



## WEST VIRGINIA MUNICIPAL WATER QUALITY ASSOCIATION

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January 18, 2018

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By Email ([PCS@orsanco.org](mailto:PCS@orsanco.org))

ORSANCO

5735 Kellogg Ave  
Cincinnati, OH 45230

### Re: Comments on Review of Pollution Control Standards

To Whom It May Concern:

### MEMBER AGENCIES

Barboursville, Village of  
Beckley Sanitary Board  
Bluefield Sanitary Board/  
Bluewell PSD  
Boone County PSD  
Bridgeport, City of  
Buckhannon Sanitary Board  
Charleston Sanitary Board  
Clarksburg Sanitary Board  
Elkins, City of  
Fairmont, City of  
Fayetteville, Town of  
Follansbee, City of  
Greater Harrison County PSD  
Hurricane, City of  
Martinsburg, City of  
Morgantown Utility Board  
Moundsville Sanitary Board  
New Martinsville, City of  
Parkersburg Utility Board  
Philippi, City of  
Princeton Sanitary Board  
Vienna, City of  
Weston, City of  
Wheeling WPCD  
Williamstown Public Works  
Worthington SB, Town of

I am writing on behalf of the West Virginia Municipal Water Quality Association (WVMWQA) related to the Commission's review of its current Pollution Control Standards (PCS). The WVMWQA strongly advocates for the Commission to choose Expanded Alternative 2.

The WVMWQA is an association of local governments and wastewater authorities that support clean water, vibrant communities, and a strong state economy by seeking to align clean water goals, smart management practices, affordable technology and public infrastructure. Several of our Members discharge into the Ohio River and are therefore directly impacted by ORSANCO's efforts in the Ohio River Basin.

ORSANCO has done very good work over the years to elevate public understanding of Ohio River issues and to facilitate improvements to Ohio River water quality. That said, we agree that ORSANCO's limited resources are better off focused on river-related study, education, and water quality improvement projects than resource and time-consuming duplicative water quality standards rulemakings. Accordingly, the WVMWQA encourages ORSANCO to eliminate from the PCS both the water quality standards/criteria and mixing zone/wastewater discharge requirements, as set forth in Expanded Alternative 2.

### CONSULTANT MEMBERS

Burgess & Niple  
Civil & Environmental Consultants, Inc.  
CT Consultants, Inc.  
Potesta & Associates  
Strand Associates, Inc.  
The Thrasher Group

### GENERAL COUNSEL

Paul Calamita, AQUALAW

We support Expanded Alternative 2 because: First, the PCS are redundant and unnecessary to protect the River given the maturity of the federal Clean Water Act (CWA) and National Pollutant Discharge Elimination System (NPDES) Program along with delegated state programs. The CWA requirement that States implement appropriate programs to satisfy CWA requirements (or that EPA step in to do so) ensures more than adequate protection of the Ohio River and rivers nationwide. State delegated programs are comprehensive in both scope and detail. These programs are developed and implemented through notice-and-comment rulemaking as well as notice-and-comment NPDES permitting. Accordingly, water quality is

adequately protected without ORSANCO's parallel PCSs. Second, the existing framework ensures transparency to the public, from water quality standards development and implementation to NPDES permitting. Third, because federal law requires that upstream discharges comply with downstream state requirements and EPA stands ready to address any interstate disputes, ORSANCO oversight on the basis of interstate coordination is unnecessary. Fourth, section 510 of the CWA allows states to be more stringent than federal requirements so the withdrawal of these ORSANCO PCS will not interfere with any compact State's ability to retain any more stringent requirements in the PCS. Fifth, we note that following and participating in ORSANCO rulemakings to update the PCS is a significant burden on citizens' and affected dischargers' time and resources, as these rulemakings are in addition to the State rulemakings to implement CWA requirements. This is compounded for those in distant states like West Virginia. Sixth, ORSANCO's PCS can cause confusion because they are not always consistent with other State and federal requirements. This results in more work for compact states in keeping track of and implementing these differences. Finally, many ORSANCO decisions have been between equally valid/lawful options and ORSANCO's preferred policy should not trump the delegated states' primacy in making those decisions for their states.

For these reasons, the WVMWQA strongly supports Expanded Alternative 2.

Thank you for the opportunity to provide our thoughts on the best use of ORSANCO's expertise and resources.

Sincerely,



F. Paul Calamita,  
General Counsel

C: WVMWQA Members  
Hon. Austin Caperton  
Mr. Scott Mandirola

**Your Name**

john riley

**Company / Organization (Optional)**

Moon Township Municipal Authority

**Email**

[riley@moontma.com](mailto:riley@moontma.com)

**Are you looking for a certain person at ORSANCO?**

None/Anyone

**Message/Comments**

I support alternative 1.

To Whom It May Concern:

I am writing on behalf of the Parkersburg Utility Board regarding the Commission's review of its current Pollution Control Standards (PCS). Parkersburg Utility Board strongly supports the Commission's adoption of Expanded Alternative 2.

Parkersburg Utility Board's wastewater treatment plant discharges into the Ohio River Basin and, therefore, is directly impacted by ORSANCO's Pollution Control Standards. For the reasons summarized in the January 18, 2018 comments submitted by the WV MWQA, we urge the Commission to adopt Expanded Alternative 2 in order to avoid duplication of water quality standards regulation and to allow ORSANCO to focus its resources to deliver the greatest benefits to ORSANCO member states and the public at large.

Thanks you for considering our input.

Respectfully,  
Eric Bennett







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Charleston, WV 25302

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[www.westvirginiaamwater.com](http://www.westvirginiaamwater.com)

February 5, 2018

Ohio River Valley Water Sanitation Commission  
5735 Kellogg Avenue  
Cincinnati, OH 45230

**RE: Pollution Control Standards (PCS) Comments**

Dear Commissioners:

The purpose of this letter is to provide input on the current review of Pollution Control Standards for Discharges to the Ohio River – 2015 Revision and whether ORSANCO should continue to maintain, administer, and periodically update the current Pollution Control Standards.

West Virginia American Water (WVAW) operates several water systems, including the Huntington water system, which draws its water from the Ohio River to provide public drinking water service in the area. Our Huntington system serves approximately 39,000 direct customers plus the communities of Lavalette, W.Va. and Chesapeake, Ohio. These communities rely on the quality of the Ohio River for their everyday needs – homes, businesses, universities, hospitals, and more.

Source water protection is important to maintaining, improving, and preserving drinking water sources. There are several components of source water protection ranging from monitoring to contingency planning to outreach. Control of point source and non-point source pollution through water quality standards is an important component and can have measurable impacts – both positive and negative – on drinking water quality.

ORSANCO is well positioned to support source water protection initiatives because it is able to effectively work across the many political and jurisdictional boundaries that exist along the Ohio River. ORSANCO plays an incredibly important role in implementing pollution control standards because it can effectively address gaps in federal requirements and inconsistencies in standards between the states while taking into consideration the river as a whole.

We fully support the comments from the Water Users Advisory Committee (WUAC) on this issue and would like to reinforce the importance of ORSANCO's involvement in maintaining pollution control standards across jurisdictional boundaries. We appreciate the Commission's efforts to streamline programs and we support removing standards that are truly redundant, while maintaining appropriate water quality standards to protect the source of drinking water supply for over three million people throughout the Ohio River basin.

Sincerely,

Jennifer Heymann, P.G.  
Source Water Protection Program Manager

Erica Pauken  
Source Water Protection Lead

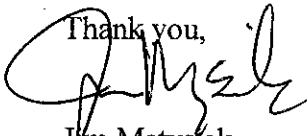
Ohio Coatings Company  
2100 Tin Plate Place  
Yorkville, Ohio 43971  
February 20, 2018

Dear Sir/ Madam:

Enclosed are our comments on ORSANCO'S triennial review of its Pollution Control Standards.

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Thank you,

A handwritten signature in black ink, appearing to read "J. Matysiak", written over the printed name.

Jim Matysiak  
Environmental Representative  
Ohio Coatings Company  
Yorkville, Ohio

Via email: [PCS@orsanco.org](mailto:PCS@orsanco.org)

Or

ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

Ohio Coatings Company (Yorkville, Ohio) is pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). Ohio Coatings Company appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed.

#### Summary of Comments

Ohio Coatings Company has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established

under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

Ohio Coatings Company believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### Additional Information

Ohio Coatings Company believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. Ohio Coatings Company believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, Ohio Coatings Company notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. The process for adoption of the PCS provides no opportunity to challenge the

appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.

- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water quality criteria are being achieved throughout the River with a small number of exceptions (e.g., fecal coliform) which are being addressed through the States' Clean Water Act-mandated programs.

In summary, Ohio Coatings Company believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

Given the complexity of the PCS and state water quality standards and implementation procedures, Ohio Coatings Company believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit, and are not necessary to meet the goals of the ORSANCO Compact. In a time of limited resources and a need for greater cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. Ohio Coatings Company also does not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jim Tennant", with a long, sweeping horizontal line extending to the right.

Jim Tennant

President and CEO

Ohio Coatings Company



# Ohio Environmental Council

## **Comments of the Ohio Environmental Council Regarding the Ohio River Valley Water Sanitation Commission 2018 Review of Pollution Control Standards**

The Ohio Environmental Council (the “OEC”) thanks the Ohio River Valley Water Sanitation Commission (“ORSANCO”) for the opportunity to provide public comment on the 2018 review of the Pollution Control Standards. Based on the Commission’s assertion that Alternative 2 is favored by the majority of ORSANCO Commission members, the OEC submits the following comments in opposition of this proposal.

### **I. Introduction**

Article VI of the Ohio River Valley Water Sanitation Compact establishes ORSANCO’s guiding principle: “Pollution by sewage or industrial wastes originating within a signatory State shall not injuriously affect the various uses of the interstate waters as hereinbefore defined.”<sup>1</sup> Article VI further outlines other principles designed to protect the Ohio River and the signatory States of the Compact from water pollution, requiring treatment of industrial waste and sewage so as to protect the public health. In order to further accomplish this goal, the Compact authorized the established Commission (ORSANCO) “to adopt, prescribe, and promulgate rules, regulations, and standards for administering and enforcing the provisions of this article.”<sup>2</sup>

Article VII further specifies that the Compact does not limit the power of any of the States to impose “additional conditions and restrictions to further lessen or prevent the pollution of waters within its jurisdiction.”<sup>3</sup> Additionally, Article IX establishes the Commission’s authority to perform investigations and issue orders upon municipalities, corporations, persons, and other entities that discharge into the Ohio River and its tributaries.<sup>4</sup>

The federal Clean Water Act substantially changed ORSANCO’s role in the 1970s, given that the U.S. Environmental Protection Agency now coordinated water quality standards at the federal level. Questions arose as to whether ORSANCO was still necessary to achieve the protection of human health and the environment of the Ohio River Valley. In its analysis of the proposed alternatives for the 2018 Review of Pollution Control Standards, ORSANCO notes that in 1975, a study commissioned by the EPA concluded:

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<sup>1</sup> Article VI, *Ohio River Valley Water Sanitation Compact*, June 30, 1948.

<sup>2</sup> *Id.*

<sup>3</sup> Article VII, *Ohio River Valley Water Sanitation Compact*, June 30, 1948.

<sup>4</sup> Article IX, *Ohio River Valley Water Sanitation Compact*, June 30, 1948.

“ORSANCO should work with the States in developing consistent stream standards for the main stem and tributaries having significant impacts on the main stem; and in periodic review of the standards. *Its interest should be primarily in achieving interstate compatibility and equity.*”

Each State formulates stream standards for its own purposes and also for submission to EPA. However, the emphasis of each State is necessarily on its particular waters both in and out of the Ohio Basin. Since the Ohio [River] is a boundary river, and because there are many other relationships as among the several State segments of the river system, the [ORSANCO] should provide the overall view and the comparative analyses needed for coordination, consistency and equity. ORSANCO’s stream models will be found useful.”<sup>5</sup>

The first Pollution Control Standards were established by ORSANCO on November 13, 1970, establishing “effluent requirements for all discharges of sewage and industrial wastes to the Ohio River.”<sup>6</sup> Those standards were first reviewed in 1984, and then reviewed every few years between 1987 and 2015, bringing ORSANCO to the current round of revisions in 2018.<sup>7</sup>

Following a review of how States implement the Pollution Control Standards, ORSANCO made a number of factual conclusions in 2015 that influence their decision to pursue Alternative #2 and eliminate most of the Pollution Control Standards. The OEC notes the following factual conclusions identified by ORSANCO:

1. ORSANCO’s water quality standards are implemented by member States through the federal NPDES Program, sometimes without actually adopting the ORSANCO water quality criteria.<sup>8</sup>
2. Member States have applied designated uses to the Ohio River that are comparable to those set by ORSANCO, but usually through their authority under the federal Clean Water Act.<sup>9</sup>
3. Some member States are not yet implementing the ORSANCO mixing zone ban and have no mixing zone ban of their own, while other States implement the mixing zone ban through NPDES permits or through regulatory bans.<sup>10</sup>
4. Instead of adopting the ORSANCO discharge requirements, States implement their own requirements under the CWA or State laws; most effluent limits are met or exceeded by alternative programs.<sup>11</sup>
5. The antidegradation programs of member States are established through State law or under the Clean Water Act, not ORSANCO requirements.<sup>12</sup>
6. The ORSANCO requirement that States may not interfere with another State’s water uses has not been adopted by the States, yet it has been implemented “under other authority including State authority and the

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<sup>5</sup> *Review of ORSANCO Pollution Control Standards: “Alternative #2” Expanded: “Clean Water Act Alternative to ORSANCO PCS Rules”*, Ohio River Valley Sanitation Commission, (April 1, 2017), at 2, <http://www.orsanco.org/wp-content/uploads/2016/09/Preferred-Expanded-Alternative-2-and-Minority-Report.pdf> (emphasis added).

<sup>6</sup> *Id.* at 6.

<sup>7</sup> *Id.* at 6 - 7.

<sup>8</sup> *Id.* at 8.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at 9.

<sup>12</sup> *Id.*

federal Clean Water Act.”<sup>13</sup>

In response to these conclusions of fact, the majority of ORSANCO commissioners have adopted the position that the correct course of action is to eliminate the ORSANCO water quality standards, criteria, mixing zone bans, wastewater discharge requirements because the Clean Water Act has succeeded in its purpose and the State programs of member States similarly have succeeded.<sup>14</sup> The OEC disputes this conclusion. First and foremost, the OEC disputes the conclusion that eliminating the force of ORSANCO’s Pollution Control Standards will further the goals of the Clean Water Act and protect human health and the environment. Second, the OEC disputes the conclusion that the federal Clean Water Act has “succeeded” in protecting the Ohio River and its tributaries. Finally, the OEC believes that Alternatives 3 and 4 represent better solutions to protect the Ohio River when compared to Alternative #2.

## **II. Alternative 2 fails to protect human health and the environment through its abdication of the Pollution Control Standards to the several States of the Ohio River Valley.**

The Commission provides the following justification for the elimination of the majority of the Pollution Control Standards: “All member States are implementing approved programs under the federal Clean Water Act.”<sup>15</sup> According to the Commission, these federally accepted programs sufficiently protect the Ohio River, and thus ORSANCO should defer to the U.S. EPA and the programs of these several States.

But this decision seems to contradict the very Compact upon which ORSANCO was established. In the declarations before Article I of the Compact, the member States emphasized that “the abatement of existing pollution in the waters of [the Ohio River basin] are of prime importance to the people...and can best be accomplished through the cooperation of the States situated therein, by and through a joint or common agency.”<sup>16</sup> ORSANCO’s proposed Alternative #2 is not in the spirit of cooperation. In fact, it eliminates a key component of cooperation from ORSANCO’s mission by eliminating coordinated Pollution Control Standards.

In its defense of Alternative #2, the Commission argues that many member States already exceed ORSANCO’s standards under the authority of the Clean Water Act. But in the same breath, ORSANCO States that some member States have not yet implemented either the ORSANCO mixing zone ban, or a mixing zone ban of their own.<sup>17</sup> Yet the Commission proposes as part of Alternative #2 a removal of Chapter 4, which covers mixing zone designations. If the US EPA fails to require these States to provide stringent mixing zone designations for the Ohio River when the federal agency approves their water quality standards, an elimination of ORSANCO’s

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<sup>13</sup> Id.

<sup>14</sup> Id.

<sup>15</sup> Id. at 10.

<sup>16</sup> *Ohio River Valley Water Sanitation Compact*, June 30, 1948.

<sup>17</sup> “It appears that member States generally consider the mixing zone ban of ORSANCO to be part of the implementation of WQS. Significantly, however, the implementation of mixing zone bans for BCCs occurs in three principal ways: (a) independent State bans; (b) direct implementation of the ORSANCO ban in NPDES permits; and (c) *having no mixing zone ban of their own and not yet implementing the ORSANCO mixing zone ban in the issuance of NPDES permits.*” See FN 10.



mixing zone designations is a backtrack on water quality standards designed to protect this valuable water body.

ORSANCO should exist as a secondary backstop for Pollution Control Standards for the Ohio River in the event that an EPA administration exists, such as the current administration, that does not place the protection of human health and the environment as its primary focus. The current administration has pursued, left and right, actions that would degrade this nation's environment. ORSANCO proposes to eliminate its role for setting unifying standards that create equity and uniformity for effluent limitations between the States because the U.S. EPA already does that - yet that is an oversimplification of how the U.S. EPA, especially the current EPA administration, approves water quality standards.

For instance, the Minority Report from ORSANCO itself emphasizes the following:

“ORSANCO’s [Pollution Control Standards] are not redundant to the provisions of the Clean Water Act. A side-by-side comparison of the Minimum Water Quality Criteria with the 122 Minimum Criteria established in the ORSANCO Pollution Control Standards reflects *that there are at least 188 parameters among the 6 signatory States and EPA, for which ORSANCO has a criteria but the State or EPA does not.* Adoption of EPA-developed categorical effluent limitations or water quality-based effluent limits by a State...may not be adequate to protect the aquatic life and uses of the Ohio River.”<sup>18</sup>

The minority report further emphasizes that the presence of a parameter under a State program does not insure the implementation of that parameter, and ORSANCO can serve a role in identifying and addressing such inconsistencies between States.<sup>19</sup> If ORSANCO guts the Pollution Control Standards, it will eliminate cognizable principles. Using such principles, ORSANCO can hold States accountable and protect human health and the environment even as State-by-State standards conflict.

But most importantly, the minority mentions recent EPA and other federal actions, such as the elimination of the Stream Protection Rule, and the reconsideration of the “Waters of the United States” definition and effluent guidelines for discharges from electric generation units, as clear indications that “the standards and scope of the Clean Water Act...are neither static, nor necessarily as broad or protective, as might be needed to address the specific needs of the Ohio River Basin.”<sup>20</sup>

ORSANCO was established to create consistent regulations between the several State *regardless* of what individual State laws require or what federal law requires. As a boundary river, the Ohio River requires a complicated coordinated effort to achieve regulatory certainty for businesses and water treatment and monitoring initiatives. ORSANCO cannot shirk this duty or lessen its responsibility because the States satisfy federal law. ORSANCO was not designed to simply satisfy federal or State law - it was designed to go beyond, to create a legal framework through

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<sup>18</sup> Supra FN 5, at 12.

<sup>19</sup> Id.

<sup>20</sup> Id. at 13.

which all citizens of the Ohio River Valley would benefit from a robust and thriving Ohio River.

### **III. The Ohio River Valley needs a unified voice for Pollution Control Standards due to complicated transboundary water quality problems.**

As the minority report emphasized, ORSANCO has 188 parameters within the Pollution Control Standards that both States and the federal EPA do not have criteria. At one point or another over the past few decades, ORSANCO concluded using sound science that the Ohio River needed those parameters to satisfy the Article I water protection goals under the Compact.<sup>21</sup>

Instead of retracting the Pollution Control Standards, ORSANCO should actually enforce the standards and find ways to encourage or even require member States to implement all 188 inconsistent parameters. Article IX of the Compact envisions the Commission playing this role when it gave it the power to issue orders upon municipalities, corporations, persons, or other entities that discharge waste into the River. ORSANCO should find ways to further implement these parameters, either through collaboration with State environmental protection agencies or upon their own initiative.

But if these parameters disappear, then in States without one of those 188 parameters, there will not be a legal mechanism through which polluters can be ordered to halt their bad acts. If a plant in West Virginia emits a pollutant that violates Ohio water quality standards, yet West Virginia does not include water quality criteria for that pollutant, complicated transboundary legal disputes could occur. ORSANCO has an opportunity to move one step further and strengthen water quality criteria and work with States to create consistent water quality criteria across the Basin. Eliminating the Pollution Control Standards is a step in the wrong direction.

Furthermore, ORSANCO could be used as a tool through which the States could solve complicated pollutant questions in instances where the federal government has chosen not to act. Consider the recent crisis along the Ohio River where the DuPont plant on the West Virginia side emitted PFOA into the river. The U.S. EPA issued a health advisory for the chemical, but it chose not to issue a National Safe Drinking Water Regulation that required specific actions when a public water system became inundated with the pollutant. The U.S. EPA made this decision even after multiple class action lawsuits were filed against DuPont and similar companies. Additionally, the C8 Science Panel found numerous health risks associated with PFOA, as did the U.S. EPA's own health advisory. More recently, Ohio's Attorney General Mike DeWine filed a lawsuit against DuPont for polluting the Ohio River and harming Ohio citizens, particularly the Little Hocking Water Association.

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<sup>21</sup> "Each of the signatory States pledges to each of the other signatory States faithful cooperation in the control of future pollution in and abatement of existing pollution from the rivers, streams and water in the Ohio River basin which flow through, into or border upon any of such signatory States, and in order to effect such object, agrees to enact any necessary legislation to enable each such State to place and maintain the waters of said basin in a satisfactory sanitary condition, available for safe and satisfactory use as public and industrial water supplies after reasonable treatment, suitable for recreational usage, capable of maintaining fish and other aquatic life, free from unsightly or malodorous nuisances due to floating solids or sludge deposits, and adaptable to such other uses as may be legitimate." Article I, *Ohio River Valley Water Sanitation Compact*, June 30, 1948.

ORSANCO should be stepping into the shoes of the EPA in this sort of situation and promulgating under its Pollution Control Standards water quality criteria for PFOA. The member States could then adopt that standard throughout the Ohio River Valley. Yet if ORSANCO decides to retract the majority of its Pollution Control Standards, the option to regulate a pollutant like PFOA on an interstate level would disappear.

#### **IV. The OEC supports Alternatives 3 or 4 as acceptable versions of the Pollution Control Standards.**

Fortunately, ORSANCO has included in its 2018 Review of the Pollution Control Standards two alternatives that would continue to foster cooperation and collaboration between the member States in furtherance of the goals of the Compact. The OEC supports either Alternative 3 or Alternative 4, or a combination of the best features of the two proposals. Alternative 3 would eliminate duplicate efforts of the member States and have ORSANCO issue water quality standards uniformly for each State.<sup>22</sup> Alternative 4 would modify the current standards on an individual basis and work with each State to harmonize their current standards.<sup>23</sup>

In Alternative 3, ORSANCO states:

“if ORSANCO were the only entity to develop standards and implementation procedures for the [Ohio] River and States adopted these standards, the States [would] save considerable resources. Currently ORSANCO uses this model successfully to develop the 305(b) report for the Ohio River. Also, using this approach will result in a consistent set of standards for the River. This will be a great help to industries in the basin, who always demand consistency and predictability. Also, consistency will help the public better understand water quality issues and avoid confusion that results from this inconsistency. An example: currently States issue conflicting fish consumption advisories for the same River segment.”<sup>24</sup>

Through Alternative 3, ORSANCO would work diligently to eliminate instances where States have rules that do not satisfy ORSANCO’s standards.<sup>25</sup> While Alternative 4 would not create complete unity or equity, it would still keep the Pollution Control Standards intact and chart a pathway toward consistency. Alternative 4 does envision, however, a combined strategy between Alternative 3 and 4:

“[Alternative 4] could be combined with Alternative 3....Combined alternatives would provide a benchmark for TEC and staff review and modification of individual standards as warranted, and the exercise of comparison would help to assure that maintenance of standards in excess of the minimum standards recommended by US EPA is necessary or advisable.”<sup>26</sup>

The OEC believes that Alternatives 3 and 4 would best protect human health and the environment, improve the water quality of the Ohio River, and further the ideas espoused in the Compact. ORSANCO would be equipped with the tools necessary to deal with complicated

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<sup>22</sup> *Water Quality Standards Alternative Summary*, Ohio River Valley Water Sanitation Commission, at 5, <http://www.orsanco.org/wp-content/uploads/2016/09/Alternatives-1-5.pdf>.

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* at 5 - 6.

<sup>25</sup> *Id.* at 6.

<sup>26</sup> *Id.* at 7.

water pollution scenarios, such as the inundation of PFOA in the Ohio River Basin, especially when the federal EPA chooses not to act. ORSANCO would provide industries with regulatory certainty by ensuring that each State has the same requirements for water quality standards. By its own calculations, ORSANCO would save the States substantial funds by housing the water quality standards under one roof. And ORSANCO would create a backstop for water quality standards for the Ohio River Basin, ensuring that even as different federal and State administrations make different decisions regarding this nation's environment, the Ohio River is protected for future generations.

## **V. Conclusion**

The OEC thanks ORSANCO for its robust public commenting period so that all interested parties can engage with the Commission on these important decisions. We hope that ORSANCO will closely consider our comments, along with the comments of many of our partner organizations, as it makes its decision regarding the fate of the Pollution Control Standards. In the end, hopefully everyone can come together in unison and support for a set of rules that adequately safeguards the Ohio River Basin and protect this important resource for the member States and their citizens.

**Chris Tavenor**

**Law Fellow**

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**From:** [Judy Petersen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Comments on PSC Alternatives  
**Date:** Wednesday, February 21, 2018 12:10:44 PM

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To: ORSANCO PSC Committee & Commissioners

From: Judith Petersen, 2995 Hammons ville Rd., Munfordville, KY 42765

Date: February 21, 2018

Re: Comments on PSC Alternatives

Please accept these comments on the Alternatives under consideration for the Pollution Control Standards (PSC) review. I am submitting these comments as an individual who has lived most of her life in the Ohio River Basin and who has spent considerable effort over the decades working to protect and improve the Ohio River. I have participated in the PSC triennial review consistently since 2005 as a prelude to the 2007 PSC review. I have reviewed all five alternatives, in addition to the minority report on alternative 2, the comments from the Advisory Committees and TEC and engaged in discussions during the February TEC, PIACO and Commission meetings about the alternatives.

For reason discussed below, I firmly believe that some combination of alternative 3 and 4 will provide better protection for the Ohio while adhering to the Compact and the mission of the Commission. In addition, a combination of 3 and 4 would also implement the recommendations in the 1974/5 EPA study and continue ORSANCOs legacy of providing valuable leadership to the Ohio River states. Finally, finding a cost effective way to selectively modify PCS after review as warranted and increase focus on harmonization of standards and their implementation among Compact states and EPA would preserve ORSANCOs leadership role in the basin.

As a former Executive Director in charge of raising funds each year to staff and implement Kentucky Waterways Alliance programs, I understand the fiscal challenges ORSANCO faces in the coming years. These challenges are clearly articulated at each ORSANCO meeting over the past couple of years, including the projected budget scenarios previously presented by Mr. Harrison. ORSANCO is an important organization for the health of the Ohio River and provides increasingly valuable assistance to member states in assessment, monitoring and spill response. However, eliminating the "heart" of the PSC rules while vaguely referencing monetary concerns with no firm comparison/analysis of the alternatives is unacceptable. Indeed, for reasons discussed below, elimination of key sections of the PSC may violate the Compact, put ORSANCOs mission and reputation at risk, while endangering progress made in Ohio River water quality.

### **Background**

The Ohio River Valley Water Sanitation Compact (the Compact) created the Ohio River Valley Water Sanitation Commission (the Commission) as a body with powers and duties set forth in it for the purpose of abating water pollution within the Compact District. Article I of the Compact mandates that all waters in the District be placed and maintained in a satisfactory, sanitary condition, available for certain beneficial uses. It is the mission of the Commission to ensure protection of these uses and to preserve the waters for other legitimate purposes.

After the Federal Water Pollution Control Act Amendments of 1972 were passed, a study was commissioned by EPA in 1974 as a means of better defining "the areas of opportunity for effectively discharging these responsibilities in a cooperative spirit and an efficient mode."

That study, titled *A Study of Prospective Water Pollution Control Activities For The Ohio River Valley Water Sanitation Commission*, was released in March 1975, and with respect to "stream standards," recommended that:

ORSANCO should work with the states in developing consistent stream standards for the main stem and tributaries having significant impacts on the main stem; and in periodic review of the standards. Its interest should be primarily in achieving interstate compatibility and equity.

Each state formulates stream standards for its own purposes and also for submission to EPA. However, the emphasis of each state is necessarily on its particular waters both in and out of the Ohio Basin. Since the Ohio is a boundary river, and because there are many other relationships as among the several state segments of the river system, the interstate agency should provide the overall view and the comparative analyses needed for coordination, consistency and equity. ORSANCO's stream models will be found useful.

**Conclusion:** I therefore believe it is the purpose and mission of the Commission to maintain some form of PSC program, and further that by choosing to combine alternatives 3 and 4 the Commission will be implementing this decade's old, but still relevant EPA recommendation.

**Alternative 1: Terminate ORSANCO's PCS and rely upon state and federal programs provided for and mandated under the Clean Water Act and related state statutes.**

### **Background**

"This alternative would free up resources within ORSANCO to be reprogrammed to other Commission activities." However, it also begs the question as to what could be lost in terminating ORSANCO's PSC.

If these changes are offered as purely a budgetary measure, there should be a cost benefit analysis included and the background documents should clearly state this fact. While organizational budgets are always a consideration, this alternative is a drastic change to the PSC and to ORSANCO's mission and leadership in the Ohio River Basin. In addition, I believe the purpose and mission of the organization as stated in the Compact would preclude this option from further consideration. As early as the 1974/5 EPA study quoted above, parties recognized the value of ORSANCO as unified voice of the Ohio River. Nothing has changed in that regard.

While state and federal Clean Water Act programs are necessary for a boundary river like the Ohio a coordinating interstate agency (ORSANCO) should still provide the overall view and comparative analyses needed for coordination, consistency and equity. Indeed the need for a coordinating interstate agency was confirmed again recently when ORSANCO staff compared the states' standards for the main stem of the Ohio River with USEPA recommended criteria. That comparison (while a snapshot) proved that states CWA programs alone would not provide the consistency or equity (in regards to standards) needed for the Ohio.

**Conclusion:** This option should be removed from further consideration.

**Alternative 2: Clean Water Act Alternative to ORSANCO PCS Rules**

### **Background**

"To the extent that all member states are implementing approved programs under the federal Clean Water Act, there would be little or no purpose for the Commission to continue the process for updating the PCS and for unnecessarily expending its limited resources on a redundant program at a time when other programs are in need for those funds. Removal of

the water quality criteria (Chapter 3), mixing zone designation (Chapter 4) and portions of wastewater discharge requirements (Chapter 5) of the PCS should be sufficient to eliminate the need to triennial review.

This alternative would allow ORSANCO to redirect resources not needed for the PCS program to be redirected to other Commission activities. ORSANCO's true value to member states and the public is in such programs as assessments of the water quality and biological integrity of the river, public out-reach, spill detection and response and many, many other programs with respect to which ORSANCO is uniquely qualified and with respect to which states have few, if any alternatives."

