes to make comments on WV's Water Quality Standards. In general we urge the protection of our waters for now and the future. We oppose weakening the standards as well as increasing pollution into WV's waters. We need to protect our waters for human and fauna health.
If more pollution is allowed, the costs of cleaning up the pollution will also go up.
1. We oppose allowing Category A use for the waters of our state to be changed through NPDES permits. Variances from Category A use need full reviews and studies to ensure downstream waters uses are protected.
2. Changing the way flow of the waters are determined needs a full study in conjunction with the USGS. The method used should take into account the lowest flow of the waters.
3. The procedure for determining bacterial count in our waters should use both Fecal Coliform and E. Coli until it is determined which is the more accurate system. 4. Adopt EPA's recommended standards for aquatic life criteria for organic chemicals.
Thank you for allowing us to comment on the Triennial Review.
League of Women Voters of WV President, Nancy Novak, and board member, Helen Gibbins

Helen Gibbins
gibbins@frontier.com
6128 Gideon
Huntington, WV, West Virginia 25705

Smith, Chris B

From: Colleen Anderson <motherwit@suddenlink.net>
Sent: Sunday, August 07, 2016 11:01 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Colleen Anderson
motherwit@suddenlink.net
6 Arlington Court
Charleston , West Virginia 25301

Smith, Chris B

From: jim hatfield <info@actionnetwork.org>
Sent: Saturday, August 06, 2016 10:47 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Although West Virginia will continue to mine less coal, it can share its other natural resources more, including abundant and clean water. Do not allow our overall water quality to be degraded by changing the Category A criteria through an NPDES or any other permit. If a business or industry cannot afford to discharge safe, clean water, they are not paying all their expenses and, instead, shifting the cost to the public domain.

Do not shift to a new method of measuring stream flow without understanding, through a statewide scientific study, how the proposed method compares to the current one. Let science dictate which is best or if they both have a place in producing the most accurate numbers.

Also allow science to determine the differences between measuring E. Coli and Fecal Coliform as a gauge of public water safety. Adequate sampling frequency must also be taken into account.

Adopt as proposed EPA's recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

jim hatfield
hatfield.jch@gmail.com
1077 foley drive
saint albans, West Virginia 25177

Smith, Chris B

From: Scott Price <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 1:23 PM
To: DEP Comments
Subject: I'm the 6th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 18 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> You can't keep people from their God giving Rights

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838571&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838571&target_type=custom&target_id=73331&csv=1

Scott Price
Cleveland, OH

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Debbie Jarrell <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 1:23 PM
To: DEP Comments
Subject: I'm the 2nd signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 18 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

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My additional comments are:

> Please, our kids and grandkids do matter!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838568&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838568&target_type=custom&target_id=73331&csv=1

Debbie Jarrell
rock creek, WV

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Janet Perry <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 1:23 PM
To: DEP Comments
Subject: I'm the 7th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 18 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> The destruction of miles upon miles of streams in West Virginia due to the practice of Mountaintop Removal (or 'bombing' as it should be called...) by the coal industry is, in and of itself a travesty of humanity and justice. The destruction of this vital part of local ecosystems, as well as the drinking water of hundreds of thousands of people is something that cannot be overlooked. The state and federal government must step up and hold the coal industry responsible for the clean-up of its mess.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838569&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838569&target_type=custom&target_id=73331&csv=1

Janet Perry
San Clemente, CA

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receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Mark Graham <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 1:23 PM
To: DEP Comments
Subject: I'm the 13th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 18 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> Clean Water is for everyone

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838570&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838570&target_type=custom&target_id=73331&csv=1

Mark Graham
Hyattsville, MD

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Copper Development Association Inc.
Copper Alliance

August 8, 2016

Laura Cooper
Water Quality Standards, DWWM
WV Department of Environmental Protection
601 57th St. S.E.
Charleston, WV 25304

Re: Proposed Triennial Review of Legislative Rule 47CSR2, "Requirements Governing Water Quality Standards"

Dear Ms. Cooper,

Thank you for this opportunity to provide comments on the items to be considered during the West Virginia Department of Environmental Protection's (DEP) 2016 Triennial Review of aquatic life water quality standards, on behalf of our client, the Copper Development Association (CDA). CDA played a significant role in sponsoring scientific research used in the development of the freshwater Biotic Ligand Model (BLM) for copper, which was adopted by the United States Environmental Protection Agency (USEPA) as the basis for its latest nationally recommended freshwater aquatic life ambient water quality criteria for copper (USEPA 2007).

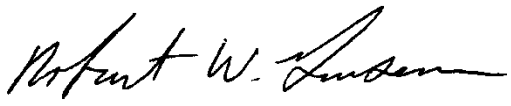
The purpose of this letter is to support DEP's proposed rule which includes language to allow the BLM to be used to derive site-specific criteria for copper. We are encouraged to see the adoption of criteria derivation methods that more accurately predict copper bioavailability compared to the existing hardness-based standard.

While the model is useful for derivation of site-specific water quality criteria, we suggest its best application is on a state-wide basis for any discharger with sufficient water quality data to run the BLM. We suggest that the DEP explore full replacement of the hardness-based standards with the BLM, or include the BLM as a site-wide alternative. Several states are already working towards full replacement of the hardness-based criteria for copper with the BLM as the basis (i.e., DE, ID, KS, and OR).
This would enable individual permit writers and permittees to collaborate directly to use the BLM to derive permit limits, thereby minimizing or eliminating the need to go through a lengthy and expensive rulemaking process. BLM-based criteria provide a practical means of deriving demonstrably more accurate levels of aquatic life protection across a broad range of water quality conditions, and with sufficient flexibility to support most any regulatory application framework.

We appreciate the opportunity to provide comments on the topic to consider for updating West Virginia's water quality standards. Please let us know if you have any questions. We look forward to discussing this with you further.

Cu

Sincerely,
GEI CONSULTANTS, INC.



Robert W. Gensemer, Ph.D., GEI
Senior Ecotoxicologist

Carrie Claytor, CDA
Director of Health, Environment and Sustainable Development

RWG
cc: Steven Canton, GEI
John Gondek, GEI
David DeForest, Windward Environmental
Eric Van Genderen, International Zinc Association

References

U.S. Environmental Protection Agency (USEPA). 2007. Aquatic Life Ambient Freshwater Quality Criteria – Copper. EPA-822-R-07-001. U.S. Environmental Protection Agency, Washington, D.C.

Smith, Chris B

From: Shane Assadzandi <info@actionnetwork.org>
Sent: Monday, August 08, 2016 12:57 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Shane Assadzandi
shane.assadzandi.wv@gmail.com
106 Ashley Oaks
Morgantown, West Virginia 26505

Smith, Chris B

From: Ferold Torchenot <info@actionnetwork.org>
Sent: Monday, August 08, 2016 12:51 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Ferold Torchenot
feroldtorchenot@yahoo.com
7080Cradlerock way
COLUMBIA, Maryland 21045

Smith, Chris B

From: JL Summers <summersimac@frontier.com>
Sent: Monday, August 08, 2016 12:20 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
It is hard to believe anyone would think it proper to weaken water standards. Please stop kowtowing to industries asking this be done. The citizens of WV are being done a large disservice by the WVDEP. It is no wonder WV continues to loose population every year. Cater to the residence population that deserves clean pure water both to drink and for recreation. Thank you.

JL Summers
summersimac@frontier.com
13004 Winfield Rd
Winfield, West Virginia 25213

Smith, Chris B

From: Norma Miller <info@actionnetwork.org>
Sent: Monday, August 08, 2016 1:10 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Norma Miller
n0k9miller@aol.com
2010 Weberwood Dr.
Charleston, West Virginia 25303

Smith, Chris B

From: Betsy Reeder <ereeder44@msn.com>
Sent: Monday, August 08, 2016 12:57 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Betsy Reeder
ereeder44@msn.com
HC 85 Box 305
Jumping Branch, West Virginia 25969

Smith, Chris B

From: Elise Keaton <info@actionnetwork.org>
Sent: Monday, August 08, 2016 12:08 PM
To: DEP Comments
Subject: Protect our water!!

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Please reject the proposal to allow removal of Category A drinking water protection through the permitting process. I support protecting all waters as current or future drinking water sources and oppose any rollback of this long-standing policy.
Please reject changes to the “critical design flow” that would allow more carcinogens into our water. WVDEP proposes to change flow rate calculation to a system that is not as protective during low water or drought conditions, allowing for higher, more dangerous concentrations of pollutants into our water. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions. I recommend WVDEP work with the USGS to conduct a statewide study to determine the best estimates for flow.

Please support increased statewide monitoring for bacteria in our waters. I support using E. Coli, instead of Fecal Coliform, as the new bacterial indicator as long as a procedure is in place to monitor both indicators during the transition process, and that frequency of sampling is adequate to measure a monthly average value.

Please adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Sincerely,

Elise Keaton

Elise Keaton

elise.keaton@gmail.com

PO Box 481

Hinton, WV, West Virginia 25951

Smith, Chris B

From: Linda Farwell <info@actionnetwork.org>
Sent: Monday, August 08, 2016 1:01 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Linda Farwell
farwell4775@gmail.com
756 Gordon Drive
Charleston, West Virginia 25303

Smith, Chris B

From: Joseph Sandy <info@actionnetwork.org>
Sent: Monday, August 08, 2016 12:56 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Joseph Sandy
josephsandy040@aol.com
103 Pinewood Road
Clarksburg, West Virginia 26330

Smith, Chris B

From: Angela Hughes <info@actionnetwork.org>
Sent: Monday, August 08, 2016 12:30 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Angela Hughes
scampyhughes@aol.com
2101 Rays Branch Road
Charleston, West Virginia 25314

Smith, Chris B

From: wes holliday <wes@suddenlink.net>
Sent: Monday, August 08, 2016 12:02 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
We do not need to go back to the old ways, when the river actually caught on fire, when you could not eat the fish, or swim in the waters.
West Virginia needs to go forward, we have never had progress when we sold out our Environment to 'out of state" interests, or manufacturers. Every time we compromise our environment for a few jobs, it ends up hurting all of us !
Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

wes holliday
wes@suddenlink.net
141 notyurbusiness
charleston, West Virginia 25311

Smith, Chris B

From: Steve Cantley <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 1:23 PM
To: DEP Comments
Subject: I'm the 12th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 18 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> save our streams PLEASE

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838572&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838572&target_type=custom&target_id=73331&csv=1

Steve Cantley
Naoma, WV

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Rodney Hytonen <rodneyhytonen@frontier.com>
Sent: Monday, August 08, 2016 1:44 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Why ANY Fossil Fuel facilities are being, or have been, permitted in West Virginia, is completely beyond my understanding, and that of any thinking person.

And the immediate proof of its harm, in the real world, continues to torture many thousands of West Virginians daily, myself and my family very much included. Our (nightly, now) asthma has gone through the roof, and I had until now, only had ONE attack in 68 years! Ghis began when the drilling and fracking pads north of our town, Pennsboro, grew from 11 pads to over 75 Pads recently, according to ARCGIS and the Earthworks online map!

West Virginia is suffering from the irresponsible proliferation of this EXPORT-level gas drilling and fracking. We will not forget it, as we grow to recognize the source, the corrupt enablers, and the feculent reason -irresponsible greed- for all this permanent harm and immediate suffering.
Our government agencies were created to PROTECT the people from its harm - not to ENABLE it!

The still-emerging scientific proof is already overwhelming, that the use of fossil fuels has been a two century long, colossal mistake, made by mankind out of the pure, irresponsible greed of a few criminally harmful industries, and their lies that these deadly and death-dealing "jobs" are "the only ones available."
We could easily have made other, far less harmful jobs- and energy sources- available.

END the drilling, fracking, piping, shipping, and other EXPORTING of our very land from beneath us, do it overnight!
Create those jobs NOW, to actually clean it up (not just the cosmetic minimum) and pay for them by exacting ALL the losses and costs, in Public Health, Infrastructure, and

Private Property; which the Industries have EXTERNALIZED to a public that could ill afford them. How much LESS will we be able to afford it, when the inevitable BUST comes. Have we learned NOTHING?

PLEASE do not allow this facility to be built or operated AT ALL,
and mandate an immediate END to the MISTAKE of protecting and enabling
this irresponsible, marauding, poisonous, devastating industry of
nonconventional, horizontal drilling and "slickwater" hydraulic fracturing;
NOW.
Protect the people's health, our mountains wildlife, and streams, and the planet -
NOT CORPORATE PROFITS. BANKRUPT this criminal imdusry, SEIZE their assets,
NATIONALIZE energy to keep our resources HERE, and CREATE those new Green Energy jobs TODAY.

Rodney Hytonen
rodneyhytonen@frontier.com
109 Pine Drive
Pennsboro, West Virginia 26415

Smith, Chris B

From: Jacqueline Stalnaker <info@actionnetwork.org>
Sent: Monday, August 08, 2016 1:27 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Jacqueline Stalnaker
jmstalnaker@outlook.com
19091 Barbour County Ave
Philippi, West Virginia 26416

Smith, Chris B

From: Patricia Gundrum <info@actionnetwork.org>
Sent: Monday, August 08, 2016 1:48 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Patricia Gundrum
gundrum2@gmail.com
252 STAUNTON AVE
SOUTH CHARLESTON, West Virginia 25303

Smith, Chris B

From: Lucy Jenkins <info@actionnetwork.org>
Sent: Monday, August 08, 2016 1:43 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Hello Laura,

I have been concerned for some time about the quality of our drinking water here in West Virginia. We constantly receive notifications that we are not to drink the water because of potential contamination. Water is a basic necessity, and whilst I realize we have cleaner water than most developing countries, it is of grave concern to me that I and several of my friends and acquaintances have developed cancerous tumors in the 16 years since I have lived in this area. We need to make water quality a priority. Please ensure our drinking and cooking water is safe.
Please also work to develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

It has been suggested I ask you to adopt the proposed EPA's recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Much of the chemistry of this is unclear to me, but I am currently buying water from the grocery store or otherwise filling containers from sources outside the town.
Thank you so much for the opportunity to comment.

Lucy Jenkins
lumaze@hotmail.com
15 Valley Court
Shepherdstown, West Virginia 25443

Smith, Chris B

From: George Little <info@actionnetwork.org>
Sent: Monday, August 08, 2016 1:59 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

George Little
george.wilbur.little@gmail.com
307 Hillside Pass
Frankford, West Virginia 24938

Smith, Chris B

From: Michael McLeod <info@actionnetwork.org>
Sent: Monday, August 08, 2016 2:42 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Michael McLeod
holdfastmclemi@gmail.com
4 Penrose Street
White Hall, West Virginia 26554

Smith, Chris B

From: Dorris Headden <dorrie6s@comcast.net>
Sent: Monday, August 08, 2016 3:20 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Dorris Headden
dorrie6s@comcast.net
399 All American Way
MARTINSBURG, West Virginia 25405

Smith, Chris B

From: Michael Condon <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 3:39 PM
To: DEP Comments
Subject: I'm the 40th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 40 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> Legislators seem to have little regard for our state's water ways. We need higher standards to protect our drinking water. Additionally the Birthplace of Rivers National Monument would illustrate a commitment to honoring the value of water to everyone.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838611&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838611&target_type=custom&target_id=73331&csv=1

Michael Condon
Hillsboro, WV

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here:

http://petitions.moveon.org/delivery_unsub.html?get=ZUo0OnH0Sto.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Natalie Thompson <info@actionnetwork.org>
Sent: Monday, August 08, 2016 2:25 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Natalie Thompson
Thompson4change@gmail.com
140 Westview Avenue
Huntington, West Virginia 25701

Smith, Chris B

From: Elizabeth Scott <info@actionnetwork.org>
Sent: Monday, August 08, 2016 2:36 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Elizabeth Scott
scottbetsy40@gmail.com
114 Shady Ln
Winfield, West Virginia 25213

Smith, Chris B

From: Monique TONET <tonet.monique@neuf.fr>
Sent: Monday, August 08, 2016 3:25 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Monique TONET
tonet.monique@neuf.fr
14 boulevard Jean Baptiste Verany
Nice, Provence-Alpes-Côte d'Azur 06300

Smith, Chris B

From: Thomas Bouldin <info@actionnetwork.org>
Sent: Monday, August 08, 2016 3:19 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Increasingly the state's lawmakers seem to believe that lowering demands on industry we can somehow get people to invest in the state's economy. That is a foolish and ill-conceived strategy. If our state's environment is more seriously polluted because of reduced regulatory standards, there will be less meaningful investment, not more.