Again, it is confusing if this option is presented solely as a budgetary measure. If so, there should be a cost benefit analysis. My comments under alternative 1 are incorporated herein as I deem this alternative inconsistent with the purpose and mission of the Commission. Further, this option does not address the conclusion in the EPA study which found an interstate coordinating agency to be useful for the protection of the Ohio River. Finally, recently ORSANCO staff compared the states' standards for the main stem of the Ohio River with USEPA recommended criteria. The comparison indicated that there are many differences between ORSANCO's PSC, states WQS and EPAs published WQ Criteria and reinforced the benefit of implementing the recommendations of the 1974/5 EPA study.

**Conclusion:** This option should be removed from further consideration.

### **Alternative 3: Cost Effective Alternative for Standards**

#### **Background**

"Utilize a cost effective approach to finalize uniform WQS rules for the Ohio River by tasking ORSANCO to take the lead in order to eliminate duplication of efforts among six states and save resources. Also, as a starting point, utilize work done by USEPA to develop WQS to avoid conducting basic research.

This alternative is developed to achieve the following goals (pros):

1. Establish numerical water quality standards for the Ohio River that are protective of the intended uses.
2. Reduce the cost of developing water quality standards for ORSANCO and the states.
3. Promote consistency among states.
4. Allow flexibility to adopt alternative standards, when appropriate.
5. Streamline the process for developing the 305(b) Report.
6. Reduce the influence of campaign donors and special interest groups on the standards development and permitting processes.
7. Satisfy 106 grant work plan requirements.
8. Enhance ORSANCO's historic role as the protector of water quality of the River.

This Alternative may result in following reactions (cons):

1. Opposed by some industries and the chambers of commerce who object to any regulations, even the ones that may help them.
2. Opposed based on ideological ground by the states' rights advocates."

Recently ORSANCO staff compared the states' standards for the main stem of the Ohio River with USEPA recommended criteria. The comparison indicated that there may be a great deal of inconsistency among the states, ORSANCO and EPA.

Under this Alternative, ORSANCO will use the federal criteria as a starting point. In certain

situations ORSANCO may choose to use different criteria as a basis to develop standards. States will participate in the standards development process and they may choose to deviate from ORSANCO's standards, if appropriate.

In addition, Article VI of the Compact requires ORSANCO and the states to maintain the water quality of Ohio River tributaries in a sanitary and satisfactory condition at least equal to the condition of the waters of the River immediately above the confluence. The article authorities ORSANCO to adopt standards to implement and enforce this provision. Although there may be other ways to implement this requirement, adopting numerical water quality standards is the obvious and most direct approach to comply with this provision.

#### BUDGET/STAFF IMPLICATIONS:

1. The USEPA 106 grant represent 50% of ORSANCO's budget. This year's work plan for this grant includes the development of numerical standards for the main stem of the Ohio River. If ORSANCO decides to eliminate or severely reduce the WQS Program, the 106 grant may be negatively impacted.
2. The above mentioned approach for developing standards relies on the science developed by USEPA. ORSANCO and states will not waste resources in developing basic science unless it is absolutely needed. Also, in most cases states will adopt ORSANCO's WQS. This will save state resources and avoid duplication of efforts.
3. This approach will simplify the 305(b) report for ORSANCO and states because all the states will adopt similar water quality standards.

**Conclusion:** For long time, ORSANCO successfully utilized stream standards to set water quality goals, help dischargers plan for the future, improve consistency among states, prepare 305(b) & TMDL reports and to protect the River's designated uses. **The standards program should be streamlined to save resources. However, eliminating the numerical stream standards will be a step backward that will adversely impact the stream water quality and create nothing but confusion.**

The discussion and materials included with the alternative 2 document makes a strong case to choose alternative 3. I agree. Alternative 3 and/or 4 which can be viewed as consistent with 3 should be chosen. Either alternative maintains ORSANCO's interstate coordination and leadership role in establishing water quality goals for the river. The PSC reviews can approach the problem in a methodical, prioritized manner using the staff and fiscal resources available. Choosing alternative 3 or 4 (or combining them) would also implement the EPA recommendations.

**Alternative 4: Selectively modify PCS after review as warranted and increase focus on harmonization of standards and their implementation among Compact states and EPA**

#### Background

"...would maintain concurrency between PCS and emerging biological and chemical science, relying on staff and the TEC to identify standards that are candidates for revision, adoption, or elimination during the subsequent triennial review, thus providing sound bases for permitting and WQC decisions that are protective of the water resource."

Pro: Better integration of standards and levels of protection among compact states. Second prong recognizes that while the individual Compact states may have standards that vary in number or stringency from those adopted by ORSANCO, it is the interaction of state permitting and certification processes and those adopted standards that determine whether comparable levels of protection of uses are being achieved as among the states. To that end, the NPDES Committee will work with staff and each state to develop a more comprehensive understanding of the interaction of standards and permitting / certification processes in and among the states, with a goal of assuring that protection of uses and achievement of pollution controls needed to maintain those uses occurs throughout the Ohio River system. Where the state has not incorporated one or more ORSANCO standards into the permitting and



certification processes, staff and the NPDES Committee will work with that state to assure that the state process nevertheless achieves a comparable level of protection of the designated uses.

Pro: Could be combined with Alternative 3, which proposes to “continue to include numerical standards in ORSANCO’s rules but simply Pollution Control Standards program by adopting US EPA standards for all pollutants unless it is determined that the federal standards for a specific pollutant are not protective of the intended use.” Combined alternatives would provide a benchmark for TEC and staff review and modification of individual standards as warranted, and the exercise of comparison would help to assure that maintenance of standards in excess of the minimum standards recommended by US EPA is necessary or advisable.

Con: Budgetary considerations for both ORSANCO Staff and NPDES Committee.

**Conclusion:** This Alternative would work to provide better coordination between ORSANCO and the member states and among those states, and to approach standard-setting in a more nuanced manner than wholesale abandonment of the standard-setting function of ORSANCO.

While selecting this alternative would not cost ORSANCO any more money than it currently spends for PSC reviews, it might not provide a great deal of budgetary savings either. It would remove any suggestion that ORSANCO is not complying with the 106 grant. All options that rely upon budgetary considerations should have a cost benefit analysis to accompany this request for comments.

Even more important, combining this option with alternative 3 above will preserve ORSANCO’s leadership role in the basin, while protecting the purpose and mission of the organization and the water quality in Ohio River. Combining 3 and 4 has the potential to save funds in subsequent years for ORSANCO and the member states – while providing clear PCSs (WQS and TEBELs) for the Ohio River. Alternative 3 and/or 4 should be chosen.

**Alternative 5: Provision for states to consider the PCSs when developing state water quality standards.**

### **Background**

“Propose to change the ORSANCO PCS language from mandating that Compact member states adopt the ORSANCO PCS in permits issued for the main stem of the Ohio River to requiring member states give consideration of the ORSANCO PCS when developing and issuing permits.”

**Conclusion:** I see no benefit to this alternative. Based on discussions at TEC and Commission meetings I believe this is the status quo, however it does nothing to implement the 1974/5 EPA recommendations. Further, it does nothing to relieve the financial burden on ORSANCO or the states and does nothing to improve Ohio River coordination or water quality. This alternative should be removed from further consideration.

### **Summary and Conclusion**

Many of ORSANCO’s own committees including the PTOW, WUAC, WOAC and PIACO support retaining the PSC in some form. Indeed as evidenced by the minority report for alternative 2, some Commissioners feel strongly about the complete elimination of much of the current PSC rules. Finally, several of the states at the February Commission meeting expressed concerns about the preferred alternative as eliminating the PSC rules would require new rulemaking for their states. Again, this would eliminate alternatives 1 and 2.

I do not have as strong of an objection to alternative 5 but I see no net benefit to water quality or budgetary considerations and no reason to make such a fundamental change to the PSC language.

I strongly urge the Commission to choose alternative 3 or 4, or a combination of the two. This can grant the Commission some budgetary relief particularly in coming years. The Commission

can propose a timeline that meets their needs and the states. Implementation will finally incorporate EPA recommendations. Water Quality in the Ohio River, and understanding by the states, regulated entities and the public will be improved.

ORSANCO's Compact grants the organization a unique role in the United States even among other interstate compacts/agreements. Implementation of alternative 1 or 2 above will negate this role. It is extremely unlikely should the Commission feel it made a mistake in subsequent years that it will ever again be granted such a unique role. Making this decision in haste is a very big mistake. While I understand that states have made significant progress in regulatory programs since the 1974/5 EPA study, recent comparisons conducted by ORSANCO staff and committees have revealed significant discrepancies. These discrepancies were anticipated decades ago by EPA in the study. The EPA recommendations have not been addressed and it would greatly benefit ORSANCO, the compact states and EPA to do so in a methodical manner by implementing alternative 3 and/or 4.

Thank you for the opportunity to comment. I am happy to address any questions regarding my comments.

Judith Petersen  
2995 Hammons ville Rd.  
Munfordville, KY



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [PatP@wheeling-nisshin.com](mailto:PatP@wheeling-nisshin.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Lonny Riggs](mailto:Lonny.Riggs@wheeling-nisshin.com); [BillS@wheeling-nisshin.com](mailto:BillS@wheeling-nisshin.com)  
**Subject:** Comments  
**Date:** Wednesday, February 21, 2018 11:50:17 AM

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ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

Wheeling-Nisshin, Inc. (Follansbee, WV) is pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). Wheeling-Nisshin appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed. Finally, regardless of what decision the Commission makes, Wheeling Nisshin wishes to commend ORSANCO for re-evaluating whether PCS remain a necessary part of its mission. It is rare that an organization is willing to consider whether the actions that were appropriate yesterday are still relevant today, and consider charting a different, but equally effective, course for the future.

#### Summary of Comments

Wheeling-Nisshin has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

Wheeling-Nisshin believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### Additional Information

Wheeling-Nisshin believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. Wheeling-Nisshin believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, Wheeling-Nisshin notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology based discharge requirements and water quality based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. The process for adoption of the PCS provides no opportunity to challenge the appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.
- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water quality criteria are being achieved throughout the River with a small number of exceptions (e.g., fecal coliform) which are being addressed through the States' Clean Water Act mandated

programs.

In summary, Wheeling-Nisshin believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

Given the complexity of the PCS and state water quality standards and implementation procedures, Wheeling-Nisshin believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit, and are not necessary to meet the goals of the ORSANCO Compact. In a time of limited resources and a need for greater cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. Wheeling Nisshin also does not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

Sincerely,

Patrick E. Pendleton  
Vice President Manufacturing  
Wheeling Nisshin  
Penn & Main Streets  
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**From:** [Mark Volkmann](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution Control Standards - Triennial Review Comments  
**Date:** Thursday, February 22, 2018 4:39:57 PM  
**Attachments:** [image003.png](#)

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February 19, 2018

Via email: [PCS@orsanco.org](mailto:PCS@orsanco.org)  
ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

Jupiter Aluminum Corp., is pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). Jupiter Aluminum Corp., appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed.

#### Summary of Comments

Jupiter Aluminum Corp., has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment.

As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as

supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

Jupiter Aluminum Corp., believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### Additional Information

Jupiter Aluminum Corp., believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. Jupiter Aluminum Corp., believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, Jupiter Aluminum Corp., notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. The process for adoption of the PCS provides no opportunity to challenge the

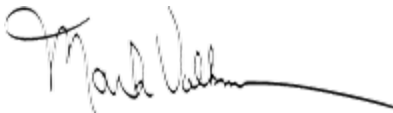
appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.

- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water quality criteria are being achieved throughout the River with a small number of exceptions (e.g., fecal coliform) which are being addressed through the States' Clean Water Act-mandated programs.

In sum, Jupiter Aluminum Corp., believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

Thank you.

Sincerely,



Mark Volkmann  
EHS Director  
Jupiter Aluminum Corp.  
Jupiter Coil Coating – Beech Bottom, WV

**Mark Volkmann**  
**EHS Director**  
**Jupiter Aluminum Corporation**  
**1745 165<sup>th</sup> Street**  
**Hammond, IN 46320**  
**219-933-2752**



**From:** [Robert Brundrett](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Robert Brundrett](#)  
**Subject:** OMA Comments on ORSANCO's Pollution Control Standards – triennial review  
**Date:** Thursday, February 22, 2018 2:36:25 PM

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Via email [PCS@orsanco.org](mailto:PCS@orsanco.org)

ORSANCO

5735 Kellogg Avenue

Cincinnati, OH 45230

**Re: OMA Comments on ORSANCO's Pollution Control Standards – triennial review**

Dear Sir or Madam:

Pursuant to ORSANCO's recent public notice, The Ohio Manufacturers' Association (OMA) is hereby providing the Ohio River Valley Water Sanitation Commission (ORSANCO) with written comments in response to potential revisions to its Pollution Control Standards (PCS).

The OMA is dedicated to protecting and growing manufacturing in Ohio. The OMA represents more than 1,400 manufacturers in every industry throughout Ohio. For more than 100 years, the OMA has supported reasonable, necessary and transparent environmental regulations that protect Ohio's citizens and resources.

The OMA would like to thank ORSANCO for the opportunity to comment as the Commission continues its review and evaluation of potential alternatives and revisions to the ORSANCO Pollution Control Standards – 2015 Revision (PCS). The OMA appreciates the role ORSANCO plays in helping protect and preserve water quality in the Ohio River and collecting and providing data and information for the river's many stakeholders. This comment period offers an important opportunity to review the role of ORSANCO in light of both regulatory developments and improvements in water quality in the Ohio River since ORSANCO's inception in 1948.

#### Summary of Comments

OMA has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded. We view this as the most sensible and cost-effective approach to achieve the goals of the ORSANCO Compact. Alternative 2 Expanded is appropriate and consistent with the mandates of the ORSANCO Compact.

When ORSANCO was created in 1948 the need for water quality improvements in the Ohio River was clear and prior to ORSANCO there was no effective regulatory framework to address this critical need. Since the creation of ORSANCO, there have been numerous changes to the regulatory system most notably the passage and enactment of the Clean Water Act and a comprehensive system of federal and state water quality programs and standards developed and implemented in all of the ORSANCO Compact states. As a result of these changes, there has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other feeder streams.

Today all of the Compact States implement a federally-enforceable water quality program approved by the U.S. EPA. These programs have been effective in addressing each state's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

The water quality goals of the Compact are being effectively addressed by the Clean Water Act and the PCS no longer provide the value and impact they once did. Today, the difference between the PCS and Clean Water Act standards can and do lead to confusion for the manufacturing community, and can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations. The more valuable role for ORSANCO today is to concentrate on its scientific and technical information gathering and research. This would allow ORSANCO to provide valuable information to the states in carrying out their obligations to preserve and protect water quality under the Clean Water Act. It would also help promote and coordinate consistency among the states in the Ohio River basin.

OMA believes that Alternative 2 Expanded is the best alternative outlined by the Commission. Alternative 2 Expanded maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while at the same time removing the duplicative and resource intensive aspects of the PCS. Alternative 2 Expanded also allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

While the OMA appreciates the time and effort the Commission took in compiling these alternatives, the OMA cannot support Alternatives 3 or 4. Both of these options would consume significant amounts of time and resources, while creating duplicity and inconsistency, without likely achieving any real environmental benefit. Creating a more cumbersome regulatory regime for ORSANCO on top of the already stringent requirements of the Clean Water Act is inadvisable.

Alternative 5 which requires ORSANCO to maintain and update the PCS, but makes the standards essentially "voluntary" is an option the OMA cannot support. There is no justification for the expenses of maintaining the PCS if there is no overarching legal authority and no practical impact on water quality.

We again want to thank the Commission for the opportunity to provide comments. We look forward to working with the Commission throughout this review process, and appreciate the opportunity to convey our support for Alternative 2 Expanded. We look forward in participating in any future meetings or comment periods regarding the PCS as the Commission further evaluates the program.

Sincerely,

**Robert A. Brundrett**  
Director, Public Policy Services  
**The Ohio Manufacturers' Association**  
[rbrundrett@ohiomfg.com](mailto:rbrundrett@ohiomfg.com)  
Office (614) 629-6814  
Mobile (614) 348-1233

**From:** [John Canfield](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO - WV Chamber's Comments on 2018 Review of Pollution Control Standards  
**Date:** Thursday, February 22, 2018 7:54:02 AM

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February 21, 2018

ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

***Re: Comments on 2018 Review of Pollution Control Standards***

To Whom It May Concern:

These comments are filed on behalf of the West Virginia Chamber of Commerce's Environmental Committee ("the Chamber") in response to the 2018 Review of Pollution Control Standards ("PCS") announced by ORSANCO ("the Commission"). The Chamber is the voice of business in West Virginia and is committed to promoting regulatory reform in order to promote efficient government and thereby effective laws and regulation.

The West Virginia Chamber of Commerce's Environmental Committee has worked for many decades with the WV Department of Environmental Protection, the West Virginia Legislature, the U.S. Environmental Protection Agency, and ORSANCO on the lawful and consistent implementation of the federal Clean Water Act and the other key federal statutory environmental programs, many of which impact water resources. The Chamber's Environmental Committee works to ensure the integrity of environmental law and regulation. Our goal has always been to promote an environmental regulatory program that is effective at protecting the environment for a strong economy for our state citizens.

As articulated by the Commission, this review differs from past reviews in that it asked for input on whether ORSANCO should continue to maintain, administer, and periodically update the Pollution Control Standards or should eliminate the PCS and withdraw from the process of

maintaining and updating such standards. The state level implementation of the federal program has proven a very effective model throughout the nation. The Chamber urges ORSANCO to eliminate the Pollution Control Standards as unnecessary in light to existing state environmental regulatory programs protective of the Ohio River that are subject to federal oversight.

As commented by the Chemical Industry Advisory Committee (“CIAC”): *“While ORSANCO continues to be uniquely situated to address many issues related to the Ohio River, its Pollution Control Standards have been eclipsed by these federal and state programs, rendering ORSANCO’s current efforts to mirror federal/state water quality standards implementation duplicative and in some instances confusing for the member states and the regulated community.”* The Chamber agrees that the ORSANCO Pollution Control Standards represent an increased burden on the regulated community with little or no added value.

The Chamber supports the CIAC's conclusion that *“ORSANCO’s greatest value to be centered on its unique scientific and technical research, its coordinating role with states and stakeholders, and its Organic Detection System (ODS).”*

The report that the majority of the Commissioners believe that “Alternative #2” merits additional review by the Commission provides important insight into ORSANCO’s future and its interest in complementing today’s federal and state environmental policies and programs. The Chamber joins the CIAC in applauding the Commission’s work and preliminary conclusions.

As stated in Alternative #2:

*“In recognition of the successes of the federal Clean Water Act and the related state water pollution control programs of member states, the Pollution Control Standards (PCS) should be revised by adding a provision that recognizes that water quality standards and criteria, as well as mixing zone requirements, and other provisions of the PCS are being adequately addressed by member states in accordance with programs appropriate for implementation of the federal Clean Water Act. To the extent that all member states are operating under such programs, the Commission may conclude that it need not continue with triennial review process related to water quality criteria (and related provisions) of the PCS.”*

The Chamber is in agreement that the requirements of the Compact are being satisfied by the federal Clean Water Act, and supports Alternative #2.

The Chamber strongly supports a future ORSANCO as described by Alternative #2 and will assist in seeking appropriate public and private resources to secure the mission to protect the Ohio River.

In conclusion, the Chamber incorporates by reference the full text of the CIAC comments, urges adoption of Alternative #2, and encourages the Commissioners to implement its stated goal.

Sincerely,

***John Canfield***  
***Vice President and Counsel***  
***WV Chamber of Commerce***



**John Canfield** | Vice President & Counsel  
1624 Kanawha Boulevard East  
Charleston, WV 25311

main: 304-342-1115 • direct: 304-414-2499 • fax: 304-342-1130  
[icanfield@wvchamber.com](mailto:icanfield@wvchamber.com) • [www.wvchamber.com](http://www.wvchamber.com)

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**LG&E and KU Energy  
LLC**

**Environmental Affairs**

**220 W. Main St.**

**Louisville, KY 20232**

**[www.lge-ku.com](http://www.lge-ku.com)**

February 22, 2018

**[SENT VIA ELECTRONIC MAIL]**

Dear Sir or Madam,

LG&E and KU Energy LLC (hereinafter "LKE"), a subsidiary of PPL Corporation, appreciates the opportunity to submit comments in response to the 2018 Review of Pollution Control Standards announced by the Commission. LKE is the parent of Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU), public utilities serving more than 941,000 electricity customers in Kentucky and Virginia. LG&E and KU own and operate power generation stations located on the Ohio River in Jefferson, Trimble, and Carroll counties in Kentucky. The Kentucky Division of Water has issued Kentucky Pollutant Discharge Elimination System (KPDES) permits pursuant to the Clean Water Act for all of the LG&E and KU power generation stations. These KPDES permits are issued through a comprehensive permitting process and contain stringent discharge limitations aimed at protecting water quality in the Ohio River.

The Commission's request for comment solicits input on whether the Commission should continue to maintain, administer and periodically update its Pollution Control Standards or discontinue those undertakings. As many commenters have pointed out, the Commission was created pursuant to interstate compact in 1948 before there were any significant water quality protections at the state and federal level. With the enactment of the Clean Water Act in 1972, the U.S. Environmental Protection Agency (EPA) and the corresponding state agencies established a comprehensive regulatory framework for protection of water quality. The regulatory programs established by EPA and the states have resulted in dramatic water quality improvements in the Ohio River and other waterways across the nation.

Each of the Compact States is currently implementing a federally-enforceable water quality program approved by EPA pursuant to the Clean Water Act. Those programs include designated uses, "free from" mandates, water quality standards, wastewater

discharge requirements, mixing zone provisions, and enforcement authority. While the Commission's Pollution Control Standards were originally adopted in the absence of other regulatory standards, they are now part of a complex web of regulatory requirements found at the federal, state, and interstate levels. Today, the state and federal programs adopted pursuant to the Clean Water Act provide an effective mechanism for the protection of water quality in the Ohio River.

The Commission's Pollution Control Standards are largely duplicative of water quality standards adopted by the States pursuant to the Clean Water Act. However, on occasion, the Commission's Pollution Control Standards may differ from corresponding state standards which have been approved by EPA. At best, this results in confusion for the regulated community. In some cases, it results in NPDES permit conditions that are more stringent than state standards, without demonstrable environmental benefit. As a practical matter, it is difficult for the regulated community to address these inconsistencies through the permitting process which occurs at the state level.

Therefore, in recognition of the effective regulatory programs that have been adopted at the state and federal level pursuant to the Clean Water Act, LKE believes that the adoption of the Commission's Alternative 2 – discontinuing the Commission's Pollution Control Standards – is both appropriate and consistent with the mandates of the ORSANCO Compact. Eliminating duplicative regulatory initiatives will allow the Commission to enhance its ongoing efforts in the areas of scientific and technical information gathering and research. In closing, we urge the Commission to adopt Alternative 2 and implement its stated goal.

Sincerely,

Gary Revlett

Director, Environmental Affairs

LG&E and KU Energy LLC

T (502) 627-4621

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**From:** Hollander, Bill H.  
**Sent:** Thursday, February 22, 2018 3:50 PM  
**To:** PCS@orsanco.org  
**Cc:** Ethridge, Kyle  
**Subject:** Ohio River Pollution Control Standards Review

Dear Sir or Madam:

I am the Metro Councilman for Louisville's District 9, which borders the Ohio River and includes Louisville Water's Zorn Pump Station. I am writing to express my opposition to the proposal by ORSANCO to amend its Pollution Control Standards (PCS) by eliminating water quality standards and criteria, as well as mixing zone and wastewater discharge requirements, from the rules, and by making changes to other sections of the PCS.

My reading of the minority report indicates that there are nearly two hundred parameters among the six signatory states and EPA, for which ORSANCO has a criteria but the state or EPA does not. If that is true, how can anyone conclude that the ORSANCO standards are redundant? I also agree with the minority report that we need an independent body that "is able to research, develop, propose, and adopt standards tailored to the specific needs of the river in an atmosphere that stresses sound science and data-driven policy." In Louisville, we rely on water from the Ohio River and we count on ORSANCO and its PCS to help keep it clean.

Finally, the public process for the review seems flawed. While I now realize that ORSANCO announced the review on January 10, I was not informed about it until I read an article in the Courier-Journal last night, three days before the comment period ended. That was too late to inform my constituents in our weekly newsletter. ORSANCO should make additional efforts for more public notice of a review of this nature, if it actually wants broad public input. The possibility of a second comment period, after a recommendation in June, is wholly inadequate.

Thank you for considering these comments and , hopefully, providing for additional public input on this important matter.

Regards,

Bill Hollander



**Councilman Bill Hollander** | Ninth District Councilman  
Louisville Metro Council  
601 W. Jefferson Street | Louisville, KY 40202  
d: (502) 574-1109

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**From:** [Kurdila, Julianne](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Cc:** [Nagel, Keith](#); [Vansumeren, Timothy](#); [Pozar, Aaron A](#); [Addair, John D](#)  
**Subject:** Comments on PCS (Triennial Review)  
**Date:** Friday, February 23, 2018 7:40:21 AM

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Via email: [PCS@orsanco.org](mailto:PCS@orsanco.org)  
ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

Dear Madam/Sir:

ArcelorMittal Weirton LLC and Arcelor Mittal Princeton (ArcelorMittal) are pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). ArcelorMittal appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed.

#### Summary of Comments

ArcelorMittal has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the Federal Water Pollution Control Act ("Clean Water Act") and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, where there is often no effective way to question or

challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

ArcelorMittal believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### Additional Information

ArcelorMittal believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. ArcelorMittal believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the Pollution Control Standards are no longer necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, ArcelorMittal notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by State standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. Adoption of the PCS provides no due process in that there is no opportunity to challenge the appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.
- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water

quality criteria are being achieved throughout the River with a small number of exceptions, which are being addressed through the States' Clean Water Act-mandated programs.

In sum, ArcelorMittal believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

Given the complexity of the PCS and state water quality standards and implementation procedures, ArcelorMittal believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit, and are not necessary to meet the goals of the ORSANCO Compact. In a time of limited resources and a need for greater cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. ArcelorMittal also does not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

Sincerely,

Julianne Kurdila

**Julianne Kurdila** | Lead Specialist, Environmental Compliance & Policy

**ArcelorMittal USA** | 4020 Kinross Lakes Parkway, Richfield, OH 44286

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**From:** [Madeline Fleisher](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Environmental Organization comments on 2018 Pollution Control Standards  
**Date:** Friday, February 23, 2018 2:44:24 PM

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**To Whom It May Concern:**

The Environmental Law & Policy Center, Hoosier Environmental Council, Kentucky Waterways Alliance, Lower Ohio River Waterkeeper, Ohio Environmental Council, Ohio River Foundation, Ohio Valley Environmental Coalition, Sierra Club Cumberland Chapter (Kentucky), Sierra Club Hoosier Chapter, Sierra Club Ohio Chapter, Three Rivers Waterkeeper, Valley Watch, and West Virginia Rivers Coalition (collectively, “Environmental Organizations”), submit these comments to the Ohio River Valley Water Sanitation Commission (“ORSANCO”) regarding the 2018 review of ORSANCO’s Pollution Control Standards (“PCS”). In its solicitation of comments, ORSANCO indicated that a majority of Commissioners support withdrawing from its role in maintaining, administering, and periodically updating the current Pollution Control Standards. The Environmental Organizations strongly oppose that proposal and urge ORSANCO to continue in its role as a source of consistent and expert input on appropriate pollution control standards for the Ohio River. We therefore ask the Commission to reject proposed Alternative 2 in favor of an approach that, consistent with Alternatives 3 and 4, allows ORSANCO to continue to apply its expertise and unique interstate perspective to protect water quality for the entire Ohio River.

**I. BACKGROUND**

**A. ORSANCO’s History and Authority**

The Ohio River flows almost a thousand miles through six states, with more states included in its drainage basin. In 1948, eight of those states – Illinois, Indiana, Kentucky, New York, Ohio, Pennsylvania, Virginia, and West Virginia – signed the interstate compact that created ORSANCO and established the commitment of those states to “enact any necessary legislation to enable each such State to place and maintain the waters of said basin in a satisfactory sanitary condition, available for safe and satisfactory use as public and industrial water supplies after reasonable treatment, suitable for recreational usage, capable of maintaining fish and other aquatic life, free from unsightly or malodorous nuisances due to floating solids or sludge deposits, and adaptable to such other uses as may be legitimate.” The Compact provides ORSANCO with authority to promulgate rules and issue orders to ensure that “[a]ll industrial wastes discharged or permitted to flow into the aforesaid waters shall be modified or treated, within a time reasonable for the construction of the necessary works, in order to protect the public health or to preserve the waters for [these uses] . . . to such degree as may be determined to be necessary by the Commission after investigation, due notice and hearing.”

As early as 1949, ORSANCO began putting in place water treatment standards to carry out this obligation. In 1972, Congress enacted the “Clean Water Act” (“CWA”) as we know it today, and in 1984 ORSANCO revised its standards to mirror the Clean Water Act structure of designated uses, water quality criteria to protect those uses, and effluent limitations (including mixing zone requirements and a variance procedure). ORSANCO has since reviewed and updated these Pollution Control Standards every three years.

**B. The 2018 Pollution Control Standards Proposal**

In 2014, ORSANCO established the Ad Hoc Committee on Water Quality Standards Implementation to review how the Pollution Control Standards were being implemented. In 2015 ORSANCO directed the committee to evaluate options relating to ORSANCO’s future role in setting water quality standards. The committee subsequently formulated five alternative proposals for ORSANCO’s role going forward. These alternatives can be grouped into two categories, with Alternatives 1, 2 and 5 calling for a markedly reduced role and Alternatives 3 and 4 calling for a more focused application of ORSANCO’s current standard-setting approach. These five alternatives, and the relevant considerations for each, are described in ORSANCO’s Water Quality Standards Alternative Summary.

Alternative 1 would “[e]liminate the Pollution Control Standards Program and defer to the requirements of the Clean Water Act and member state water quality regulations.” The considerations listed in favor of this alternative are that it would potentially “free up resources” to be reprogrammed to other ORSANCO activities, and would also avert the problem that at least one Ohio River state cannot adopt ORSANCO’s Pollution

Control Standards by reference.

Alternative 2 would suspend the triennial review process for the Pollution Control Standards and deem all states in compliance with the Standards to the extent they are implementing approved programs under the federal Clean Water Act. The description of this alternative presumes that the Pollution Control Standards are redundant and that resources currently dedicated to the PCS could be “redirected to other Commission activities” such as “assessments of the water quality and biological integrity of the water, public out-reach, spill detection and response.”

Alternative 3 would “[u]tilize a cost effective approach to finalize uniform WQS rules for the Ohio River by tasking ORSANCO to take the lead in order to eliminate duplication of efforts among six states and save resources. Also, as a starting point, utilize work done by USEPA to develop WQS to avoid conducting basic research.” This proposal would be aimed at protecting water quality and promoting consistency among states, while reducing the overall costs of developing water quality standards and allowing states flexibility to adopt alternative standards when appropriate. It would also enable ORSANCO to continue carrying out the work plan requirements for its section 106 grant from U.S. EPA, which currently includes development of numeric pollution control standards for the Ohio River and constitutes 50% of ORSANCO’s budget.