Keep our water quality standards protective of public health and recreational safety. This is more productive long-term investment than some cow-towing to corporate demands to oppose Federal Standards for protection of environment.

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream. Such detailed testing may be more time-consuming and more expensive, but the results are far more empowering than any inconveniences entailed by meeting high expectations.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions. Current misrepresentations of flow rates by various gas-industry interests show that we really must

insist on such standard measures as are supplied by national organizations like USGS. More localized and less rigorous standards will ultimately work against the state and its people.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

I have been deeply concerned about the DEP's evaluation of water-related issues as impacted by the Mountain Valley Pipeline proposal, and will be sending further expressions of that concern as time permits.

Sincerely
Thomas T. Bouldin
Pence Springs, WV

Thomas Bouldin
tybouldin@outlook.com
PO Box 431
Talcott, WV, West Virginia 24910

Smith, Chris B

From: Beth Covington <info@actionnetwork.org>
Sent: Monday, August 08, 2016 2:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Beth Covington
covington925@hotmail.com
PO Box 57
Greenville, WV, West Virginia 24945

Smith, Chris B

From: Rick Abel <rickabel@excite.com>
Sent: Monday, August 08, 2016 3:32 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Rick Abel
rickabel@excite.com
P. O. Box 431
Pursglove, West Virginia 26546

Smith, Chris B

From: Robin J Reash <rjreash@aep.com>
Sent: Monday, August 08, 2016 12:41 PM
To: Cooper, Laura K
Cc: Smith, Chris B; Jill N Lukehart; Alan R Wood
Subject: AEP comments - proposed rules for 2017 triennial review

Hello Laura. American Electric Power (AEP) submits the following comments on proposed changes to the "Requirements Governing Water Quality Standards, 47 CRS 2". AEP submitted comments in 2014 and 2015 regarding our suggested changes to the water quality standards (WQS) pursuant to the 2017 triennial review.

- Category A Use Designation: we appreciate DEP allowing some flexibility to the regulated community concerning mechanisms to demonstrate that the Category A use is not appropriate on a site-specific basis. We believe that the proposed provisions do not go far enough, however. They are administratively onerous and can be challenged by 3rd-parties and/or US EPA. We request that DEP re-consider the common-sense approach to Category A. This use designation should only apply when an actual drinking water intake is located at a reasonable distance from a permitted facility. This would allow adequate protection for raw river water quality and not incur significant wastewater treatment costs for a facility not located proximal to an intake. This scheme is also predictable - a regulated entity and all stakeholders know, in advance, what criteria apply when there is a new source or an expanded source of an existing discharge. If, despite these recommendations, DEP decides to finalize the proposed changes considering applicability of Category A criteria, we believe a cost/benefit analysis should be conducted, i.e., what are the treatment (economic) costs relative to the environmental benefits of all waterbody segments attaining the Category A use criteria? The regulated community can forecast the cost implications of attaining certain criteria in downstream water. To be fair to them, an understanding of the environmental or human health benefits should be made available.

- Default permitting flow: We support DEP's proposed provision that the harmonic mean streamflow be used for deriving wasteload allocations regarding carcinogenic pollutants (human health protection).

- AEP supports the comments submitted by the West Virginia Manufacturers Association.

Feel free to contact me at 614-716-1237 if you have any comments on the above comments.

Rob Reash
American Electric Power – Environmental Services Department
Consulting Environmental Scientist
Certified Fisheries Professional

Smith, Chris B

From: Michael Donahue <shenandoah117@comcast.net>
Sent: Monday, August 08, 2016 3:49 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Michael Donahue
shenandoah117@comcast.net
327 Blue Bird Ln
Harpers Ferry, West Virginia 25425

Smith, Chris B

From: Jeff Wilson <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 4:29 PM
To: DEP Comments
Subject: I'm the 45th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 45 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> We are led by ignorant hicks. Shame on you.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838622&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838622&target_type=custom&target_id=73331&csv=1

Jeff Wilson
Morgantown, WV

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Martha Walker <info@actionnetwork.org>
Sent: Monday, August 08, 2016 4:30 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Martha Walker
marthalee3@hotmail.com
202 Joseph St
South Charleston, West Virginia 25303

Smith, Chris B

From: Sam Golston <info@actionnetwork.org>
Sent: Monday, August 08, 2016 6:11 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sam Golston
sam_golston@hotmail.com
Sam
Elkins, West Virginia 26241

Smith, Chris B

From: Richard D. Reece <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 3:35 PM
To: DEP Comments
Subject: I'm the 39th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 39 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> Air and water are our most precious and life giving pesuxs of nature. Without them we would die. Therefore, keep them both pure as we can have them.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838606&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838606&target_type=custom&target_id=73331&csv=1

Richard D. Reece
Romney, WV

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Smith, Chris B

From: Stephanie Somers <info@actionnetwork.org>
Sent: Monday, August 08, 2016 4:53 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Stephanie Somers
jhs_thespian@yahoo.com
54 Lindsey Dr
Charles Town, West Virginia 25414

Smith, Chris B

From: Llysse <llysse@gmail.com>
Sent: Monday, August 08, 2016 4:57 PM
To: DEP Comments
Subject: Proposed changes to water standards: Public Comment

Dear DEP:

I am truly dumbfounded by the changes you're proposing. You should be at all times making the water safer for us. Why are you weakening protections? It really makes no sense given the poisoning of 300,000 people in the Charleston area, and the decades long poisoning I myself have been a victim of with c-8 in the Parkersburg area. How many people do you know who have died from kidney cancer? Zero... one? I know two *on the same street.* I nearly died from the pre-eclmapsia associated with the poisoning. Having moved away... now I have to worry about you allowing my stream to be poisoned? I will fight you tooth and nail.

I have a creek on my property--beautiful little thing. Very tinkly in the spring, but it doesn't flow much in the summer. Changes to the "Critical Design Flow" are ridiculous. We have so many seasonal streams like my own. All my little fishes would die. All the crawdads. Heck, the DEER might get sick drinking from the streams if you change these standards. Don't be evil; protecting our water is not about allowing corporations to pollute us more and sicken us more in order to pad their bottom line.

Our waters are a resource that should be protected for all uses. I live in rural WV, and many out here depend on non-municipal sources. Don't remove Category A designations from our streams. I'd suggest that EVERY stream should have such a designation. How can you think it's okay to designate a common resource to just the one use--someone else's waste?

I know that the EPA has concluded that a simple test for electrical conductivity can show whether a stream is getting polluted from things like mining or fracking. And testing for bacteria from agricultural run-off is a good idea, too, especially in swimming holes or recreational lakes. Why not ADD a safety measure or two. You're meant to update standards to protect us, not to profit others at our expense.

Don't get me wrong, I appreciate that you're wanting to adopt the EPA's recommended standards to test for those five chemicals, including carbaryl. But please, don't weaken standards elsewhere. I'm a person, dammit. It's my creek, too. I like to fish and camp, and I don't want to have to break out the map and do complex calculations to determine if it's safe to stand in the water or eat what I catch there.

You know, I have health problems because of corporate bad faith and absolute disregard for the welfare of others. Don't do this to other people here in WV, too. You're here to protect us.

Sincerely,
Lissa Lucas
Cairo, WV
26337

Smith, Chris B

From: Leslee McCarty <info@actionnetwork.org>
Sent: Monday, August 08, 2016 6:10 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Leslee McCarty
lesleemac1@gmail.com
486 old Powell Rd
Lewisburg, West Virginia 24901

Smith, Chris B

From: Judith Bair <info@actionnetwork.org>
Sent: Monday, August 08, 2016 4:15 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Judith Bair
judithbair@gmail.com
315 Red Wing Ln.
Sinks Grove, WV 24976

Smith, Chris B

From: Carol Sheffield <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 4:55 PM
To: DEP Comments
Subject: I'm the 46th signer: "Protect West Virginia Water"

Dear 47CSR2 Water standards rule comments,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 46 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73331-20260808-MPKRic

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> Just NO! Our waterways are a precious resource...FIRST, DO NO HARM!!!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838634&target_type=custom&target_id=73331

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838634&target_type=custom&target_id=73331&csv=1

Carol Sheffield
Buckhannon, WV

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=tVUo0ChI09uo.VobkFLowERFUC5Db21tZW50c0B3di5nb3Y-&petition_id=112579.

Smith, Chris B

From: Judy Hunter <judyandcap@comcast.net>
Sent: Monday, August 08, 2016 7:17 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Judy Hunter
judyandcap@comcast.net
1834 Woodmont
Huntington, West Virginia 25701

Smith, Chris B

From: David Fox <info@actionnetwork.org>
Sent: Monday, August 08, 2016 5:54 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

David Fox
lissadavidfox@gmail.com
431 Nansfield Dr
HARPERS FERRY, West Virginia 25425-3161

Smith, Chris B

From: Cooper, Laura K
Sent: Tuesday, August 09, 2016 10:58 AM
To: Smith, Chris B
Subject: FW: Comment on water quality standards

Laura K. Cooper
Assistant Director - Water Quality Standards Division of Water and Waste Management WV Department of Environmental Protection
Office: 304-926-0499 x1110
Mobile: 304-206-8901
Email: Laura.K.Cooper@wv.gov
Room 2169, 601 57th St SE; Charleston, WV

-----Original Message-----
From: Mark Blumenstein [mailto:markb@mountain.net]
Sent: Tuesday, August 09, 2016 7:31 AM
To: Cooper, Laura K
Subject: Comment on water quality standards

The WV Rivers Coalition has covered the extremely technical aspect of protecting our life source , WATER and I agree . What our State needs ,is to lead the way and not follow . We are the headwaters to surrounding states and how many millions of citizens and yet we continue to turn our heads where serious pollutants are pumped into our ground and then we find out months down the road contaminants in our water supply I.e. Lockjelly injection well for an example . We allow fracking which is contaminating entire regions of subgeo strata , just waiting for these highly toxic chemicals to appear miles from the injection source . Then trying to identify the impossible source of these leaks in the substrata . We know this happens and we know that our waters are threatened !
Just look at the surrounding health of that community's not the rim of the New River Gorge . This goes directly to water quality standards. You must consider and question practices and methods of disposal ! You must consider oversight! You must consider the health of your community . Setting standards must go hand in hand with oversight . Killing our citizens slowly with poorly regulated waters with chemical contamination that is not regulated for, will cause mass extinction . You can see it now in the numbers of cancer cases in our state !
Fix this issue now before it's too late Mark Blumenstein , past president and board member of Greenbrier River Watershed Assoc. and Friends of the Lower Greenbrier River.
365 Sky View Farm Lane
ALDERSON WV 24910

Sent from my iPad

Smith, Chris B

From: Cooper, Laura K
Sent: Tuesday, August 09, 2016 10:58 AM
To: Smith, Chris B
Subject: FW: Comment re: WQS Triennial Review proposed standards

Laura K. Cooper
Assistant Director - Water Quality Standards
Division of Water and Waste Management
WV Department of Environmental Protection
Office: 304-926-0499 x1110
Mobile: 304-206-8901
Email: Laura.K.Cooper@wv.gov
Room 2169, 601 57th St SE; Charleston, WV

From: Robin Blakeman [mailto:rbrobinjh@gmail.com]
Sent: Monday, August 08, 2016 4:48 PM
To: Cooper, Laura K
Subject: Comment re: WQS Triennial Review proposed standards

Please see our (OVEC) comments below and include them in your public record for the 8/9 scheduled public meeting. Thanks for taking our concerns into consideration!

Ohio Valley Environmental Coalition comments:

www.ohvec.org

Ohio Valley Environmental Coalition
Supporting Organized Voices and Empowered Communities Since 1987
P.O. Box 6753 Huntington, WV 25773-6753
Ph. 304-522-0246 Fax 304-522-4079
info@ohvec.org

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

Smith, Chris B

From: Cooper, Laura K
Sent: Tuesday, August 09, 2016 11:00 AM
To: Smith, Chris B
Subject: FW: 62 signers: Protect West Virginia Water petition

Laura K. Cooper
Assistant Director - Water Quality Standards
Division of Water and Waste Management
WV Department of Environmental Protection
Office: 304-926-0499 x1110
Mobile: 304-206-8901
Email: Laura.K.Cooper@wv.gov
Room 2169, 601 57th St SE; Charleston, WV

From: Vernon Haltom [mailto:petitions@moveon.org]
Sent: Monday, August 08, 2016 9:18 PM
To: Cooper, Laura K
Subject: 62 signers: Protect West Virginia Water petition

Dear Laura Cooper,

I started a petition to you titled *Protect West Virginia Water*. So far, the petition has 62 total signers.

You can post a response for us to pass along to all petition signers by clicking here:
http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

To download a PDF file of all your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838693&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838693&target_type=custom&target_id=73330&csv=1

Thank you.

--Vernon Haltom

If you have any other questions, please email petitions@moveon.org.

The links to download the petition as a PDF and to respond to all of your constituents will remain available for the next 14 days.

This email was sent through MoveOn's petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=n_gEeZd8232FwN6IAqruekxhdXJhLksuQ29vcGVyQHd2Lmdvdg--&petition_id=112579.

WVRWA Comments on WV Water Quality Standards (8/8/16):

These comments are made in addition to WVRWA's previous comments to WV Division of Environmental Protection, regarding WVDEP's Triennial Review of its Water Quality Standards. These comments are in regard to estimating stream flow for ungauged streams, and the uncertainty in those estimates.

WVDEP proposes changes in the critical design flow for permitted dischargers, specifically changing 47CSR2 Section 8.2.b, to allow for use of the Harmonic Mean Low Flow for discharges of carcinogens and 30Q5 Low Flow for non-carcinogens, rather than the currently used 7Q10 Low Flow. These changes would allow for significantly greater loads of such pollutants being discharged, as Harmonic Mean and 30Q5 flows are significantly greater than 7Q10. This point was debated in the 1990s, and 7Q10 flow was kept as the critical design flow.

Part of the debate in the past dealt with the potential inaccuracy of 7Q10 low flows for locations where actual flow measurements don't exist, and the need for better low flow data. In recent years the US Geological Survey has published several studies of streamflow in West Virginia, including regression equations for estimating low flows at unmeasured locations throughout the state.

WVDEP has a webpage where a map of the state can be queried to find the flow statistics for such locations, using the USGS historical data for gauged locations and the regression equations for ungauged locations. The low flow values estimated by these equations are only approximations, with the resulting values for Harmonic Mean, 30Q5 and 7Q10 calculated for the gauged locations being as much as 3 times more or less the historic record.

As an alternative to using the USGS regression equations, WVRWA recommends WVDEP consider a mapping method for estimating low flow values between gauging stations. To visualize the mapping, first consider that WVDEP's Water Use Section has a map layer for Average Annual Precipitation, which is a variable in some of the USGS equations. In WV, we average between 2 and 5 feet of precipitation per year, with the lowest values along the Ohio River, in the Southern Coalfields and in the Eastern Panhandle. The wettest part of the state is in the east central highlands, where the highest mountains capture more of the west-east flows of moisture.

WVDEP could easily add another mapping layer that could be of more value to the Water Use Section, which would be a map of the Average Annual Runoff across the state. Statewide, Average Annual Runoff is generally about 2 feet per year less than Average Annual Precipitation, with the difference being what is lost to Evapotranspiration. All three of these variables could be mapped, either as inches per year, or as cubic feet per second per square mile (cfsm). (one cfsm = 13.6 inches/yr)

Low flow statistics, such as Harmonic Mean, 30Q5 and 7Q10, could also be mapped as cfsm, or as % of Average Annual Runoff, using values for gauged locations. Low flow statistics (as cfsm or % of AAR) for locations between gauging stations could be contoured, and then low flow flows in cfs calculated for a watershed from its area in square miles.

One advantage to such mapping of contoured flow statistics could be the added insights gained from visualizing the data. For example, low flows tend to be a higher % of Annual Runoff in the karst and pseudo-karst (deep mined) watersheds, as well as in watersheds with above ground reservoirs. The effect on low flows from other watershed variables, such as soil type or soil organic carbon content, % impervious surfaces, etc may also become apparent.

A key advantage for WVDEP's Water and Wastewater Permitting Section from mapping low flow data in this way could be a reduction of the uncertainty in the flow values relative to the uncertainty in values from the regression equations. WVDEP should assess this possibility.

In addition, WVDEP should maintain a policy of promoting the collection of streamflow data where it is currently lacking, which will help validate low flow data for such locations. For example, if a party were to question the low flow value being estimated for an ungauged location, WVDEP may promote the collection of flow data at or near that location by the interested party and/or other stakeholders. If a permit applicant were to begin collecting flow data on a previously ungauged stream, and had a year's worth of data for example, could this be sufficient data to amend a previous low flow statistic which was based solely on data from other sites?

Perhaps WVDEP could include a measure of uncertainty (a "margin of safety") in its low flow statistics for ungauged locations. If the margin of safety, for example, made for a critical design flow 100 cfs instead of an otherwise estimated 500 cfs, but the permitee could get a critical design flow of 500 cfs (or potentially much more) by collecting sufficient local stream flow data, the permitee would have an incentive to collect the flow data.

http://petitions.moveon.org/delivery_unsub.html?gen_gFeZd8262FwN6IAqruekxhdXJhLksuQ29vcGVyQHd2Lmdvdg--&petition_id=112579.

Smith, Chris B

From: ann malone <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 8:09 PM
To: Cooper, Laura K
Subject: I'm the 55th signer: "Protect West Virginia Water"

Dear Laura Cooper,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 55 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> People's health should be more important than corporate profit!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838670&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838670&target_type=custom&target_id=73330&csv=1

ann malone
sugar grove, VA

This email was sent through MoveOn's public petition website, a free service that allows anyone to set up their own online petition and share it with friends. MoveOn does not endorse the contents of petitions posted on our public petition website. If you have any questions, please email petitions@moveon.org. If you don't want to receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=n_gEeZd8232FwN6IAqruekxhdXJhLksuQ29vcGVyQHd2Lmdvdg--&petition_id=112579.

Smith, Chris B

From: Tom Ferguson <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 7:51 PM
To: Cooper, Laura K
Subject: I'm the 54th signer: "Protect West Virginia Water"

Dear Laura Cooper,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 54 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> We all live downstream .Headwater streams are where pure water is made. Clean water is our most valuable resource!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838664&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838664&target_type=custom&target_id=73330&csv=1

Tom Ferguson
Mesa, AZ

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Smith, Chris B

From: Michael A. Moore <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 7:31 PM
To: Cooper, Laura K
Subject: I'm the 51st signer: "Protect West Virginia Water"

Dear Laura Cooper,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 52 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> Yeah. I agree that more corporations should make more insane amounts of money off of polluting our natural resources, while we are left with nothint when their toxic resources spill over into our water because they dont actually care sbout standards. And i think its great that no one is ever held accountable. We should not be allowing more pillutants, and more streams desecrated. We should ve cutting back and attempting to fix the streams that are damaged.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838655&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838655&target_type=custom&target_id=73330&csv=1

Michael A. Moore
Charleston, WV

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receive further emails updating you on how many people have signed this petition, click here: http://petitions.moveon.org/delivery_unsub.html?e=n_gEeZd8232FwN6IAqruekxhdXJhLksuQ29vcGVyQHd2Lmdvdg--&petition_id=112579.

Smith, Chris B

From: Daile Boulis <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 8:59 PM
To: Cooper, Laura K
Subject: I'm the 60th signer: "Protect West Virginia Water"

Dear Laura Cooper,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 60 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> WVDEP has a poor track record using "estimates". The water quality standards should not change until a true study has been completed.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838686&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838686&target_type=custom&target_id=73330&csv=1

Daile Boulis
Charleston, WV

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Smith, Chris B

From: Jennifer Lee <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 7:49 PM
To: Cooper, Laura K
Subject: I'm the 53rd signer: "Protect West Virginia Water"

Dear Laura Cooper,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 53 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> What's in this for us? This change would be a real step backward. It's a betrayal of the many to benefit the few.

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838661&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838661&target_type=custom&target_id=73330&csv=1

Jennifer Lee
Parkersburg, WV

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Smith, Chris B

From: Jessica Blalock <petitions-noreply@moveon.org>
Sent: Monday, August 08, 2016 9:18 PM
To: Cooper, Laura K
Subject: I'm the 61st signer: "Protect West Virginia Water"

Dear Laura Cooper,

I just signed a petition addressed to you titled *Protect West Virginia Water*. So far, 62 people have signed the petition.

You can reach me directly by replying to this email. **Or, post a response for MoveOn.org to pass along to all petition signers by clicking here:** http://petitions.moveon.org/target_talkback.html?tt=tt-112579-custom-73330-20260808-sUj5cm

The petition states:

> "Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

My additional comments are:

> We need to find better ways to protect our water!

To download a PDF file of all of your constituents who have signed the petition, including their addresses, click this link: http://petitions.moveon.org/deliver_pdf.html?job_id=1838692&target_type=custom&target_id=73330

To download a CSV file of all of your constituents who have signed the petition, including their addresses, click this link:
http://petitions.moveon.org/deliver_pdf.html?job_id=1838692&target_type=custom&target_id=73330&csv=1

Jessica Blalock
Charleston, WV

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Smith, Chris B

From: Ashofteh Bouman <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 1:40 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Ashofteh Bouman
ashbouman@hotmail.com
282 Ashwood Dr.
Meadow Bridge , West Virginia 25976

Smith, Chris B

From: Shantha Alonso <shantha@creationjustice.org>
Sent: Tuesday, August 09, 2016 12:53 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Shantha Alonso
shantha@creationjustice.org
9901 Woodland Dr.
Silver Spring, Maryland 20902

Smith, Chris B

From: Taylor Johnson <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 12:27 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Please protect our water, do not weaken our water protect. Please adopt the following standards.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Taylor Johnson
taylorj24945@gmail.com
3227 Ellison Rdg
Greenville, Colorado WV 24945

Smith, Chris B

From: Leslie Stone <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 11:55 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water is the world's most precious and vital resource. We are blessed with an abundance in WV. At all costs, for both human life and the state's economy, we must protect and preserve our water.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Leslie Stone
leslie.stone4@gmail.com
5294 DeWitt Road
Charleston , West Virginia 25314

Smith, Chris B

From: Selina Vickers <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 1:41 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water standards need to be very strict! We all need water. Do everything to protect our water, please!

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Selina Vickers
emailtheselina@gmail.com
2821 Lansing Edmond Rd
Edmond, West Virginia 25837

Smith, Chris B

From: Diane Wellman <dwellwv@comcast.net>
Sent: Tuesday, August 09, 2016 12:47 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

It's crazy that a letter like this needs to be written at all, given that 300,000 people had their drinking water contaminated due to lax laws and lax oversight. We need stricter laws to protect our water, not weaker.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Diane Wellman
dwellwv@comcast.net
PO Box 2546
Huntington, West Virginia 25726

Smith, Chris B

From: Rachelle Marion <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 12:21 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Rachelle Marion
rachelle304@gmail.com
836 White Oak Hgts
Elkview, West Virginia 25071

Smith, Chris B

From: Dwayne Milam <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 11:49 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

As a resident of Summers County, I am writing today to express my concern regarding water quality in my county, and within our state. Unfortunately our county, and farm lies within the path of the proposed Mountain Valley Pipeline (MVP). Almost everyone in rural areas rely on wells and springs for water. Massive construction and blasting in the vicinity of wells and springs will likely negatively effect our water supply. Runoff from construction will also negatively impact our water. As you know our mountains are very steep and the soil is very close to bedrock...we get large quantities of rain from micro-bursts, hurricanes and strong thunderstorms (as the destruction in Greenbrier and Summers County has recently shown). As this rain was falling, I thought that we are very fortunate that the MVP had not been constructed. You and I both know what would have happened...all of the dirt would have washed away and eventually ended-up in our streams and rivers. Our wells would likely had been contaminated in addition to various public water supplies. Protect our water, strengthen the rules and regulations that safeguard all of the citizens of West Virginia.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sincerely,
Dwayne Milam

Dwayne Milam
dlmilam2010@hotmail.com
418 Doc Miller Lane
Alderson, West Virginia 24910

Smith, Chris B

From: Natalie Thiele <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 1:40 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I am very concerned about the possibility that West Virginia water quality standards may soon be undermined instead of upheld or strengthened. My family drinks West Virginia water, bathes in it, and all the produce we grow and eat has been watered with it-- and I would like our municipal water source (a West Virginia river) to remain as clean and safe as it currently is, if not cleaner and safer. All West Virginians have a right to clean and safe drinking water and access to clean recreational bodies of water, and I hope that the WVDEP does their part to help protect that right. Thank you for your advocacy.

What follows is the suggested letter from the West Virginia Rivers Coalition:

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Natalie Thiele
natalie.a.a.thiele@gmail.com
905 Walnut St
Glenville, West Virginia 26351

Smith, Chris B

From: Amy Gherke <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 12:43 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

WV is known for her beautiful land, rivers, streams, and mountains. Please help keep our water clean. Actually, please do not allow any more pollution into our waters. We are made primarily of water, so when our sources become polluted, so do our bodies. -Amy S. Gherke

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Amy Gherke
amysue913@yahoo.com
2088 Atkinson Ridge Rd
Walker, West Virginia 26180

Smith, Chris B

From: Cindy Smith <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 12:06 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Cindy Smith
buz.cindy.smith@gmail.com
3808 Wash Ave SE
CHARLESTON , West Virginia 25304

Smith, Chris B

From: Sara Young <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 11:39 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sincerely,

Sara Young

Sara Young
syoung1145@yahoo.com
112 Airview Lane
Craigsville, West Virginia 26205

Smith, Chris B

From: Donald Briggs <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 12:57 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Please do not sacrifice our public health and outdoor recreation-based economy; I urge you to:

- Remove the provision to allow Category A use change through a NPDES permit which is contrary to the Clean Water Act.

- Conduct a statewide study in collaboration with USGS to determine the best estimates for flow taking into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances.

- Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation—this is important to maintain the health of our outdoor recreation economy as well as our drinking and fishing waters.

- Adopt as proposed EPA's recommended standards for aquatic life criteria for acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Donald Briggs
1donaldbriggs@gmail.com
P. O. Box 733
Shepherdstown, West Virginia 25443

Smith, Chris B

From: Damon Mills <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 12:28 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Damon Mills
five5tbird@aol.com
338 11th ave west
Huntington , West Virginia 25701

Smith, Chris B

From: Bonnie Hall <bhall42@live.com>
Sent: Tuesday, August 09, 2016 12:01 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Bonnie Hall
bhall42@live.com
164 Allen Ridge Road
New Martinsville, West Virginia 26155

Smith, Chris B

From: Sharon Kearns <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 11:34 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
I agree with the following below but want to insert my own comments, too.
I have a farm in Hillsboro but my permanent home is in Virginia so I can easily contrast some of what I experience in both states. Virginia tries to listen to its' people and is not as easily influenced by corporations that don't have the interests of their people in mind.
I see the proposed changes as an effort to weaken the rights of West Virginians to have clean drinkable water. Hillsboro, where I have a farm, has wonderful water. I tested the water before we bought our farm and those results and our soils are exactly the reason we are in WV.
Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation.

Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Please consider the people of West Virginia before you allow the weakening of water standards.
Thank you for your service,
Sincerely,
Sharon Kearns

Sharon Kearns
skwalks@gmail.com
110 Kestrel Lane
Hillsboro, West Virginia 24946

Comments of the
West Virginia Manufacturers Association
regarding the
Requirements Governing Water Quality Standards
47 CSR 2

These comments are filed on behalf of the West Virginia Manufacturers Association (WVMA) on the proposed rule titled "Requirements Governing Water Quality Standards," 47 C.S.R. 2 (the Proposed Rule). Formed in 1915, the WVMA represents the interests of manufacturers throughout West Virginia. The WVMA promotes balancing environmental protection and economic development in order to provide safe and productive opportunities for citizens of the state of West Virginia. Our members have a tradition of technological innovation and providing jobs for West Virginians. Moreover, the WVMA has experience working with environmental regulators and community members in order to protect the environment and promote economic development. It is in this spirit of experience and partnership that the WVMA offers these comments.

A. The Category A Public Water Use Definition Should Be Re-Evaluated and Revised

During the 2015 Legislative Session the approval of revisions to water quality standards in HB 2283 was conditioned on a study by the Department of Environmental Protection (DEP) of the possible alternative application of the Category A public water supply use described in 47 CSR 2-6.2 (the Category A use):

> (h) The legislative rule filed in the State Register on August 1, 2014, authorized under the authority of section four, article eleven, chapter twenty-two of this code, relating to the Department of Environmental Protection (requirements governing water quality standards, 47 CSR 2), is authorized.; Provided; that the Secretary of the Department of Environmental Protection shall consider, for the 2017 triennial review, potential alternative applications for the Category A drinking water use designation to the waters of the state, taking into consideration stream flow, depth, and distance to a public water intake.

Currently, the DEP applies Category A criteria in all locations in all state waterbodies, even where the water is not being used as a public water supply. The study mandated by the Legislature presented an opportunity for the DEP to reconsider its application of the Category A use, by exploring the function of the Category A use and how alternatives to the DEP's present approach might provide relief to industry without affecting public protections. Instead, the DEP has proposed a very convoluted procedure that would only apply to water bodies that, by their very description, are not feasible as public water supplies. The DEP gave no consideration to how industry might have demonstrated, during the permit process, that existing public water supply intakes were too far away to be affected by an industrial or municipal discharge.

We are very disappointed that the DEP ignored the Legislature's direction and refused to consider whether distance to intake should be evaluated when determining where the Category A use applies. The reason the DEP has given for refusing to allow relief from Category A criteria is that *W. Va. Code* §22-11-7b(c) obligates the agency to protect future uses, and that it must apply Category A in all streams so that all of them are available as future drinking water supplies. That interpretation of the DEP's authority represents a selective reading of the statute. The relevant sentence provides that:

> Standards of quality with respect to surface waters shall protect the public health and welfare, wildlife, fish and aquatic life and the present and prospective future uses of the water for domestic, agricultural, industrial, recreational, scenic and other legitimate beneficial uses thereof.

In the hierarchy of considerations set forth in that sentence, domestic use of water resources is not afforded pre-eminence over the need to foster industrial growth in West Virginia. To imply, as the DEP does with its interpretation of the statute, that it need give no consideration to future industrial growth when applying water quality standards, is disturbing.

The WVMA is not suggesting that public water supplies are not deserving of protection; it would merely point out that those protections already exist, and will remain in place, even if the changes that it has proposed are implemented. First, a drinking water use has priority of right. If a public water supply decides to put its intake 10 feet downstream of an existing industrial or municipal discharge, the drinking water use becomes an existing use, and Category A criteria must be met. In that situation, the DEP will set limits on upstream dischargers to protect the new intake. Second, the number of new intakes that have been proposed in the state over the past few years has been vanishingly small, and there have been no siting disputes between industrial and potable water uses. Both domestic and industrial uses can be accommodated. Third, the DEP is essentially prohibiting development in the state by any new manufacturer or other business that might discharge Category A pollutants above criteria levels. There is no difference between existing dischargers asking for minor relief from strict Category A criteria-based permit limits for their discharges, and new dischargers who will need a mixing zone to meet Category A-based permit limits. Both are, in the DEP's view, preventing future use of a stream segment as a public water supply. Accordingly, we can only conclude that the DEP will not permit any new discharger, if it would need a Category A mixing zone, because that would mean that limited area is no longer available for use as a public water supply.

The WVMA had proposed to the DEP that we set aside years of arguing over whether the Category A use is intended to apply in all locations, in all state streams, and instead develop a system that allows dischargers to demonstrate, by modeling or otherwise, that no one downstream of their intakes would be affected by Category A pollutants, in which case the Category A criteria would not apply to that discharger. That is, after all, what someone would demonstrate if he or she wanted to remove the Category A use from a stream segment, and by

following the WVMA's suggested approach, the permittee would not waste tens of thousands of dollars in consultant and legal fees, and lose at least a year or two seeking approval from the DEP, the Legislature, and the EPA. We know that such a system would work, because the mining industry does it right now, in order to avoid stringent Category A limits for manganese. Mines that are seeking relief from the Category A criteria for manganese survey the area 5 miles downstream of their discharges, to determine whether there are any public or private intakes. If there are not any intakes, the stricter Category A manganese criteria do not apply. If there are intakes in that stream segment, the mine has to meet the Category A criteria.