Alternative 4, similar to Alternative 3, would focus on harmonizing water quality standards across the Ohio River. ORSANCO would look at “standards on an individual basis as warranted,” to ensure coordinated implementation to “restore and maintain the quality of and protect uses of the Ohio River.” This approach would be carried out by the NPDES Committee, working with staff and member states on permitting and certification processes “with a goal of assuring that protection and achievement of pollution controls needed to maintain those uses occurs throughout the Ohio River system.” Even where a state has not formally adopted an ORSANCO standard, the Commission will work with the state so that any permit “achieves a comparable level of protection of the designated uses.”

Finally, Alternative 5 would alter the nature of the PCS, from binding standards to simple recommendations that member states should consider in developing and issuing permits. This alternative rests on the proposition that “the process of promulgating the PCS is redundant of member states’ triennial review of water quality standards.”

ORSANCO has identified Alternative 2 as its “preferred alternative” for consideration in the 2018 PCS review.

## **II. DISCUSSION**

The Commission’s preference for Alternative 2 appears to rest on two primary grounds: first, that it will save resources for ORSANCO to eliminate the Pollution Control Standards from its workload; and second, that the Pollution Control Standards do not serve a significant function in protecting the Ohio River. Neither of these rationales has been adequately explored or supported with detailed facts.

It is entirely reasonable for ORSANCO to be concerned about making the most of its limited financial resources. However, in considering the best use of those resources, it is important to keep in mind that the ORSANCO Pollution Control Standards play an important role in preserving state resources by allowing standards for at least some pollutants, as well as the overall assessment of whether the Ohio River is suffering any serious water quality problems, to be dealt with across the entire river rather than on a state-by-state basis. If ORSANCO were to eliminate the PCS, Ohio River states might well be worse off in the long run without an efficient forum for establishing and updating standards for all pollutants, and an irreplaceable venue for determining a river-wide approach to particularly problematic pollutants.

### **A. Individual Pollutants**

ORSANCO has provided summary-level data from a 2015 staff survey of state water quality standards versus ORSANCO’s Pollution Control Standards, which shows that there are significant discrepancies among state standards. While Alternative 2 presumes that these discrepancies are meaningless and that the PCS and state water quality standards are redundant, that presumption is not backed up by any factual analysis. Moreover, Alternative 2 also assumes that if the PCS were eliminated, ORSANCO could redirect the resources used to maintain the PCS with no adverse effects on ORSANCO or its member states. That reasoning likewise lacks

any detailed foundation.

## 1. The Problem of State-ORSANCO Disparities

The ORSANCO analysis indicates that, for the pollutants compared as of 2015:

- There are 188 instances in which ORSANCO has criteria but a member state environmental agency does not;
- There are 252 instances in which member state agencies have parameters that are more than 10% less stringent than ORSANCO's criteria;
- There are 405 instances in which the member state agencies are within 10% of, or more stringent than, the ORSANCO criteria.
- There are 342 instances in which the member state has criteria but ORSANCO does not.

In other words, based on this survey there are 440 pollutants for which the ORSANCO standard is either more stringent than a member state standard or there simply is no state standard. By comparison, there are 747 instances where the state standard is more stringent than or equivalent to the ORSANCO standard, or ORSANCO lacks a standard for the relevant pollutant. Overall, this represents 1187 points of comparison, with 440 – or almost 40% -- where the ORSANCO standard is filling in a gap in state standards or providing a more protective standard.

ORSANCO provided tables containing the information underlying this comparison on February 20, 2018, four days before the deadline for comment, and therefore we have not undertaken a thorough analysis of individual water quality criteria. However, even an initial survey of the data shows that there are concerning inconsistencies and gaps among the state standards. For example, the human health criteria table shows that as of 2015, Ohio and Kentucky both had limits of 10 micrograms per liter for arsenic – significantly higher than ORSANCO's 0.1 microgram per liter criterion. Similarly, Indiana and Ohio both apparently have criteria for polychlorinated biphenyls ("PCBs") that are less stringent than ORSANCO's, which is particularly notable given that the Ohio River's fish consumption use is partially impaired by PCB contamination. While the explanation for these discrepancies is unknown, it shows that some states' standards are not as protective as those in other Ohio River states. Without an ORSANCO standard providing uniformity, there is potential for polluting industries to migrate to states with less restrictive criteria, leaving those states downstream or across the river to deal with their pollution without gaining any of the economic benefits.

The Clean Water Act does not provide an efficient tool for states to address such discrepancies on their own. The Supreme Court confirmed in *Arkansas v. Oklahoma*, 503 U.S. 91 (1992), that the U.S. Environmental Protection Agency ("U.S. EPA") has the authority to consider effects on other states water quality standards when reviewing draft permits under Clean Water Act section 402, 33 U.S.C. § 1342. However, that authority must be applied on a permit-by-permit basis, and is discretionary with U.S. EPA, meaning that policing of interstate discharges through this mechanism would be an onerous and potentially sporadic process without any certain outcome. ORSANCO's authority to set prospective, uniform standards for the Ohio River is a unique tool not available under the Clean Water Act. Even to the extent states do not directly incorporate the ORSANCO PCS into their water quality criteria, but rather apply them to individual sources through the state permitting process, that is still an improvement over the cumbersome and likely ineffective process available under the CWA.

In addition to inconsistent standards, there are some standards where – at least according to the ORSANCO survey – the states have simply left it to ORSANCO to establish criteria. These include gross total alpha, copper, cyanide, fluoride, methylmercury, nitrites, and others. If ORSANCO were to eliminate its Pollution Control Standards, states without standards for those pollutants would presumably have to expend time and resources on filling in those gaps to ensure protection of their portions of the Ohio River.

Overall, this comparison suggests that the ORSANCO standards play a central role in ensuring consistent and up-to-date pollution standards for the Ohio River. Meanwhile, the current proposal provides no estimate, or even description, of what state work would be necessary to make up for the absence of the PCS if they were eliminated. Comments from the POTW Advisory Committee underline this concern, with one commenter pointing out that: "During this time of 'stressed' budgets and limited resources, duplication of efforts is definitely a major concern of many organizations at all levels of government (federal, state and local), as well

as the public (tax/rate payers) that we serve. Under any future scenario that minimizes PCS activities, it will be important for ORSANCO to continue to provide a forum to discuss water quality standards and to promote consistency among the states to ensure the protection of the Ohio River as a shared resource.” A significant problem with Alternative 2, or any approach that eliminates periodic consideration of river-wide water quality criteria, is the danger that in the absence of ORSANCO standards, inconsistencies will arise without such an adequate forum.

## **2. The Value of River-Wide Water Quality Criteria**

As discussed above, there are clearly significant inconsistencies among state standards for the Ohio River that bear further investigation before ORSANCO can draw any conclusions about the potential costs for states to make up for the loss of the PCS. Meanwhile, the affirmative value of river-wide criteria is clear. There have already been a number of instances where ORSANCO’s Pollution Control Standards have and will continue to play an important role in protecting water quality in the Ohio River.

For example, over the last decade ORSANCO has acted to address a growing concern with levels of Total Dissolved Solids (“TDS”) in the Ohio River, by using an expedited PCS process in 2012 to reinstate a (previously eliminated) limit of 500 mg/L at drinking water intakes in order to protect drinking water quality. ORSANCO staff have subsequently conducted valuable research regarding background levels of TDS in order to support translation of that standard into appropriate permit limits. *See* ORSANCO, Characterization of Dissolved Solids in the Ohio River and Selected Tributaries (Feb. 2014), *available at* <http://www.orsanco.org/wp-content/uploads/2016/12/Characterization-of-Dissolved-Solids-in-the-Ohio-River-and-Selected-Tributaries.pdf>. This is an instance where ORSANCO, because of its triennial PCS review process, was well-positioned to react swiftly to a unique Ohio River problem and provide drinking water protection along the entire river, backed up by sound science and expertise. Without the PCS process, it is not clear when affected states – themselves facing budget constraints – might have dealt with this problem and what resources they might have to use to do so. The Water Users Advisory Committee comments similarly identify pollutants such as ammonia, E. coli, temperature, and others as ones where ORSANCO’s standards provide important, uniform water quality protection across the entire Ohio River to the benefit of states as well as their citizens.

Even where addressing a given pollutant is simply a matter of adopting water quality criteria issued by U.S. EPA, ORSANCO can do so efficiently in order to bring the PCS up-to-date for the entire Ohio River at one time. As one example, ORSANCO has repeatedly indicated its readiness to adopt an updated U.S. EPA aquatic life criterion for selenium. Now that the federal criteria have been issued (in summer 2016), ORSANCO can do so. Notably, some states will not be conducting triennial reviews in which they would address this development for some time – for instance, West Virginia adopted fish tissue limits based on the draft criteria in 2016, but apparently will not address the water column limits in the final criterion until its next triennial review in 2020. By addressing this issue in its 2018 PCS review, ORSANCO will ensure those additional protections are in place significantly earlier. Moreover, in addressing this and other federal criteria, ORSANCO can determine on a river-wide basis whether those criteria are appropriate for the Ohio River rather than leaving individual member states to do so, with potentially disparate results.

Looking ahead, there are emerging pollution issues where ORSANCO’s PCS may similarly provide an important avenue to bring the expertise of Commission staff to bear on preserving water quality across the entire Ohio River. In recent years, ORSANCO has been engaged in trying to determine a numeric criterion for nutrient pollution in the Ohio River. This work is timely given that a massive algal bloom occurred on the river in the summer of 2015, and studies show climate change is driving temperature and precipitation changes that may increase the frequency and severity of such algae outbreaks. U.S. Army Corps of Engineers, OHIO RIVER BASIN– Formulating Climate Change Mitigation/Adaptation Strategies through Regional Collaboration with the ORB Alliance 47 (May 2017), *available at* [http://www.corpsclimate.us/docs/USACE%20Ohio%20River%20Basin%20CC%20Report\\_MAY%202017.pdf](http://www.corpsclimate.us/docs/USACE%20Ohio%20River%20Basin%20CC%20Report_MAY%202017.pdf). Although ORSANCO’s analysis has not yet identified an appropriate numeric criterion, this is a looming threat to the drinking water, recreation, and aquatic life uses of the Ohio River that ORSANCO cannot ignore. Moreover, as shown in ORSANCO’s efforts to date, the Commission’s staff has the relevant expertise to adequately and efficiently address this complex issue on a river-wide basis. The alternative might well be for states to waste resources as the question of numeric nutrient limits comes up on a state-by-state or even permit-by-permit basis.



Finally, ORSANCO is currently considering a study of the bioaccumulative pollutants Perfluorooctanoic Acid (“PFOA”) and Perfluorooctane Sulfonate (“PFOS”), initially identified as of potential concern in a 2010 report on emerging contaminants (<http://www.orsanco.org/wp-content/uploads/2017/01/A-Screening-Study-Investigating-the-Presence-of-Emerging-Contaminants-within-the-Ohio-River-Basin.pdf>). Recently, as noted in ORSANCO’s October 2017 TEC meeting minutes, PFOA contamination of drinking water in the Ohio River watershed has been the subject of significant litigation, and U.S. EPA has released health advisory levels for both contaminants. Although PFOA and PFOS are being largely phased out, replacement chemicals with similar properties may continue to pose a threat to Ohio River water quality. Once ORSANCO determines the scope and seriousness of this issue, it may well be appropriate to address this type of pollution through the PCS.

We could list many more instances of ORSANCO’s valuable work in connection with the Pollution Control Standards. However, these examples are sufficient to highlight the key questions that Alternative 2 fails to address:

- Will eliminating the Pollution Control Standards actually significantly reduce ORSANCO’s workload? A number of the efforts above, although occurring in conjunction with ORSANCO’s PCS reviews, fall within its larger mission of providing expert scientific monitoring and analysis of water quality issues in the Ohio River. If the PCS were not in place, it seems likely that ORSANCO would still have a role to play in addressing issues such as identification of numeric nutrient criteria or analysis of total dissolved solid levels. Absent a detailed consideration of what work ORSANCO could in fact abandon if the PCS were eliminated, the answer to this question is unclear.
- If eliminating the PCS does truly reduce ORSANCO’s activities, will it simply shift work to ORSANCO member states? For pollutants like Total Dissolved Solids, there is a clear need for a limit and analysis of how to apply that limit to sources. ORSANCO is currently providing that information in the context of the PCS. Eliminating that standard, or precluding ORSANCO from adopting such standards in the future, may simply force each state to individually duplicate the Commission’s work while introducing the possibility of more disparities among water quality criteria the Ohio River states. As several other commenters have noted, this shift in workload may also result in a commensurate reduction in federal or other funding.
- Will adopting Alternative 2 prevent ORSANCO from addressing emerging pollution issues in a timely manner? Although the Commission could technically resume its role in setting standards, the regular triennial review process encourages all stakeholders to actively consider and address whether existing standards are adequately protecting the Ohio River’s water quality. Without that forum for consideration of both urgent problems like TDS and developing issues like nutrient pollution, inadequate or disparate state-level regulation could easily go unaddressed.
- Are there opportunities to increase the efficiency of the PCS process without eliminating ORSANCO’s standards altogether? As noted above, there are a number of pollutants for which the PCS and state standards are similar, as well as a number where there are significant differences. We are sensitive to ORSANCO’s concerns regarding whether its PCS work is redundant to ongoing state activities under the Clean Water Act. One sensible way to potentially streamline the PCS reviews would be to focus on promoting uniform standards across the Ohio River, especially for pollutants where U.S. EPA has not provided any federal criteria. This would essentially be a combination of Alternatives 3 and 4.

These significant unanswered questions show that the preference for Alternative 2 is not based on a sufficient exploration of the important issues involved in potentially eliminating a role that ORSANCO has played for decades. Fundamentally, we believe that the current PCS process is in fact efficient and focused on the areas where ORSANCO is needed most. Nevertheless, if ORSANCO does decide to refine its approach to the PCS, we urge the Commission to ensure it avoids throwing the baby out with the bathwater and preserves the PCS as a valuable tool for providing efficient and effective water quality standards across the whole Ohio River.

## **B. Water Quality Assessment for the Ohio River**

Sections 305(b) and 303(d) of the federal Clean Water Act require each state to conduct an assessment of the status of its waters every two years and make a determination as to whether those waters are “impaired” by any

pollutant. 33 U.S.C. § 1315(b); 33 U.S.C. § 1313(d); 40 C.F.R. §§ 130.7, 130.8. ORSANCO has prepared a biennial section 305(b) assessment for the Ohio River ever since 2002, offering an expert view “of the degree to which the river supports each of its four designated uses: warm water aquatic life; public water supply; contact recreation; and fish consumption.” Although ORSANCO’s section 305(b) report does not substitute for each state’s duty to assess and determine the impairment status of the portions of the Ohio River within its jurisdiction, the Ohio River states have traditionally relied heavily on ORSANCO’s work in carrying out these Clean Water Act obligations. Often, states simply adopt ORSANCO’s evaluation and conclusions wholesale in determining the impairment status of the Ohio River.

If ORSANCO adopts Alternative 2, this approach will no longer be viable. Currently, ORSANCO’s water quality assessment in its section 305(b) reports is based in large part on application of the numeric criteria included in the Pollution Control Standards. If these criteria are eliminated, ORSANCO will either have to confront the problem of applying potentially hundreds of inconsistent state criteria in assessing the Ohio River’s water quality, and may end up reaching inconsistent conclusions as to impairment status of the river based on those criteria. Alternatively, it may no longer make sense for ORSANCO to conduct the 305(b) assessment for the Ohio River, merely shifting that work to individual states and probably losing efficiencies along the way. That scenario could also result in a reduction in ORSANCO’s funding.

Finally, we note that while these concerns represent our view of the existing information, we requested that ORSANCO share the “Report of the ORSANCO Ad Hoc Water Quality Standards Implementation Committee”, dated May 11, 2015, referenced in some of the materials provided for comment. ORSANCO provided a copy of that report on February 23, the day before the comment deadline. Although we have not had adequate time to review the report for purposes of these comments, we look forward to providing ORSANCO with supplemental comments as appropriate.

### **III. CONCLUSION**

A proposal for ORSANCO to step back from standards it has set in their current form for more than two decades is obviously a significant one. Before the Commission determines the wisest course of action, it must conduct further analysis of the key assumptions here: that the Pollution Control Standards provide no additional water quality protection beyond state standards under the Clean Water Act, and that reducing or eliminating the Pollution Control Standards review process would free up resources without any burden-shifting to states or impacts to funding. While those assumptions may prove true to some extent, we believe the appropriate response is to narrow the focus of ORSANCO’s Pollution Control Standards process along the lines of Alternatives 3 and 4. That approach would keep ORSANCO in the role of doing what it does best: providing significant scientific expertise and a basin-wide perspective on protecting the Ohio River.

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Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

Koppers Inc. is pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). Koppers Inc. appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed.

### Summary of Comments

Koppers Inc. has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in

addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

Koppers Inc. believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### Additional Information

Koppers Inc. believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. Koppers Inc. believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, Koppers Inc. notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.

- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. The process for adoption of the PCS provides no opportunity to challenge the appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.
- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water quality criteria are being achieved throughout the River with a small number of exceptions (e.g., fecal coliform) which are being addressed through the States' Clean Water Act-mandated programs.

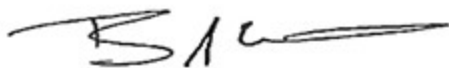
In sum, Koppers Inc. believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

Given the complexity of the PCS and state water quality standards and implementation procedures, Koppers Inc. believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit, and are not necessary to meet the goals of the ORSANCO Compact. In a time of limited resources and a need for greater

cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. Koppers Inc. also does not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

Sincerely,

**KOPPERS INC.**



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February 23, 2018

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Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

The Kentucky Chamber of Commerce (the Kentucky Chamber) and Greater Louisville, Inc. (GLI) appreciate the opportunity to submit comments on the potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). The Kentucky Chamber and GLI appreciate the role played by ORSANCO since 1948 in protecting and preserving water quality in the Ohio River and in collecting and disseminating water quality data and information on the river. We welcome the opportunity to provide input as the Commission assesses the role of ORSANCO in light of the significant regulatory developments that have occurred since 1948, including the enactment of the federal Clean Water Act and related state requirements, and the consequent improvements in water quality in the Ohio River. This is particularly important in a time of limited governmental budgets, which reinforce the need to eliminate unnecessary duplication. The Commission should ensure that the goals of the ORSANCO Compact are being met while not imposing unnecessary costs or complexities on business and local communities that hinder the economic health of the ORSANCO Compact States.

About the Kentucky Chamber and GLI

- The Kentucky Chamber of Commerce is the major catalyst, consensus builder, and advocate for a thriving economic climate in the Commonwealth of Kentucky. The Kentucky Chamber of Commerce supports a prosperous business climate in the state and works to advance Kentucky through advocacy, information, program management and customer service in order to promote business retention and recruitment. Representing the interests more than 68,000 employers across the Commonwealth, the Kentucky Chamber advocates for growth-oriented tax reform, infrastructure investment, workforce solutions, a sensible regulatory approach that satisfies the following criteria: scientific validity, technical feasibility and economic rationality, and a sustainable state government to ensure Kentucky is positioned for growth and opportunity.

- As the Greater Louisville region's largest convener of business leadership, GLI leads economic and global outreach strategies focused on business attraction; nurtures the entrepreneurial eco-system; and champions the development of the community's talent base. As the voice of Greater Louisville's business community, GLI advocates for a pro-business environment and facilitates businesses engagement on issues that impact regional competitiveness, such as sensible regulatory standards and compliance.



## Comments

The Kentucky Chamber and GLI support the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact while recognizing the realities of the current regulatory environment. ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since then, the federal Clean Water Act has been enacted and a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all the ORSANCO Compact States. Today, those programs and standards are addressing the goals of the Compact, making the continued maintenance of a duplicative, and sometimes contradictory, set of ORSANCO Pollution Control Standards questionable at best.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, “free from” mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those standards and requirements are designed to support each State’s streams as aquatic habitats, as well as their uses for recreation and drinking water. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.

Whereas the ORSANCO PCS may have been necessary in 1948, before the enactment of the Clean Water Act, they are now duplicative of the comprehensive federal and state water quality programs required under the Clean Water Act. Today, the goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added environmental benefit. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create unnecessary complexity in the permitting process. Moreover, there is often no effective way to question or challenge the appropriateness or applicability of the PCS in specific permitting situations. This can lead to the imposition of unnecessary, and unnecessarily stringent, permit requirements that serve no real purpose in protecting the water quality of the Ohio River, and that create an economic disadvantage for the communities and businesses that are located along the Ohio River.

Implementation of the PCS also creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.

At a time when our States are looking for ways to promote community sustainability and economic growth, and to encourage investment in domestic industry, the ORSANCO Compact States can ill afford to impose an environmentally unnecessary and costly regulatory regime on the communities located along the Ohio River. Rather, the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact is to concentrate on its scientific and technical information gathering and research. Resources currently devoted to the PCS

program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.

The Kentucky Chamber and GLI believe that the adoption of Alternative 2 Expanded is entirely consistent with the requirements of the ORSANCO Compact. The ORSANCO Compact establishes certain limited, baseline treatment requirements for discharges of sewage and industrial wastes, but grants discretion to the Commission to determine if additional treatment standards are needed to protect public health or to preserve the waters for other legitimate purposes. Beyond these baseline requirements, the Commission is given wide latitude to determine whether additional pollution control standards are necessary, or whether ORSANCO must even adopt its own regulations or pollution control standards to meet the minimal goals of the Compact. The Commission is well within its rights to determine – after investigation, due notice, and hearing – that the Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. If the Commission determines that the Compact's goals of protecting public health and preserving other legitimate purposes are being satisfied by the States' implementation of the Clean Water Act permitting programs, then the PCS are simply duplicative and an unnecessary burden on the States and regulated businesses.

In sum, the Kentucky Chamber and GLI believe that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

The Kentucky Chamber and GLI do not support Alternatives 3 and 4. Either of those alternatives would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, and would not likely yield much in the way of real environmental benefit. And they are not necessary to meet the goals of the ORSANCO Compact. Creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. The Kentucky Chamber and GLI also do not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There is no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

\* \* \*

Thank you again for the opportunity to comment on these important revisions. The Kentucky Chamber and GLI encourage the Commission to adopt Alternative 2 Expanded so that ORSANCO can play a more effective and efficient role in protecting and preserving the water quality of the Ohio River.

Very truly yours,



**Kate Shanks | Director of Public Affairs**

Kentucky Chamber of Commerce

464 Chenault Road

Frankfort KY 40601

P: 502-848-8788 c: 502-319-1806

**From:** [Cress, Rusty](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Lee Lingo](#)  
**Subject:** PCS Comments  
**Date:** Friday, February 23, 2018 12:36:56 PM

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Kentucky Association of Manufactures/ Kentucky Chemical Industry Council

February 23, 2018

ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Re: 2018 Review of Pollution Control Standards

Dear Sir or Madam:

The below comments are provided on behalf of the Kentucky Association of Manufacturers (“KAM”) and its Kentucky Chemical Industry Council (“CIC”). Established in 1911, KAM is the Commonwealth of Kentucky's oldest industrial trade association. KAM's CIC represents chemical manufacturers and allied industries within the Commonwealth. The associations' mission is to raise the prosperity of all Kentuckians by protecting and growing the Commonwealth's economic engine, manufacturing. KAM and CIC seek to enhance the competitiveness of manufacturers by shaping a legislative and regulatory environment conducive to economic growth, including a sound infrastructure for the delivery of affordable energy and raw materials. KAM and CIC appreciate the opportunity to submit the following comments regarding the 2018 Review of Pollution Control Standards announced by the Commission.

In this review, the Commission asked for input on whether ORSANCO should continue to maintain, administer, and periodically update the Pollution Control Standards or should eliminate the Pollution Control Standards and withdraw from the process of maintaining and updating such standards. KAM and CIC believe that the state level implementation of the federal program has proven a very effective model throughout the nation. The associations urge ORSANCO to eliminate the Pollution Control Standards as unnecessary due to the thriving existing state environmental regulatory programs, along with federal oversight, that are protective of the Ohio River.

KAM and CIC agree with the Chemical Industry Advisory Committee's (“CIAC”) assertion that “[w]hile ORSANCO continues to be uniquely situated to address many issues related to the Ohio River, its Pollution Control Standards have been eclipsed by these federal and state programs, rendering ORSANCO's current efforts to mirror federal/state water quality standards implementation duplicative and in some instances confusing for the member states and the regulated community.” In addition, the associations concur in the CIAC conclusion that “ORSANCO's greatest value to be centered on its unique scientific and technical research, its coordinating role with states and stakeholders, and its Organic Detection System (ODS).”

In sum, KAM and CIC support Alternative #2 from the PCS review materials, which includes the following statement:

In recognition of the successes of the federal Clean Water Act and the related state water pollution control programs of member states, the Pollution Control Standards (PCS) should be revised by adding a provision that recognizes that water quality standards and criteria, as well as mixing zone requirements, and other provisions of the PCS are being adequately addressed by member states in accordance with programs appropriate for implementation of the federal Clean Water Act. To the extent that all member states are operating under such programs, the Commission may conclude that it need not continue with triennial review process related to water quality criteria (and related provisions) of the PCS.

KAM and CIC urge the adoption of Alternative #2 and encourage the Commissioners to implement its stated goal.

Sincerely,

Lloyd R. ("Rusty") Cress, Jr., Exec. Dir.  
Kentucky Chemical Industry Council

**Dinsmore**

**Lloyd R. ("Rusty") Cress, Jr.**  
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**From:** [Pritchard, Kim \(NSGAL\)](#)  
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**Cc:** [Eaton, Chad \[Corp\]](#); [Miller, Tom \(GM\)\[Corp\]](#); [Bedell, Chris \[DJJ\]](#); [Phillips, Sam \[Corp\]](#); [Underwood, Patrick N. \(NSGAL\)](#); [Matt Joy](#)  
**Subject:** Comments on ORSANCO's PCS-Triennial Review  
**Date:** Friday, February 23, 2018 4:06:41 PM

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Subject: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

Dear Sir or Madame:

Nucor Steel – Gallatin (Nucor – Gallatin or Nucor) is submitting these comments regarding the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). As a long-time supporter of the ORSANCO River Sweep, Nucor appreciates this opportunity to provide these comments and believes that these comments will assist the Commission in developing and implementing protective, efficient and effective standards for the Ohio River.

Nucor– Gallatin is engaged in the manufacture of flat sheet steel coils and products and employs over 450 team members in and around Gallatin County, Kentucky. As we are located on the Ohio River, Nucor relies on the river to provide water that is of high quality and meets or exceeds industrial uses for its operations. Hence, Nucor has a vested interest in the protection of the uses afforded by the ORSANCO Compact and by state and federal programs. Given this position, Nucor is uniquely qualified to provide comments regarding the proposed alternatives offered by the Commission.

### General Comments

- Nucor has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in light of the current legal and regulatory environment. Since the creation of ORSANCO, a multitude of federal and state programs have been established to protect water quality through the passage of the Clean Water Act and the state programs established and authorized under the Act. As you are aware, all of the states that are party to the Compact have promulgated regulations imposing standards on the discharge of effluent from industrial operations which are protective of the Ohio River. The result has been a dramatic improvement in the quality of the Ohio River and its tributaries.

The state programs are protective of the very same designated uses targeted by the Compact and include "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. These programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water. Finally, states are required to undertake a triennial review of waterbodies to determine whether specific uses are met within particular river segments and adjust water quality standards and criteria as necessary. This is a much more in-depth and segment-specific review than can be afforded by the more generalized standards set forth under the Compact.

While the pollution control standards first established by ORSANCO may have been necessary at the outset of the Compact, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. States must set surface water quality standards based on whether the Ohio River meets designated uses and impose technology-based and water quality-based effluent limitations specifically tailored to individual dischargers through an established permitting process.

Through these mechanisms, the water quality goals of the Compact are being effectively addressed by the Clean Water Act and the state programs authorized by the Act, and the PCS provide little or no added value. Furthermore, state-mandated standards and permit conditions take into account local and discharge-specific factors, which the Compact simply cannot, and are likely at least as stringent as any standards set forth by ORSANCO. Finally, due process considerations are addressed in the permitting context as permittees, and the public in general, are afforded the opportunity to challenge the appropriateness or applicability of state-established water quality standards and state-issued permit terms and conditions.

Nucor believes that the adoption of “Alternative 2 Expanded” is both appropriate and consistent with the mandates of the ORSANCO Compact. Nucor believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the numeric Pollution Control Standards are no longer necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO’s By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact’s goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States’ implementation of the Clean Water Act permitting programs.

For the reasons outlined above, Nucor does not believe that Alternatives 3 or 4 would be an efficient or protective use of ORSANCO resources. Generalized standards issued under these alternatives would be duplicative in some cases, inconsistent in others, and not as protective in yet others. The states are in the best position to take into account site- and segment-specific determinations concerning protection of the Ohio River. ORSANCO’s resources would be better utilized assessing water quality and the biological integrity of the Ohio River, engaging in public outreach and assisting in spill detection and response. Similarly, Alternative 5 is not an efficient use of ORSANCO resources as it would require resources to develop “standards” but make them voluntary and provide little or no environmental benefit in light of the fact that states must already develop standards that are protective of the very same uses at the heart of ORSANCO’s Compact.

### Specific Comments

Nucor understands that the Commission has developed a “mock” draft of “Alternative 2 Expanded” which is intended as an indication of what the alternative standard could look like. If a draft version of the alternative resembling the mock draft is developed, Nucor suggests that the term “sewage” be defined. It appears that, in the past, standards for “sewage” were distinct from standards that applied to “industrial wastes” (i.e., “sewage” was limited to human or animal wastes from various sources). For purposes of clarification, if the term is retained in future drafts of the standard, a definition should be included.

Nucor Steel – Gallatin appreciates this opportunity to provide these comments and appreciates the valuable contributions ORSANCO has made and will continue to make in protecting

important uses of the Ohio River. Please contact me if you have any questions at ((859)-567-3121.

Sincerely,  
Kim Pritchard  
Environmental Manager  
Nucor Steel – Gallatin  
4831 US-42  
Ghent, Kentucky 41045

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**From:** [Gail Hesse](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** NWF et al Comments  
**Date:** Friday, February 23, 2018 5:20:39 PM  
**Attachments:** [image002.emz](#)  
[image003.png](#)

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## **Comments on the ORSANCO Proposed Revision to the Pollution Control Standards**

To: ORSANCO Pollution Control Standards Committee & Commissioners

From: National Wildlife Federation, Citizens for Pennsylvania's Future, West Virginia Rivers Coalition, Kentucky Waterways Alliance and the Prairie Rivers Network

Date: February 23, 2018

RE: Comments on the ORSANCO Proposed Revision to the Pollution Control Standards

-----Submitted via email-----

The National Wildlife Federation and the undersigned affiliates appreciate the opportunity to provide these comments in response to ORSANCO's request for input to assist in its review of the current Pollution Control Standards (PCS) for Discharges to the Ohio River - 2015 Revision.

After reviewing all five alternatives, in addition to the minority report on Alternative #2, we firmly believe that Alternative #4 provides the best protection for the Ohio River while adhering to the Compact and the mission of the Commission.

ORSANCO provides increasingly valuable assistance to member states in assessment, monitoring and spill response, and PCS administration. The rationale provided for retraction of ORSANCO's role with the PCS rules are vague with no firm comparison or analysis of the alternatives. Indeed, for reasons discussed below, elimination of key sections of the PCS may violate the Compact, putting ORSANCO's mission and reputation at risk.

### Overview

In its review ORSANCO proposed five alternatives for modifications to ORSANCO's role in the administration of the Ohio River PCS.

With the exception of Alternative #4, we believe that the proposed alternatives are an abdication of ORSANCO's responsibilities for "...faithful cooperation in the control of future pollution in and abatement of existing pollution from the rivers, streams and water in the Ohio River basin..." as stated in Article 1 of the Compact. The purpose of ORSANCO is to provide the forum for that cooperation so that the environmental condition and health of the river maintains its established beneficial uses.

The comparison tables released by ORSANCO on February 14 and February 20 2018 depict wide variability in the number and stringency of standards by the states. We have grave concern that the response to this variability by ORSANCO is to eliminate ORSANCO's role in the development and adoption of the standards and defer to the states. Resorting to administration of water quality standards within jurisdictional boundaries may seem to be an expedient approach to the member states, but it represents a failure to invest in the collaboration needed to think beyond jurisdictional boundaries and manage the river as a whole system. The issue that needs to be solved is not the role of ORSANCO, but rather the lack of adoption/implementation by the states of the PCS into state standards.

We acknowledge that states have challenges in the development, promulgation and implementation of the PCS. The missed opportunity is that ORSANCO and the member states should be using their collective leverage towards getting the PCS adopted among the states so that the Ohio River is managed as one river basin, not individual stream

segments within state boundaries. A regional body speaking with one voice can wield significant influence in the interest of meeting beneficial uses and a cleaner river. This speaks to the integration and harmonization presented in Alternative #4, but also to the need for collaboration and leadership of ORSANCO and its members to use its role more effectively. Rather than trying to solve a lack of leadership problem by weakening the role of the body created for the purpose of facilitating a unified approach to managing the river, the Commission should be stepping up to fulfill its intended mission for 'faithful cooperation'.

The variability among the states' adoption and implementation of the PCS should be a call to action and focus as described in Alternative #4 regarding the need for harmonization of the standards among the individual states. There is a need for leadership and cooperation by the Commission *and* its member states to honor the pledges made by each state for the oversight of pollution abatement and health of the entire Ohio River. The Commission Compact compels the member states to act on behalf of a water body beyond its jurisdictional waters, a unique role that demands actions beyond parochial interests.

1. Technically, it defies logic that two sides of the same river segment require two separate sets of water quality standards. The guiding principle of the Compact is that no pollution from an individual State shall "injuriously affect" interstate waters. Unless water quality standards are consistent for the same segment of river, one set of state standards by comparison will be less restrictive and in conflict with the opposite side of the river. It is the Commission's responsibility to ensure protection for the river and should not sanction a framework that would allow for such inconsistencies and violation of the founding mission of the Commission. This point is reflected in the statement by the Water Users Advisory Committee comment: "The PCS should be the yardstick by which states may be measured when implementing their individual standards applicable to the Ohio River. This helps to ensure minimum standards are set to protect the river as a whole."
2. A framework for inconsistent standards for the same water body will create confusion and economic harm for the regulated community as they seek to comply with different standards for different states. Additionally, such a framework would also establish a lack of equity among the states in its attempts to regulate discharges to the river. Economic development efforts will be compromised if differing standards are in place for different states.
3. The proposed framework will also generate great confusion for the greater public with the issuance of advisories, both fish advisories and recreational contact advisories. How is the public to interpret an advisory issued on one side of the river but not the other? What is in the best interest of public health? The narrative for Alternative #3 mentions that conflicting fish consumption advisories currently exist for the same segment of river. There is no discussion in the materials on how this situation has been allowed to continue nor how it would be addressed in a future framework with independent state standards.
4. The proposed alternatives will unnecessarily complicate the biennial Section 305(b) reports and the 303(d) list for the Ohio River main stem. Which of the state standards will apply for the analyses required by the Clean Water Act? Attempting to address multiple state standards will require more time and analysis to complete these reports for USEPA.
5. The materials provided by ORSANCO do not provide any cost/benefit analyses of the proposed alternatives. Was any such analysis conducted as part of this review and if so, why isn't it part of the materials available for review? We maintain that the elimination of the PCS will result in significant duplication of effort and increased costs. How is this duplication in the best interest in the expenditure of public funds?

With elimination of the ORSANCO PCS there will be significant investments of time by the states in the technical development of standards, the procedures for adoption, implementation of those standards and future triennial reviews as required by the Clean Water Act. There would be six public agencies conducting the work currently done by one entity. The costs of expanding this work from entity to six should be factored into any analysis of the overall impact. And while any individual state may see a retraction of ORSANCO's role

with administration of the PCS as the most expedient option for its own purposes, it is imperative that the Commission and its individual members, evaluate the entirety of the costs and benefits. The most cost-effective solution should be a primary driver for any proposed change.

6. We remain very concerned that the alternatives were released with a preferred alternative selected by a majority of Commission members. Did the Commission employ any criteria for this selection? If so, the criteria should be made available to the public as part of the review process. The presentation/selection of a preferred alternative suggests that this is a predetermined course of action without the benefit of public review. As a public institution, ORSANCO is beholden to an open, transparent review process congruent with its delegated authorities under federal law.
7. The tables released on February 20, 2018 contain summary information on the numbers of pollutants regulated by the states and the numeric criteria for individual pollutants. It is apparent that there are many gaps and inconsistencies among the states, ORSANCO and USEPA criteria. Yet in the narrative materials presented by ORSANCO, there is no information or analysis as to why these discrepancies have been allowed to persist. We reiterate our contention that a fundamental purpose of ORSANCO's role with the PCS is to facilitate collaboration for the establishment, adoption and implementation of the PCS.
8. In the comments provided by the seven advisory committees to ORSANCO, only two committees expressed support for Alternative #2 (the Chemical Industry and the Power Industry expressing it as a preference among #1, 2 and 5). The POTW Advisory Committee only states that further consideration is appropriate for Alternative #2 and goes on to discuss the value of ORSANCO's role in ensuring consistency in any future scenario. Two committees (Public Information and Watershed Organizations) express serious concerns and/or objection with Alternative #2. The remaining two committees (Technical and Water Users) do not express preference or objection but both sets of comments raise relevant questions about the rationale provided for the alternatives. It is understandable that these two committees do not express a preferred alternative given that their membership is primarily the technical staff of the public agencies. However, looking at the totality of the comments provided along with the minority report for Alternative #2, clearly there is not overwhelming support for the "preferred" Alternative #2 from those voices within the ORSANCO structure and most familiar with the workings of the PCS program. We question the value of advancing a proposal that has so little support and would result in a fundamental diminishment of water quality protections for the Ohio River.

#### Conclusion

In summary, the Ohio River is an important resource as a working river for cargo transport, a source of drinking water for five million people, a place for recreation along its 981 mile length and a home for diverse habitat for wildlife and fish. Pollution control is a primary function of the environmental agencies charged with maintaining the health of the river and sustaining its many uses. Any proposal to resort to pollution control oversight within state borders is a step backward. Forty years of water program administration under the Clean Water Act has taught us that we need to manage our water bodies as whole systems within drainage boundaries, not jurisdictional boundaries. The Commission is a regional body with the mandate to manage the Ohio River as a basin system, a unique role that was forward thinking in 1948 and just as necessary today. We strongly oppose any retraction in ORSANCO's role in the development and administration of the PCS.

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Respectfully submitted,

**From:** [Zack Frymier](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review  
**Date:** Friday, February 23, 2018 10:36:09 AM  
**Attachments:** [image001.png](#)

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To Whom It May Concern:

The Ohio Chamber of Commerce is pleased to submit these comments in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). The Ohio Chamber appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River, as well as in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO considering the significant regulatory developments and improvements in Ohio River's water quality that have occurred in the 70 years since ORSANCO was formed.

After reviewing five alternatives identified by the Commission, the Ohio Chamber supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948. This was a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River and its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency, pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

While the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community. The differences can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

The Ohio Chamber believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on

its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act. It also helps to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework and is certainly its highest and best use.

The Ohio Chamber believes the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. The Ohio Chamber believes that the Commission is well within its rights to determine – after investigation, due notice and hearing – that the bulk of the Pollution Control Standards may no longer be necessary considering the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine if the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, The Ohio Chamber notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Differences between the ORSANCO PCS and state water quality criteria and implementation procedures can cause the PCS, which must be implemented by the States, to result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. The process for adoption of the PCS provides no opportunity to challenge the appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River and differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.
- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all

PCS water quality criteria are being achieved throughout the River. There are only a small number of exceptions (e.g., fecal coliform) which are being addressed through the States' Clean Water Act-mandated programs.

Given the complexity of the PCS and state water quality standards and implementation procedures, the Ohio Chamber believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time. They would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit and are not necessary to meet the goals of the ORSANCO Compact. In a time of limited resources and a need for greater cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. The Ohio Chamber also does not support Alternative 5, requiring ORSANCO to maintain and update the PCS, as it would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

In sum, The Ohio Chamber believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River and keeps consistent with the mandates of the ORSANCO Compact while removing the duplicative and resource intensive aspects of the PCS.



Zachary Frymier • Director, Energy and Environmental Policy

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**Subject:** PCS Public comment from Ohio River Foundation  
**Date:** Friday, February 23, 2018 2:57:09 PM

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To Whom It May Concern:

The Ohio River Foundation (“ORF”) submits these comments to the Ohio River Valley Water Sanitation Commission (“ORSANCO”) regarding the 2018 review of ORSANCO’s Pollution Control Standards (“PCS”). In its solicitation of comments, ORSANCO indicated that a majority of Commissioners support withdrawing from its role in maintaining, administering, and periodically updating the current Pollution Control Standards. ORF strongly opposes that proposal and urges ORSANCO to continue in its role as a source of consistent and expert input on appropriate pollution control standards for the Ohio River. Therefore we ask the Commission to reject proposed Alternative 2 in favor of an approach that, consistent with Alternatives 3 and 4, allows ORSANCO to continue to apply its expertise and unique interstate perspective to protect water quality for the entire Ohio River.

## **I. BACKGROUND**

### **A. ORSANCO’s History and Authority**

The Ohio River flows almost a thousand miles through six states, with more states included in its drainage basin. In 1948, eight of those states – Illinois, Indiana, Kentucky, New York, Ohio, Pennsylvania, Virginia, and West Virginia – signed the interstate compact that created ORSANCO and established the commitment of those states to “enact any necessary legislation to enable each such State to place and maintain the waters of said basin in a satisfactory sanitary condition, available for safe and satisfactory use as public and industrial water supplies after reasonable treatment, suitable for recreational usage, capable of maintaining fish and other aquatic life, free from unsightly or malodorous nuisances due to floating solids or sludge deposits, and adaptable to such other uses as may be legitimate.” The Compact provides ORSANCO with authority to promulgate rules and issue orders to ensure that “[a]ll industrial wastes discharged or permitted to flow into the aforesaid waters shall be modified or treated, within a time reasonable for the construction of the necessary works, in order to protect the public health or to preserve the waters for [these uses] . . . to such degree as may be determined to be necessary by the Commission after investigation, due notice and hearing.”

As early as 1949, ORSANCO began putting in place water treatment standards to carry out this obligation. In 1972, Congress enacted the “Clean Water Act” (“CWA”) as we know it today, and in 1984 ORSANCO revised its standards to mirror the Clean Water Act structure of designated uses, water quality criteria to protect those uses, and effluent limitations (including mixing zone requirements and a variance procedure). ORSANCO has since reviewed and updated these Pollution Control Standards every three years.

### **B. The 2018 Pollution Control Standards Proposal**

In 2014, ORSANCO established the Ad Hoc Committee on Water Quality Standards Implementation to review how the Pollution Control Standards were being implemented. In 2015 ORSANCO directed the committee to evaluate options relating to ORSANCO’s future role in setting water quality standards. The committee subsequently formulated five alternative proposals for ORSANCO’s role going forward. These

alternatives can be grouped into two categories, with Alternatives 1, 2 and 5 calling for a markedly reduced role and Alternatives 3 and 4 calling for a more focused application of ORSANCO's current standard-setting approach. These five alternatives, and the relevant considerations for each, are described in ORSANCO's Water Quality Standards Alternative Summary.

Alternative 1 would "[e]liminate the Pollution Control Standards Program and defer to the requirements of the Clean Water Act and member state water quality regulations." The considerations listed in favor of this alternative are that it would potentially "free up resources" to be reprogrammed to other ORSANCO activities, and would also avert the problem that at least one Ohio River state cannot adopt ORSANCO's Pollution Control Standards by reference.

Alternative 2 would suspend the triennial review process for the Pollution Control Standards and deem all states in compliance with the Standards to the extent they are implementing approved programs under the federal Clean Water Act. The description of this alternative presumes that the Pollution Control Standards are redundant and that resources currently dedicated to the PCS could be "redirected to other Commission activities" such as "assessments of the water quality and biological integrity of the water, public out-reach, spill detection and response."

Alternative 3 would "[u]tilize a cost effective approach to finalize uniform WQS rules for the Ohio River by tasking ORSANCO to take the lead in order to eliminate duplication of efforts among six states and save resources. Also, as a starting point, utilize work done by USEPA to develop WQS to avoid conducting basic research." This proposal would be aimed at protecting water quality and promoting consistency among states, while reducing the overall costs of developing water quality standards and allowing states flexibility to adopt alternative standards when appropriate. It would also enable ORSANCO to continue carrying out the work plan requirements for its section 106 grant from U.S. EPA, which currently includes development of numeric pollution control standards for the Ohio River and constitutes 50% of ORSANCO's budget.

Alternative 4, similar to Alternative 3, would focus on harmonizing water quality standards across the Ohio River. ORSANCO would look at "standards on an individual basis as warranted," to ensure coordinated implementation to "restore and maintain the quality of and protect uses of the Ohio River." This approach would be carried out by the NPDES Committee, working with staff and member states on permitting and certification processes "with a goal of assuring that protection and achievement of pollution controls needed to maintain those uses occurs throughout the Ohio River system." Even where a state has not formally adopted an ORSANCO standard, the Commission will work with the state so that any permit "achieves a comparable level of protection of the designated uses."

Finally, Alternative 5 would alter the nature of the PCS, from binding standards to simple recommendations that member states should consider in developing and issuing permits. This alternative rests on the proposition that "the process of promulgating the PCS is redundant of member states' triennial review of water quality standards."

ORSANCO has identified Alternative 2 as its "preferred alternative" for consideration in the 2018 PCS review.

## **II. DISCUSSION**

The Commission's preference for Alternative 2 appears to rest primarily on two grounds: first, that it will save resources for ORSANCO to eliminate the Pollution Control Standards from its workload; and second,



that the Pollution Control Standards do not serve a significant function in protecting the Ohio River. Neither of these rationales has been adequately explored or supported with detailed facts.

It is entirely reasonable for ORSANCO to be concerned about making the most of its limited financial resources. However, in considering the best use of those resources, it is important to keep in mind that the ORSANCO Pollution Control Standards play an important role in preserving state resources by allowing standards for at least some pollutants, as well as the overall assessment of whether the Ohio River is suffering any serious water quality problems, to be dealt with across the entire river rather than on a state-by-state basis. If ORSANCO were to eliminate the PCS, Ohio River states might well be worse off in the long run without an efficient forum for establishing and updating standards for all pollutants, and an irreplaceable venue for determining a river-wide approach to particularly problematic pollutants.

## **A. Individual Pollutants**

ORSANCO has provided summary-level data from a 2015 staff survey (“SURVEY”) of state water quality standards versus ORSANCO’s Pollution Control Standards, which shows that there are significant discrepancies among state standards. While Alternative 2 presumes that these discrepancies are meaningless and that the PCS and state water quality standards are redundant, that presumption is not backed up by any factual analysis nor clear from a review of the SURVEY. Moreover, Alternative 2 also assumes that if the PCS were eliminated, ORSANCO could redirect the resources used to maintain the PCS with no adverse effects on ORSANCO or its member states. That reasoning likewise lacks any detailed foundation.

### **1. The Problem of State-ORSANCO Disparities**

The ORSANCO SURVEY indicates that, for the pollutants compared as of 2015:

- There are 188 instances in which ORSANCO has criteria but a member state environmental agency does not;
- There are 252 instances in which member state agencies have parameters that are more than 10% less stringent than ORSANCO’s criteria;
- There are 405 instances in which the member state agencies are within 10% of, or more stringent than, the ORSANCO criteria.
- There are 342 instances in which the member state has criteria but ORSANCO does not.

In other words, based on this SURVEY there are 440 pollutants for which the ORSANCO standard is either more stringent than a member state standard or there simply is no state standard. By comparison, there are 747 instances where the state standard is more stringent than or equivalent to the ORSANCO standard, or ORSANCO lacks a standard for the relevant pollutant. Overall, this represents 1187 points of comparison, with 440 – or almost 40% -- where the ORSANCO standard is filling in a gap in state standards or providing a more protective standard.

ORSANCO provided tables containing the information underlying this comparison on February 20, 2018, four days before the deadline for comment, and therefore we have not undertaken a thorough analysis of individual water quality criteria. However, even an initial survey of the data shows that there are concerning inconsistencies and gaps among the state standards. For example, the human health criteria table shows that as of 2015, Ohio and Kentucky both had limits of 10 micrograms per liter for arsenic – significantly higher than ORSANCO’s 0.1 microgram per liter criterion. Similarly, Indiana and Ohio both

apparently have criteria for polychlorinated biphenyls (“PCBs”) that are less stringent than ORSANCO’s, which is particularly notable given that the Ohio River’s fish consumption use is partially impaired by PCB contamination. While the explanation for these discrepancies is unknown, it shows that some states’ standards are not as protective as those in other Ohio River states. Without an ORSANCO standard providing uniformity, there is potential for polluting industries to migrate to states with less restrictive criteria, leaving those states downstream or across the river to deal with their pollution without gaining any of the economic benefits.

The Clean Water Act does not provide an efficient tool for states to address such discrepancies on their own. The Supreme Court confirmed in *Arkansas v. Oklahoma*, 503 U.S. 91 (1992), that the U.S. Environmental Protection Agency (“U.S. EPA”) has the authority to consider effects on other states water quality standards when reviewing draft permits under Clean Water Act section 402, 33 U.S.C. § 1342. However, that authority must be applied on a permit-by-permit basis, and is discretionary with U.S. EPA, meaning that policing of interstate discharges through this mechanism would be an onerous and potentially sporadic process without any certain outcome. ORSANCO’s authority to set prospective, uniform standards for the Ohio River is a unique tool not available under the Clean Water Act. Even to the extent states do not directly incorporate the ORSANCO PCS into their water quality criteria, but rather apply them to individual sources through the state permitting process, that is still an improvement over the cumbersome and likely ineffective process available under the CWA

In addition to inconsistent standards, there are some standards where – at least according to the ORSANCO SURVEY – the states have simply left it to ORSANCO to establish criteria. These include gross total alpha, copper, cyanide, fluoride, methylmercury, nitrites, and others. If ORSANCO were to eliminate its Pollution Control Standards, states without standards for those pollutants would presumably have to expend time and resources on filling in those gaps to ensure protection of their portions of the Ohio River.

Overall, this cursory review suggests that the ORSANCO standards play a central role in ensuring consistent and up-to-date pollution standards for the Ohio River. Meanwhile, the current proposal provides no estimate, or even description, of what state work would be necessary to make up for the absence of the PCS if they were eliminated. Comments from the POTW Advisory Committee (provided by ORSANCO) underline this concern, with one commenter pointing out that: “During this time of ‘stressed’ budgets and limited resources, duplication of efforts is definitely a major concern of many organizations at all levels of government (federal, state and local), as well as the public (tax/rate payers) that we serve. Under any future scenario that minimizes PCS activities, it will be important for ORSANCO to continue to provide a forum to discuss water quality standards and to promote consistency among the states to ensure the protection of the Ohio River as a shared resource.” A significant problem with Alternative 2, or any approach that eliminates periodic consideration of river-wide water quality criteria, is the danger that in the absence of ORSANCO standards, inconsistencies will arise between states.

## **2. The Value of River-Wide Water Quality Criteria**

As discussed above, there are clearly significant inconsistencies among state standards for the Ohio River that bear further investigation before ORSANCO can draw any conclusions about the potential costs for states to make up for the loss of the PCS. Meanwhile, the affirmative value of river-wide criteria is clear. There have already been a number of instances where ORSANCO’s Pollution Control Standards have and will continue to play an important role in protecting water quality in the Ohio River.

For example, over the last decade ORSANCO has acted to address a growing concern with levels of Total

Dissolved Solids (“TDS”) in the Ohio River, by using an expedited PCS process in 2012 to reinstate a (previously eliminated) limit of 500 mg/L at drinking water intakes in order to protect drinking water quality. ORSANCO staff have subsequently conducted valuable research regarding background levels of TDS in order to support translation of that standard into appropriate permit limits. See ORSANCO, *Characterization of Dissolved Solids in the Ohio River and Selected Tributaries* (Feb. 2014), *available at* <http://www.orsanco.org/wp-content/uploads/2016/12/Characterization-of-Dissolved-Solids-in-the-Ohio-River-and-Selected-Tributaries.pdf>. This is an instance where ORSANCO, because of its triennial PCS review process, was well-positioned to react swiftly to a unique Ohio River problem and provide drinking water protection along the entire river, backed up by sound science and expertise. Without the PCS process, it is not clear when affected states – themselves facing budget constraints – might have dealt with this problem and what resources they might have to use to do so. The Water Users Advisory Committee comments similarly identify pollutants such as ammonia, E. coli, temperature, and others as ones where ORSANCO’s standards provide important, uniform water quality protection across the entire Ohio River to the benefit of states as well as their citizens.

Even where addressing a given pollutant is simply a matter of adopting water quality criteria issued by U.S. EPA, ORSANCO can do so efficiently in order to bring the PCS up-to-date for the entire Ohio River at one time. As one example, ORSANCO has repeatedly indicated its readiness to adopt an updated U.S. EPA aquatic life criterion for selenium. Now that the federal criteria have been issued (in summer 2016), ORSANCO can do so. Notably, some states will not be conducting triennial reviews in which they would address this development for some time – for instance, West Virginia adopted fish tissue limits based on the draft criteria in 2016, but apparently will not address the water column limits in the final criterion until its next triennial review in 2020. By addressing this issue in its 2018 PCS review, ORSANCO will ensure those additional protections are in place significantly earlier. Moreover, in addressing this and other federal criteria, ORSANCO can determine on a river-wide basis whether those criteria are appropriate for the Ohio River rather than leaving individual member states to do so, with potentially disparate results.

Looking ahead, there are emerging pollution issues where ORSANCO’s PCS may similarly provide an important avenue to bring the expertise of Commission staff to bear on preserving water quality across the entire Ohio River. In recent years, ORSANCO has been engaged in trying to determine a numeric criterion for nutrient pollution in the Ohio River. This work is timely given that a massive algal bloom occurred on the river in the summer of 2015, and studies show climate change is driving temperature and precipitation changes that may increase the frequency and severity of such algae outbreaks. U.S. Army Corps of Engineers, *OHIO RIVER BASIN– Formulating Climate Change Mitigation/Adaptation Strategies through Regional Collaboration with the ORB Alliance 47* (May 2017), *available at* [http://www.corpsclimate.us/docs/USACE%20Ohio%20River%20Basin%20CC%20Report\\_MAY%202017.pdf](http://www.corpsclimate.us/docs/USACE%20Ohio%20River%20Basin%20CC%20Report_MAY%202017.pdf). Although ORSANCO’s analysis has not yet identified an appropriate numeric criterion, this is a looming threat to the drinking water, recreation, and aquatic life uses of the Ohio River that ORSANCO cannot ignore. Moreover, as shown in ORSANCO’s efforts to date, the Commission’s staff has the relevant expertise to adequately and efficiently address this complex issue on a river-wide basis. The alternative might well be for states to waste resources as the question of numeric nutrient limits comes up on a state-by-state or even permit-by-permit basis.

Finally, ORSANCO is currently considering a study of the bioaccumulative pollutants Perfluorooctanoic Acid (“PFOA”) and Perfluorooctane Sulfonate (“PFOS”), initially identified as of potential concern in a 2010 report on emerging contaminants (<http://www.orsanco.org/wp-content/uploads/2017/01/A-Screening-Study-Investigating-the-Presence-of-Emerging-Contaminants-within-the-Ohio-River-Basin.pdf>). Recently, as noted in ORSANCO’s October 2017 TEC meeting minutes, PFOA contamination of drinking water in the

Ohio River watershed has been the subject of significant litigation, and U.S. EPA has released health advisory levels for both contaminants. Although PFOA and PFOS are being largely phased out, replacement chemicals with similar properties may continue to pose a threat to Ohio River water quality. Once ORSANCO determines the scope and seriousness of this issue, it may well be appropriate to address this type of pollution through the PCS.

We could list many more instances of ORSANCO's valuable work in connection with the Pollution Control Standards. However, these examples are sufficient to highlight the key questions that Alternative 2 fails to address:

- Will eliminating the Pollution Control Standards actually significantly reduce ORSANCO's workload? A number of the efforts above, although occurring in conjunction with ORSANCO's PCS reviews, fall within its larger mission of providing expert scientific monitoring and analysis of water quality issues in the Ohio River. If the PCS were not in place, it seems likely that ORSANCO would still have a role to play in addressing issues such as identification of numeric nutrient criteria or analysis of total dissolved solid levels. Absent a detailed consideration of what work ORSANCO could in fact abandon if the PCS were eliminated, the answer to this question is unclear.
- If eliminating the PCS does truly reduce ORSANCO's activities, will it simply shift work to ORSANCO member states? For pollutants like Total Dissolved Solids, there is a clear need for a limit and analysis of how to apply that limit to sources. ORSANCO is currently providing that information in the context of the PCS. Eliminating that standard, or precluding ORSANCO from adopting such standards in the future, may simply force each state to individually duplicate the Commission's work while introducing the possibility of more disparities among water quality criteria the Ohio River states. As several other commenters have noted, this shift in workload may also result in a commensurate reduction in federal or other funding.
- Will adopting Alternative 2 prevent ORSANCO from addressing emerging pollution issues in a timely manner? Although the Commission could technically resume its role in setting standards, the regular triennial review process encourages all stakeholders to actively consider and address whether existing standards are adequately protecting the Ohio River's water quality. Without that forum for consideration of both urgent problems like TDS and developing issues like nutrient pollution, inadequate or disparate state-level regulation could easily go unaddressed.
- Are there opportunities to increase the efficiency of the PCS process without eliminating ORSANCO's standards altogether? As noted above, there are a number of pollutants for which the PCS and state standards are similar, as well as a number where there are significant differences. We are sensitive to ORSANCO's concerns regarding whether its PCS work is redundant to ongoing state activities under the Clean Water Act. One sensible way to potentially streamline the PCS reviews would be to focus on promoting uniform standards across the Ohio River, especially for pollutants where U.S. EPA has not provided any federal criteria. This would essentially be a combination of Alternatives 3 and 4.

These significant unanswered questions show that the preference for Alternative 2 is not based on a sufficient exploration of the important issues involved in potentially eliminating a role that ORSANCO has played for decades. Fundamentally, we believe that the current PCS process is in fact efficient and focused on the areas where ORSANCO is needed most. Nevertheless, if ORSANCO does decide to refine its

approach to the PCS, we urge the Commission to ensure it avoids throwing the baby out with the bathwater and preserves the PCS as a valuable tool for providing efficient and effective water quality standards across the whole Ohio River.

## **B. Water Quality Assessment for the Ohio River**

Sections 305(b) and 303(d) of the federal Clean Water Act require each state to conduct an assessment of the status of its waters every two years and make a determination as to whether those waters are “impaired” by any pollutant. 33 U.S.C. § 1315(b); 33 U.S.C. § 1313(d); 40 C.F.R. §§ 130.7, 130.8.

ORSANCO has prepared a biennial section 305(b) assessment for the Ohio River ever since 2002, offering an expert view “of the degree to which the river supports each of its four designated uses: warm water aquatic life; public water supply; contact recreation; and fish consumption.” Although ORSANCO’s section 305(b) report does not substitute for each state’s duty to assess and determine the impairment status of the portions of the Ohio River within its jurisdiction, the Ohio River states have traditionally relied heavily on ORSANCO’s work in carrying out these Clean Water Act obligations. Often, states simply adopt ORSANCO’s evaluation and conclusions wholesale in determining the impairment status of the Ohio River.

If ORSANCO adopts Alternative 2, this approach will no longer be viable. Currently, ORSANCO’s water quality assessment in its section 305(b) reports is based in large part on application of the numeric criteria included in the Pollution Control Standards. If these criteria are eliminated, ORSANCO will either have to confront the problem of applying potentially hundreds of inconsistent state criteria in assessing the Ohio River’s water quality, and may end up reaching inconsistent conclusions as to impairment status of the river based on those criteria. Alternatively, it may no longer make sense for ORSANCO to conduct the 305(b) assessment for the Ohio River, merely shifting that work to individual states and probably losing efficiencies along the way. That scenario could also result in a reduction in ORSANCO’s funding.

Finally, we note that while these concerns represent our view of the existing information, we requested that ORSANCO share the “Report of the ORSANCO Ad Hoc Water Quality Standards Implementation Committee”, dated May 11, 2015, referenced in some of the materials provided for comment. ORSANCO provided a copy of that report on February 23, the day before the comment deadline. Although we have not had adequate time to review the report for purposes of these comments, we look forward to providing ORSANCO with supplemental comments as appropriate.

## **III. CONCLUSION**

A proposal for ORSANCO to step back from standards it has set in their current form for more than two decades is obviously a significant one. Before the Commission determines the wisest course of action, it must conduct further analysis of the key assumptions here: that the Pollution Control Standards provide no additional water quality protection or function beyond state standards under the Clean Water Act, and that reducing or eliminating the Pollution Control Standards review process would free up resources without any burden-shifting to states or impacts to funding. While those assumptions may prove true to some extent, we believe the appropriate response is to narrow the focus of ORSANCO’s Pollution Control Standards process along the lines of Alternatives 3 and 4. That approach would keep ORSANCO in the role of doing what it does best: providing significant scientific expertise and a basin-wide perspective on protecting the Ohio River.

In closing, as ORSANCO looks for ways to reallocate its budget we fear that it has developed a solution in search of a problem.

Sincerely,

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To: ORSANCO PSC Committee & Commissioners,

Please accept these comments on the Alternatives under consideration for the Pollution Control Standards (PSC) review.

I believe that some combination of alternative 3 and 4 will provide better protection for the Ohio while adhering to the Compact and the mission of the Commission. In addition, a combination of 3 and 4 would also implement the recommendation in the 1974/5 EPA study. Finally, finding a cost effective way to selectively modify PCS after review as warranted and increase focus on harmonization of standards and their implementation among Compact states and EPA would preserve ORSANCO's leadership in the basin.

Here's why.

ORSANCO is an important organization for the health of the Ohio River and provides increasingly valuable assistance to member states in assessment, monitoring and spill response. However, eliminating the "heart" of the PSC rules while vaguely referencing monetary concerns with no firm comparison/analysis of the alternatives is unacceptable. Indeed, for reasons discussed below, elimination of key sections of the PSC may violate the Compact, put ORSANCO's mission and reputation at risk.