Rather than take this sort of common sense approach, the DEP proposes a cumbersome process that allows only limited relief, and only for those streams with insufficient flow or a hydrologic modification. Even then, the relief would not be available if "insufficient flow may be compensated for by the discharge of sufficient volume of effluent discharges" or "reasonable provision for storage or impoundment of the water could be made" or if the stream may be capable of serving as an emergency water supply. 47 CSR. § 2.6.3.a.. Even if that hurdle is crossed, the permittee would be required to provide the same information that is mandated for a use removal or other change, such as a description of general land use in the area and an assessment of aquatic life, even though that information is irrelevant to removal of a drinking water use. The proposed rule goes on to require that EPA approve the determination that Category A does not apply, despite the fact that EPA does not have that authority in this sort of permitting situation.

In evaluating how the Category A use should be applied, the DEP should have looked at how the use was originally meant to be interpreted. The Category A use was never intended to apply in all places state-wide. When the Water Resources Board, the entity that formerly

developed water quality standards, adopted the Category A definition, it said in its response to comments about this section that:

> The Board responded to the first group of comments [relating to the types of water intakes that would be protected] by agreeing that all waters actually used for human consumption should be included in the definition and therefore protected. They further agreed that defining where the criteria are to apply as part of the definition might be improper. **Above all, they agreed that the category and criteria for public water supplies should not be applied to streams or stream segments where no one is using the waters for drinking**.

State Water Resources Board of West Virginia Rationale Document for Revision of Legislative Rules Series I, II, III and IX (January 6, 1986) at 19-20 (bold emphasis added). The Board never meant for the Category A use to apply where there was no public drinking water intake. A review of the rule, and the observations of the Board that adopted the rule, clearly establish that the goal is to protect public drinking water that is drawn through surface water intakes and subjected to conventional treatment (e.g., settling, clarification, chlorination).[1] The water that is drawn into those intakes must meet human health criteria. As long as the water meets those criteria, the water quality standards are being properly applied.

Imposing the Category A use in all locations in the state, regardless of actual use, is inconsistent with the requirement in the Code that DEP rules adopted after July 1, 1994 cannot be more stringent than a counterpart federal program without a written demonstration that such additional stringency is needed "to protect, preserve or enhance the quality of West Virginia's environment or human health or safety, taking into consideration the scientific evidence, specific environmental characteristic of West Virginia or an area thereof . . ." *W. Va. Code* §22-1-3a. We know the DEP's position is more stringent than required by the federal water quality standards program because neighboring states with EPA-approved water quality standards do not

[1] "'Conventional treatment' is the treatment of water as approved by the West Virginia Bureau for Public Health to assure that the water is safe for consumption." 47 CSR 2-2.1.

treat every waterbody as a public water supply. Maryland, Kentucky, Ohio and Virginia all limit Category A-equivalent protections to those areas where public water supplies might actually be affected. There is no reason for West Virginia to be more exacting than neighboring states, and more stringent than federal requirements.

The WVMA proposes the following as a more appropriate revision to 47 CSR 2-6.3, in lieu of the DEP's proposal:

> For purposes of setting limits in permits, the Category A criteria in Appendix E and human health narrative criteria for drinking water developed pursuant to Section 3 of this rule shall apply at the point of discharge (subject to any mixing zone developed in accordance with Section 5) unless the permittee demonstrates that there is no public water supply intake that would be affected by the discharge. A public water supply intake is affected by a permittee's discharge when substances discharged by the permittee would exceed the criteria in Appendix E, or any human health narrative criterion developed for drinking water, at the point of intake, or at some other point established by the Director at a distance not to exceed one-half mile upstream of the intake. The permittee may establish the location of the nearest downstream public water supply intake using the Bureau of Public Health list of public water supplies, and by performing a survey of downstream water users.

B. The WVMA Supports the Use of the Harmonic Mean Flow for Calculating Permit Limits for Carcinogens

The WVMA agrees that the appropriate design flow for calculating permit limits for carcinogens is the harmonic mean flow. This is the flow regime used by neighboring states and is endorsed in EPA's *Technical Support Document for Water Quality-based Toxics Control*, EPA/505/2-90-001 (March 1991) (the TSD). Human health criteria for protection of water supplies is developed assuming many years of drinking water drawn from affected streams, and it is appropriate to assume that average, not low flow, conditions apply over the course of many years.

C. The Human Health Design Flow Basis for Noncarcinogens Should Be Modified to Include Measures Based on Human Health Exposure

The Proposed Rule includes the use of 30Q5 flow to calculate permit limits for human health criteria that are noncarcinogens. The WVMA supports the use of the 30Q5 flow for noncarcinogens; however, a design flow value that is representative of the human health exposure time period should also be allowed. The TSD states that "if the effects from certain noncarcinogens are manifested after a lifetime of exposure, then a harmonic mean flow may be appropriate." TSD 89. By allowing different flow measures based on the human health exposure time period to calculate permit limits, the DEP would enhance the ability of manufacturers and citizens alike to use West Virginia's water resources.

The WVMA proposes that the DEP delete the period at the end of the last sentence of §8.2.b, as proposed for amendment by the DEP, and add the following: ", unless it is established that the harmonic mean flow would be a more appropriate design flow."

D. Spatial Limitations on Mixing Zones Established for Human Health Should be Removed.

The Proposed Rule still includes limits on the spatial area allowed for mixing zones, regardless of whether the mixing zone is established for the protection of aquatic or human life. For instance, "the mixing zone shall not exceed one-third (1/3) of the width of the receiving stream, and in no case shall the mixing zone exceed one-half (1/2) of the cross-sectional area of the receiving stream." 47 C.S.R. 2-5.2.e. Moreover, the Proposed Rule prohibits mixing zones that "extend downstream at any time a distance of more than five times the width of the receiving watercourse at the point of discharge" or that "overlap one another". 47 C.S.R. 2-5.2.h.2 and 5.2.h.5. Although such rules may make sense for mixing zones established for the protection of aquatic life, there is no need to extend spatial limitations to mixing zones

established for the protection of human health because water quality at the water intake is still protected.

The DEP has sufficient authority to waive the restrictions in §§ 5.2.e and 5.2.h.2 but not the prohibition against overlapping mixing zones in §5.2.h.5. All three waivers are appropriate for human health, because the receptor is the public water intake, not an instream organism. As long as the mixing zone does not overlap the half mile area above an intake, as provided in §5.2.h.6, human health will be protected regardless of how large the mixing zone is upstream. There are other protections as well that are not waivable, such as "mixing zones for human health criteria shall be sized to prevent significant human health risks." 47 C.S.R. § 2.5.2.c. This language preserves the DEP's ability to restrict the size of mixing zones in situations where there are adverse human health effects, while allowing relief where there is no demonstrable risk posed by a larger mixing zone.

The WVMA proposes that the DEP add §5.2.h.5 to the list of sections in §5.2.j that can be waived by the DEP.

E. Bacteria Standard Should Include Wet Weather Exceedances

WVMA supports the use of *E. coli* as an indicator for bacteriological pathogens. However, the DEP should consider including an allowance for wet weather exceedances where the permittee can demonstrate that bacteria exceed the criteria because of runoff, not industrial or municipal operations. This would allow manufacturers to focus their energies on mediating the discharge of bacteriological pathogens actually related to their industrial activities.

F. The Aluminum Testing Method Should Be Re-Evaluated or the Limits Should Be Revised

Recently, two West Virginia University professors published a study calling into question the reliability of EPA's recommended method for analyzing aluminum. Y. Thomas He and Paul F. Ziemkiewicz, *Bias in Determining Aluminum Concentrations: Comparison of Digestion Methods and Implications on AI Management*, 159 Chemosphere 570 (2016). The investigators found that EPA's method 200.7 significantly over-estimates the amount of dissolved aluminum in the water supply, especially in high pH conditions with clay particulate. *Id.* Because only dissolved aluminum harms aquatic life, there is no environmental reason to include aluminum attached to particulate in the discharge calculations. In light of this report, the DEP should consider alternative means of analyzing aluminum discharges and consider whether an alternative method should be developed for translating dissolved aluminum criteria into total aluminum limits in NPDES permits.

In order to maintain water quality standards that properly balance the environmental and economic development interests at play, alternative techniques and protocols are available. For instance, ASTM International recommends using a process involving atomic absorption in order to determine the amount of aluminum in water. ASTM D857-12, Standard Test Method for Aluminum in Water, ASTM International. Whatever the correct analytical method or approach, West Virginia's businesses should not be forced to comply with an unnecessarily stringent aluminum standard.

G. Net Limits

Under the state's NPDES permit regulations, 47 CSR. 10, a procedure for setting net limits is allowed for certain technology-based limits. There is no reason that netting should not

also be allowed for water quality-based permit limits, such as where a permittee causes a reduction in the pollutants in a certain waterbody. For instance, where a permittee could establish that high levels of iron are present in the intake water, and lower levels of iron are present when that water is discharged into the same waterbody, the discharge should be allowed even if it would exceed the water quality criteria for iron. In that situation, the net effect of the permittee's actions is less iron in the water. The permittee should not be punished by criteria requiring further removal of a substance that it has already helped to reduce from its ambient concentration.

The WVMA recognizes that netting may not be appropriate for all pollutants, that it would not be available where the net effect of the discharge was an increase in loading, and that allowing netting might require additional monitoring of intakes. However, we believe permittees should be given the option to use netting in setting permit limits. This could be done by adding the following language as Section 8.6: "Water quality-based permit limits may be developed for pollutants on a net basis upon demonstrating to the Secretary that the pollutant is discharged in lower concentrations than the concentration of the same pollutant in the permittee's intake, or upon such other demonstration approved by the Secretary."

H. New Criteria

The proposed rule incorporates aquatic life criteria for five organic chemicals: acrolein, carbaryl, diazinon, nonylphenol, and tributyltin. We are concerned that there are not laboratories certified in West Virginia to analyze for these substances. The WVMA is requesting a list of certified laboratories that are approved to perform the test methods for each organic chemical, and we seek confirmation that the method detection limit is achievable, and will allow

dischargers to establish compliance with the proposed aquatic life criteria. We would also like to know whether the DEP has data demonstrating that that the methods have passed data validation reviews consistently without qualifiers or rejection, and are requesting any information the DEP has on proficiency test samples for these chemicals. We are also interested in any information the DEP has on the additional costs for this testing and for approval certifications by a lab.

F. Conclusion

WVMA appreciates the opportunity to provide these comments to WVDEP and requests that they be given careful consideration by the DEP.

Respectfully Submitted,

Rebecca McPhail, President
West Virginia Manufacturers Association

August 9, 2016

WEST VIRGINIA RIVERS COALITION

3501 MacCorkle Ave. SE #129 • Charleston, WV 25304 • (304) 637-7201 • www.wvrivers.org

August 9, 2016

Laura Cooper
Water Quality Standards Program
WV Department of Environmental Protection
601 57th St., S.E.
Charleston, WV 25304

Submitted electronically to Laura.k.cooper@wv.gov

RE: Requirements Governing Water Quality Standards

Dear Ms. Cooper,

These comments elaborate on our previous triennial review comments as well as respond to some of the information presented in the proposed rule governing Water Quality Standards. They are being submitted on behalf of West Virginia Rivers Coalition and the organizations and individuals signed below.

Category A

West Virginia is a headwaters state. Eleven other states depend on WV's waters for their drinking water after it leaves our state, therefore all waters upon leaving the state should meet Category A use for human consumption as a good faith effort to our neighboring states. We strongly support the current, long-standing, status of Category A designation for all waters within West Virginia.

The current definition of Category A says the state must protect future use. A new state law requires utilities to develop source water protection plans which study the feasibility of secondary intakes or backup sources. Over the next several years, water utilities will be identifying a backup source of water in the event of an emergency. This law makes it especially crucial to preserve the future use of drinking water in sources where the flow makes it a feasible source. Making sure the State's rivers and streams are adequately protected for future drinking water use is prudent management. We applaud the state's policy to protect all of our water supplies with adequate flows for future drinking water use.

Category A is the most stringent standard for 60 parameters that are known or suspected carcinogens. Removing Category A Use Designation from any portion of a state water would allow higher concentrations of known or suspected carcinogens into the waters of the state. If the state allows a use removal though an NPDES permit, more carcinogens will be discharged into a waterbody that has insufficient flow for dilution. Those carcinogens will then flow downstream into a waterbody that has sufficient flow for drinking water use which would adversely impact the health and safety of our current and future populations and users downstream. We cannot allow more carcinogens into our water simply because at that particular location the water is not used for drinking, because the water is still used for drinking downstream of that point. Pursuant to Clean Water Act (CWA) regulations, "[i]n designating uses of a water body and the appropriate criteria for those uses, the State shall take into consideration the water quality standards of downstream waters and shall ensure that its water quality standards provide for the attainment and maintenance of the water quality standards of downstream waters." 40 C.F.R. § 131.10(b). Because the Category A Use Designation protects the population from known carcinogens, the statewide designation must be preserved in the interest of public health.

The new rule allows WVDEP to limit the application of Category A use designation through the National Pollutant Discharge Elimination System (NPDES) process based on insufficient flow or hydrologic modification. Allowing a use removal of Category A through the NDPES permitting process may circumvent the process outlined in the Clean Water Act. Pursuant to 40 C.F.R. § 131.10, "[t]he classification of waters of the State must take into consideration the use and value for public water supplies, protection and propagation of fish, shellfish and wildlife, recreation in and on the water, agricultural, industrial, and other purposes, including navigation." If a state wishes to remove a designated use it must submit to EPA, "documentation justifying how their consideration of the use and value of water for those uses. . . appropriately supports the State's action."

Additionally, a revision to water quality standards (as well as the issuance of a NPDES permit) must comply with the minimum requirements of the CWA's antidegradation policy. In the case of high quality waters—those exceeding the fishable/swimmable goals of the CWA—the state must make certain required findings before the lowering of water quality is allowed. Specifically, "the State shall find, after an analysis of alternatives, that such a lowering is necessary to accommodate important economic or social development in the area in which the waters are located. The analysis of alternatives shall evaluate a range of practicable alternatives that would prevent or lessen the degradation associated with the proposed activity." 40 C.F.R. § 131.12(a)(2)(ii). which requires a use attainability analysis and approval of the legislature and EPA. The provisions for Category A use removal should be improved to

include evaluations of water quality, not simply the physical properties of the stream at issue. We object to this proposed method to remove the use of Category A.

Under Section 6.3a Insufficient Flow, the rule states that the Secretary shall consider whether the insufficient flow may be compensated for by the effluent discharge to meet the use. We question whether an effluent dominated flow should be considered as potential source water. If there is insufficient flow to meet Category A, then there may not be sufficient flow to provide dilution for the effluent discharge. A case in point is the 1988 incident in the City of Buckhannon in Upshur County when the Buckhannon River (source of the public water supply) was quite low and the effluent from the large surface mine upstream at Tenmile constituted a major source of water in the river. Water treatment systems were overwhelmed and complaints of nasty water and cream curdling in coffee were plentiful. More expensive water treatment measures have since been added to the basic operation of the water plant and cost to local users increased.

As stated previously, water utilities are currently identifying secondary or backup water sources. Section 6.3.a.3 states that the Secretary shall consider whether the water could serve as a backup water supply. The criteria should also be included in Section 6.6 where it states that the Secretary shall ensure that the water is not currently used as a water supply and shall require the applicant to demonstrate that the water supply has no potential for future use as a backup water source.

Under Section 6.6c the rule states that the applicant shall make a determination of the connection between the wells or springs and the surface water in question. Groundwater under the direct influence of surface water is a common occurrence in West Virginia. The applicant must be required to hire a qualified individual to make a GWUDI determination based on criteria such as physical parameters in wells and surface waters in nearby streams and monitoring bacteria (bacti test) to determine which groundwater sources are affected by surface water sources.

Critical Design Flow for Human Health Criteria

Although the Harmonic Mean Flow is the critical design flow recommended by EPA, there are certain instances where the Harmonic Mean Flow is not a good indicator of flow and should be recognized as such by DEP. The Harmonic Mean Flow is not an appropriate flow measurement when there are seasonably variable effluent discharge rates and hold and release treatment systems. At effluent dominated sites, the effluent load and downstream flow are not independent of each other. Instead of harmonic mean flow, a modeling technique should be used which calculates the average daily concentration of criteria pollutants over time.