Article I of the ORSANCO Compact mandates that all waters in the District be placed and maintained in a satisfactory, sanitary condition, available for certain beneficial uses. It is the mission of the Commission to ensure protection of these uses and to preserve the waters for other legitimate purposes.

A study, titled *A Study of Prospective Water Pollution Control Activities For The Ohio River Valley Water Sanitation Commission*, was released in March 1975, and with respect to "stream standards," recommended that: ORSANCO should work with the states in developing consistent stream standards for the main stem and tributaries having significant impacts on the main stem; and in periodic review of the standards. Its interest should be primarily in achieving interstate compatibility and equity.

Each state formulates stream standards for its own purposes and also for submission to EPA. However, the emphasis of each state is necessarily on its particular waters both in and out of the Ohio Basin. Since the Ohio is a boundary river, and because there are many other relationships as among the several state segments of the river system, the interstate agency should provide the overall view and the comparative analyses needed for coordination, consistency and equity. ORSANCO's stream models will be found useful.

Therefore it is the purpose and mission of the Commission to maintain some form of PSC program, and further that by choosing to combine alternatives 3 and 4 the Commission will be implementing

this decade's old, but still relevant EPA recommendation.

**Alternative 1-** Terminate ORSANCO's PCS and rely upon state and federal programs provided for and mandated under the Clean Water Act and related state statutes - would free up resources within ORSANCO to be reprogrammed to other Commission activities.

If these changes are offered for consideration as purely a budgetary measure, there should be a cost benefit analysis included and the background documents should clearly state this fact. While organizational budgets are always a consideration, this alternative is a drastic change to the PCS and to ORSANCO's mission and leadership in the Ohio River Basin. In addition, the purpose and mission of the organization as stated in the Compact may preclude this option from further consideration. As early as the 1974 EPA study quoted above, parties recognized the value of ORSANCO as unified voice of the Ohio River. Nothing has changed in that regard.

While state and federal Clean Water Act programs are necessary for a boundary river like the Ohio a coordinating interstate agency (ORSANCO) should still provide the overall view and comparative analyses needed for coordination, consistency and equity. Indeed the need for a coordinating interstate agency was confirmed again recently when ORSANCO staff compared the states' standards for the main stem of the Ohio River with USEPA recommended criteria.

This option should be removed from further consideration.

**Alternative 2 -** Clean Water Act Alternative to ORSANCO PCS Rules. There would be little or no purpose for the Commission to continue the process for updating the PCS and for unnecessarily expending its limited resources on a redundant program at a time when other programs are in need for those funds. Removal of the water quality criteria (Chapter 3), mixing zone designation (Chapter 4) and portions of wastewater discharge requirements (Chapter 5) of the PCS should be sufficient to eliminate the need to triennial review.

This alternative would allow ORSANCO to redirect resources not needed for the PCS program to be redirected to other Commission activities. ORSANCO's true value to member states and the public is in such programs as assessments of the water quality and biological integrity of the river, public outreach, spill detection and response and many, many other programs with respect to which ORSANCO is uniquely qualified and with respect to which states have few, if any alternatives.

It is confusing if this option is presented solely as a budgetary measure. If so, there should be a cost benefit analysis. My comments under alternative 1 are incorporated herein as I deem this alternative inconsistent with the purpose and mission of the Commission. Further, this option does not address the conclusion in the EPA study which found an interstate coordinating agency to be useful for the protection of the Ohio River. Finally, recently ORSANCO staff compared the states' standards for the main stem of the Ohio River with USEPA recommended criteria. The comparison indicated that there are many differences between ORSANCO's PCS, states WQS and EPA's published WQ Criteria. This option should be removed from further consideration as well.

**Alternative 3 -** Cost Effective Alternative for Standards – would utilize a cost effective approach to finalize uniform WQS rules for the Ohio River by tasking ORSANCO to take the lead in order to eliminate duplication of efforts among six states and save resources. Also, as a starting point, utilize



work done by USEPA to develop WQS to avoid conducting basic research.

This alternative achieves the following positive goals:

Establish numerical water quality standards for the Ohio River that are protective of the intended uses.

1. Reduce the cost of developing water quality standards for ORSANCO and the states.
2. Promote consistency among states.
3. Allow flexibility to adopt alternative standards, when appropriate.
4. Streamline the process for developing the 305(b) Report.
5. Reduce the influence of campaign donors and special interest groups on the standards development and permitting processes.
6. Satisfy 106 grant work plan requirements.
7. Enhance ORSANCO's historic role as the protector of water quality of the River.

This Alternative may result in the following negative reactions - It is opposed by some industries and the chambers of commerce who object to any regulations, even the ones that may help them and it is opposed by the states' rights advocates based on ideological ground.

Recently ORSANCO staff compared the states' standards for the main stem of the Ohio River with USEPA recommended criteria. The comparison indicated that there may be a great deal of inconsistency among the states, ORSANCO and EPA.

Under this Alternative, ORSANCO will use the federal criteria as a starting point. In certain situations ORSANCO may choose to use different criteria as a basis to develop standards. States will participate in the standards development process and they may choose to deviate from ORSANCO's standards, if appropriate.

In addition, Article VI of the Compact requires ORSANCO and the states to maintain the water quality of Ohio River tributaries in a sanitary and satisfactory condition at least equal to the condition of the waters of the River immediately above the confluence. The article authorizes ORSANCO to adopt standards to implement and enforce this provision. Although there may be other ways to implement this requirement, adopting numerical water quality standards is the obvious and most direct approach to comply with this provision.

Potential budget and staff implication for this Alternative include:

1. The USEPA 106 grant represent 50% of ORSANCO's budget. This year's work plan for this grant includes the development of numerical standards for the main stem of the Ohio River. If ORSANCO decides to eliminate or severely reduce the WQS Program, the 106 grant may be negatively impacted.
2. The above mentioned approach for developing standards relies on the science developed by USEPA. ORSANCO and states will not waste resources in developing basic science unless it is absolutely needed. Also, in most cases states will adopt ORSANCO's WQS. This will save state resources and avoid duplication of efforts.
3. This approach will simplify the 305(b) report for ORSANCO and states because all the states will adopt similar water quality standards.

ORSANCO has successfully utilized stream standards to set water quality goals, help dischargers plan for the future, improve consistency among states, prepare 305(b) & TMDL reports and to protect the River's designated uses. **The standards program should be streamlined to save resources.**

**However, eliminating the numerical stream standards will be a step backward that will adversely impact the stream water quality and create nothing but confusion.**

The discussion and materials included with the Alternative document makes a strong case to choose alternative 3. Alternative 3 and/or 4 which can be viewed as entirely consistent with 3 should be chosen. Either alternative maintains ORSANCO's interstate coordination and leadership role in establishing water quality goals for the river. The PSC reviews can approach the problem in a methodical, prioritized manner using the staff and fiscal resources available.

**Alternative 4** - Selectively modify PCS after review as warranted and increase focus on harmonization of standards and their implementation among Compact states and EPA – this would maintain concurrency between PCS and emerging biological and chemical science, relying on staff and the TEC to identify standards that are candidates for revision, adoption, or elimination during the subsequent triennial review, thus providing sound bases for permitting and WQC decisions that are protective of the water resource.

This provides better integration of standards and levels of protection among compact states. Second prong recognizes that while the individual Compact states may have standards that vary in number or stringency from those adopted by ORSANCO, it is the interaction of state permitting and certification processes and those adopted standards that determine whether comparable levels of protection of uses are being achieved as among the states. To that end, the NPDES Committee will work with staff and each state to develop a more comprehensive understanding of the interaction of standards and permitting / certification processes in and among the states, with a goal of assuring that protection of uses and achievement of pollution controls needed to maintain those uses occurs throughout the Ohio River system. Where the state has not incorporated one or more ORSANCO standards into the permitting and certification processes, staff and the NPDES Committee will work with that state to assure that the state process nevertheless achieves a comparable level of protection of the designated uses.

It could be combined with Alternative 3, which proposes to continue to include numerical standards in ORSANCO's rules but simply Pollution Control Standards program by adopting US EPA standards for all pollutants unless it is determined that the federal standards for a specific pollutant are not protective of the intended use. Combined alternatives would provide a benchmark for TEC and staff review and modification of individual standards as warranted, and the exercise of comparison would help to assure that maintenance of standards in excess of the minimum standards recommended by US EPA is necessary or advisable.

Budgetary considerations for both ORSANCO Staff and NPDES Committee must be evaluated as with the other alternatives.

This Alternative would work to provide better coordination between ORSANCO and the member states and among those states, and to approach standard-setting in a more nuanced manner than wholesale abandonment of the standard-setting function of ORSANCO.

While selecting this alternative would not cost ORSANCO any more money than it currently spends for PSC reviews, it might not provide a great deal of budgetary savings either. It would remove any suggestion that ORSANCO is not complying with the 106 grant. All options that rely upon budgetary

considerations should have a cost benefit analysis to accompany this request for comments.

Even more important, combining this option with alternative 3 above will preserve ORSANCO's leadership role in the basin, while protecting the purpose and mission of the organization and the water quality in Ohio River. Combining 3 and 4 has the potential to save funds in subsequent years for ORSANCO and the member states – while providing clear PCSs (WQS and TEBELs) for the Ohio River. Alternative 3 and/or 4 should be chosen.

**Alternative 5** - Provision for states to consider the PCSs when developing state water quality standards - proposes to change the ORSANCO PCS language from mandating that Compact member states adopt the ORSANCO PCS in permits issued for the main stem of the Ohio River to requiring member states give consideration of the ORSANCO PCS when developing and issuing permits.

There are no clear benefits to this alternative. Based on discussions at TEC and Commission meetings this is the status quo, however it does nothing to implement the 1974/5 EPA recommendations. Further, it does nothing to relieve the financial burden on ORSANCO or the states and does nothing to improve Ohio River coordination or water quality. This alternative should be removed from further consideration as well.

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### **Summary and Conclusion**

Many of ORSANCO's own committees including the PTOW, WUAC, WOAC and PIACO support retaining the PSC in some form. Indeed as evidenced by the minority report for alternative 2, some Commissioners feel sternly about the complete elimination of much of the current PSC rules. Finally, several of the states at the February Commission meeting expressed concerns about the preferred alternative. Again, this would eliminate alternatives 1 and 2.

I strongly urge the Commission to choose alternative 3 or 4, or a combination of the two. This can grant the Commission some budgetary relief particularly in coming years. The Commission can propose a timeline that meets their needs and the states. Implementation will finally incorporate EPA recommendations. Water Quality in the Ohio River, and understanding by the states, regulated entities and the public will be improved.

ORSANCO's Compact grants the organization a unique role in the United States even among other interstate compacts/agreements. Implementation of alternative 1 or 2 above will negate this role. It is extremely unlikely should the Commission feel it make a mistake in subsequent years that it will ever again be granted such a unique role. Making this decision in haste is a very big mistake. While I understand that states have made significant progress in regulatory programs since the 1974/4 EPA study, recent comparisons conducted by ORSANCO staff and committees have revealed significant discrepancies. These discrepancies were anticipated decades ago by EPA in the study. The EPA recommendations have not been addressed and it would greatly benefit ORSANCO, the compact states and EPA to do in a methodical manner by implementing alternative 3 and/or 4.

Thank you for the opportunity to comment on this very important matter.

Sincerely,

William T. Boria, P.G.

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**From:** [Jason Bostic](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Comments of the WV Coal Association on ORSANCO's PCS Triennial Review  
**Date:** Friday, February 23, 2018 2:57:50 PM

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## West Virginia Coal Association

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**Via email: [PCS@orsanco.org](mailto:PCS@orsanco.org)**  
**ORSANCO**  
**5735 Kellogg Avenue**  
**Cincinnati, Ohio 45230**

**Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review**

### **To Whom It May Concern:**

The West Virginia Coal Association (WVCA) is pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS).

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 95 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.

WVCA appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information for the river. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed.

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### Summary of Comments

**WVCA** has reviewed the five alternatives identified by the Commission and supports the adoption

of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

WVCA believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### Additional Information

WVCA believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. WVCA believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the

Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, WVCA notes the following:

- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. The process for adoption of the PCS provides no opportunity to challenge the appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.

- Resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.
- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water quality criteria are being achieved throughout the River with a small number of exceptions (e.g., fecal coliform) which are being addressed through the States' Clean Water Act-mandated programs.

In sum, WVCA believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River.

Given the complexity of the PCS and state water quality standards and implementation procedures, WVCA believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit, and are not necessary to meet the goals of the ORSANCO Compact.

In a time of limited resources and a need for greater cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. WVCA also does not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.



**Respectfully Submitted,**

**Jason D. Bostic**

**Vice-President**



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Ohio River Valley Water Sanitation Commission  
5735 Kellogg Avenue  
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Feb. 23, 2018

## **RE: ORSANCO's Triennial Review of Pollution Control Standards**

I am writing on behalf of the Pennsylvania Chamber of Business and Industry (PA Chamber), the largest, broad-based business advocacy organization in the Commonwealth. Our nearly 10,000 member companies are involved in all industrial categories and are of all sizes. On behalf of these businesses, we welcome the opportunity to respond to the Department's invitation for public comments concerning the development of the Ohio River Valley Water Sanitation Commission's (ORSANCO) Triennial Review of Pollution Control Standards.

The PA Chamber has been actively and positively involved throughout the past 15 years or more in working with other stakeholders in helping to frame workable approaches to addressing the water quality challenges of the state. As the PA Chamber has expressed in our previous comments on various legislation regarding water policy, DEP and EPA proposed rulemakings, and proposals from interstate water basin commissions for the Ohio, Delaware and Susquehanna rivers, the Chamber and its members recognize that development, use and stewardship of the state's water resources is vital to the health and success of the communities, industries and enterprises throughout the state. That stewardship of our water resources requires a thoughtful balancing of environmental and economic considerations. It is with this perspective that we offer the following comments.

### **ORSANCO Should Adopt Alternative #2 (Clean Water Alternatives to ORSANCO PCS Rules)**

ORSANCO was created seventy years ago when there was not a comprehensive state and federal framework to regulate water quality in interstate waters. Its creation predated the enactment of the federal Clean Water Act and the formation of various state regulatory agencies as they exist today. ORSANCO's role at the time was to establish and coordinate regional water quality efforts. A substantial and effective regulatory framework has since been put into place at the state and federal level, resulting in considerable reductions in pollutant loadings into the Ohio River basin and substantially improving water quality.

Every state in the Ohio River basin is carrying out federally-enforceable water quality efforts and, in cases like Pennsylvania, implementing regulatory criteria that are more stringent than federal rules (for example, with respect to protection, mitigation and compensation of wetland resources and with respect to some various in-stream water quality criteria and point source discharge regulatory obligations). The goals that ORSANCO was originally designed to achieve are being met by these state programs, and we do not believe the existing Pollution Control Standards (PCS) add much value or environmental benefit. What the PCS do is lead to confusion on the part of states, which must incorporate them into statewide permitting structures, and on the part of the regulated community, who do not have an effective way to question, appeal or challenge the appropriateness of the underlying PCS.

Therefore, the PA Chamber believes that the best and proper role for ORSANCO is to focus its efforts on scientific research and technical information gathering, rather than developing and implementing duplicative and unnecessary water quality regulations. We understand the Commissioners of ORSANCO have developed several proposals for how to move forward with PCS. Of these, we believe the second approach, Clean Water Alternatives to ORSANCO PCS Rules, is the best framework for all parties involved.

The Commission is satisfying its duties established under the ORSANCO Compact (and the water quality goals the Compact was designed to achieve) to find that the bulk of the existing PCS are no longer necessary in light of existing

state and federal law. Pennsylvania has an extensive and robust set of water quality criteria that sets stringent limits on point source discharges; these criteria will not be relaxed under Alternative #2. Further, we believe that the resources expended by ORSANCO that in essence overlap with existing state and federal programs could be better expended on research and assessment of water quality and biological integrity of the Ohio River. Finally, we understand that the beneficial uses of the Ohio River are being achieved throughout the basin with a small number of exceptions that are already being addressed through state agency's implementation of state and federal water quality laws and regulations.

In closing, we believe that Alternative #2 is the best approach for the Commission, the states and the regulated community. Each of these stakeholders, whether public or private, must and should continue to evaluate how existing resources should be best deployed to achieve the desired outcomes. As such, after review of the six proposed approaches, Alternative #2 is a framework that eliminates duplicative, burdensome and unnecessary water quality rules and that will not sacrifice environmental quality in the basin.

We appreciate your consideration of these comments and look forward to continuing to work with the Commission on further policy.

Sincerely,



Gene Barr  
President and CEO

CC:

The Honorable Patrick McDonnell, Secretary of DEP & Commissioner, Ohio River Valley Water Sanitation Commission.  
Ms. Jennifer Orr, Director of the Office of Compacts and Commissions and Alternate for Secretary McDonnell  
Mr. Charles Duritsa, Commissioner, Ohio River Valley Water Sanitation Commission

**KEVIN SUNDAY**

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SENT VIA EMAIL AND U.S. POSTAL MAIL

February 23, 2018

ATTN: PCS Comments  
ORSANCO  
5735 Kellogg Avenue  
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[PSC@orsanco.org](mailto:PSC@orsanco.org)

**Re: Alternative Recommendations – Pollution Control Standards**  
*Our File No. 108630*

To Whom It May Concern:

On February 5, 2018, ORSANCO made available for comment several alternatives to address whether ORSANCO should continue “to maintain, administer, and periodically update the current Pollution Control Standards, or should eliminate the Pollution Control Standards and withdraw from the process of maintaining and updating such standards.” The following comments regarding this action are submitted on behalf of the Ohio Utility Group and its member companies (“OUG” or “the Utilities”),<sup>1</sup> which is an association of individual electric utilities in the State of Ohio. The Utilities own and operate power plants and other facilities that generate, transmit, and distribute electricity for residential, commercial, industrial, and institutional customers. These power plants and other facilities are subject to the Clean Water Act and Ohio water regulations. OUG’s purpose, in part, is to participate collectively on behalf of its members in administrative proceedings under various environmental laws and in litigation arising from those proceedings that affect the Utilities.

In 2017, ORSANCO solicited comments from its Advisory Committees regarding five alternatives to address its role in developing the Pollution Control Standards for the Ohio River. These alternatives ranged from continuing with the status quo to completely eliminating ORSANCO’s role in developing the standards. On August 29, 2017, the Power Industry Advisory Committee submitted comments to ORSANCO. *See*, attached Comments. The Utilities endorse these comments, having provided input on the initial comments. The Utilities further incorporate these comments by reference.

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<sup>1</sup> The member companies include: AEP Generation Resources Inc., Buckeye Power, Inc., The Dayton Power and Light Company, Duke Energy Ohio, Dynegy Commercial Asset Management, LLC, FirstEnergy Solutions, and Ohio Valley Electric Corporation.

Since that time, ORSANCO has expressed its intent to adopt Alternative 2, which was the Power Industry Advisory Committee's preference. This would "[m]odify ORSANCO's Pollution Control Standards ... by removal of the Water Quality Criteria (Chapter 3), Mixing Zone Designation (Chapter 4) and portions of wastewater discharge requirements (Chapter 5) from the [Pollution Control Standards] and maintain the Chapters on Designated Uses."<sup>2</sup> The Utilities are comfortable with this proposed alternative and support ORSANCO's recommendation.

At the Technical Committee meeting on February 7-8, 2018, some members of the public and some States expressed concerns that this action would be to the detriment of the Ohio River. This could not be further from the truth. Most of these comments appear to be due to a lack of understanding of how Ohio River water quality is protected. The Compact was signed on June 30, 1948. At that time, the U.S. EPA and state agencies to regulate water pollution did not exist and there was a need to address the increasing raw sewage and unregulated industrial pollution discharged to the Ohio River. Since that time, the Clean Water Act was enacted (and revised multiple times) and has been implemented at both the State and Federal level.

Under Alternative 2, ORSANCO will no longer conduct a triennial review of the Pollution Control Standards or assess variances for the Ohio River. However, under the Clean Water Act, each state is required to develop and enforce water quality standards; these requirements must be approved by U.S. EPA. In addition, most of the numeric criteria promulgated by the states come directly from U.S. EPA recommendations. Thus, should ORSANCO adopt Alternative 2, contrary to the concerns expressed by some, the Ohio River will continue to be protected by the states, with oversight and input from U.S. EPA. Further, as noted above, ORSANCO would maintain the chapters on Designated Uses and presumably continue to submit an Integrated Report on these uses for the entire Ohio River.

It should be noted that Ohio EPA cannot incorporate ORSANCO's Pollution Control Standards by reference nor can it include any of ORSANCO's Pollution Control Standards in a permit without first promulgating, through notice and comment rulemaking, the standards under Ohio Law.<sup>3</sup> Therefore, any changes to ORSANCO's Pollution Control Standards must then be adopted by Ohio EPA through a rulemaking, which requires Ohio EPA to provide its own legal and technical justification for the revisions before the revised standards can be implemented on the Ohio River. This step, however, allows interested parties to challenge any proposed standards when there is no defensible legal or technical basis for the standards. By adopting Alternative 2, ORSANCO is simply removing one component of an already long process in promulgating and implementing regulations to protect the Ohio River.

The Utilities have long questioned the jurisdiction for challenging ORSANCO's ability to promulgate the Pollution Control Standards. Article VI of the Compact gives the Commission authority "to adopt, prescribe and promulgate rules, regulations and standards for administering and enforcing the provisions of this article." The Compact also gives the Commission authority to issue orders requiring a person to eliminate, modify, or treat a discharge into the Ohio River. Article IX

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<sup>2</sup> <http://www.orsanco.org/wp-content/uploads/2016/09/Preferred-Expanded-Alternative-2-and-Minority-Report.pdf>

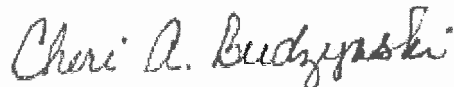
<sup>3</sup> See, *The Dayton Power and Light Company v. Nally*, ERAC Case Nos. 13-296712-13-666718 (June 18, 2014); R.C. §119.

also indicates that the Commission can enforce these orders in any Court of General jurisdiction or any United States district court in the signatory states "by mandamus, injunction, specific performance or other form of remedy." Ohio R.C. §6113.03 provides that the courts of common pleas are granted the jurisdiction specified in Article IX. In contrast, the Compact is silent regarding whether a party has a right to appeal ORSANCO's Pollution Control Standards, and ORSANCO's legal staff contends that parties lack judicial review. Thus, the Utilities have often found it frustrating when ORSANCO proposed revisions where there was no sound legal or technical basis for the revision. Even when the Utilities had the opportunity to comment on ORSANCO's revisions, there was no legal recourse if ORSANCO disregarded the Utilities' comments. In contrast, as noted above, when states promulgate standards, there is a legal avenue to challenge those standards.

Rather than trying to be a regulatory body that duplicates the work of the states, the Utilities think that, by adopting Alternative 2, ORSANCO can focus on one of its greatest assets to the states – collecting data on the health of the Ohio River. This is a very important aspect of developing water quality standards. This is especially critical given the limited resources both states and ORSANCO have faced in the most recent years.

The Utilities thank ORSANCO for the opportunity to comment and would be happy to meet with Ohio EPA to discuss the above recommendations.

Very truly yours,

A handwritten signature in cursive script that reads "Cheri A. Budzynski".

Cheri A. Budzynski

CAB\rde  
Enclosure

## **Comments of the Power Industry Advisory Committee on Proposed Alternatives to how ORSANCO Implements the Pollution Control Standards (PCS) Program**

**August 2017**

These comments are provided by the ORSANCO Power Industry Advisory Committee (PIAC) concerning proposed alternatives as to how ORSANCO implements the existing Pollution Control Standards (PCS), as delineated in the July 18, 2017 white paper. We appreciate the time and resources that the Ad Hoc Committee has taken to develop the five proposed alternatives. Good water quality in the Ohio River benefits everyone, and the significant chemical and biological monitoring programs conducted by ORSANCO staff have clearly shown improved water quality. In addition, several companies of the PIAC have contributed meaningful funding to ecological assessments of the Ohio River near coal-fired generating facilities for over 30 years via the Ohio River Ecological Research Program. These studies, like the ORSANCO data, have demonstrated improved water quality since the early 1970s.

With the advent of potential lowered funding to ORSANCO (and also to states) from the federal government, the decision to re-think the function of the PCS is timely. Notwithstanding the fact that the ORSANCO Compact does not directly address the derivation and implementation of water quality standards (WQS), ORSANCO's greatest contribution for all stakeholders is the collection and issuance of high-quality monitoring results. Many PIAC companies have accessed these data to support environmental permitting/relicensing activities.

As to the alternatives outlined in the white paper, the PIAC can support alternatives 1, 2, or 5. Alternative 2 would be our preference. One of the reasons we believe that ORSANCO should not assume the review of WQS during its triennial reviews is that the Commission has no mechanism for due process (i.e., affected parties cannot file legal challenges to updated or new standards). This is a critical aspect when states propose new environmental regulations or standards. Moreover, the effort that ORSANCO staff put toward the triennial review process is not cost-effective as some member states, themselves, do not adopt the updated PCS in their own standards. The PIAC thinks ORSANCO would be better served reallocating the limited resources to programs supporting data collection on the Ohio River. As each member state has the authority to implement the Clean Water Act, the added value of the states working with ORSANCO during the triennial review process is highly speculative. ORSANCO could still serve in an advisory role should the state need assistance in the development of their WQS. This is not to say that the PCS are outdated or irrelevant; as an example, ORSANCO is one of only a few water resource regulatory bodies that has adopted US EPA's methylmercury fish tissue

criterion. The PIAC supports ORSANCO's usage of a weight-of-evidence approach to assess the fish consumption use, and we support the continued use of this for 305(b) reporting purposes.

The electric utility industry is a highly regulated sector. Significant investments have been made by PIAC member companies to reduce air emissions, minimize solid waste releases, and improve the quality of process waste streams. The footprint of coal-based power production on the Ohio River is considerably less than 10 years ago. For those facilities that have installed state-of-the-art pollution control technologies to comply with applicable federal or state regulations (allowing them to continue to use coal as a fuel), the development of reasonable, scientifically-based environmental standards is essential.

Lastly, the Utilities would like to bring attention to some statements made concerning Alternative 3. Under the "Key Considerations", item #6 states that one of the advantages of this alternative would be to "Reduce the influence of campaign donors and special interest groups on the standards development and permitting processes." One of the disadvantages (cons) listed, as item #1, is that the alternative may be "Opposed by some industries and the chamber of commerce who object to any regulations, even the ones that may help them." We consider these statements irrelevant, without basis, and inflammatory. Over the years the PIAC and other industry advisory committees have worked constructively with ORSANCO and member states to develop standards and policies that are reasonable and technically sound.

The PIAC appreciates the opportunity to submit these comments.



**AK Steel Corporation**

BUTLER WORKS

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**ORSANCO**

5735 Kellogg Avenue

Cincinnati, Ohio 45230

Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

AK Steel Corporation (AK Steel), through its wholly owned subsidiary Mountain State Carbon (MSC), owns and operates a by-product cokemaking facility located on the Ohio River at Follansbee, WV. AK Steel has filed separate comments on the 2018 proposed revisions of the ORSANCO Pollution Control Standards (PCS) in support of Alternative 2 Expanded. In the event ORSANCO does not modify the PCS as contemplated by Alternatives 1, 2 or 2 Expanded, AK Steel requests that ORSANCO publish the following proposed changes to the PCS criteria for public review and comment in the second round of PCS review planned for later this year.



The table below sets out the current PCS water quality criteria from Chapter 3, Section 3.1 for mercury, selenium and phenolics. Comments regarding the PCS water quality criteria for each pollutant are presented below as well as comments regarding the mixing zone ban for mercury.

Pollutant	Water Quality Criteria (µg/L)	Beneficial Use Designation
Mercury	0.012 1.45 0.774	Human Health – Non-Carcinogenic Aquatic Life – Acute Aquatic Life - Chronic
Selenium	170 5	Human Health – Carcinogenic Aquatic Life - Chronic
Phenolics	5	All Other Uses (e.g., Taste and Odor)

*Mercury*

PCS Chapter 4, Section F.1 includes the following provision regarding mixing zone bans for bioaccumulative chemicals of concern (BCCs):

*F.1. Facilities with discharges which were in existence on or before October 16, 2013 will have mixing zones eliminated for any bioaccumulative chemical of concern (BCC) as soon as practicable, as determined by the permitting authority, considering the following criteria:*

- i. Measures taken during the current permit cycle and an evaluation of those measures proposed to be taken during the next permit cycle to reduce or eliminate the necessity of a mixing zone for each BCC.*

- ii. *The concentration and duration of the discharges, bioaccumulation factors and exposure considerations for each BCC for which the mixing zone is sought to be continued.*

The assessments for mercury presented in Attachment A show the ORSANCO mercury water column PCS criterion is achieved in the Pike Island Pool on a consistent basis, with a few exceptions during high Ohio River flow conditions (i.e., when Ohio River velocity is greater than 1 mile per hour). Furthermore, the PCS fish tissue criterion of 0.3 mg/kg has been achieved in the Pike Island Pool for the entire period of record of ORSANCO fish tissue data extending back to 1983. This result takes into account the cumulative effect of current and historical point source discharges, background sources and atmospheric deposition sources. Consequently, a point source mixing zone ban for mercury in the Pike Island Pool is not necessary to attain or ensure continued compliance with the ORSANCO PCS fish tissue criterion. As with selenium (see comments below), the mercury fish tissue criterion should take precedence over the water column criterion.

We request that the mixing zone ban for mercury be removed for the Pike Island Pool, and any mixing zone bans for mercury for the remaining pools of the Ohio River be applied on a pool-by-pool basis as may be warranted based on fish tissue data.

#### *Selenium*

The table below presents a comparison of the PCS water column criterion for selenium and water column and fish tissue criteria recommended by EPA and those adopted by West Virginia and Kentucky.

Selenium Water Quality Criteria	Units	ORSANCO PCS	EPA	Kentucky	West Virginia
Water Column	ug/L	5	5	5	5
Fish Tissue (whole fish)	mg/kg		8.5	8.6	8.0
Fish Tissue (boneless, skinless filet)	mg/kg		11.3		11.3
Fish Tissue (egg-ovary)	mg/kg		15.1	19.3	15.8

The assessments for selenium presented in Attachment B show the PCS water column criterion is being achieved in the Pike Island Pool and throughout the Ohio River. The recommended EPA fish tissue criteria and the fish tissue criteria adopted by Kentucky and West Virginia are also achieved throughout the Ohio River by wide margins.

The EPA recommended selenium criteria and those adopted by Kentucky and West Virginia establish a protocol whereby fish tissue criteria take precedence over water column criteria. This is a sensible approach because it directs regulation of selenium at the highest level of human health protection.

A problem arises at Mountain State Carbon where application of the PCS water column criterion results in water quality based effluent limits that are not currently achievable,

whereas available water column and fish tissue selenium data for the Pike Island Pool show the West Virginia fish tissue criteria are being achieved by wide margins. We request that ORSANCO either adopt the EPA (or West Virginia) water quality criteria for selenium, or provide a mechanism whereby state fish tissue criteria for selenium would take precedence over the PCS water column criterion.