Harmonic Mean is not designed for low flows because it assumes the flows are log-normally distributed. It's less protective of exposure to carcinogens during low flows, allowing more pollution when there is not enough of a dilution factor. Knowledge of magnitude and frequency of low flows for streams is imperative for calculating waste load allocations (WLA), recreational contact safety, and protecting aquatic life. Low-flow statistics are needed for water quality regulatory activities to be used as thresholds when setting allowable pollutant loads to meet water quality standards. Reliable estimates of stream flow must be calculated for low-flow periods when determining TMDLs or WLA for NPDES permits.

Since stream gages are not located within every stream in the state, accurate methods are needed for estimating harmonic mean flows and low flow frequencies at un-gaged streams. Therefore, we request WVDEP work with USGS to conduct a statewide study to develop regression equations for low-flow frequency statistics and estimation equations for harmonic mean flow statistics to update and improve the accuracy of the estimates.

We request that WVDEP use best-fit equations for calculating harmonic mean flow. Simple equations based on drainage area only have larger prediction errors than the best-fit equations. Best-fit equations quantify the basin characteristics using GIS. Simple equations that do not account for basin characteristics exhibit geographic biases for most stream flow statistics. We urge WVDEP to use a regionalization approach to calculate flow rates based on hydrologic characteristics, landform regions, and soil regions to provide the best estimates of flow. We encourage WVDEP to work with USGS to develop weighted-least-squares regression equations for each region to estimate harmonic mean flow statistics. Caution should be used when applying equations for basins with characteristics near applicable limits of equations and basins within karst topography, which underlies much of the eastern part of the state.

We refer WVDEP to the comments submitted by Affiliated Construction Trades Foundation in 2003 when the change to Harmonic Mean was first proposed. Those comments prepared by Carpenter Environmental Associates gave recommendations on the areas of study to determine the impacts of the proposed changes. Specifically, they recommended a determination of the need for revisions to critical design flow for human health carcinogens, a determination of health impacts as a result of the proposed change to Harmonic Mean Flow, and a determination of the economic impact of revising the critical design flow. The use of Harmonic Mean for critical design should not be adopted until the impacts of the revision is fully investigated. It is vital to the future health of West Virginians that prior to adopting this change, WVDEP must determine the amount of increased carcinogens to be discharged into WV waters as a result of changing from 7Q10 to Harmonic Mean.

Biotic Ligand Model for Copper

We support the revision to use the Biotic Ligand Model (BLM) for Copper to develop site-specific numeric criteria. The BLM represents the best current and available science. Application of this model is the best way to ensure that resulting criteria will be protective of aquatic life designated uses. The BLM provides better accounting for the effects of individual parameters and can be used to develop site-specific criteria for copper by characterizing the bioavailability of metals at a site. The BLM can significantly improve predictions of acute toxicity of certain metals across an expanded range of water chemistry parameters.

Replacing Fecal Coliform with E. Coli as Bacterial Indicator

Other states that have converted from fecal coliform to E. coli have a transition period where both the old and the new bacterial criteria run concurrently until the department has adequately collected E. coli data on the streams. This transition process should be explicitly stated in the water quality standard. All streams listed as impaired based on the existing fecal coliform criterion should remain on the 303(d) list, unless new E. coli data are collected that specifically contradict the existing impairment.

Additionally, we have serious concern over the daily maximum criterion included in the previously proposed revision. Understanding that when WVDEP collects fecal coliform data, it rarely does so more than once a month during routine testing done under the watershed management framework, we are concerned that the proposed daily value for E. coli “not to exceed a concentration level of 1074 cfu/100 ml” is likely to become the default criterion - this would result in criteria less stringent than our existing criteria. This daily maximum criterion should be dropped and the proposed 410 cfu/100 ml should be interpreted the same as the prior fecal coliform criterion i.e., that one sample > than 410 cfu/100 ml is an exceedance of the water quality standard as it would be equal to 10% exceedance even if 10 samples were taken in that month and 9 of those samples were less than 410 cfu/100ml. The added daily value provision to the proposed was confusing and could be interpreted and applied as a weakening of the current bacteria standard and should be removed.

Aquatic Life Criteria

We commend WVDEP on taking EPA’s recommendations and adopting standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin and encourage WVDEP to adopt the other 91 standards for organic chemicals that EPA recommends.

Thank you for taking these comments into consideration.

Sincerely,

Angie Rosser & Autumn Bryson
West Virginia Rivers Coalition

Cindy Ellis & Cindy Rank
West Virginia Highlands Conservancy

Gary Zuckett
West Virginia Citizens Action Group

Julie Archer
West Virginia Surface Owners' Rights Organization

Janet Keating
Ohio Valley Environmental Coalition

Larry V. Thomas
Friends of Beautiful Pendleton County

Brent Walls
Upper Potomac Riverkeeper

Nancy Novak & Helen Gibbins
League of Women Voters of West Virginia

Leslee McCarty
Greenbrier River Watershed Association

Cathy Kunkel
Advocates for a Safe Water System

Chad Cordell
Kanawha Forest Coalition

Arthur W. Dodds, Jr.
Laurel Mountain Preservation Association

Cierra Pennington
West Virginia Environmental Council

Smith, Chris B

From: Matthew Thiele <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 3:09 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I am writing to ask you to please make sure that West Virginia's water quality standards continue to protect public health and recreational safety. Please do not let industry degrade the public's water quality and quality of life.

The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Matthew Thiele
thielem@hotmail.com

905 Walnut Street

Glenville, WV, West Virginia 26351

Smith, Chris B

From: Mike Manypenny <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:33 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,
It is much easier and more cost effective to mitigate pollution before it happens rather than try to clean it up later on the taxpayers dime. We cant have this pollute for profit mentality too continue. We need to responsible and hold all industry accountable for its actions.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Mike Manypenny
manypenny51@gmail.com
Rt 3 Box 202
Grafton, West Virginia 26354

Smith, Chris B

From: Matt Wyatt <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:14 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Matt Wyatt
matt.wyatt1980@gmail.com
4320 wells st
Weirton, West Virginia 26062

Smith, Chris B

From: Brian Dorsey <bdorsey@aol.com>
Sent: Tuesday, August 09, 2016 3:27 PM
To: DEP Comments
Cc: Chris Hale
Subject: WV Waters - Today's Meeting and Beyond!

Laura Cooper
Water Quality Standards
DWWM
WV Department of Environmental Protection
601 57th St. S.E.
Charleston, WV 25304

Dear Ms. Cooper:

Please know that I stand in solidarity today and every day with the "Friends of Water" organization in regard to protecting WV's precious rivers, lakes and streams!

WE RESPECTFULLY URGE the WV-DEP:

1) to include a 300 uS/cm standard for electrical conductivity in West Virginia Water Quality Standards. Since conductivity is easily measured, numerous scientific studies and EPA have concluded that electrical conductivity greater than 300 uS/cm is harmful to aquatic life.

2) to protect “Category A Drinking Water”. Streams that can serve as sources of public drinking water are designated “Category A”. WV-DEP proposes to allow pollution discharge permits to remove this Category A designation from a stream. PLEASE delete sections 6.3 through 6.9 of the proposed rule. This proposed language is entirely focused on allowing more pollution. Water Quality Standards should be about protecting drinking water and other water uses!

3) to reject proposed changes to the “Critical Design Flow”. WV-DEP proposes to change this calculation to allow higher rates of carcinogens in water. While EPA has supported this in some cases, it is not appropriate during drought or low flow periods. PLEASE establish procedures to reduce the amount of carcinogens during low flow periods.

4) to increase monitoring of E. coli and fecal coliform bacterial contamination. PLEASE increase the required sampling frequency to assure safety for swimming and boating.

5) to adopt as proposed EPA’s recommended standards for aquatic life criteria for five organic chemicals: acrolein, carbaryl, diazinon, nonylphenol, and tributyltin. PLEASE recognize that these compounds are toxic and West Virginia needs these water quality standards.

The safety and health of every West Virginian and each visiting tourist is in your hands today. PLEASE stand up for WV's waters to keep us safe for decades to come!

Thank you.

Brian Dorsey
bdorsey@aol.com

Sent from my iPhone

Smith, Chris B

From: Kelly Shreve <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 3:04 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Kelly Shreve
kshreve50@gmail.com
725 Rowan Rd.
Gap Mills, Rio de Janeiro 24841

Smith, Chris B

From: Amanda Stoner <amstoner@mix.wvu.edu>
Sent: Tuesday, August 09, 2016 2:27 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Amanda Stoner
amstoner@mix.wvu.edu
107 Uvilla Road
Harpers Ferry, WV, West Virginia 25425

Smith, Chris B

From: Kelli Hall <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:12 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Thank you for the opportunity to comment.

Kelli Hall
cheesegenius@yahoo.com
223 Gallagher St
Huntington, West Virginia 25705

Smith, Chris B

From: Charlotte Fremaux <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 3:19 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

We need more protective standards for water quality, not compromises. I support protecting all waters as current or future drinking water sources and oppose any rollback of this long-standing policy; I reject changes to the “critical design flow” that would allow more carcinogens into our water; and I support increased statewide monitoring for bacteria in our waters. Our watersheds, streams and rivers are under great stress. This is no time to roll back protections.

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Charlotte Fremaux
cmfremaux@gmail.com
175 Fern Drive
HARPERS FERRY, West Virginia 25425

Smith, Chris B

From: Barrie Kaufman <artistbarrie@ail.com>
Sent: Tuesday, August 09, 2016 2:59 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Barrie Kaufman
artistbarrie@ail.com
410 Sheridan circle
Charleston wva, West Virginia 25314

Smith, Chris B

From: Christopher Pennington <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:23 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Christopher Pennington
penningtonc24@gmail.com
7 Pine Knoll Apt 4
Oak Hill, West Virginia 25901

Smith, Chris B

From: Suzanne Hornsby <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:00 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Thank you for the opportunity to comment.

Suzanne Hornsby
tealturtle86@hotmail.com
814 Station Camp Rd
Leroy, West Virginia 25252

Smith, Chris B

From: Paul Howe III <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:48 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation.

We need to address the over fluoridation of our environment. This toxic waste product is dripped into our potable water as a deterrent for dental carries. However, the CDC claims less than a 30% reduction from fluoridation. Fluoride is toxic to the environment and cost prohibitive to remove for sanitation plants and consumers who want chemical free water.

Thank you for the opportunity to comment.

Paul Howe III
paulhowe3@gmail.com
315 So Chestnut St
Clarksburg, West Virginia 26301

Smith, Chris B

From: Marz Attar <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 2:20 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

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Thank you for the opportunity to comment.

Marz Attar
marzattar@gmail.com
125 White Stick Rd
Beckley, West Virginia 25801

Smith, Chris B

From: Clarence Mizell <c_mizell@frontier.com>
Sent: Tuesday, August 09, 2016 3:28 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

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Thank you for the opportunity to comment.

Clarence Mizell
c_mizell@frontier.com
202 Bostick Ave
Beckley, West Virginia 25801

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AUG 0 9 2016

Ms. Laura K. Cooper, Assistant Director
Water Quality Standards
Division of Water and Waste Management
West Virginia Department
of Environmental Protection
601 57th St SE
Charleston, WV 25304

Dear Ms. Cooper:

The U.S. Environmental Protection Agency (EPA), Region III has reviewed the proposed amendments to West Virginia's "Requirements Governing Water Quality Standards" (Title-Series, 47-02). This proposal, which was announced for public review and comment in the West Virginia Register on June 17, 2016, constitutes West Virginia's current triennial review of its water quality standards, as required by the Clean Water Act (CWA or "the Act") Section 303(c)(1). The purpose of this letter is to provide EPA's comments on the proposal. Please note that the comments and recommendations contained in this letter are strictly for the West Virginia Department of Environmental Protection's (WVDEP) consideration and do not constitute approval or disapproval decisions under CWA 303(c) and 40 CFR §131.21. Neither are these comments a determination by the EPA Administrator under CWA Section 303(c)(4)(B) and 40 CFR §131.22(b) that revised or new standards are necessary to meet the requirements of the Act.

This letter includes comments on the proposed revisions, as well as additional revisions EPA would like West Virginia to consider adopting:

Category A Designated Use Removal Process for Insufficient Flow and Hydrologic Modifications

WVDEP is proposing to establish a process by which the Category A Public Water Supply use designation can be removed through the NPDES permitting process. The process could be used when it is determined that a surface water cannot support the Public Water Supply use based on either insufficient flow or hydrologic modification. The process in and of itself is not a water quality standard subject to EPA review under CWA Section 303(c); any removal of Category A uses (either individual or categorical) would still need to be adopted pursuant to state law, and submitted to EPA for review under CWA Section 303(c). EPA is offering comments on the process mindful that EPA would ultimately need to review any removal of Category A uses adopted pursuant to this process.

Because Category A use is not a use specified in CWA 101(a)(2) (i.e. protection and propagation of fish, shellfish, and wildlife and recreation in and on the water), West Virginia is not required to conduct a use attainability analysis prior to removing the Category A use. However, in accordance with 40 CFR §131.10(a), West Virginia must submit documentation justifying how their consideration of the "use and value" of water for the Public Water Supply use appropriately supports the State's action to remove the use. 80 FR 51026. When determining the use and value of a stream, States must consider downstream protection and existing uses of the water. WVDEP does appropriately note the consideration of downstream protection in 47-2-6.7, but should also reiterate in this process that existing uses, as defined 47-2-2.6 cannot be removed. In other words, a water that has been used as a public water supply on or after November 28, 1975 cannot be removed, regardless of the flow or hydrologic modifications.

When considering the use and value of a surface water, EPA recommends states also take into account a suite of facts, including but not limited to:

- Relevant descriptive information (e.g., identification of the use that is under consideration for removal, location of the water body/waterbody segment, overview of land use patterns, summary of available water quality data and/or stream surveys, physical information, information from public comments and/or public meetings, anecdotal information, etc.
- Attainability information (i.e., the 131.10(g) factors) if applicable
- Value and/or benefits (including environmental, social, cultural, and/or economic value/benefits) associated with either retaining or removing the use,
- Impacts of the use removal on other designated uses, including downstream designated and existing uses.

In addition to the information above, WVDEP should provide EPA and the public with documentation that: the drinking water use is not an existing use; the nearby population uses an alternative drinking water supply; and projected population trends suggest that the current supply is sufficient to accommodate future growth. States should make this documentation available to the public prior to any public hearing, and submit it to EPA with the WQS revision.

The proposed process does indicate that any determination under subsection 6.3 that the Category A use does not apply shall be subject to approval by EPA. WVDEP should clarify that the use removal is not effective until approved by EPA under CWA 303(c). Finally, changes to use designations need to be legally binding (i.e., located in state regulations). WVDEP needs to provide a legal explanation of how these use removals executed through the NPDES permit process are legally binding, not only for the permittee but for the water segment as a whole, and after the permit expires.

47-2-6.1.b.

WVDEP is proposing to modify this provision of the regulation to read that a designated use which is not an existing use may be removed if the **permit applicant** (emphasis added) can demonstrate that attaining the designated use is not feasible. EPA believes WVDEP is proposing this modification to support the addition of the proposed Category A Use Removal process. EPA believes this modification may have the consequence of limiting use removals to NPDES permit holders. Please support if that is WVDEP's intention. Otherwise, EPA suggests that the proposed language revert back to the current language.

Critical Design Flow for Human Health Criteria

West Virginia is proposing to redefine critical design flow for human health criteria by using harmonic mean flow for carcinogens, and 30Q5 flow for noncarcinogens. In the preamble to the Federal Register notice announcing the availability of EPA's 2000 Methodology for Deriving Ambient Water Quality Criteria for the Protection of Human Health, EPA recommends the harmonic mean flow as the design flow to be used to implement both carcinogen and noncarcinogen human health criteria. 65 FR 66450. Harmonic mean flow should be used to implement human health criteria because, by and large, human health criteria are designed to protect an individual over a lifetime of exposure. By this recommendation, EPA is attempting to match the longest stream flow averaging period (using harmonic mean) with the criterion which is protective over a human lifetime. EPA recommends that WVDEP modify this revision to reflect harmonic mean flow as the critical design flow for both carcinogens and noncarcinogens. However, West Virginia has the prerogative to retain flows that will result in a more stringent application of the State's human health criteria.