*Total Phenolics*

The ORSANCO PCS water quality criterion for total phenolics of 5 ug/L is for protection against taste and odor in potable water supplies. The assessment in Attachment C shows that that criterion has been met for more than 98% of the Ohio River samples collected by ORSANCO. The standard dates back decades and is contained in many state water quality standards. We are not aware that phenolic-derived taste and odor is a significant issue for public water supplies located on the Ohio River.

The total phenolics analytical method (SM 5530) is a non-specific colorimetric procedure that measures some but not all phenolic compounds. It does not distinguish among those phenolic compounds that contribute to taste and odor (i.e., chlorophenols) and those phenolic compounds and other substances assayed by the test that do not. EPA has published a list of phenolic compounds that are known to contribute to taste and odor in potable water (see Attachment C). We request that ORSANCO consider replacing the total phenolics water quality criterion with criteria for potable water supplies with public water supply criteria for those compounds identified by EPA as contributing to taste and odor.

Thank you for considering AK Steel's comments on possible 2018 revisions to the PCS. We would welcome the opportunity to review our comments with the ORSANCO technical staff and ORSANCO commissioners as may be useful in the course of your review. If you have any questions I can be reached at 724 284-226 or by email at russ.dudek@aksteel.com

Sincerely,



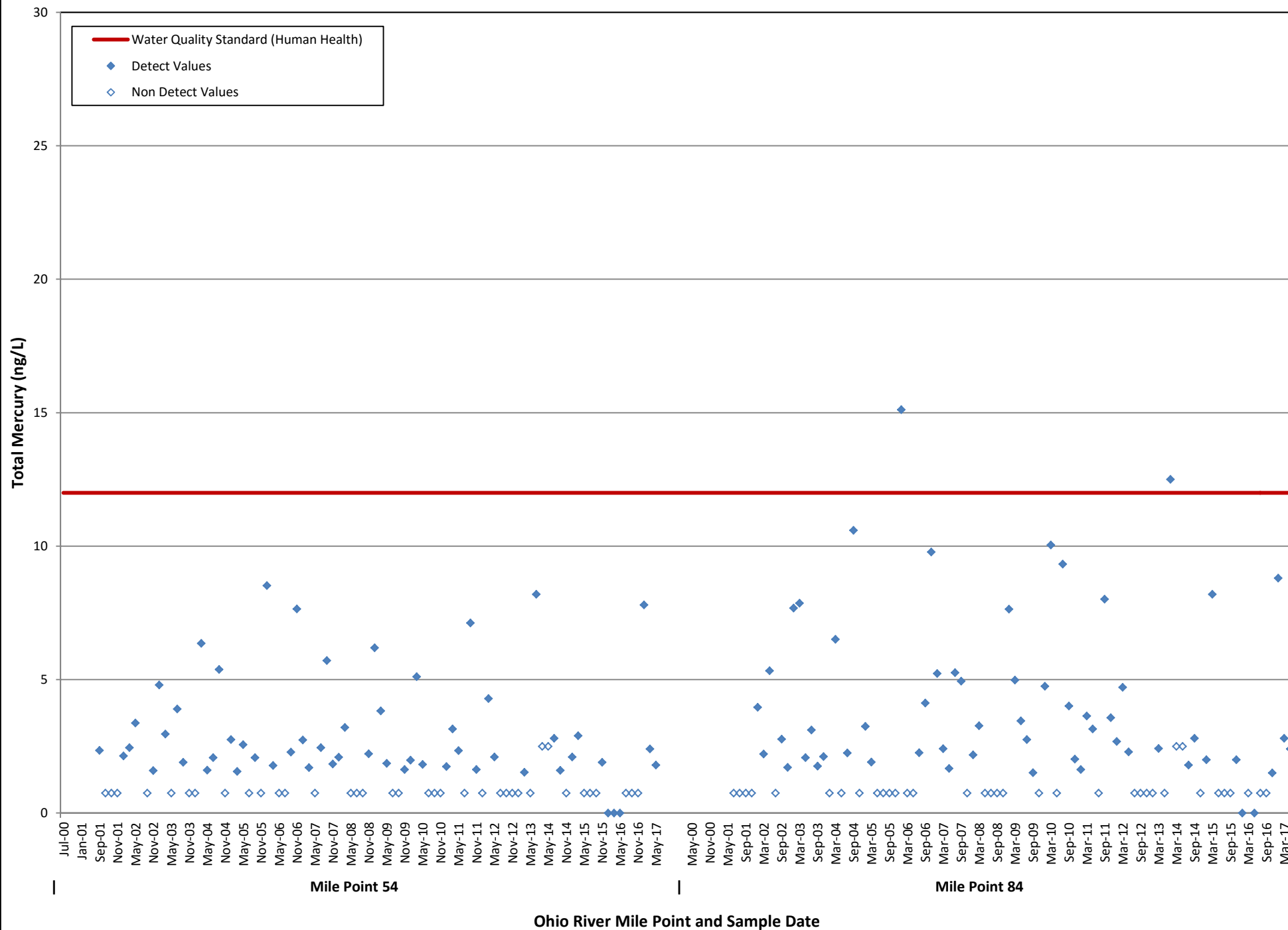
Russell J. Dudek  
Senior Environmental Manager  
AK Steel Corporation

cc     Scott Mandirola  
       David Flannery  
       Ronald Potesta  
       Austin Caperton  
       Patrick Smith

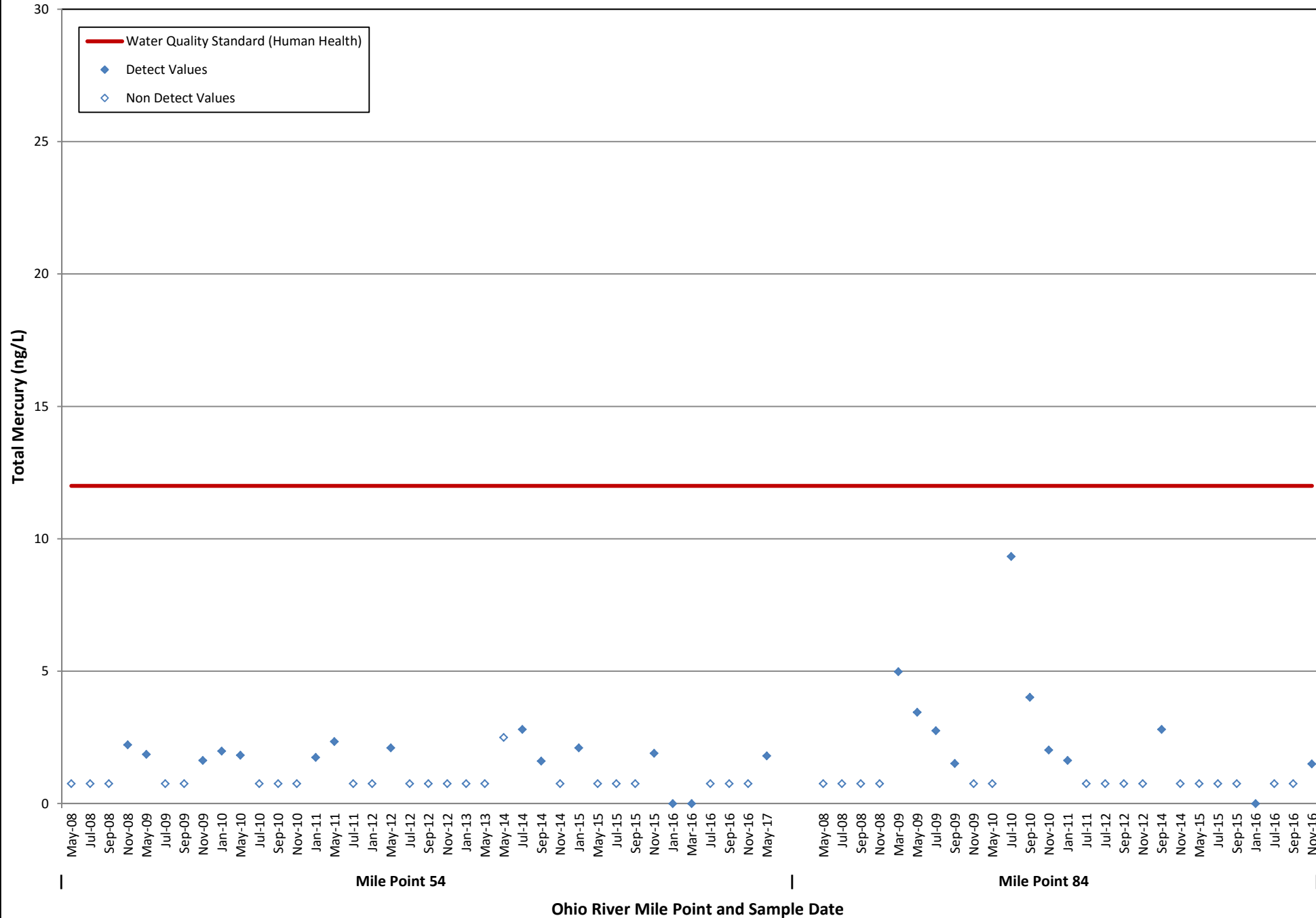
**ATTACHMENT A**

**Ohio River Data Charts  
Mercury Water Column and Fish Tissue Data**

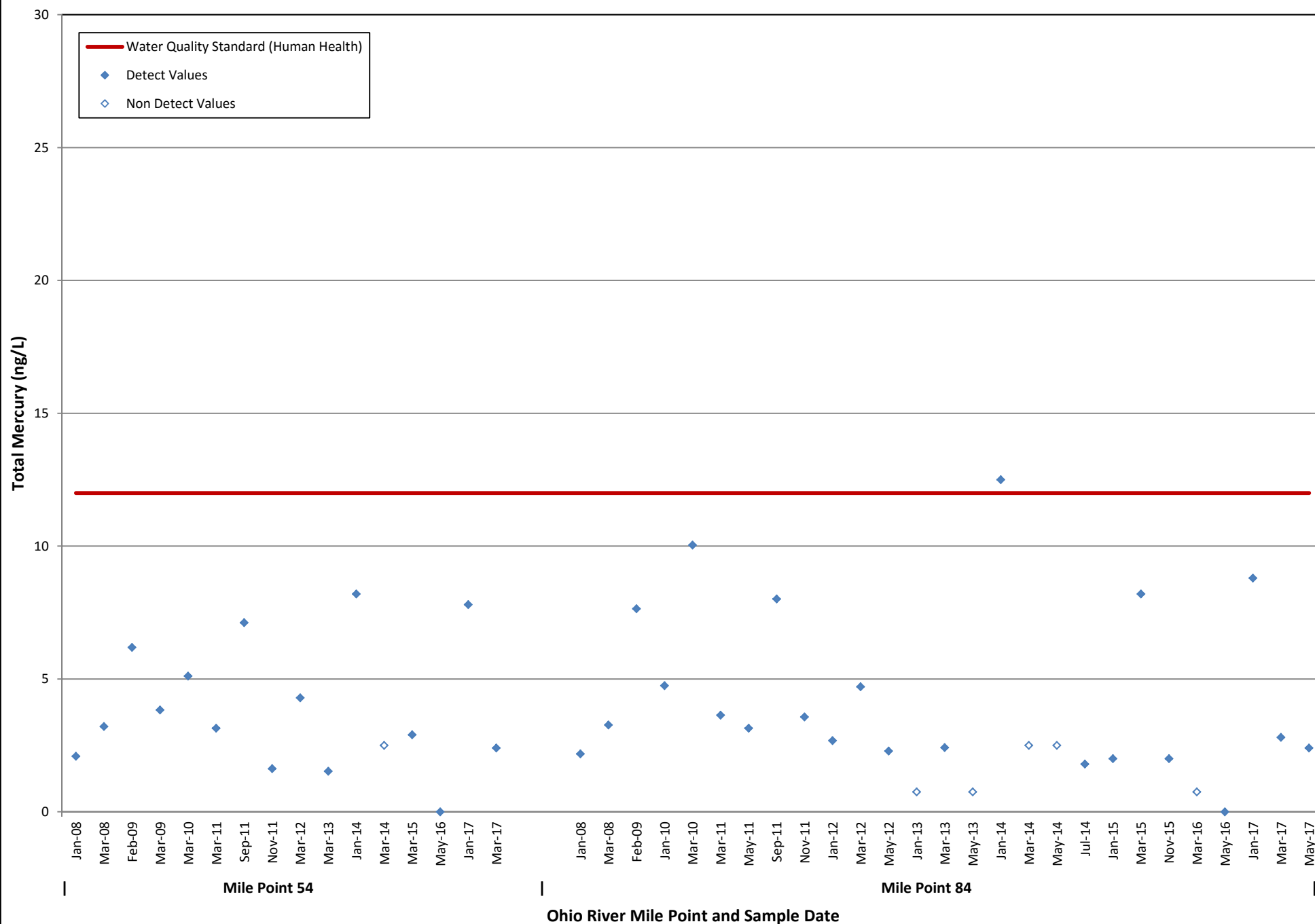
ORSANCO Ohio River Total Mercury Data  
Ohio River Pike Island Pool - MP 54 and 84 (2000 to 2017)



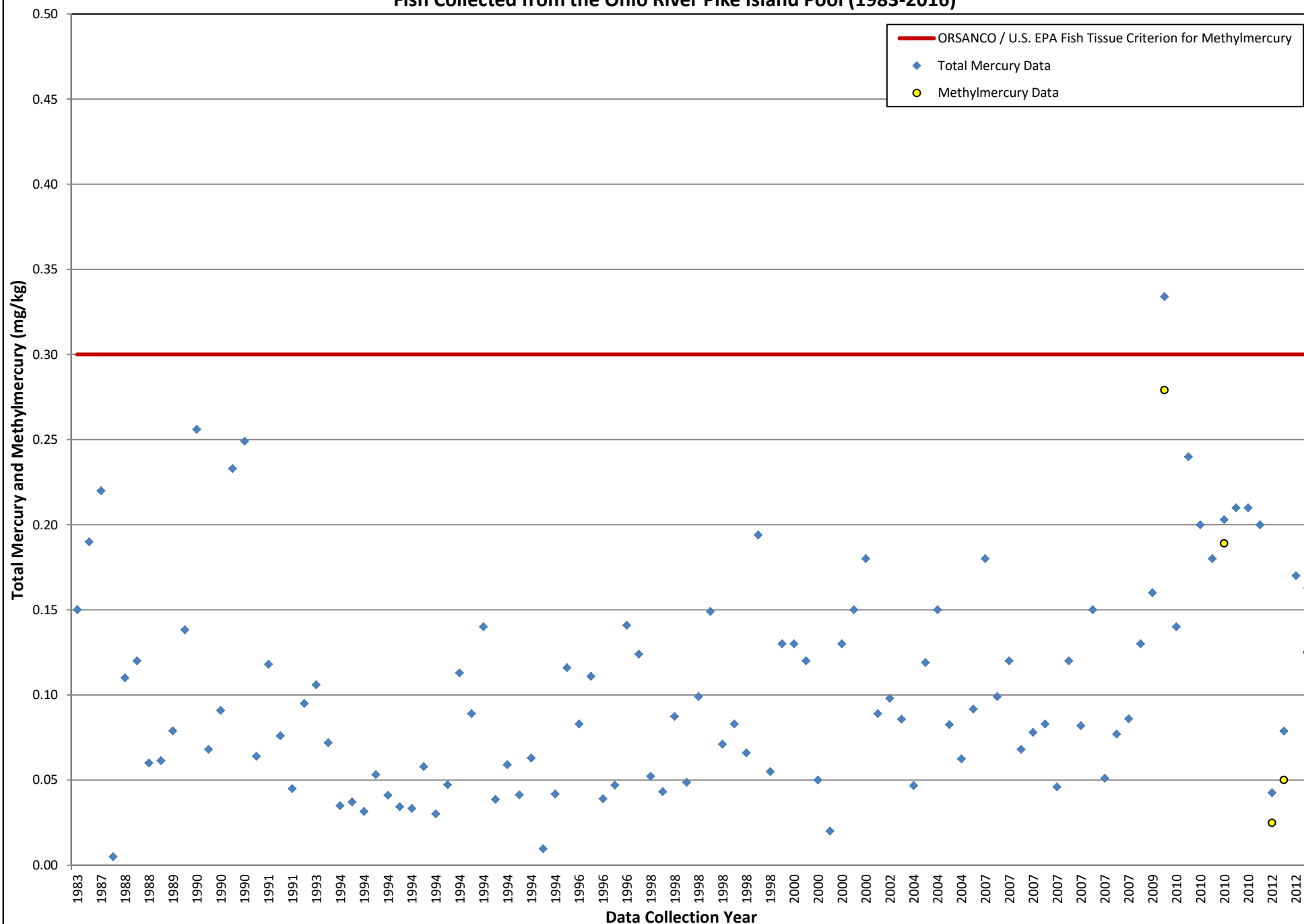
ORSANCO Ohio River Total Mercury Data  
Ohio River Pike Island Pool - MP 54 and 84 (2008 to 2017)  
Ohio River Velocities  $\leq 1.0$  mph



ORSANCO Ohio River Total Mercury Data  
Ohio River Pike Island Pool - MP 54 and 84 (2008 to 2017)  
Ohio River Velocities >1.0 mph



**ORSANCO Total Mercury and Methylmercury Fish Tissue Data  
vs. ORSANCO / U.S. EPA Fish Tissue Criterion for Methylmercury  
Fish Collected from the Ohio River Pike Island Pool (1983-2016)**

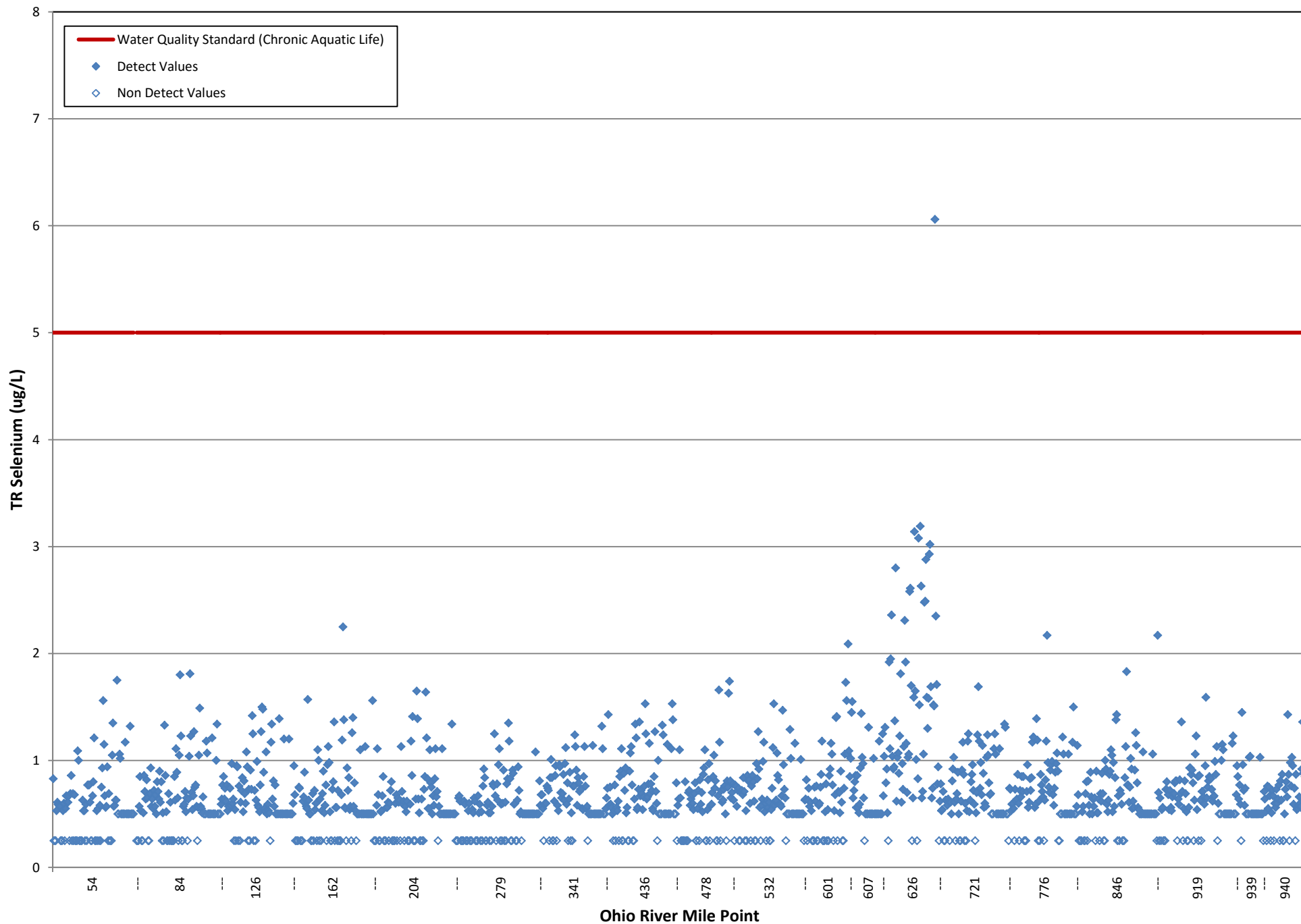




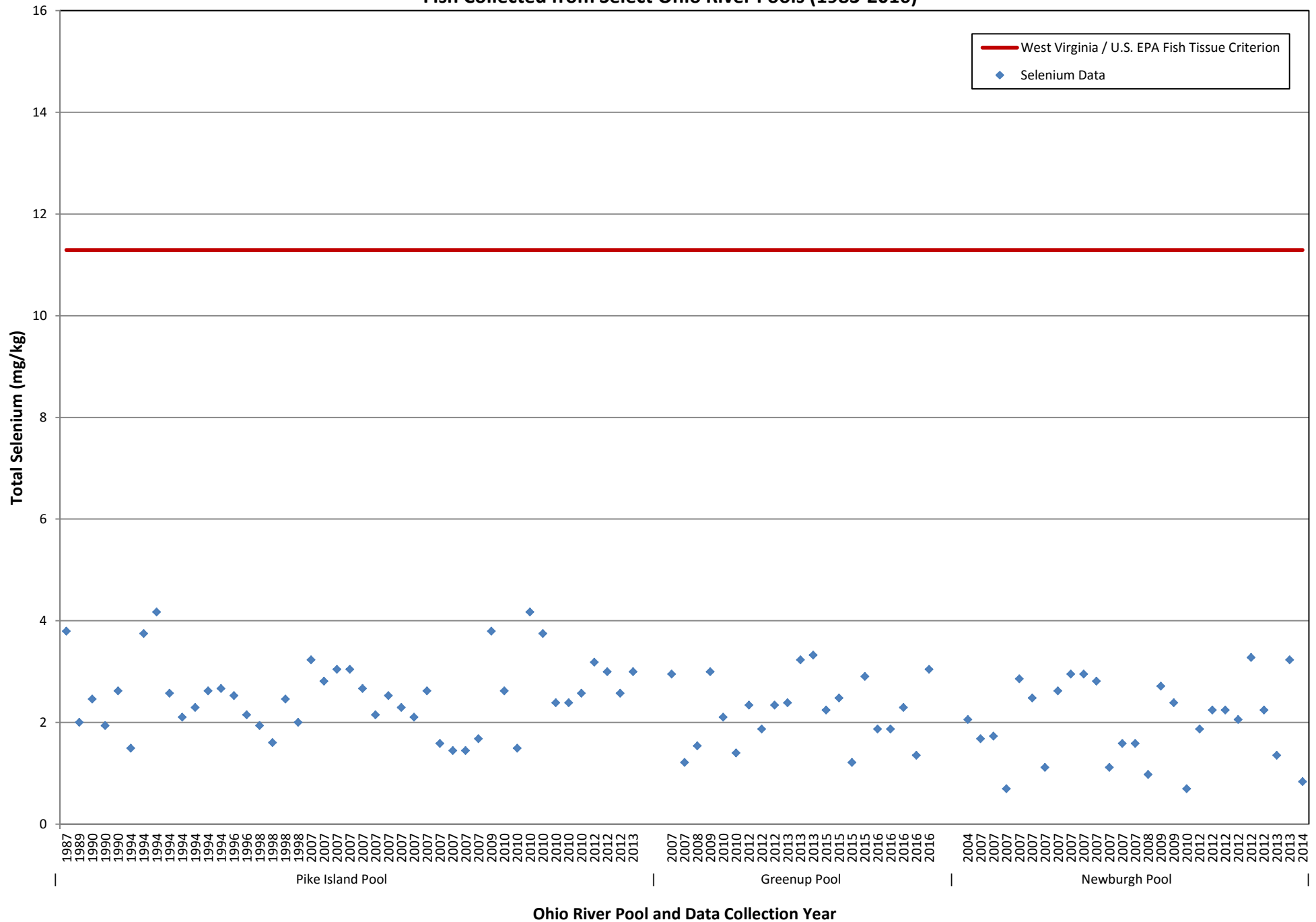
**ATTACHMENT B**

**Ohio River Data Charts  
Selenium Water Column and Fish Tissue Data**

ORSANCO Ohio River Water Column Total Recoverable Selenium Data  
Ohio River Main Stem - MP 54 to 940 (2000 to 2017)



**ORSANCO Total Selenium Fish Tissue Data  
vs. U.S. EPA Fish Tissue Criterion (Skinless, Boneless Muscle/Filet)  
Fish Collected from Select Ohio River Pools (1983-2016)**

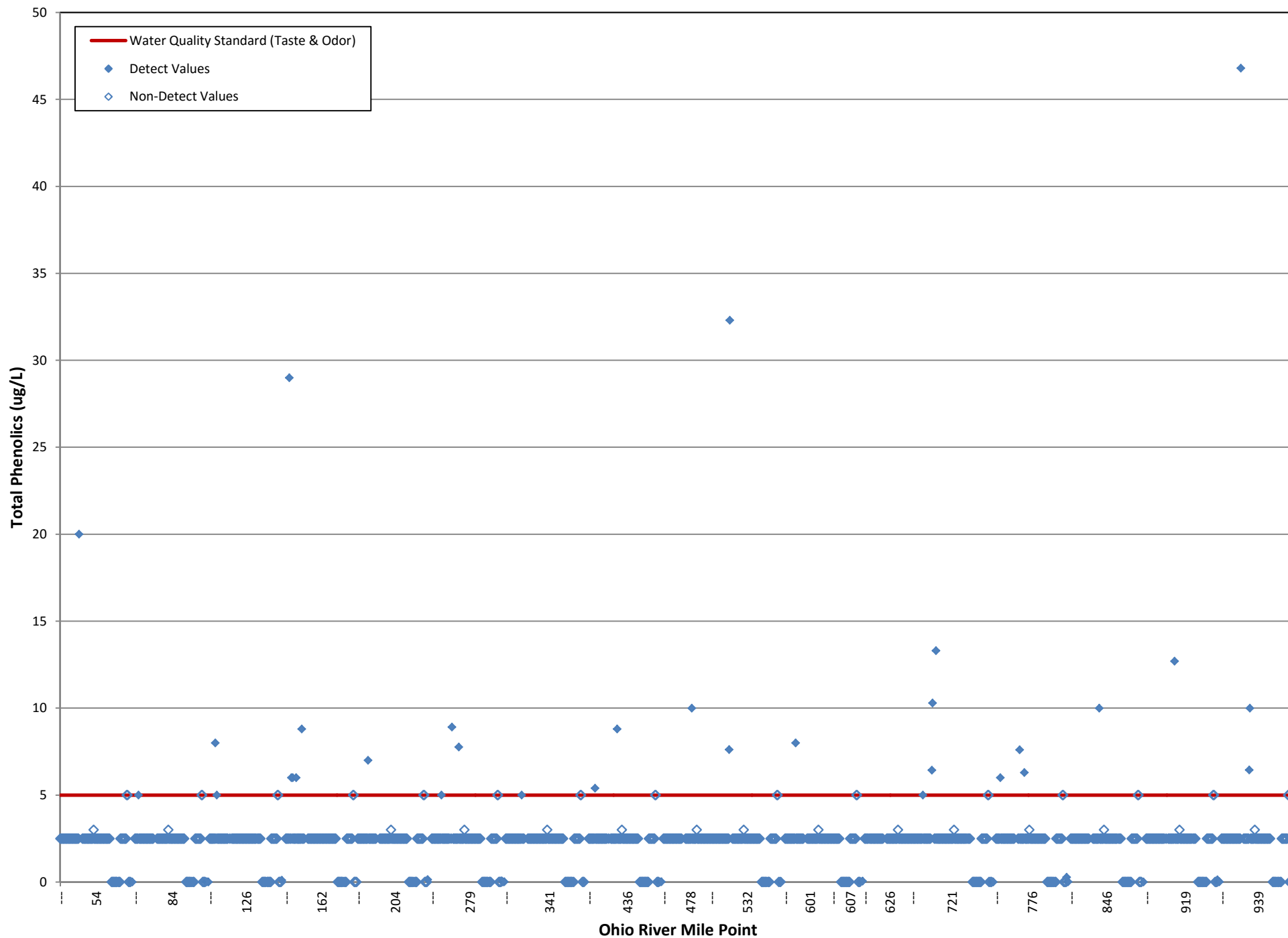


**ATTACHMENT C**

**Ohio River Data Charts  
Total Phenolics Water Column Data**

**List of Phenolic Compounds  
Known to Contribute to Taste and Odor in Potable Water**

ORSANCO Ohio River Total Phenolics Data  
Ohio River Main Stem - MP 54 to 940 (2000 to 2017)



**Nationally Recommended Water Quality Criteria**  
**Phenolic Compounds with Organoleptic (taste/odor) Effects**

<b>Pollutant</b>	<b>CAS Number</b>	<b>Organoleptic Effect Criteria (µg/L)</b>
3-Chlorophenol	—	0.1
4-Chlorophenol	106489	0.1
2,3-Dichlorophenol	—	0.04
2,5-Dichlorophenol	—	0.5
2,6-Dichlorophenol	—	0.2
3,4-Dichlorophenol	—	0.3
2,4,5-Trichlorophenol	95954	1
2,4,6-Trichlorophenol	88062	2
2,3,4,6-Tetrachlorophenol	—	1
2-Methyl-4-Chlorophenol	—	1800
3-Methyl-4-Chlorophenol	59507	3000
3-Methyl-6-Chlorophenol	—	20
2-Chlorophenol	95578	0.1
2,4-Dichlorophenol	120832	0.3
2,4-Dimethylphenol	105679	400
Pentachlorophenol	87865	30
Phenol	108952	300

Source

<http://water.epa.gov/scitech/swguidance/standards/criteria/current/index.cfm#organoleptic>

Below please find FirstEnergy's comments on the alternatives ORSANCO proposed for their Pollution Control Standards (PCS) Program. A signed paper copy is being mailed to your office today. Thank you for your consideration of these comments.

Joe L.

**SENT VIA EMAIL AND  
CERTIFIED MAIL 7012 3460 00020162 4480**

February 23, 2018

ATTN: PCS Comments  
ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230  
[PSC@orsanco.org](mailto:PSC@orsanco.org)

**Re: Alternative Recommendations – Pollution Control Standards**

To whom it may concern:

FirstEnergy Corp. (FirstEnergy), a diversified energy holding company with both electric distribution and generation companies forms one of the nation's largest investor-owned electric systems, serving customers in Ohio, Pennsylvania, New Jersey, West Virginia, Maryland, and New York. FirstEnergy's generation subsidiaries control more than 16,000 megawatts of capacity from a diversified mix of scrubbed coal, non-emitting nuclear, natural gas, pumped-storage hydro, and other renewables. As such, FirstEnergy has a vested interest in Ohio River Valley Water Sanitation Commission's (ORSANCO) Pollution Control Standards (PCS) Program.

The ORSANCO recently made available for comment several alternatives to address whether ORSANCO should continue "to maintain, administer, and periodically update the current Pollution Control Standards, or should eliminate the Pollution Control Standards and withdraw from the process of maintaining and updating such standards."

FirstEnergy participated in the development of and concurs with comments filed by the Ohio Utility Group (OUG1) in support of the Commission's adoption of Alternative #2, as well as initial comments filed on August 29, 2017 by the Power Industry Advisory Committee (PIAC). In addition, FirstEnergy is pleased to offer the following comments to further emphasize points raised by the OUG.

Of the five alternatives proposed by the Commission, FirstEnergy supports the adoption of Alternative #2 as the most sensible, cost-effective approach to satisfying the goals of the ORSANCO Compact. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear and the absence of an effective regulatory framework to address that need was critical.

---

<sup>[1]</sup> The member companies include: AEP Generation Resources Inc., Buckeye Power, Inc., The Dayton Power and Light Company, Duke Energy Ohio, Dynegy Commercial Asset Management, LLC, FirstEnergy Solutions, and Ohio Valley Electric Corporation.

Since that time, the federal Clean Water Act and related laws have been enacted, as well as the development and implementation of a comprehensive system of federal and state water quality programs and standards, which administer all ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency (US-EPA) pursuant to the Clean Water Act. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Under Alternative 2, ORSANCO would no longer conduct a triennial review of their Pollution Control Standards, or assess variances for the Ohio River. However, under the Clean Water Act, each Compact state is required to develop and enforce water quality standards; requirements which must be approved by the U.S. EPA. In addition, most of the standards promulgated by the states come directly from U.S. EPA recommendations. Thus, should ORSANCO adopt Alternative 2, contrary to the concerns expressed by some at ORSANCO's recent Technical Committee Meeting in Covington, Kentucky, the Ohio River's water quality will continue to be protected by the Compact states. Further, as noted above, ORSANCO would maintain the chapters on Designated Uses and presumably continue to submit an Integrated Report on these uses for the entire Ohio River.

Rather than trying to be a regulatory body that duplicates the work of the states, FirstEnergy contends that, by adopting Alternative 2, ORSANCO can focus on one of its greatest assets to the states – collecting data on the health of the Ohio River. This is a very important aspect of developing water quality standards. This is especially critical given the limited resources both states and ORSANCO have faced in the most recent years.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed 70-years ago, they have since become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact states are being effectively addressed by the Clean Water Act, while ORSANCO's PCS provide little added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process, as there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.



FirstEnergy appreciates the historical role ORSANCO has provided in protecting and preserving water quality in the Ohio River and in collecting and disseminating river water quality data and information. Furthermore, we appreciate the opportunity to provide these comments on the proposed Alternatives for the PCS Program and request the Commission carefully consider these comments, as well as those from OUG. Please do not hesitate to call me at (724) 838 – 6099 to discuss these comments in more detail.

Sincerely,

Joseph P. Lapcevic  
Supervisor, Water Permitting

Joseph P. Lapcevic  
Supervisor, Water Permitting  
(724) 838 - 6099 work  
(234) 678 - 2385 fax  
FirstEnergy Corp.  
800 Cabin Hill Drive  
Greensburg, PA 15601-1689

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2001 Quarrier Street  
Charleston, WV 25311  
304.342.2123 Phone

February 23, 2018

ORSANCO  
5735 Kellogg Avenue  
Cincinnati, OH 45230

Attn: PCS Comments

### **ORSANCO Comments**

The Ohio River Valley Water Sanitation Commission has invited comments on five alternatives for its Pollution Control Standards (PCS). The West Virginia Manufacturers Association, which counts among its members many companies that operate along the Ohio River, supports the first alternative offered by ORSANCO. We would also support the second of the alternatives, but feel it is inferior for the reasons given below.

The first alternative proposed by ORSANCO is: "[t]erminate ORSANCO's PCS and rely upon state and federal programs provided for under the Clean Water Act and related state statutes." This alternative best recognizes the most important change in environmental regulation relative to the Ohio River that has occurred since ORSANCO's founding: the passage of the federal Clean Water Act in 1972 and its subsequent amendments. The Clean Water Act is a comprehensive approach to protecting the health of the nation's interstate waters, like the Ohio River, and it has augmented, and eventually supplanted, some of the mission of multi-state compacts like ORSANCO. More specifically, in the area of water quality standards, the Environmental Protection Agency and the states have now assumed lead roles in developing and implementing water quality criteria.

Each state is required to develop water quality standards that are subject to the approval of EPA; if a state does not, EPA will promulgate standards for that state. To our knowledge, all compact states have adopted their own water quality standards, and those standards have been approved by EPA. Each of those states has adopted an approved antidegradation process and numerical and narrative criteria. The numeric criteria are generally based on EPA-sponsored laboratory studies and developed in accordance with EPA guidance. In short, all the states have developed programs that correspond to the PCS, and provide the same, or greater, environmental protections. It is a correct statement that:

Because all states are mandated by the federal Clean Water Act to adopt and submit for USEPA approval a program that addresses designated uses, free from mandates, wastewater discharge requirements, water quality standards, mixing zones, and more, we can fairly conclude that the requirements of the Compact are being satisfied by the federal Clean Water Act.

### **Water Quality Standards Alternative Summary, Alternative Number 2.**

The fact that all states have adopted protective standards does not mean that the states have adopted the same standards. At least one commenter claimed that "there are at least 188 parameters among the six signatory states and EPA for which ORSANCO has criteria and state or EPA does not; stringency of criteria are not consistent; mixing zones prohibitions and anti-degradation policies are inconsistently applied." Summary of Comments, Comments from the Technical Committee. Regardless of whether that is correct, it is irrelevant. Water quality standards are not a one-size-fits-all proposition that are uniform nationally; states develop standards that are appropriate for that state. For example, some states have no water quality criterion for iron, since it is ubiquitous in soil, whereas West Virginia has adopted a chronic criterion of 1.5 mg/L. For another example, West Virginia has done a survey of in-state anglers and households to develop a fish consumption rate that is different than EPA's, to be used in standards setting and permit issuance. The PCS should not be continued if they are intended to over-ride these sorts of state decisions, which are reviewed and approved by EPA.

ORSANCO's PCS are applied by the states, sometimes in disparate ways. As ORSANCO reports:

Additionally, status and implementation of ORSANCO standards varies to some degree from state to state. Some states implement ORSANCO standards directly into their permitting and compliance programs, while one state is prohibited from implementing our standards. That state can only implement regulations adopted by the state through its own administrative process. This may also be the case to some extent in other states as well.

Water Quality Standards Alternative Summary, Alternative Number 1. West Virginia is one of the states that implements ORSANCO standards directly into NPDES permits, based on its interpretation of the ORSANCO Compact. The fact that other states interpret the Compact to allow more flexibility puts West Virginia companies at a potential disadvantage when NPDES permits are issued.


ORSANCO notes that nothing in the Compact mandates development of PCS, which may explain why neither the Compact nor the PCS make any provision for challenging the PCS. Our research has suggested that the proper avenue for appeal may be through federal district court, although to our knowledge that has not been tested and is not entirely clear. In any event, the lack of clear due process with regard to a rule that could affect fundamental interests is problematic. If there are no PCS, that concern vanishes.

Alternative 2 would be acceptable as well, as it would provide a clear statement that compliance with state water quality standards constitutes compliance with the PCS, and would remove all or parts of Chapters 3, 4 and 5. Once those Chapters are removed or modified, though, it is unclear what would be left, and how the remaining sections would be applied. If Chapter 1, which contains narrative criteria and site-specific criteria and variance provisions, would still be effective, how would it be enforced? It is also unclear why the use designations and the clarification of their application in Chapter 2 should remain in the PCS, since designated uses are already set forth in the Compact, and the Compact requires adoption of state programs to protect those uses. In fact, there is no point to any of the PCS, if compliance with state standards constitutes compliance with PCS. Leaving parts of the PCS in place, but providing that they don't apply to states that are meeting their Clean Water Act obligations, could result in confusion as to how the rule is meant to be applied.

Under both Alternative 1 and Alternative 2, ORSANCO staff could be re-assigned to other tasks such as river monitoring, the organic detection system, fish studies, and other program support. We believe that such activities would be more productive than developing, proposing and adopting PCS that are redundant of state water quality standards. If it does not engage in the PCS process, ORSANCO would have more resources to devote to determining compliance with standards, rather than duplicating existing standards.

Finally, regardless of what decision the Commission makes, the WVMA wishes to commend it for re-evaluating whether PCS remain a necessary part of its mission. It is rare that an organization is willing to consider whether the actions that were appropriate yesterday are still relevant today, and consider charting a different, but equally effective, course for the future.

Sincerely,



Rebecca McPhail  
President



## Alcoa Warrick Operations

Environmental Department  
4000 W State Road 66  
P.O. Box 10  
Newburgh, IN 47629-0010

**Friday, February 23, 2018**

Certified Mail: 7015 0640 0004 5075 0862

ORSANCO  
Attn: PCS Comments  
5735 Kellogg Avenue  
Cincinnati, OH 45230

RE: PCS Comments, Alcoa Corporation

To Whom It May Concern:

These comments are filed on behalf of Alcoa Corporation ("Alcoa") in response to the 2018 Review of Pollution Control Standards announced by the Commission. The Commission is requesting comments on whether ORSANCO should continue to maintain, administer, and periodically update the Pollution Control Standards or should eliminate the Pollution Control Standards and withdraw from the process of maintaining and updating such standards.

In Alcoa's view, the state-level implementation of the federal Clean Water Act is fully effective at each of our locations across the country, including our Warrick Operations facility located on the Ohio River in Newburgh, Indiana. Therefore, Alcoa would recommend that ORSANCO eliminate its standards, as they pre-date robust state and federal environmental regulatory programs designed to protect the Ohio River.

Alcoa believes that ORSANCO's other programs provide substantial value to Ohio River communities and we support the Commission's broader mission of assessing and protecting the Ohio River as a critical recreation, water supply, aquatic habitat, and transportation resource. Alcoa supports the ORSANCO Chemical Industry Advisory Committee's (CIAC) conclusion that ORSANCO's greatest value is "centered around its unique scientific and technical research, its coordinating role with states and stakeholders, and its Organic Detection System."

As such, of the five (5) alternatives the Commission has developed, Alcoa supports Alternative #2:


In recognition of the successes of the federal Clean Water Act and the related state water pollution control programs of member states, the Pollution Control Standards (PCS) should be revised by adding a provision that recognizes that water quality standards and criteria, as well as mixing zone requirements, and other provisions of the PCS are being adequately addressed by member states in accordance with programs appropriate for implementation of the federal Clean Water Act. To the extent that all member states are operating under

such programs, the Commission may conclude that it need not continue with triennial review process related to the water quality criteria (and related provisions) of the PCS.

Alcoa incorporates by reference the full text of the CIAC comments and therefore urges adoption of Alternative #2.

We appreciate the opportunity to provide these comments and the Commission's considered review of the same.

Sincerely,

A handwritten signature in black ink that reads "Anna M Bogan". The signature is written in a cursive, flowing style.

Anna M. Bogan  
Staff Environmental Engineer  
Water Programs Coordinator  
Alcoa Warrick Operations

**AK Steel Corporation**

BUTLER WORKS  
P.O. BOX 832  
BUTLER, PENNSYLVANIA 16003-0832

TELEPHONE 724.284.2000

Via email: [PCS@orsanco.org](mailto:PCS@orsanco.org) and [jheath@orsanco.org](mailto:jheath@orsanco.org)  
ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Re: Comments on ORSANCO's Pollution Control Standards (PCS) – Triennial Review

To Whom It May Concern:

AK Steel Corporation (AK Steel) is pleased to submit these comments to assist in the Commission's review and evaluation of potential revisions to the ORSANCO Pollution Control Standards – 2015 Revision (the PCS). AK Steel appreciates the historical role of ORSANCO in helping to protect and preserve water quality in the Ohio River and in collecting and disseminating water quality data and information. The Commission's recent request for comments is an important opportunity to assess the role of ORSANCO in light of the significant regulatory developments and improvements in water quality in the Ohio River that have occurred in the 70 years since ORSANCO was formed.



Summary of Comments

AK Steel has reviewed the five alternatives identified by the Commission and supports the adoption of Alternative 2 Expanded as the most sensible and cost-effective approach to satisfying the goals of the ORSANCO Compact in the current legal and regulatory environment. As noted in the Commission's materials and in the comments of several Advisory Committees, ORSANCO was created in 1948, at a time when the need for water quality improvements in the Ohio River was clear. There was an absence of an effective regulatory framework to address the needs that were critical. Since that time, and as a result of the enactment of the federal Clean Water Act and related laws, a comprehensive system of federal and state water quality programs and standards has been developed and implemented in all of the ORSANCO Compact States. The result has been a dramatic improvement in the quality of the Ohio River, as well as its tributaries and other streams throughout the Compact States.

Today, each of the Compact States is implementing a federally-enforceable water quality program approved by the U.S. Environmental Protection Agency pursuant to the Clean Water Act. Each of those programs includes designated uses, "free from" mandates, water quality standards, wastewater discharge requirements, mixing zone provisions, and enforcement authorities. Those programs have been effective in addressing each State's streams as aquatic habitats, as well as supporting their uses for recreation and drinking water.

Whereas the ORSANCO PCS may have been necessary when the Compact was first signed, they have become duplicative of the subsequently enacted federal and state water quality programs established under the Clean Water Act. Today, the water quality goals of the Compact are being effectively addressed by the Clean Water Act, and the PCS provide little or no added value. In fact, the differences between the PCS and Clean Water Act standards can lead to confusion for the States and the regulated community, and can create complications in the permitting process,

where there is often no effective way to question or challenge the appropriateness or applicability of the underlying PCS in specific permitting situations.

AK Steel believes that the most valuable role ORSANCO can play in meeting the goals of the ORSANCO Compact in the current regulatory environment is to concentrate on its scientific and technical information gathering and research. This role allows ORSANCO to provide important information to the States in carrying out their obligations to preserve and protect water quality under the Clean Water Act, and in helping to coordinate and promote consistency among the various States in the Ohio River basin. This is a unique role that only ORSANCO can perform in the current framework, and is certainly its highest and best use.

#### About AK Steel

AK Steel Corporation is one of a few remaining independent steel manufacturers based in the United States, with nine (9) steel manufacturing facilities located in Indiana, Michigan, Ohio, Kentucky, West Virginia, and Pennsylvania and with total employment of approximately 10,000 people. AK Steel has three facilities located on the Ohio River:

Facility	Type of Operation	Principal Products	Total Discharge to the Ohio River
Mountain State Carbon Follansbee, WV	By-Product Coke Plant	Metallurgical coke Crude coal tar Ammonium sulfate	10 to 20 mgd
AK Steel Ashland Works Ashland, KY	Blast Furnace <sup>+</sup> Basic Oxygen Furnaces <sup>+</sup> Ladle Metallurgy Station <sup>+</sup> Vacuum Degasser <sup>+</sup> Continuous Caster <sup>+</sup> Hot Dip Galvanizing Line <sup>+</sup> on idle status	Carbon and ultra-low carbon steel slabs. Galvanized and galvannealed coated steel sheet.	8 mgd
AK Steel Rockport Works Rockport, IN	Steel Finishing Mill	Cold-rolled carbon, coated and stainless steels	1.2 mgd

Cokemaking operations at Mountain State Carbon commenced in 1917; steelmaking operations at the Ashland Works in 1923; and steel finishing operations at the Rockport Works in 1998. Collectively, these three facilities currently employ between 750 and 1,500 people, depending on business conditions, and provide critical manufacturing, finishing and support services to the other AK Steel facilities. Environmental programs at these facilities require substantial investments in pollution control facilities and substantial ongoing operating and maintenance costs to ensure clean air and water. Thus, AK Steel is vitally interested in the ORSANCO PCS and how they are implemented in ORSANCO Compact State water quality programs. Moreover, AK Steel has a long-standing tradition of working closely and cooperatively with environmental



regulators in West Virginia, Kentucky, and Indiana to ensure that its operations meet all applicable standards, including those applicable to the Ohio River. AK Steel is proud of its history of environmental compliance, and is committed to environmental excellence in all of its operations.

Process wastewater, non-contact cooling water and storm water discharges from each of AK Steel's facilities on the Ohio River have been regulated effectively for many years by State-issued NPDES permits. These permits contain both technology-based effluent limits derived from 40 CFR Part 420 (the federal categorical effluent limitations guideline regulation for the Iron and Steel Manufacturing Point Source Category) and water quality-based effluent limits derived by the States under the CWA.

#### Additional Information

AK Steel believes that the adoption of Alternative 2 Expanded is both appropriate and consistent with the mandates of the ORSANCO Compact. The ORSANCO Compact establishes certain minimum requirements for the Commission, its staff, and the signatory States, including:

- Article I requires the States to “enact any necessary legislation” to reach certain general goals identified in Article I, but does not provide for any specific standards or requirements.
- Article VI sets certain limited, baseline treatment requirements for discharges of sewage and industrial wastes (primarily settleable solids and TSS limits for sewage), but grants discretion to the Commission to determine if additional treatment standards are needed to protect public health or to preserve the waters for other legitimate purposes.
- Article VII preserves the rights of signatory States to adopt more stringent standards than those required by Article VI.
- Article VIII requires ORSANCO to survey and study water pollution in the Ohio River drainage basin and to publish a comprehensive report on its findings.
- Article IX gives ORSANCO powers to enforce its standards and requirements.

Thus, ORSANCO must continue to exist and function to meet these basic requirements. But beyond these baseline requirements, we believe the Commission is given wide latitude to determine whether additional pollution control standards are necessary, or whether ORSANCO even must adopt its own regulations or pollution control standards to meet the minimal goals of the Compact, given the existence of mandatory federal and state regulatory programs that address those same goals. AK Steel believes that the Commission is well within its rights to determine – after investigation, due notice, and hearing – that the bulk of the Pollution Control Standards may no longer be necessary in light of the subsequent implementation of the Clean Water Act. Nothing in the Compact, ORSANCO's By-Laws, or the Pollution Control Standards undercuts this conclusion or requires the adoption of more extensive standards. The Commission simply needs to determine that the Compact's goals of protecting public health and preserving other legitimate purposes, including those listed in Article I, are satisfied by the States' implementation of the Clean Water Act permitting programs.

In support of this conclusion, AK Steel notes the following:



- The PCS are largely duplicative of the States' water quality standards adopted pursuant to the Clean Water Act. Beneficial use designations are essentially the same. Most water quality criteria are either the same or provide the same degree of human health and aquatic life protection. Mixing zone designations are similar. Given federal and State technology-based discharge requirements and water quality-based limits, the PCS wastewater discharge requirements are superfluous for most categorical industrial dischargers and municipal dischargers.
- Where there are differences between the ORSANCO PCS and state water quality criteria and implementation procedures, the PCS, which must be implemented by the States, sometimes result in NPDES permit conditions that are more stringent than otherwise required by the States standards – and with no demonstrable environmental benefit. Examples for AK Steel and Mountain State Carbon include PCS provisions governing mercury, selenium and phenolics.
- The implementation of the ORSANCO PCS creates confusion for the States and regulated entities. Unlike the state WQS development and implementation, the process for adoption of the PCS provides no opportunity to challenge the appropriateness or applicability of the PCS. The result is that if a regulated entity believes that a particular PCS requirement is inappropriate, its only option is to challenge that requirement as applied in the entity's NPDES permit – a process that does not allow the permittee to challenge the underlying soundness of the PCS and deprives permittees of regulatory and legal due process. Moreover, implementation of the PCS creates a separate set of standards that apply only to the Ohio River, and that differ from the standards that apply throughout the remainder of each of the Compact States. Eliminating this confusion will improve regulatory consistency and promote clarity for the regulated community.
- Today the regulated community faces a continual increase in the amount and complexity of environmental laws and regulations, with finite company resources available to stay abreast of the latest developments and ensure compliance. The ORSANCO PCS add another layer of complexity on top of the already expansive federal and state regulatory scheme governing water quality. Companies should not be faced with the choice of either dedicating significant additional resources to monitoring the ORSANCO PCS development process, or simply hoping that the implementation of the ORSANCO standards does not result in the inclusion of unworkable requirements in their NPDES permits – particularly if the PCS are no longer necessary to meet the water quality goals for the Ohio River.
- The ORSANCO resources devoted to the PCS program can be more effectively used to support other ORSANCO programs that do not overlap with state and federal water quality programs, and that provide real added value to the States. ORSANCO has particular skill and expertise in assessing water quality and the biological integrity of the Ohio River, disseminating that information to the States and public to ensure coordination and consistency among the States' regulatory programs and other water quality initiatives, engaging in public outreach, and assisting in spill detection and response through information-gathering and coordination.

- Most importantly, the beneficial uses for the Ohio River associated with nearly all PCS water quality criteria are being achieved throughout the River with a small number of exceptions. And even those few exceptions are being addressed through the States' Clean Water Act-mandated programs.

AK Steel recognizes the concerns identified in the Minority Report of Commissioners, which questions the initial preference of a majority of Commissioners for Alternative 2 Expanded. AK Steel believes that those concerns, while sincere, are unfounded. First, while it may be true that the ORSANCO PCS contain water quality criteria for a number of parameters that are not covered by comparable state or federal criteria, it is not necessarily true that the maintenance of those additional ORSANCO criteria is necessary to protect the aquatic life and uses of the Ohio River. Under the Clean Water Act, States are required to develop and enforce water quality criteria to protect aquatic life and designated uses of all streams, including the Ohio River. And U.S. EPA is charged with ensuring that each State's water quality program satisfies the requirements of the Clean Water Act. Thus, the concern voiced in the Minority Report that reliance on the States' standards "may not be adequate to protect the aquatic life and uses of the Ohio River" ignores the basic reality and requirements of the Clean Water Act, the States' EPA-approved programs, and their application to the Ohio River. In fact, the States' programs include criteria for over 100 pollutants that are not covered by the ORSANCO PCS, belying the notion that they there are somehow lax.

Second, the Minority Report expresses a concern about the risk of a lack of coherent implementation of the various States' water quality standards and policies applicable to the Ohio River, and thus the purported need for ORSANCO to enforce such coherence. This concern overlooks the important role of cooperative federalism in implementing the Clean Water Act. Under that approach, each State is given leeway to develop its own water quality standards and policies in light of unique local conditions, needs, and priorities. But that leeway is subject to the oversight and approval of U.S. EPA, whose broad perspective and mandate ensures that the States are individually and collectively meeting the fundamental water quality goals of the Act. ORSANCO need not duplicate the role of U.S. EPA. There is no need to impose a "one size fits all" solution throughout the Ohio River basin, as long as each State is implementing a water quality program that meets the underlying goals of the Clean Water Act.

Third, the Minority Report's concern about "the vagaries of the political process" overstates the role of "politics" in the federal-state Clean Water Act regulatory program and also suggests a troubling lack of confidence in the citizens' elected representatives. In fact, the ongoing development, review and implementation of the States' water quality programs, including the strenuous triennial review process required under the Act, ensure that those water quality standards are data-driven and reflect sound science. Moreover, it is entirely appropriate for federal and state regulatory programs to ultimately reflect the Nation's current policy preferences as articulated by Congress and the States' legislatures, as those bodies reflect the will of the citizenry regarding how to balance environmental protection, economic growth, and other important social factors. AK Steel is confident that the current federal-state partnership under the Clean Water Act has resulted in dramatic water quality improvements over the past several



decades and will continue to protect and preserve the quality of the Nation's rivers and streams, including the Ohio River.

In sum, AK Steel believes that Alternative 2 Expanded is the best alternative because it maintains the beneficial uses of the Ohio River consistent with the mandates of the ORSANCO Compact, while removing the duplicative and resource intensive aspects of the PCS. And it allows ORSANCO to concentrate its resources on those tasks that it can best perform to help promote and preserve water quality in the Ohio River. Although AK Steel believes that Alternative 2 Expanded is the best alternative, we believe that Alternatives 1 and 2 would also sustain the goals and purposes of the ORSANCO Compact while reducing unnecessary regulation, and are therefore viable options.

Given the complexity of the PCS and state water quality standards and implementation procedures, AK Steel believes that Alternatives 3 and 4 would likely consume an inordinate amount of ORSANCO and State resources and time, would create more duplication and inconsistency, would not likely yield much in the way of real environmental benefit, and are not necessary to meet the goals of the ORSANCO Compact. In a time of limited resources and a need for greater cooperation and efficiencies, creating a super-regulatory regime for ORSANCO, on top of the already stringent requirements of the Clean Water Act, would be wasteful and inadvisable. AK Steel also does not support Alternative 5, which would require ORSANCO to maintain and update the PCS, but would make them essentially voluntary. There seems no point in spending considerable resources on maintaining the PCS if they have no legal significance and likely no practical effect on water quality.

Finally, should the Commission decide not to pursue Alternatives 1, 2, or 2 Expanded, and to maintain (or even expand) the existing PCS, AK Steel requests that the Commission consider specific revisions to the water quality criteria for phenolics and selenium and to the mixing zone ban for mercury. Detailed explanations for these requested revisions are provided in comments provided under separate cover by AK Steel.

Thank you again for the opportunity to comment on the proposed alternatives for ORSANCO's PCS. If you have any questions I can be reached at 724 284-226 or by email at [russ.dudek@aksteel.com](mailto:russ.dudek@aksteel.com)

Sincerely,



Russell J. Dudek  
Senior Environmental Manager  
AK Steel Corporation

cc     Scott Mandirola  
       David Flannery  
       Ronald Potesta  
       Austin Caperton

**From:** Whitteberry, Bruce  
**Sent:** Friday, February 23, 2018 12:46 PM  
**To:** PCS@orsanco.org  
**Cc:** Bailey, Cathy; Arnette, Verna; Swertfeger, Jeff; Stuck, Richard; Piao, Haishan  
**Subject:** Comments on 2018 Pollution Control Standards Review

Thank you for allowing us the opportunity to comment on the whether ORSANCO should administer the current Pollution Control Standards (PCS) or should withdraw from the process of maintaining the standards.

Greater Cincinnati Water Works does not support the favored proposal to remove the water quality standards from the ORSANCO PCS. While the favored option (Alternative 2) would retain some language in the standards, from a practical standpoint, we see little difference between total elimination of the standards (Alternative 1) and Alternative 2. We believe the pollution control standards should act as a mechanism to ensure the water quality standards for the River are uniform across all state boundaries. The PCS were intended to fill a niche that could not be adequately addressed by the states, that is to view the Ohio River as one system, and to bring consistency to water quality standards. This is concisely stated in at least two places in the study commissioned by the USEPA in 1974 to evaluate ORSANCO's role relative to federal and state regulation. The first statement is within the report text itself:

*"...neither the states nor EPA is organized to treat the Ohio as a basin, or even as a whole main river. Such treatment is essential if many aspects of the Federal Water Pollution Control Act are to be administered equitably or perhaps at all. ORSANCO is just an agency as can provide the multi-jurisdictional-interstate-federal, EPA regional bridge needed to bring the pieces together basinwide."*

Then from the recommendations in the report:

*"ORSANCO should work with states in developing consistent stream standards for the main stem and tributaries having significant impacts on the main stem; and in periodic review of the standards. Its interest should be primarily in achieving interstate compatibility and equity. "*

The report goes on to say:

*"Each state formulates stream standards for its own purposes and also for submission to the EPA. However, the emphasis of each state is necessarily on its particular waters both in and out of the Ohio Basin. Since the Ohio is a boundary river, and because there are many other relationships as among the several state segments of the river system, the interstate agency should provide the overall view and the comparative analyses needed for coordination, consistency and equity."*

We also believe the PCS are central to the overall mission of ORSANCO. The PCS should be the yardstick by which states may be measured when implementing their individual standards applicable to the Ohio River. This ensures minimum, appropriate, and consistent standards are set to protect the entire river.

While this is the intent of the standards, it seems upon a cursory review, significant variation still exists between ORSANCO, USEPA recommendations, and the individual states' water quality standards. The goal of providing a level of uniformity to the standards for the river seemingly has not yet been achieved. Some states' standards appear to adhere closely or are more stringent than ORSANCO's while others are less stringent.

We understand the PCS have some redundancy with USEPA water quality standards, but we do not view this as a reason to eliminate the standards. Rather, ORSANCO should use the USEPA standards as a starting point to ensure that standards are appropriate for the Ohio River, and then modify those standards as necessary. ORSANCO's PCS serve to uniformly address issues which may slip through the cracks of EPA Water Quality Standards or the States' standards.

ORSANCO is uniquely positioned to have a positive impact on basin-wide river quality by virtue of an existing regulatory framework extending beyond the state boundaries. Reducing or eliminating this regulatory framework removes one of the key benefits ORSANCO can provide by protecting river quality on a basin-wide basis.

ORSANCO standards should serve as guidance to the states as they address facilities impacting the Ohio River. The standards should reflect the unique needs of the river as a whole. The standards can also serve to address contaminants of emerging concern where individual states may not have the ability to do so directly.

We understand implementation and enforcement of the pollution control standards are imperfect. However, we recommend maintaining the standards and working toward consistency across all compact states. We view this as not just the responsibility of ORSANCO, but also of the individual states as part of their responsibility as members of the compact. Instead of eliminating the standards, the Commission should work toward eliminating the weaknesses which have hampered the PCS effectiveness.

If the periodic standards review process poses a significant workload on ORSANCO staff, we would support increasing the period between reviews as a way to reduce this burden. We do not, however, support elimination of the standards.

Thank you for the opportunity to provide input on this issue.

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To Whom It May Concern:

The Environmental Law & Policy Center, Hoosier Environmental Council, Kentucky Waterways Alliance, Lower Ohio River Waterkeeper, Ohio Environmental Council, Ohio River Foundation, Ohio Valley Environmental Coalition, Sierra Club Cumberland Chapter (Kentucky), Sierra Club Hoosier Chapter, Sierra Club Ohio Chapter, Three Rivers Waterkeeper, Valley Watch, and West Virginia Rivers Coalition (collectively, “Environmental Organizations”), submit these comments to the Ohio River Valley Water Sanitation Commission (“ORSANCO”) regarding the 2018 review of ORSANCO’s Pollution Control Standards (“PCS”). In its solicitation of comments, ORSANCO indicated that a majority of Commissioners support withdrawing from its role in maintaining, administering, and periodically updating the current Pollution Control Standards. The Environmental Organizations strongly oppose that proposal and urge ORSANCO to continue in its role as a source of consistent and expert input on appropriate pollution control standards for the Ohio River. We therefore ask the Commission to reject proposed Alternative 2 in favor of an approach that, consistent with Alternatives 3 and 4, allows ORSANCO to continue to apply its expertise and unique interstate perspective to protect water quality for the entire Ohio River.