Establishment of Site-Specific Criteria

In 47-2-8.5.a, WVDEP is proposing to establish a process by which site-specific criteria can be established through the NPDES permitting process using a Water Effect Ratio study pursuant to EPA's *Interim Guidance on the Determination and Use of Water-Effect Ratios for Metals* (EPA-823-B-94-001, February 1994) or a site-specific numeric criterion for copper derived using the the Biotic Ligand Model (BLM) as described in EPA's *Aquatic Life Ambient Freshwater Quality Criteria – Copper* (EPA-822-R-07-001, February 2007). As with the Category A removal process, this provision for establishing certain site-specific criteria is not a water quality standard subject to EPA review under CWA Section 303(c). As written, WVDEP's addition of this process does not change the fact that in order for site-specific criteria to be effective for CWA purposes, they are required to be approved by EPA under its CWA 303(c) authority. EPA is willing to work with WVDEP if it would like to explore development of a performance-based process that articulates how to derive site-dependent criteria that are protective of designated uses.

Adoption of E. coli for Protection of Waters Designated for Water Contact Recreation

EPA is pleased that West Virginia is proposing to adopt E. coli criteria that for the most part appears to be consistent with EPA's recommendations found in "Recreational Water Quality Criteria" (EPA-820-F-12-058). In order to be wholly consistent with EPA recommendations, EPA recommends WVDEP revise "nor shall E. coli concentration exceed 410 cfu/100 ml in more than ten percent of all samples taken during the same month" to "nor shall E. coli concentration exceed 410 cfu/100 ml more than 10% of the time in the same month." As written it appears that West Virginia's criteria would be based on number of samples collected vs. the intended duration and frequency that no value can exceed 410 cfu/100 ml more than 10% of the time regardless of the number of samples.

Also, WVDEP should remove the provision "based on no less than three samples per month." Data sufficiency (e.g., sample size) is not a reviewable element of a water quality standards submission as determined by 40 CFR §131.21(c), but it could be considered in EPA's review as it relates to the criteria's scientific defensibility and protectiveness of the use. Data sufficiency is more appropriately addressed in the development of the State's assessment methodologies.

Adoption of Water Quality Criteria for Certain Organic Chemicals

WVDEP is proposing to adopt EPA 304(a) recommendations for the following criteria for the protection of aquatic life: chronic criteria for acrolein, carbaryl, diazinon and acute chronic criteria for nonylphenol and tributyltin (TBT). Although acute criteria recommendations are available for acrolein (*Ambient Aquatic Life Water Quality Criteria for Acrolein*, July 1, 2009), carbaryl (*Aquatic Life Ambient Water Quality Criteria for Carbaryl*, EPA-820-R-12-007, April 2012) and diazinon (*Aquatic Life Ambient Water Quality Criteria for Diazinon*, EPA-822-R-05-006, December 2005), WVDEP has not proposed adoption of acute criteria, as those numbers are the same as the chronic recommendations. EPA notes that although the acute and chronic magnitudes for these criteria are the same, the frequency and duration differ, and therefore would make a difference in the implementation of these criteria for CWA purposes such as the development of water quality-based effluent limits in NPDES permits, and assessment of water quality. EPA recommends that WVDEP modify this revision to include the acute criteria for acrolein, carbaryl and diazinon.

New or Updated Section 304(a) Criteria Recommendations

In August 2015, EPA revised the WQS regulations at 40 CFR Part 131. As part of that revision, states are now required to provide an explanation if not adopting new or revised criteria for parameters for which EPA has published new or updated CWA Section 304(a) criteria recommendations. 40 CFR §131.20(a). This change was made to foster meaningful and transparent involvement of the public and intergovernmental coordination with local, state, and federal entities in light of recent science provided by EPA through its criteria recommendations. EPA will not approve or disapprove this explanation. For West Virginia's triennial review, the state will need to provide explanations where new or revised criteria are not adopted for parameters where EPA has published new or updated CWA Section 304(a) criteria recommendations since May 30, 2000. These would include:

- Acute criteria for acrolein, carbaryl and diazinon (if WVDEP chooses not to include the acute criteria numbers per EPA's comment above).
- Ammonia criteria for the protection aquatic life, including freshwater mussels listed as endangered or threatened under the Endangered Species Act (ESA). (*Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater*, EPA-822-R-13-001, April 2013)
- Selenium criterion for the protection of aquatic life (*Aquatic Life Ambient Water Quality Criteria for Selenium – Freshwater*, EPA-822-R-16-006, June 2016). West Virginia has adopted fish tissue elements consistent with EPA recommendations, but needs to review the water column elements of EPA's selenium criterion.
- Updated ambient water quality criteria for the protection of human health, 80 FR 36986.
- Application, statewide, of the *Aquatic Life Ambient Freshwater Quality Criteria – Copper* (EPA-822-R-07-001, February 2007).
- Cadmium criteria for the protection of aquatic life (*Aquatic Life Ambient Water Quality Criteria for Cadmium*, EPA-820-R-16-002, March 2016).

WVDEP can link to additional information on all of these parameters through EPA's Water Quality Criteria website at:

https://www.epa.gov/wqc

Additional EPA Recommendations for Revisions in this Triennial Review of West Virginia's Water Quality Standards Regulation

- 47-2-7.2.d.16 & 47-2-7.2.d.20.2 establish site specific selenium criterion for Connors Run and Little Scary Creek of 62 ug/l. EPA has recently published new selenium criteria for the protection of aquatic life (EPA 822-R-16-006). That document includes guidance for developing modified selenium criteria to reflect site-specific conditions where the scientific evidence indicates that different values will be protective of aquatic life and provide for the attainment of designated uses. WVDEP should review the site-specific criteria for Connors Run and Little Scary Creek in light of EPA's new guidance, and determine if they are scientifically defensible and protective of designated uses as required by 40 CFR §131.11.

- In this triennial review, WVDEP is proposing to specify the critical flow for the application of criteria for the protection of human health. WVDEP should also consider specifying the criteria flow for the application of the aquatic life criteria. According to the EPA document Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001, March 1991), 7Q10 is recommended for the application of chronic criteria, and 1Q10 for the application of acute.

EPA will be providing a copy of this package to the U.S. Fish and Wildlife Service (USFWS) so that USFWS may identify any issues with this action. We will notify WVDEP of any issues raised. This coordination with the USFWS will help to fulfill EPA's obligations under ESA, and facilitate EPA's CWA Section 303(c) action once this rulemaking is finalized and submitted to EPA for review.

Thank you for this opportunity to provide comments on West Virginia's triennial review of its water quality standards regulation. EPA would be happy to assist the State as necessary to complete this triennial review. If you have any questions concerning this letter, please contact me at (215)814-5717, or have your staff contact Denise Hakowski at (215)814-5726.

Sincerely,

Evelyn S. MacKnight

Evelyn S. MacKnight, Associate Director
Office of Standards, Assessment & TMDLs
Water Protection Division

WV Department of Environmental Protection

601 57th St., S.E. Charleston, WV 25304

Public Comments for Proposed Water Quality Standards

Think of Our Children

Section 1)

If the Proposed Changes to Water Quality apply in any way to the Oil and Natural Gas Waste Stream, WVDEP Must Collaborate with West Virginia Bureau for Public Health WVBPH in Order to Change Water Quality Standards as per the West Virginia Radiological Health Rule.

Both the WVDEP and WVBPH have regulatory authority over the oil and natural gas waste stream. This should force both agencies to collaborate in the case that the proposed water quality standards apply to the Oil and Gas waste stream in any way.

The WVBPH has the duty to ensure the safety of drinking source waters and public utility drinking water. It is essential that the WVDEP seeks the approval of the proposed water quality standards by WVBPH.

Section 2)

The State of West Virginia Cannot Afford the Monetary Cost of Removing Class A Protections, Increasing Concentration of Any Chemicals, or Reducing Protections of Any Streams.

Appropriate Public Health Monitoring to Facilitate Proposed Changes in Water Quality Standards Does Not Exist:

Many county health departments do not have environmental health professionals on staff, but rather sanitarians. This leaves West Virginia county health boards very little options in the case that a perceived public health issue arises. With all environmental health issues being sent to the centralized environmental health professionals at WVBPH, we have reason to believe that each issue does not get the attention it deserves under current WVBPH staffing infrastructure.

We have concluded that the following health monitoring infrastructure would have to exist, at the very least.

Before permitting of any locale by WVDEP:

- Hiring of full-time environmental health professionals at every county health department
- Each industry be mandated to disclose any compound or chemical to be managed at or released from every locality.
- West Virginia Bureau for Public Health review of all findings surrounding said compounds or chemicals.
- Widespread preliminary public health surveying of residents with surveys that include health effects and symptoms found during discovery of public health findings surrounding said chemicals or compounds

After permitting of any locale by WVDEP:

- Frequent public health surveying of residents in the county where any WVDEP permitted localities exist and at any locality that would be affected by any increased concentrations of chemicals or compounds in their waters. This surveying should be mandated to include potential symptoms of exposure to said chemicals and compounds.

- Access to medical professionals qualified to treat illness caused by exposure to said chemicals and compounds should be guaranteed to any and all residents and people spending time in areas potentially impacted by removal of protections and increased concentration of chemicals.

Current Water Quality monitoring of Drinking Source Waters and Public Utility water are Grossly Insufficient. Sufficient Monitoring is Not Economical for the State of West Virginia and Public Utility Providers under Current Water Quality Standards. The This Impact Would be Worsened by Lifting Stream Protections and Allowing Increased Concentrations of Compounds into Waterways.

- Endocrine Disrupting Chemicals (EDCs) can be harmful to people and wildlife if ingested in concentrations less than 10 parts per trillion. There is currently not any requirements to monitor drinking source water and residential public utility service in the appropriate concentration. Appropriate monitoring for EDCs would be incredibly expensive for public water utility service providers and WVBPH.
- If anyone notices problems with the drinking water from their tap, there are currently no water testing resources that are accessible to public water utility users. Testing is too expensive for most people.
- People with well water may be impacted by lifting protections on streams. Water sampling resources for private wells are scarce and unaffordable for most.
- When the water flowing out of taps at Fayetteville Elementary School was discolored and odorous, the local health board only had resources to test the drinking water for lead and fecal coliform. The only other activity that is acceptable for county health departments to do is to forward complaints and requests to WVBPH. Fayetteville Elementary School has yet to see sufficient water testing to this day, and the problems with water quality in the school have yet to cease. Fayette County hosts legacy mining activity, current mining activity, and commercial disposal of oil and gas waste. Even though all of these industrial practices produce EDCs, no appropriate tests for EDC content in water have been performed.
- **WVDEP must be ready to provide comprehensive water quality monitoring for streams in the case that stream protections are removed and increased concentrations of carcinogens and EDC's are allowed in order to ensure the health and safety of the public and protect the environment.**

Comments Prepared and Submitted 8/9/2016 by:

HEADWATERS
DEFENSE

Brandon Richardson	**Jerry Allen**	**Sandra Keeney Redden**
Brittany Huerta	**Danielle Crouch**	**Matthew D.W. Webb**
Kristine Crouch-Gilkey	**Autumn Crouch**	**Mary E.R. Webb**
Thomas Rhule	**Jean Evansmore**	**Christopher Pennington**
Alice Beecher	**Patrick M. Webb**	**Justin Coen**
Gary Crouch	**Danielle R. Lewis**	**Natasha Green**
Amy Crouch	**Lisa H. Henry**	**Josh Jones**

West Virginia Coal Association
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August 9, 2016

Ms. Laura Cooper
West Virginia Department of Environmental Protection
Division of Water & Waste Management
601 57th Street
Charleston, WV 25304

Via Electronic Mail: Laura.K.Cooper@wv.gov

Re: 2017 Triennial Review of State Water Quality Standards

Dear Ms. Cooper:

Pursuant to the public notice published by the West Virginia Department of Environmental Protection (WV DEP), the West Virginia Coal Association (WVCA) offers the following comments regarding the 2017 Triennial Review of state water quality standards. WVCA appreciates the opportunity to provide comments to WV DEP regarding the proposed revisions to the state's water quality standards program.

The West Virginia Coal Association (WVCA) is a non-profit state coal trade association representing the interests of the West Virginia coal industry on policy and regulation issues before various state and federal agencies that regulate coal extraction, processing, transportation and consumption. WVCA's general members account for 98 percent of the Mountain State's underground and surface coal production. WVCA also

represents associate members that supply an array of services to the mining industry in West Virginia. WVCA's primary goal is to enhance the viability of the West Virginia coal industry by supporting efficient and environmentally responsible coal removal and processing through reasonable, equitable and achievable state and federal policy and regulation. WVCA is the largest state coal trade association in the nation.

Overall, WV DEP is to be commended for the pronounced improvements to the water quality standards rulemaking process since assuming that duty from the Environmental Quality Board (EQB) in 2005. Recent revisions proposed by WV DEP to have updated specific water quality criteria that were maintained without adequate scientific justification. These changes will improve the relevancy of the state's water quality standard and NPDES programs and will remove unnecessary compliance complications.

However, the statewide application of the Category A / public drinking water supply use designation maintained by WV DEP continues to be an unsubstantiated interpretation of West Virginia's water quality standards that has created substantial regulatory confusion and imposed significant compliance costs (with no benefit) on the coal industry.

Previous comment filings by WVCA regarding the state's water quality standards program and individual water quality criteria have detailed the history and technical particulars of the contrived interpretation of Category A by the EQB and WV DEP. These

previous comments were filed with WV DEP on September 30, 2015, and we ask the agency to consider the sections and supporting attachments related to Category A as comments on the current agency-proposed revisions. The past comments are particularly instructive regarding the substantial confusion surrounding the application of Category A criteria. The references to the administrative history of the state's manganese water quality criteria provide a workable example of an efficient and common sense approach to address the legislative mandate regarding Category A.

Additionally, WVCA endorses the comments filed by the West Virginia Manufacturers Association on the proposed revisions.

On March 12, 2015 the West Virginia Legislature passed House Bill (HB) 2283. Signed by the Governor on March 31, 2015, the bill requires WV DEP in the 2017 triennial review cycle to examine its application of Category A to all waters statewide:

> The legislative rule filed in the State Register on August 1, 2014, authorized under the authority of section four, article eleven, chapter twenty-two of this code, relating to the Department of Environmental Protection (requirements governing water quality standards, 47 CSR 2), is authorized.; ***Provided; that the Secretary of the Department of Environmental Protection shall consider, for the 2017 triennial review, potential alternative applications for the Category A drinking water use designation to the waters of the state, taking into consideration stream flow, depth, and distance to a public water intake*** (emphasis added).[1]

[1] Enrolled Committee Substitute for House Bill 2283, pg. 4, March 2015. http://www.legis.state.wv.us/Bill_Text_HTML/2015_SESSIONS/RS/pdf_bills/HB2283%20SUB%20ENR%20PRINTED.pdf

Unfortunately, WV DEP has shunned the common sense approach to protecting actual public water supplies presented by the manganese criteria and proposed a meandering, regulatory labyrinth that will require individual applications and subsequent approval by the agency, the West Virginia Legislature and the federal Environmental Protection Agency (EPA). The current proposal is also disappointing in that WV DEP has ignored the Legislature's instruction to consider "distance to a public water intake" in favor of preserving the EQB-devised and WV DEP-perpetuated bureaucratic fantasy that all waters of the state are public drinking water supplies, despite previous instructions from the Legislature that was not the case.

The tortured interpretation of statewide Category A application by the EQB and now WV DEP caused substantial compliance issues related to manganese and resulted in adverse environmental impacts from the application of chemical agents to maintain compliance with a misplaced standard. After many years of languishing under the EQB's rulemaking procedures and in the federal review process, a revised state standard for manganese was finally approved in 2005 (referred to as the "Mn-5-Mile Rule").

West Virginia's approved manganese Category A water quality standard, (which was only necessary because of the misplaced application of the drinking water use to all state waters), applies five miles above public and private drinking water intakes:

> "...the manganese human health criterion shall only apply within the five-mile zone immediately upstream above a known public or private supply used for human consumption."[2]

WV DEP supported the revision to the manganese criterion, and EPA acknowledged in its approval letter that the application of drinking water criteria at the point of intake is reasonable, protective, and consistent with water quality standards programs implemented in other states:

> ...this change in the water quality standard should not have an impact on the water withdrawn for drinking, the drinking water treatment processes and the cost treating water for drinking. All water withdrawn for drinking by private and public intakes that was covered under the designated use and thus protected by the manganese criterion prior to the MN 5-mile rule continues to be subject to the applicable 1mg/L manganese criterion. Therefore, application of the MN 5-mile rule continues to protect the public water supply use...[3]
>
> The application of a criterion for the protection of public water supply at the intake point is consistent with EPA's approval in other states. EPA has approved applications of human health criteria at the intake or withdrawal points in other states as well...[4]

EPA's approval of the 5-mile rule and its supporting justification presents a very practical question to WV DEP with regard to application of drinking water criteria to all state waters: If application of the Category A use designation at the point of intake is protective of "all water withdrawn for drinking" and if "application of the Mn 5-mile rule continues to protect the public water supply" as EPA observed in its approval

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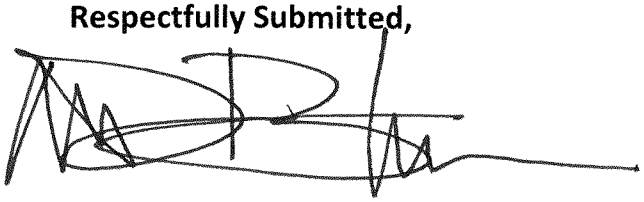
[2] 47 CSR 2.6.2.d. http://apps.sos.wv.gov/adlaw/csr/readfile.aspx?DocId=26654&Format=PDF
[3] Letter dated June 29, 2005 from EPA Region III to the EQB approving West Virginia's manganese standard.
[4] *Ibid.*

documents, then why would a similar approach not be protective and warranted for other parameters?

WV DEP has largely ignored this comment and the simple solution it offers to end the Category A controversy, choosing instead to hide behind the EQB's fabricated justification for statewide application.

WVCA was hopeful that HB 2283 would finally lead the agency lead the agency to consideration of a similar, common sense approach for other parameters.

Respectfully Submitted,



Jason D. Bostic
Vice-President

Smith, Chris B

From: MaryAnn McGowan <info@actionnetwork.org>
Sent: Wednesday, August 10, 2016 8:48 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

MaryAnn McGowan
riversnlakes23@gmail.com
PO Box 332
Hico, West Virginia 25854

Smith, Chris B

From: Gina Schrader <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 11:02 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Gina Schrader
ginaschrader@yahoo.com
825 Byus Drive
charleston, WV, West Virginia 25311

Smith, Chris B

From: Jessica Chasengnou <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 7:31 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Jessica Chasengnou
jessica.m.cha@gmail.com
743 Whispering Oaks Ln
Saint Albans, West Virginia 25177

Smith, Chris B

From: Becky Park <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 5:38 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

There is nothing as important as clean water in our streams, as it effects so many aspects of the web of life and humanity.
Please do not revmove and requirements for Class A stream purity, and proceed carefully to conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions.

I do not agree with the proposed Harmonic Mean flow estimate. We are facing uncertain climate situations which may create droughts in our state. The proposed flow estimate procedure would not be adequate and would increase the possibility of carcinogens in our waters.

Let's be smart and stringent and return West Virginia to the pristine conditions that will draw people to our state.

Thank you for the opportunity to comment.

Becky Park
rebeccamasonpark@gmail.com
943 Mathews Ave
Charleston, West Virginia 25302

Smith, Chris B

From: Mary Lee <info@actionnetwork.org>
Sent: Wednesday, August 10, 2016 7:35 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

LET'S STOP MINCING WORDS. STOP STROKING THE INDUSTRIES THAT PAD YOUR PERSONAL POCKETS!!!!!
Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Mary Lee
maryfleas@aol.com

228 FRANCIS MINE RD

FAIRMONT, West Virginia 26554

Smith, Chris B

From: Joy Woodrum <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 10:44 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Joy Woodrum
wvwoodjoy@aol.com
107 Hayes Ave.
Charleston, West Virginia 25314

Smith, Chris B

From: Sarah Corley <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 7:12 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sarah Corley
corley.daugherty@gmail.com
3423 Union Rd
Philippi, West Virginia 26416

Smith, Chris B

From: JERRY PAYNE <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 5:20 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

JERRY PAYNE
jacabay@yahoo.com
69 FAIRPLAIN MOBILE HOME PARK
RIPLEY, West Virginia 25271

Smith, Chris B

From: Tracy King <info@actionnetwork.org>
Sent: Wednesday, August 10, 2016 6:32 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Tracy King
showdator@yahoo.com
105 HAYMARKET DR
BECKLEY, West Virginia 25801

Smith, Chris B

From: Sabrina Shrader <sabrinashrader@ymail.com>
Sent: Tuesday, August 09, 2016 2:16 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Sabrina Shrader
sabrinashrader@ymail.com
609 Hale Avenue
Princeton , West Virginia 24740

Smith, Chris B

From: Marilyn Howells <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 6:37 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Marilyn Howells
mhowe9876@gmail.com
5364 Newcomb Ck. Rd.
Huntington, WV, West Virginia 25704

Smith, Chris B

From: Beverly Martin <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 4:57 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Thank you for the opportunity to comment.

Beverly Martin
bayoubev@hotmail.com
250 Lakeview Dr
Morgantown , West Virginia 26508

Smith, Chris B

From: Annette Yurkovich Brichford <ays40@frontiernet.net>
Sent: Wednesday, August 10, 2016 1:09 AM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Growing up in McDowell County and later working there from 2005-2011, I saw firsthand the effects of allowing sewage and mine run-off to enter rivers and streams. Today residents fish those streams but release their catches because they dare not eat the trout or other species from those polluted waters.

In Mercer County, where I now live, algae blooms that may be caused by fertilizer runoff make our drinking water foul in taste and odor every summer. My mother's water source, the Green Valley-Glenwood PSD, sent a letter to its customers last winter detailing higher than permitted levels of certain cancer-causing substances. To put it plainly, even our treated water is not safe enough.

Please keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate

is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA's recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Annette Yurkovich Brichford
ays40@frontiernet.net
195 Butternut Dr
Princeton, West Virginia 24740

Smith, Chris B

From: William Skaggs <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 8:40 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

William Skaggs
weskaggs.wes@gmail.com
656 Martin Road
Grafton, West Virginia 26354

Smith, Chris B

From: Brian Washington <washinbd@gmail.com>
Sent: Tuesday, August 09, 2016 6:12 PM
To: DEP Comments
Subject: WV DEP water standards hearing

Dear Ms. Cooper,

In addition to the pre-prepared statement below, I'll include a brief statement on why I am passionate on the subject of water quality in WV. I recently made the decision to remain employed in the mountain state, despite the potential for higher earnings, more progressive community programs and infrastructure opportunities in neighboring states within our nation. A key component in my choice to stay is the recreational opportunities that are abundant in this state, and the natural beauty of the bounty of rivers here. I work in home health, and work with many of the retired coal miners, loggers, and native population of WV, and many will tell stories of how their profession has "killed" many streams and rivers in mountain state, and they lament the loss of once abundant natural life. Resource industry is a vital part of WV economy currently, but it is finite, and can exist without such long term impact on the fragile resources we have that effect the health and quality of life of so many west virginians. Please help Protect west virginia's health, and one of the few sources of population influx in a state that desperately needs a reason for skilled workers to stay. Respectfully,

Brian Washington, DPT.

Laura Cooper
Water Quality Standards
DWWM
WV Department of Environmental Protection
601 57th St. S.E.
Charleston, WV 25304

Dear Ms. Cooper:

Please know that I stand in solidarity today and every day with the "Friends of Water" organization in regard to protecting WV's precious rivers, lakes and streams!

WE RESPECTFULLY URGE the WV-DEP:

1) to include a 300 uS/cm standard for electrical conductivity in West Virginia Water Quality Standards. Since conductivity is easily measured, numerous scientific studies and EPA have concluded that electrical conductivity greater than 300 uS/cm is harmful to aquatic life.

2) to protect “Category A Drinking Water”. Streams that can serve as sources of public drinking water are designated “Category A”. WV-DEP proposes to allow pollution discharge permits to remove this Category A designation from a stream. PLEASE delete sections 6.3 through 6.9 of the proposed rule. This proposed language is entirely focused on allowing more pollution. Water Quality Standards should be about protecting drinking water and other water uses!

3) to reject proposed changes to the “Critical Design Flow”. WV-DEP proposes to change this calculation to allow higher rates of carcinogens in water. While EPA has supported this in some cases, it is not appropriate during drought or low flow periods. PLEASE establish procedures to reduce the amount of carcinogens during low flow periods.

4) to increase monitoring of E. coli and fecal coliform bacteria contamination. PLEASE increase the required sampling frequency to assure safety for swimming and boating.

5) to adopt as proposed EPA’s recommended standards for aquatic life criteria for five organic chemicals: acrolein, carbaryl, diazinon, nonylphenol, and tributyltin. PLEASE recognize that these compounds are toxic and West Virginia needs these water quality standards.

The safety and health of every West Virginian and each visiting tourist is in your hands today. PLEASE stand up for WV's waters to keep us safe for decades to come!

Thank you.

--

Brian D. Washington

DPT, Marshall University

M.S. in Adapted Physical Activity

Fayetteville, WV

(304) 654-0612

Washinbd@gmail.com

Smith, Chris B

From: Doris Irwin <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 4:54 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation. Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Doris Irwin
dorisirwinmobile@yahoo.com
771 Turtle Ridge Rd
Princeton , West Virginia 24739

Smith, Chris B

From: Theresa Dennison <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 11:10 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water standards should only be raised!

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Theresa Dennison
theresagarrett@hotmail.com
Po box 271
Stanaford, West Virginia 25927

Smith, Chris B

From: Daven Marrin <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 7:38 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Have you people lost your minds or your souls? Our rivers are toxic enough already! All the mess with Dow and C-8 and the toxic coal industry chemicals and other industrial waste and spillage? You want to lower water standards? How about NO! People in WV are crapped on enough by a greedy government and heartless companies. Why not think of the citizen's health and not letting fat cats run extra dirty toxic businesses?

Daven Marrin
lvxfvxo@yahoo.com
730 South St.
Morgantown, West Virginia 26505

Smith, Chris B

From: Gabriele Koenig <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 5:41 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

I will become a WVa resident in 2017. One of the reasons I selected WVa is the natural beauty. One of the reasons I selected the parcel of land I bought is because the quality of spring water is superb. Why, why, why would any official seriously consider any legislature that could lessen standards? When will improvement and health win over industry? Will you be the champion of this fragile "blue marble" or of industry that can find better ways and not be lazy about waste and contamination?

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

Conduct a statewide study in collaboration with USGS to determine the best estimates for flow which take into account low flow conditions. The proposed Harmonic Mean flow estimate is not appropriate in all circumstances, especially during drought conditions.

Develop a procedure that measures both Fecal Coliform and E. Coli as the bacterial indicators until enough data is collected on E. Coli to ensure the water is safe for recreation.

Increase sampling frequency to measure the monthly average values for more priority watersheds.

Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

Gabriele Koenig
gabyderek@gmail.com
1515 Farlow Avenue
Crofotn, Maryland 21114

Smith, Chris B

From: ben morgan <info@actionnetwork.org>
Sent: Tuesday, August 09, 2016 4:07 PM
To: DEP Comments
Subject: Water Quality Standards

Laura Cooper,

Dear Ms. Cooper,

Water Quality Standards need to protect and maintain water quality for safe use and enjoyment. Some of the changes proposed during the current triennial review raise concerns because they will allow more pollution in our water.

Keep our water quality standards protective of public health and recreational safety:

Remove the provision to allow Category A use change through a NPDES permit that is contrary to the Clean Water Act's process for the removal of a designated use. The provisions for Category A use removal should include thorough evaluations of water quality, not simply the physical properties of the stream at issue to assure the protection of public health and drinking water users downstream.

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Adopt as proposed EPA’s recommended standards for aquatic life criteria for 5 organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin.

Thank you for the opportunity to comment.

ben morgan
morgan8n@yahoo.com
103 fayette ave
fayetteville, West Virginia 25840

West Virginia Council of Churches
WV DEP Triennial Review Testimony
August 9, 2016

Good evening. My name is Rev. Jeff Allen and I am the executive director of the West Virginia Council of Churches.

I am native West Virginian and I grew up in Glen Dale, a small town situated between the Ohio River and the hill. At the base of the hill is a small stream, inhabited largely by snails, minnows, and crawdads. To the best of my knowledge, it is not used as a source of drinking water, but I can tell you, that growing up there as a kid, I played in that stream many days for many years during the summer and even some during the winter.

I think that there must many small streams like this across West Virginia, with many snails and minnows and many small children who have played and will continue to play in those streams in the future. I am greatly appreciative that all streams in West Virginia are protected through Category A regulations and I, personally, would strongly oppose the weakening of those standards.

The West Virginia Council of Churches, first organized in 1880 and made up of fourteen member denominations, supports policies that ensure water quality.

The Council notes that with increased oil and gas exploration come additional challenges in protecting our state's water resources and encourages the Department of Environmental Protection to strengthen rules that safeguard water quality and quantity.

The Council encourages the state and its agencies to adopt and enforce the federal Clean Water Act standards and the Council supports the highest level of protection possible for our finest streams.

Lastly, the Council urges that narrative standards for mercury, selenium, and other toxic metals should not be compromised, as these elements pose many dangers to human health, and especially the health of our children.

The West Virginia Council of Churches hopes that the DEP will keep Category A regulations as they are in order to protect all steams in West Virginia.

Thank you!

August 7, 2016

Comment on WV DEP Proposed Modifications to 47 CSR 2 WQS Rules:

My name is Philip C. Price. I have a PhD in Analytical Chemistry, with over 40 years' experience in industrial chemistry, trace analyses, spill/release incident investigations, and Superfund Site remediation. I have comments on two areas of the proposed changes:

Drinking Water Use Designation

DEP proposes to remove these designations of ***potential*** future source water use. One prediction we can all agree with is that WV will see more change in the future: new industries, shifting populations, economic challenges, and new environmental events (algae blooms, spill events, floods). Last summer's sudden algae bloom events clearly demonstrated the usefulness of an alternate clean emergency water source for Huntington. Degrading our currently-available alternate water supplies increases future risks to Public Health.

This change seems driven mainly by WV manufacturers. Are there any data to demonstrate specific WV economic benefits "if we could only degrade the water quality of this specific stream"?

Implement EPA-recommended Harmonic mean flow

DEP proposes ***increasing*** the amount of permissible carcinogens (and other pollutants) in WV waters by changing the flow/dilution calculation factors. Some of the increases would be more than 10-fold, based on stream flow data. However, there is a lack of data on carcinogen and polutant identities, current concentrations, and proposed future concentrations. Without this data, the rule would be changed, but without any information as to its impact on Public Health or specific aquatic toxicity increase.

Hello my name is Lori Magano

Thank you for taking the time to strongly consider the concerns of WV citizens in regard to the considered changes to the current water protective standards. I believe that changes to the current level of protection will be detrimental to the health & well being of those of us who live & play in WV.

When I look at the initials of your agency & reflect on what they stand for and should mean, The Dept of Enviromental Protection, it gives me some level of hope that this agency makes the ~~right~~ Best decisions to protect our environment & water. I know I try to do what is right to protect our water, at least in the sense, of talking to those that control the safety of my water. I've been here to the DEP, to the statehouse, and I've even written a book to encourage others to do what they can to protect our environment, particularly, our water.

I am doing what I can, so I ask for you to do what you can by ~~keeping~~ not removing the Category A standards to ~~the~~ WV streams/rivers ~~that currently have them~~, abide by ~~that standard~~.

I don't understand/or have had time to review your formulas, and I can't currently tell you the physics of the water cycle and how water that flows will eventually be consumed & used by vegetation, people or animals/fish.

[illegible]

But I do know that all water sustains life some sort of life, and we should maintain the strictest of standards in keeping toxins out of it and monitoring it at a level that will keep us safe & worry free.
I know the formula for my health & well being doesn't include have a 'plus sign' allowing more toxins into any river or stream in WV.

I care about my water. I care about your water. I greatly care about our children's water. Please keep Category A standards and maintain the highest level of water testing so that we can drink, bathe, fish & play in WV waters without worries. Water is life. Please protect our water.

Thank you,

Lori Magone

first_name	last_name	city	state	zip	comment
Jonathan	Mitchell	Madison	AL	35757	
Mark	Apel	Bisbee	AZ	85603	
Tom	Ferguson	Mesa	AZ	85201	We all live downstream .Headwater streams are where pure water is made. Clean water is our most valuable resource!
Joseph	Wack	Los Angeles	CA	90026	
Janet	Perry	San Clemente	CA	92672	The destruction of miles upon miles of streams in West Virginia due to the practice of Mountaintop Removal (or 'bombing' as it should be called...) by the coal industry is, in and of itself a travesty of humanity and justice. The destruction of this vital part of local ecosystems, as well as the drinking water of hundreds of thousands of people is something that cannot be overlooked. The state and federal government must step up and hold the coal industry responsible for the clean-up of its mess.
Colin	Bennett	Westbrook	CT	6498	
Nancy	Parsons	Spring Hill	FL	34610	
Margaret	Ricketts	Berea	KY	40404	
Donna	Aros	Frankfort	KY	40601	
Mark	Graham	Hyattsville	MD	20782	Clean Water is for everyone
Terri	Baxter	Salem	NJ	8079	
Fred	Belcher	Liverpool	NY	13908	
Peggy	Murray	Jamesville	NY	13078	
Sarah		Elyria	OH	44035	
Sarah	Haltom	Cleveland	OH	44105	
Amy	Hoskinson	Columbus	OH	43235	
Debbie	Rose	Xenia	OH	45385	
tamara		kettering	OH	45429	This is an outrage! Water is life period. You take clean water away what do you have left?
Tursia		Dayton	OH	45403	
Scott	Price	Cleveland	OH	44109	You can't keep people from their God giving Rights
Joanna	Vaughan	Philadelphia	PA	19144	
Stephanie		New Castle	PA	16101	
Lisa	Scherer	Marianna	PA	15345	
Jared	Fuller	Highland	UT	84003	

Patricia	Smith	Woodbridge	VA	22192	What affects WV often affects VA waters too, water is going to be "liquid gold" if we don't take care to treat it as our number 1 commodity.
Ann	Malone	sugar grove	VA	24375	People's health should be more important than corporate profit!
Karen	Saunders	Brattleboro	VT	5301	
Janet	Bernhard	Richmond	VT	5477	

Dear Laura Cooper, Assistant Director, Water Quality Standards, 47CSR2 Water standards rule comments, and Randy Huffman, Cabinet Secretary, WVDEP,

We are pleased to present you with this petition affirming this statement:

"Reject proposed weakening of WV water quality standard 47CSR2. WVDEP should: reject the "harmonic flow" estimate that would allow higher levels of carcinogenic discharges, and instead work with USGS to develop an estimate that accounts for low flow conditions; remove the change that allows a pollution permit to remove Category A drinking water designation from streams; develop a procedure that measures both Fecal Coliform and E. Coli as bacterial indicators for water recreation safety; adopt EPA's recommended standards for aquatic life criteria; and adopt a 300 uS/cm conductivity standard to protect aquatic life from mine runoff and other threats."

Attached is a list of individuals who have added their names to this petition, as well as additional comments written by the petition signers themselves.

Sincerely,
Vernon Haltom

Peter Schumacher
Pennsboro, WV 26415
Aug 9, 2016

Patti Goldstein
New Martinsville, WV 26155
Aug 9, 2016

Aryn
Princeton, WV 24739
Aug 9, 2016

William S Hawkins
Weston, WV 26452
Aug 9, 2016

You are our protection. Please take care of this most vital responsibility to insure safe, clean waters for West Virginia

Jeanne Wahl
Lewisburg, WV 24901
Aug 9, 2016

Hannah
Lashmeet, WV 24733
Aug 9, 2016

Protect our water. Several years ago I heard a WVDEP rep say it was OK to increase mercury limits because West Virginians don't eat much fish anyway. I would love to if there were not limits on how many you can eat before being poisoned. Department of Environmental Protection - that says it all. Do your job!

Jane Friedmann
Alum Bridge, WV 26321
Aug 9, 2016

Teresa Parcell
Elkview, WV 25071
Aug 9, 2016

Pam Harris
Stonewood, WV 26301
Aug 9, 2016

Dear ms. Cooper and mr. Huffman, Why don't you both put your mouth where your money is? Your job is to protect MY water source, yet frack waste and other vile pollutants have been found in the creek along my property. I've been using Wolf Creek water since I was a young kid, and now my kids are being exposed to all the toxins YOU were supposed to protect us from. Thanks. Anyway, since I'm sure you are doing a fabulous job at what you do best, I'd like to issue you a "one glass a day" challenge. My friends from Headwaters Defense and I will bring you both a tall glass of Wolf Creek water every single day for a year. Feel free to contact me to make arrangements, and we will get it set up for you. Since you guys are ones that regulate our water quality, I'm sure you'll have no qualms with having a taste of what my family lives with on a daily basis. Sincerely, Sandra Keeney Redden

sandra keeney redden
fayetteville, WV 25840
Aug 9, 2016

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kenneth l king
ethel, WV 25076
Aug 9, 2016

Al Justice
War, WV 24892
Aug 9, 2016

Danielle Maness
Charleston, WV 25314
Aug 9, 2016

Rita Winser
Fayetteville, WV 25840
Aug 9, 2016

Amy Fabbri
Petersburg, WV 26847
Aug 9, 2016

Mary Sullivan
Charleston, WV 25314
Aug 9, 2016

Zoe morris
St albans, WV 25177
Aug 9, 2016

Cindy Welch
West Union, WV 26456
Aug 9, 2016

We already have too many chemicals and bacteria in our water. How can this even be considered after our water crisis two years ago? No wonder we're losing population. Stop chasing the extractive industries and diversify our economy.

Regina Hendrix
Charles Town, WV 25414
Aug 9, 2016

Patrick McIntire
Center Point, WV 26339
Aug 9, 2016

Patricia Schumacher
Pennsboro, WV 26415
Aug 9, 2016

West Virginia politicians are doing everything they can to accommodate extractive industry, under the mistaken notion that this will make the state appealing and bring in jobs. Corporations may love getting cheap access to West Virginia's resources, but who would send valued employees into a state where water and air are so polluted they are unhealthful? Rather than weakening environmental protections we should be strengthening them, imposing stronger protections than EPE or any other function of the Federal government.

Thomas T Bouldin
Talcott, WV 24910
Aug 9, 2016

The precious clean water resources of WV are under attack. Our drinking water resources need additional protection and more rigid enforcement of the regulations. Do not weaken, but work to strengthen these protections.

Alfred Tuttle
Middlebourne, WV 26149
Aug 9, 2016

We have major water quality issues in WV please don't allow this to decrease the quality even further.

wendy johnston
Athens, WV 24712
Aug 9, 2016

Please do not worl to lessen water quality standards. I moved my family back to West Virginia and the disregard for its citizens is glaringly obvious in comparison to my experiences living elsewhere. A comment like this might bare little weight from a technical perspective and to not consider its gravity is the very disregard to which I refer. But, for context, such emotionally charged responses are indeed part of the numbers game. You're draining the state of its current and future potential with the lessening of water quality standards, who will stay, and who will come? These are the questions you should ask when considering yet another industry-favoring policy change that will push people out the door in order to escape and raise their children in a place where the government can actually be trusted in its role to protect its people.

Adam Webster
Morgantown, WV 26501
Aug 9, 2016

LYN BORDO
GREENWOOD, WV 26415
Aug 9, 2016

Linda Harrington
Wallace, WV 26448
Aug 9, 2016

Anthony Ervolina
West UNion, WV 26456
Aug 9, 2016

Sharron Hendrick-Jackson
Pullman, WV 26421
Aug 9, 2016

Rozanna Bracken
Charleston, WV 25314
Aug 9, 2016

Cherie Buzzard
Naoma, WV 25140
Aug 9, 2016

Margaret Spencer
Crab Orchard, WV 25827
Aug 9, 2016

Elizabeth Dennis
Littleton, WV 27581
Aug 9, 2016

Wayne Rebich
Beaver, WV 25813
Aug 9, 2016

Elizabeth Scott
Winfield, WV 25213
Aug 9, 2016

Katherine Cockerham
Copen, WV 26615
Aug 9, 2016

Michelle Walker
Saint Albans, WV 25177
Aug 9, 2016

Tina Del Prete
West Union, WV 26456-8285
Aug 9, 2016

Ahmed Sakkal
Charleston, WV 25301
Aug 9, 2016

Clint Henry
Beckley, WV 25801
Aug 9, 2016

Justin Raines
Walkersville, WV 26447
Aug 9, 2016

Keep our waterways clean! We already are drinking enough pollution!

Michelle mallamo
fairmont, WV 26554
Aug 9, 2016

Wendy. L. Knadler
Martinsburg, WV 25403
Aug 9, 2016

Lori Rose
Dunbar, WV 25064
Aug 9, 2016

Yes please the water crisis we underwent two years ago was simply awful and our water has not been the same ever since!

Joshua Carpenter
Cross Lanes, WV 25313
Aug 9, 2016

This is the birthplace of rivers, not profit.

Jason Reott
Fayetteville, WV 25840
Aug 9, 2016

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bo webb
Naoma, WV 25140
Aug 9, 2016

LAURA YOKOCHI
Salem, WV 26426
Aug 9, 2016

Kevin Campbell
Adrian, WV 26210
Aug 9, 2016

Terry Schnell
Morgantown, WV 26508
Aug 9, 2016

Mckey Elliott
Craigsville, WV 26205
Aug 9, 2016

K. Giltin
Charleston, WV 25330
Aug 9, 2016

Joan hansen
Beckley, WV 25801
Aug 9, 2016

We need to find better ways to protect our water!

Jessica Blalock
Charleston, WV 25304
Aug 9, 2016

WVDEP has a poor track record using "estimates". The water quality standards should not change until a true study has been completed.

Daile Boulis
Charleston, WV 25314
Aug 9, 2016

Anne Axel
Huntington, WV 25701
Aug 9, 2016

Nanette Nelson
Racine, WV 25165
Aug 9, 2016

Paul Nelson
Racine, WV 25165
Aug 9, 2016

George Mace
Craigsville, WV 26205
Aug 9, 2016

What's in this for us? This change would be a real step backward. It's a betrayal of the many to benefit the few.

Jennifer Lee
Parkersburg, WV 26101
Aug 8, 2016

DeWayne Ewing
Beckley, WV 25801
Aug 8, 2016

Yeah. I agree that more corporations should make more insane amounts of money off of polluting our natural resources, while we are left with nothint when their toxic resources spill over into our water because they dont actually care sbout standards. And i think its great that no one is ever held accountable. We should not be allowing more pillutants, and more streams desecrated. We should ve cutting back and attempting to fix the streams that are damaged.

Michael A. Moore
Charleston, WV 25304
Aug 8, 2016

Sara Wilts
Bruceton Mills, WV 26525
Aug 8, 2016

Judy Hunter
Huntington, WV 25701
Aug 8, 2016

Robin cathell
Rowlesburg, WV 26425
Aug 8, 2016

Richard
Charles Town, WV 25414-0694
Aug 8, 2016

Just NO! Our waterways are a precious resource...FIRST, DO NO HARM!!!

Carol Sheffield
Buckhannon, WV 26201
Aug 8, 2016

We are led by ignorant hicks. Shame on you.

Jeff Wilson
Morgantown, WV 26505
Aug 8, 2016

Nicholas Cheremisinoff
Charles Town, WV 25414
Aug 8, 2016

Tatyana Cheremisinoff
Charles Town, WV 25414
Aug 8, 2016

JChase
Charleston, WV 25314
Aug 8, 2016

Nancy Whalen
Shepherdstown, WV 25443
Aug 8, 2016

Legislators seem to have little regard for our state's water ways. We need higher standards to protect our drinking water. Additionally the Birthplace of Rivers National Monument would illustrate a commitment to honoring the value of water to everyone.

Michael Condon
Hillsboro, WV 24946
Aug 8, 2016

Air and water are our most precious and life giving pesuxs of nature. Without them we would die. Therefore, keep them both pure as we can have them.

Richard D. Reece
Romney, WV 26757-6589
Aug 8, 2016

Carole Williams
Fairmont, WV 26554
Aug 8, 2016

Petra Miller
Lost Creek, WV 26385
Aug 8, 2016

James Norton
Fairmont, WV 26554
Aug 8, 2016

Lucas Garrett
Camden, WV 26338
Aug 8, 2016

Karen Anderson
Elkins, WV 26241
Aug 8, 2016

Donna Showalter
Morgantown, WV 26508
Aug 8, 2016

William Scott Rose
South Charleston, WV 25303
Aug 8, 2016

Diane Wellman
Huntington, WV 25701
Aug 8, 2016

Robert Oliver
Scott depot, WV 25560
Aug 8, 2016

Vivian Stockman
Huntington, WV 25773
Aug 8, 2016

Robin Blakeman
Huntington, WV 25705
Aug 8, 2016

Taylor Boggess
Huntington, WV 25701
Aug 8, 2016

Charles Bonner
Grafton, WV 26354
Aug 8, 2016

Jessica woods
Huntington, WV 25701
Aug 8, 2016

June Kemp
Bluefield, WV 24701
Aug 8, 2016

Daniel Chiotos
Harpers Ferry, WV 25425
Aug 8, 2016

Jamie Shultz
Morgantown, WV 26508
Aug 8, 2016

Caresta Click
Skelton, WV 25919
Aug 8, 2016

Maureen Farrell
Beverly, WV 26253
Aug 8, 2016

Joshua Carpenter
New Haven, WV 25265
Aug 8, 2016

save our streams PLEASE

Steve Cantley
Naoma, WV 25140
Aug 8, 2016

Angela Lucas
Arnett, WV 25007
Aug 8, 2016

jesse e price
arnett, WV 25007
Aug 8, 2016

jody price
arnett, WV 25007

Aug 8, 2016

Junior Walk
Whitesville, WV 25209
Aug 7, 2016

Whitney Eskew
Huntington, WV 25701
Aug 7, 2016

Michael Morrison
Barboursville, WV 25504
Aug 7, 2016

Please, our kids and grandkids do matter!

Debbie Jarrell
rock creek, WV 25140
Aug 7, 2016

Vernon Haltom
Naoma, WV 25140
Aug 7, 2016

Comments of West Virginia Chapter of Sierra Club

WV-DEP Water Standards Hearing Aug. 9, 2016

Please accept these comments on behalf of the approximately 2000 members of Sierra Club in West Virginia. We appreciate the opportunity to comment on 47-CSR-2 during this triennial Review of Water Quality Standards. While some aspects of WV-DEP's proposed rule are appropriate, key parts need to be strengthened to protect water quality in West Virginia.

1) **We urge WV-DEP to include a 300 uS/cm standard for electrical conductivity in West Virginia Water Quality Standards.** Electrical conductivity is abroad measure of the level of chemical ions such as sulfate, bicarbonate, calcium, chlorides, and many other dissolved solids. Sources include mining operations, gas well development, road salts, and other activities. Water high in conductivity is acutely toxic to many species of aquatic life. Since conductivity is easily measured, numerous scientific studies and EPA have concluded that electrical conductivity greater than 300 uS/cm is harmful to aquatic life.
2) **Protect "Category A Drinking Water".** Streams that can serve as sources of public drinking water are designated "Category A". Current standards apply this designation to almost all waters in West Virginia, thereby protecting those streams for current and future water supplies. WV-DEP proposed rule would allow pollution discharge permits to remove this Category A designation from a stream. We urge DEP to **delete sections 6.3 through 6.9** of the proposed rule. This proposed language is entirely focused on allowing more pollution. [redacted] Water Quality Standards should be about protecting drinking water and other water uses!
3) **Reject proposed changes to the "Critical Design Flow".** The Critical Design Flow is used to estimate the water's flow rate in receiving streams. WV-DEP's proposal to change this calculation to use Harmonic Mean Flow will allow higher rates of carcinogens in water. While EPA has supported this in some cases, it is not appropriate during drought or low flow periods because that will allow higher concentrations of carcinogens. We demand that WV-DEP **establish procedures to reduce the amount of carcinogens during low flow periods, and reconsider whether adding carcinogens in ANY amount is good for West Virginia..**
4) **Require increased monitoring of *E. coli* and fecal coliform bacterial contamination**. Water with high levels of fecal coliform bacteria is unsafe for recreation. WV-DEP should increase the required sampling frequency to assure safety for swimming and boating.
5) **Adopt as proposed EPA's recommended standards for aquatic life criteria** for five organic chemicals; acrolein, carbaryl, diazinon, nonylphenol, and tributyltin. These compounds are toxic and West Virginia needs these water quality standards.

Thank you for helping to protect West Virginia's water.

Jim Kotcon, Conservation Chair, WV Sierra Club
P. O. Box 4142, Morgantown, WV 26504
jkotcon@gmail.com
304-594-3322 (home)