## **I. BACKGROUND**

### **A. ORSANCO’s History and Authority**

The Ohio River flows almost a thousand miles through six states, with more states included in its drainage basin. In 1948, eight of those states – Illinois, Indiana, Kentucky, New York, Ohio, Pennsylvania, Virginia, and West Virginia – signed the interstate compact that created ORSANCO and established the commitment of those states to “enact any necessary legislation to enable each such State to place and maintain the waters of said basin in a satisfactory sanitary condition, available for safe and satisfactory use as public and industrial water supplies after reasonable treatment, suitable for recreational usage, capable of maintaining fish and other aquatic life, free from unsightly or malodorous nuisances due to floating solids or sludge deposits, and adaptable to such other uses as may be legitimate.” The Compact provides ORSANCO with authority to promulgate rules and issue orders to ensure that “[a]ll industrial wastes discharged or permitted to flow into the aforesaid waters shall be modified or treated, within a time reasonable for the construction of the necessary works, in order to protect the public health or to preserve the waters for [these uses] . . . to such degree as may be determined to be necessary by the Commission after investigation, due notice and hearing.”

As early as 1949, ORSANCO began putting in place water treatment standards to carry out this obligation. In 1972, Congress enacted the “Clean Water Act” (“CWA”) as we know it today, and in 1984 ORSANCO revised its standards to mirror the Clean Water Act structure of designated uses, water quality criteria to protect those uses, and effluent limitations (including mixing zone requirements and a variance procedure). ORSANCO has since reviewed and updated these Pollution Control Standards every three years.

## **B. The 2018 Pollution Control Standards Proposal**

In 2014, ORSANCO established the Ad Hoc Committee on Water Quality Standards Implementation to review how the Pollution Control Standards were being implemented. In 2015 ORSANCO directed the committee to evaluate options relating to ORSANCO's future role in setting water quality standards. The committee subsequently formulated five alternative proposals for ORSANCO's role going forward. These alternatives can be grouped into two categories, with Alternatives 1, 2 and 5 calling for a markedly reduced role and Alternatives 3 and 4 calling for a more focused application of ORSANCO's current standard-setting approach. These five alternatives, and the relevant considerations for each, are described in ORSANCO's Water Quality Standards Alternative Summary.

Alternative 1 would "[e]liminate the Pollution Control Standards Program and defer to the requirements of the Clean Water Act and member state water quality regulations." The considerations listed in favor of this alternative are that it would potentially "free up resources" to be reprogrammed to other ORSANCO activities, and would also avert the problem that at least one Ohio River state cannot adopt ORSANCO's Pollution Control Standards by reference.

Alternative 2 would suspend the triennial review process for the Pollution Control Standards and deem all states in compliance with the Standards to the extent they are implementing approved programs under the federal Clean Water Act. The description of this alternative presumes that the Pollution Control Standards are redundant and that resources currently dedicated to the PCS could be "redirected to other Commission activities" such as "assessments of the water quality and biological integrity of the water, public out-reach, spill detection and response."

Alternative 3 would "[u]tilize a cost effective approach to finalize uniform WQS rules for the Ohio River by tasking ORSANCO to take the lead in order to eliminate duplication of efforts among six states and save resources. Also, as a starting point, utilize work done by USEPA to develop WQS to avoid conducting basic research." This proposal would be aimed at protecting water quality and promoting consistency among states, while reducing the overall costs of developing water quality standards and allowing states flexibility to adopt alternative standards when appropriate. It would also enable ORSANCO to continue carrying out the work plan requirements for its section 106 grant from U.S. EPA, which currently includes development of numeric pollution control standards for the Ohio River and constitutes 50% of ORSANCO's budget.

Alternative 4, similar to Alternative 3, would focus on harmonizing water quality standards across the Ohio River. ORSANCO would look at "standards on an individual basis as warranted," to ensure coordinated implementation to "restore and maintain the quality of and protect uses of the Ohio River." This approach would be carried out by the NPDES Committee, working with staff and member states on permitting and certification processes "with a goal of assuring that protection and achievement of pollution controls needed to maintain those uses occurs throughout the Ohio River system." Even where a state has not formally adopted an ORSANCO standard, the Commission will work with the state so that any permit "achieves a comparable level of protection of the designated uses."

Finally, Alternative 5 would alter the nature of the PCS, from binding standards to simple recommendations that member states should consider in developing and issuing permits. This alternative rests on the proposition that “the process of promulgating the PCS is redundant of member states’ triennial review of water quality standards.”

ORSANCO has identified Alternative 2 as its “preferred alternative” for consideration in the 2018 PCS review.

## **II. DISCUSSION**

The Commission’s preference for Alternative 2 appears to rest on two primary grounds: first, that it will save resources for ORSANCO to eliminate the Pollution Control Standards from its workload; and second, that the Pollution Control Standards do not serve a significant function in protecting the Ohio River. Neither of these rationales has been adequately explored or supported with detailed facts.

It is entirely reasonable for ORSANCO to be concerned about making the most of its limited financial resources. However, in considering the best use of those resources, it is important to keep in mind that the ORSANCO Pollution Control Standards play an important role in preserving state resources by allowing standards for at least some pollutants, as well as the overall assessment of whether the Ohio River is suffering any serious water quality problems, to be dealt with across the entire river rather than on a state-by-state basis. If ORSANCO were to eliminate the PCS, Ohio River states might well be worse off in the long run without an efficient forum for establishing and updating standards for all pollutants, and an irreplaceable venue for determining a river-wide approach to particularly problematic pollutants.

### **A. Individual Pollutants**

ORSANCO has provided summary-level data from a 2015 staff survey of state water quality standards versus ORSANCO’s Pollution Control Standards, which shows that there are significant discrepancies among state standards. While Alternative 2 presumes that these discrepancies are meaningless and that the PCS and state water quality standards are redundant, that presumption is not backed up by any factual analysis. Moreover, Alternative 2 also assumes that if the PCS were eliminated, ORSANCO could redirect the resources used to maintain the PCS with no adverse effects on ORSANCO or its member states. That reasoning likewise lacks any detailed foundation.

#### **1. The Problem of State-ORSANCO Disparities**

The ORSANCO analysis indicates that, for the pollutants compared as of 2015:

- There are 188 instances in which ORSANCO has criteria but a member state environmental agency does not;
- There are 252 instances in which member state agencies have parameters that are more than 10% less stringent than ORSANCO’s criteria;



- There are 405 instances in which the member state agencies are within 10% of, or more stringent than, the ORSANCO criteria.
- There are 342 instances in which the member state has criteria but ORSANCO does not.

In other words, based on this survey there are 440 pollutants for which the ORSANCO standard is either more stringent than a member state standard or there simply is no state standard. By comparison, there are 747 instances where the state standard is more stringent than or equivalent to the ORSANCO standard, or ORSANCO lacks a standard for the relevant pollutant. Overall, this represents 1187 points of comparison, with 440 – or almost 40% -- where the ORSANCO standard is filling in a gap in state standards or providing a more protective standard.

ORSANCO provided tables containing the information underlying this comparison on February 20, 2018, four days before the deadline for comment, and therefore we have not undertaken a thorough analysis of individual water quality criteria. However, even an initial survey of the data shows that there are concerning inconsistencies and gaps among the state standards. For example, the human health criteria table shows that as of 2015, Ohio and Kentucky both had limits of 10 micrograms per liter for arsenic – significantly higher than ORSANCO’s 0.1 microgram per liter criterion. Similarly, Indiana and Ohio both apparently have criteria for polychlorinated biphenyls (“PCBs”) that are less stringent than ORSANCO’s, which is particularly notable given that the Ohio River’s fish consumption use is partially impaired by PCB contamination. While the explanation for these discrepancies is unknown, it shows that some states’ standards are not as protective as those in other Ohio River states. Without an ORSANCO standard providing uniformity, there is potential for polluting industries to migrate to states with less restrictive criteria, leaving those states downstream or across the river to deal with their pollution without gaining any of the economic benefits.

The Clean Water Act does not provide an efficient tool for states to address such discrepancies on their own. The Supreme Court confirmed in *Arkansas v. Oklahoma*, 503 U.S. 91 (1992), that the U.S. Environmental Protection Agency (“U.S. EPA”) has the authority to consider effects on other states water quality standards when reviewing draft permits under Clean Water Act section 402, 33 U.S.C. § 1342. However, that authority must be applied on a permit-by-permit basis, and is discretionary with U.S. EPA, meaning that policing of interstate discharges through this mechanism would be an onerous and potentially sporadic process without any certain outcome. ORSANCO’s authority to set prospective, uniform standards for the Ohio River is a unique tool not available under the Clean Water Act. Even to the extent states do not directly incorporate the ORSANCO PCS into their water quality criteria, but rather apply them to individual sources through the state permitting process, that is still an improvement over the cumbersome and likely ineffective process available under the CWA.

In addition to inconsistent standards, there are some standards where – at least according to the ORSANCO survey – the states have simply left it to ORSANCO to establish criteria. These include gross total alpha, copper, cyanide, fluoride, methylmercury, nitrites, and others. If ORSANCO were to eliminate its Pollution Control Standards, states without standards for those pollutants would presumably have to expend time and resources on filling in those gaps to ensure protection of their portions of the Ohio River.

Overall, this comparison suggests that the ORSANCO standards play a central role in ensuring consistent and up-to-date pollution standards for the Ohio River. Meanwhile, the current proposal provides no estimate, or even description, of what state work would be necessary to make up for the absence of the PCS if they were eliminated. Comments from the POTW Advisory Committee underline this concern, with one commenter pointing out that: “During this time of ‘stressed’ budgets and limited resources, duplication of efforts is definitely a major concern of many organizations at all levels of government (federal, state and local), as well as the public (tax/rate payers) that we serve. Under any future scenario that minimizes PCS activities, it will be important for ORSANCO to continue to provide a forum to discuss water quality standards and to promote consistency among the states to ensure the protection of the Ohio River as a shared resource.” A significant problem with Alternative 2, or any approach that eliminates periodic consideration of river-wide water quality criteria, is the danger that in the absence of ORSANCO standards, inconsistencies will arise without such an adequate forum.

## **2. The Value of River-Wide Water Quality Criteria**

As discussed above, there are clearly significant inconsistencies among state standards for the Ohio River that bear further investigation before ORSANCO can draw any conclusions about the potential costs for states to make up for the loss of the PCS. Meanwhile, the affirmative value of river-wide criteria is clear. There have already been a number of instances where ORSANCO’s Pollution Control Standards have and will continue to play an important role in protecting water quality in the Ohio River.

For example, over the last decade ORSANCO has acted to address a growing concern with levels of Total Dissolved Solids (“TDS”) in the Ohio River, by using an expedited PCS process in 2012 to reinstate a (previously eliminated) limit of 500 mg/L at drinking water intakes in order to protect drinking water quality. ORSANCO staff have subsequently conducted valuable research regarding background levels of TDS in order to support translation of that standard into appropriate permit limits. *See* ORSANCO, Characterization of Dissolved Solids in the Ohio River and Selected Tributaries (Feb. 2014), *available at* <http://www.orsanco.org/wp-content/uploads/2016/12/Characterization-of-Dissolved-Solids-in-the-Ohio-River-and-Selected-Tributaries.pdf>. This is an instance where ORSANCO, because of its triennial PCS review process, was well-positioned to react swiftly to a unique Ohio River problem and provide drinking water protection along the entire river, backed up by sound science and expertise. Without the PCS process, it is not clear when affected states – themselves facing budget constraints – might have dealt with this problem and what resources they might have to use to do so. The Water Users Advisory Committee comments similarly identify pollutants such as ammonia, E. coli, temperature, and others as ones where ORSANCO’s standards provide important, uniform water quality protection across the entire Ohio River to the benefit of states as well as their citizens.

Even where addressing a given pollutant is simply a matter of adopting water quality criteria issued by U.S. EPA, ORSANCO can do so efficiently in order to bring the PCS up-to-date for the entire Ohio River at one time. As one example, ORSANCO has repeatedly indicated its readiness to adopt an updated U.S. EPA aquatic life criterion for selenium. Now that the federal criteria have been issued (in summer 2016), ORSANCO can do so. Notably, some states will not

be conducting triennial reviews in which they would address this development for some time – for instance, West Virginia adopted fish tissue limits based on the draft criteria in 2016, but apparently will not address the water column limits in the final criterion until its next triennial review in 2020. By addressing this issue in its 2018 PCS review, ORSANCO will ensure those additional protections are in place significantly earlier. Moreover, in addressing this and other federal criteria, ORSANCO can determine on a river-wide basis whether those criteria are appropriate for the Ohio River rather than leaving individual member states to do so, with potentially disparate results.

Looking ahead, there are emerging pollution issues where ORSANCO's PCS may similarly provide an important avenue to bring the expertise of Commission staff to bear on preserving water quality across the entire Ohio River. In recent years, ORSANCO has been engaged in trying to determine a numeric criterion for nutrient pollution in the Ohio River. This work is timely given that a massive algal bloom occurred on the river in the summer of 2015, and studies show climate change is driving temperature and precipitation changes that may increase the frequency and severity of such algae outbreaks. U.S. Army Corps of Engineers, OHIO RIVER BASIN– Formulating Climate Change Mitigation/Adaptation Strategies through Regional Collaboration with the ORB Alliance 47 (May 2017), *available at* [http://www.corpsclimate.us/docs/USACE%20Ohio%20River%20Basin%20CC%20Report\\_MAY%202017.pdf](http://www.corpsclimate.us/docs/USACE%20Ohio%20River%20Basin%20CC%20Report_MAY%202017.pdf). Although ORSANCO's analysis has not yet identified an appropriate numeric criterion, this is a looming threat to the drinking water, recreation, and aquatic life uses of the Ohio River that ORSANCO cannot ignore. Moreover, as shown in ORSANCO's efforts to date, the Commission's staff has the relevant expertise to adequately and efficiently address this complex issue on a river-wide basis. The alternative might well be for states to waste resources as the question of numeric nutrient limits comes up on a state-by-state or even permit-by-permit basis.

Finally, ORSANCO is currently considering a study of the bioaccumulative pollutants Perfluorooctanoic Acid ("PFOA") and Perfluorooctane Sulfonate ("PFOS"), initially identified as of potential concern in a 2010 report on emerging contaminants (<http://www.orsanco.org/wp-content/uploads/2017/01/A-Screening-Study-Investigating-the-Presence-of-Emerging-Contaminants-within-the-Ohio-River-Basin.pdf>). Recently, as noted in ORSANCO's October 2017 TEC meeting minutes, PFOA contamination of drinking water in the Ohio River watershed has been the subject of significant litigation, and U.S. EPA has released health advisory levels for both contaminants. Although PFOA and PFOS are being largely phased out, replacement chemicals with similar properties may continue to pose a threat to Ohio River water quality. Once ORSANCO determines the scope and seriousness of this issue, it may well be appropriate to address this type of pollution through the PCS.

We could list many more instances of ORSANCO's valuable work in connection with the Pollution Control Standards. However, these examples are sufficient to highlight the key questions that Alternative 2 fails to address:

- Will eliminating the Pollution Control Standards actually significantly reduce ORSANCO's workload? A number of the efforts above, although occurring in conjunction with ORSANCO's PCS reviews, fall within its larger mission of providing

expert scientific monitoring and analysis of water quality issues in the Ohio River. If the PCS were not in place, it seems likely that ORSANCO would still have a role to play in addressing issues such as identification of numeric nutrient criteria or analysis of total dissolved solid levels. Absent a detailed consideration of what work ORSANCO could in fact abandon if the PCS were eliminated, the answer to this question is unclear.

- If eliminating the PCS does truly reduce ORSANCO's activities, will it simply shift work to ORSANCO member states? For pollutants like Total Dissolved Solids, there is a clear need for a limit and analysis of how to apply that limit to sources. ORSANCO is currently providing that information in the context of the PCS. Eliminating that standard, or precluding ORSANCO from adopting such standards in the future, may simply force each state to individually duplicate the Commission's work while introducing the possibility of more disparities among water quality criteria the Ohio River states. As several other commenters have noted, this shift in workload may also result in a commensurate reduction in federal or other funding.
- Will adopting Alternative 2 prevent ORSANCO from addressing emerging pollution issues in a timely manner? Although the Commission could technically resume its role in setting standards, the regular triennial review process encourages all stakeholders to actively consider and address whether existing standards are adequately protecting the Ohio River's water quality. Without that forum for consideration of both urgent problems like TDS and developing issues like nutrient pollution, inadequate or disparate state-level regulation could easily go unaddressed.
- Are there opportunities to increase the efficiency of the PCS process without eliminating ORSANCO's standards altogether? As noted above, there are a number of pollutants for which the PCS and state standards are similar, as well as a number where there are significant differences. We are sensitive to ORSANCO's concerns regarding whether its PCS work is redundant to ongoing state activities under the Clean Water Act. One sensible way to potentially streamline the PCS reviews would be to focus on promoting uniform standards across the Ohio River, especially for pollutants where U.S. EPA has not provided any federal criteria. This would essentially be a combination of Alternatives 3 and 4.

These significant unanswered questions show that the preference for Alternative 2 is not based on a sufficient exploration of the important issues involved in potentially eliminating a role that ORSANCO has played for decades. Fundamentally, we believe that the current PCS process is in fact efficient and focused on the areas where ORSANCO is needed most. Nevertheless, if ORSANCO does decide to refine its approach to the PCS, we urge the Commission to ensure it avoids throwing the baby out with the bathwater and preserves the PCS as a valuable tool for providing efficient and effective water quality standards across the whole Ohio River.

## **B. Water Quality Assessment for the Ohio River**

Sections 305(b) and 303(d) of the federal Clean Water Act require each state to conduct an assessment of the status of its waters every two years and make a determination as to whether

those waters are “impaired” by any pollutant. 33 U.S.C. § 1315(b); 33 U.S.C. § 1313(d); 40 C.F.R. §§ 130.7, 130.8. ORSANCO has prepared a biennial section 305(b) assessment for the Ohio River ever since 2002, offering an expert view “of the degree to which the river supports each of its four designated uses: warm water aquatic life; public water supply; contact recreation; and fish consumption.” Although ORSANCO’s section 305(b) report does not substitute for each state’s duty to assess and determine the impairment status of the portions of the Ohio River within its jurisdiction, the Ohio River states have traditionally relied heavily on ORSANCO’s work in carrying out these Clean Water Act obligations. Often, states simply adopt ORSANCO’s evaluation and conclusions wholesale in determining the impairment status of the Ohio River.

If ORSANCO adopts Alternative 2, this approach will no longer be viable. Currently, ORSANCO’s water quality assessment in its section 305(b) reports is based in large part on application of the numeric criteria included in the Pollution Control Standards. If these criteria are eliminated, ORSANCO will either have to confront the problem of applying potentially hundreds of inconsistent state criteria in assessing the Ohio River’s water quality, and may end up reaching inconsistent conclusions as to impairment status of the river based on those criteria. Alternatively, it may no longer make sense for ORSANCO to conduct the 305(b) assessment for the Ohio River, merely shifting that work to individual states and probably losing efficiencies along the way. That scenario could also result in a reduction in ORSANCO’s funding.

Finally, we note that while these concerns represent our view of the existing information, we requested that ORSANCO share the “Report of the ORSANCO Ad Hoc Water Quality Standards Implementation Committee”, dated May 11, 2015, referenced in some of the materials provided for comment. ORSANCO provided a copy of that report on February 23, the day before the comment deadline. Although we have not had adequate time to review the report for purposes of these comments, we look forward to providing ORSANCO with supplemental comments as appropriate.

### **III. CONCLUSION**

A proposal for ORSANCO to step back from standards it has set in their current form for more than two decades is obviously a significant one. Before the Commission determines the wisest course of action, it must conduct further analysis of the key assumptions here: that the Pollution Control Standards provide no additional water quality protection beyond state standards under the Clean Water Act, and that reducing or eliminating the Pollution Control Standards review process would free up resources without any burden-shifting to states or impacts to funding. While those assumptions may prove true to some extent, we believe the appropriate response is to narrow the focus of ORSANCO’s Pollution Control Standards process along the lines of Alternatives 3 and 4. That approach would keep ORSANCO in the role of doing what it does best: providing significant scientific expertise and a basin-wide perspective on protecting the Ohio River.

February 23, 2018

Sincerely,

/s/ Madeline Fleisher  
Madeline Fleisher  
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**Robin Blakeman, Project Coordinator**

**Ohio Valley Environmental Coalition**

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

February 23, 2018

Comments to ORSANCO re: proposed changes to ORSANCO Pollution Control Standards

From: Robin Blakeman, on behalf of the Ohio Valley Environmental Coalition, (based in Huntington, WV).

We are signatories to the recently submitted Watershed Organization Advisory Committee's comments. As stated there, we have grave concern over ORSANCO's indication that a majority of Commissioners support withdrawing from ORSANCO's role in maintaining, administering, and periodically updating the current Pollution Control Standards. We strongly oppose that proposal and urge ORSANCO to continue in its role as a source of consistent and expert input on appropriate pollution control standards for the Ohio River. We therefore ask the Commission to reject proposed Alternative 2 in favor of an approach that, consistent with Alternatives 3 and 4, allows ORSANCO to continue to apply its expertise and unique interstate perspective to protect water quality for the entire Ohio River.

We also want to raise the following points and questions for serious consideration:

- Some of the sampling areas along the Ohio River are over twenty miles apart. Where will each state collect their samples from? Will states share information from each sampling site?
- There are at least 188 parameters among the 6 signatory states and EPA, for which ORSANCO has a criteria but the state or EPA does not. So, how will these extra pollution control parameters be handled, if ORSANCO ceases to centrally monitor them?
- Mercury has posed a problem as quantities have steadily increased in the Ohio River from 2007 to 2013. Will states maintain a "mixing zone" ban, or will they take a stronger stance on mercury pollution?
- Mercury and other pollutants have resulted in **fish consumption advisories** being published by ORSANCO and state entities (like WV DEP); will these continue? Will fish be safe to eat if caught in the Ohio River, or any of its major tributaries?
- Do we really know how well these state pollution control programs are working currently, and do we have enough data to feel assured that all states can meet the requirements for a successful program?
- ORSANCO was created in part as an interstate water pollution control agency, to ensure pollution dumped into the Ohio River in one state doesn't have a negative effect on the waters of another state. We still believe this is a very good idea—especially in light of spills from recent times – like the **MCHM spill** in 2014. Such petrochemical product spills are likely to be



more, not less common in the future, especially if the massive Appalachian Petrochemical Storage Hub project becomes reality very close to the Ohio River.

- The Ohio River is already considered the **most polluted inland waterway** in the United States. Do we really want the kind of “race to the bottom” that may result from turning over full pollution control standard setting authority to each state? We are not at all confident that our state (WV) DEP can handle such a responsibility. They are chronically underfunded, and about to become incredibly more overextended due to a proliferation of pipeline projects occurring across our state. Several of these lines cross under the Ohio River and/or its major tributaries.

In short, Huntington and several other cities in our area rely upon the Ohio River for source/tap water. Huntington is incredibly vulnerable to Ohio River pollutants due to the fact that we only have two intakes which are both located in the Ohio River. Many other communities along the Ohio River – which serves as a source for tap water for up to 5 million people, (according to documents on the ORSANCO website), are similarly vulnerable. Therefore, for the sake of most of our staff, members and families, we are convinced that we desperately need ORSANCO to maintain Pollution Control Standards which are consistent across all states in the watershed, and increase enforcement means for those standards. We are also convinced that allowing states to regulate their “portion” of the Ohio River will result in a potentially catastrophic increase in pollutants. Please strengthen, not weaken, the pollution control standards set forth by ORSANCO.

Thanks for your time and serious consideration of these comments!

***Robin L. Blakeman***

**OVEC Project Coordinator**

**304-522-0246 (office)**

**304-840-4877 (cell)**

Ohio River Valley Water Sanitation Commission (ORSANCO)

Mr. Harrison:

Please accept this email in opposition to the elimination of ORSANCO Pollution Control Standards for the Ohio River.

The stricter standards of ORSANCO are better suited to restoring and maintaining a safe and clean Ohio River, than are those of the individual States or the USEPA.

There is no assurance that the individual States will implement the standards or policies necessary to sufficiently protect life and use of the Ohio River.

The Trump administration's track record for environmental protection is not reassuring. ORSANCO can and does better respond to the individual States for the benefit of the Ohio River as a regional resource.

The City of New Albany has spent the better part of the last 25 years engaged in extremely expensive efforts to address waste water discharges to the Ohio River as well as reclaiming the river front for recreational purposes. Unlike the badly polluted river our parents gave us, we wish to leave a clean and healthy Ohio River to our children and grandchildren. We believe we can do that better with ORSANCO PCS than USEPA and CWA.

Scott Wood

Director and Secretary

New Albany City Plan Commission

New Albany Board of Zoning Appeals

311 Hauss Square, Room 329

New Albany, Indiana 47150

Telephone: 1.812.948.5333

After looking through some of the supporting materials including the water quality standards alternatives, I think there are several concerns that I did not see addressed regarding the proposal to reduce ORSANCO's activities and responsibilities. There appears to be a heavy reliance upon US EPA resources and program activities which appear to be increasingly endangered. This does not appear to take into consideration actions of the past 14 months that adversely impact a number of EPA's programs and substantially reduce its resources. Also interesting that in the more extensive descriptions of the alternatives for ORSANCO, there is mention that "...states adopted standards are generally not compatible with the federal standards and requirements. Also, the comparison revealed a great deal of inconsistency among the states." Not a resounding endorsement of how well the states will all work together on their own.

I also saw no discussion of the role ORSANCO may have to address emerging or increasing water pollutants that are not addressed by EPA and which may be a long time off, if ever, for Federal standards. This may include: increasing presence and levels of pharmacologically active materials in surface waters; introduction of new materials from advanced manufacturing into effluent streams that are not yet well defined toxicologically (for example nanomaterials); potentially increasing levels of traditionally monitored pollutants from aging, failing, and overburdened wastewater handling and treatment facilities – both private and municipal; and disposal of massive amounts of solutions from fracking activities. Federal standards are often minimal criteria to be met – as more is learned about the toxicology and adverse public health impact – including that many contaminants may be present at the same time allowing for interaction among multiple agents in exposed biological systems (including in humans) – I have concerns that if ORSANCO stops setting water quality standards for the Ohio River, by the time new concerns are addressed, rather than being proactive it will be a reactive posture. The development of Federal standards is long, seldom current by the time issued, and unfortunately often less protective than is needed to prevent unnecessary morbidity and mortality. The result can require actions that are much more expensive and often potentially much less effective since the response then is reacting to a problem of increasing magnitude rather than exercising an informed precautionary and preventive approach.

*Steven Ahrenholz  
547 Sugar Maple Court  
Cincinnati, OH 45255*

To: ORSANCO PSC Committee & Commissioners

From:

Gordon Garner, PE, BCEE

7300 Happy Hollow Road

Prospect, KY 40059

Date: February 24, 2018

Please accept these comments on the Alternatives under consideration for the Pollution Control Standards (PSC) review. I am submitting these comments as a board certified environmental engineer, past ORSANCO Commissioner for Kentucky for over 20 years including a term as Commission Chair and many years as chair of the ORSANCO Technical Committee.

Others have commented and addressed the alternatives and what might be the best options if the Commission truly thinks a change is warranted.

From my perspective, it is very confusing why the Commission is even considering any changes that would limit the power and authority of the Commission to address deficiencies and inconsistencies in how individual states address water quality standards (WQS). ORSANCO was created to address these kinds of issues and provide a consistent set of standards for Ohio River basin states. The background data provided suggest that there are deficiencies (maybe) and inconsistencies (for sure) that the Commission should be and is empowered to address if need be. Powers that individual states and even EPA does not have.

ORSANCO has looked at this issue in the past and found that ultimately the WQS differences were not resulting in significant variations in the NPDES permits especially for industrial dischargers. But there were still issues of concern.

I believe the Commission was prepared to address these issues if need be. The concern then was that dischargers go shopping for the best deal and find a state that will let them do less rather than more to provide clean water for the rest of us.

Now it seems some industries or utilities who are challenged to meet WQS want to be able to leverage their states for variances without annoying interference from ORSANCO. Why else make this change? States' rights and budget concerns are bogus arguments when the clean water we want and care about are threatened. I guess if the Ohio River was consistently meeting designated uses and all trends continue to be good that backing off would be ok.

But facts are facts. The Ohio River is not "clean". The Ohio River does not meet WQS and we shouldn't eat some of the fish or swim in the river some of the time and arguably we aren't

sure that the Safe Drinking Water Act standards are always met. Too many uncertainties. Too much we still don't understand.

The Commission should be focused on insuring that the WQS are being implemented consistently and successfully by the states and EPA. The Commission should be a vocal advocate for addressing concerns or threats that continue to challenge the safety and health of our water. Water quality in the Ohio River should continue to improve, not backslide because of ORSANCO failing to meet its responsibilities.

Don't reduce ORSANCO responsibilities and authorities.

**From:** [gibbins](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** PCS Comments  
**Date:** Saturday, February 24, 2018 4:18:27 PM

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To: ORSANCO's Pollution Control Standards office

From: The League of Women Voters of West Virginia

The League of Women Voters of West Virginia agrees with the comments to ORSANCO about its Pollution Control Standards, made by Madeline Fleisher, Senior Attorney, Environmental Law & Policy Center on behalf of a number of organizations and also with the comments made by Robin Blakeman, Ohio Valley Environmental Organization (OVEC). We oppose Alternatives 1, 2, and 5 and support a combination of 3 and 4.

We believe that if ORSANCO abrogates its authority for establishing Pollution Control Standards for the Ohio River, it is not living up to the Compact. Although Pollution Control Standards are not always equivalent among the different states, ORSANCO's standards move the states towards uniformity. However, we believe states should continue to have the authority to pass stronger standards than ORSANCO's standards.

Some of our other reasons for ORSANCO's role in establishing Pollution Control Standards for the Ohio River are

- It is more efficient for the states that adopt ORSANCO's standards.
- The Triennial Review gives the public an opportunity to take part in ensuring the improvement of water quality in the Ohio River.
- ORSANCO's Pollution Control Standards make assessment more uniform.
- The advisory committees are all on one page when they work together for the improvement of the River.

But most important, what happens upstream affects those who live downstream. Managing pollution on the River should reflect fairness and health for fauna and downstream users.

Thank you for the opportunity to voice our opinion on ORSANCO's proposals concerning Pollution Control Standards.

Jonathan Rosenbaum, President of the League of Women Voters of WV

531 Woodland Circle, Morgantown, WV 26505; [jr@lwvwwv.org](mailto:jr@lwvwwv.org)

Helen Gibbins, Natural Resources Director, League of Women Voters of WV

6128 Gideon Rd., Huntington, WV 25705; [gibbins@frontier.com](mailto:gibbins@frontier.com)

## Sierra Club Cumberland Chapter

February 24, 2018

TO WHOM IT MAY CONCERN:

The Cumberland Chapter (Kentucky) of the Sierra Club has been represented on the Ohio River Valley Water Sanitation Commission ("ORSANCO") Watershed Organizations Advisory Committee (WOAC), and has supported many efforts to improve the water quality of the Ohio River with ORSANCO. Among other actions, the Sierra Club in Kentucky was a founding partner with the Kentucky Waterways Alliance and the Kentucky Division of Water (DOW) Water Watch program to organize and support the Watershed Watch in Kentucky (WWKY) citizen science program, and we have been collecting water quality data across Kentucky since 1997. For several years, WWKY directed a portion of its water testing resources to monitor sampling sites within Kentucky that are tributaries of the Ohio River as part of our Ohio River Action. On occasions, and when resources were available, ORSANCO supported the WWKY data collection. WWKY data can be found at:

<http://kgs.uky.edu/wwky/main.htm>

Kentucky Sierra Club members have attended meetings of the US EPA Hypoxia Task Force, learning at one such meeting that the Commonwealth of Kentucky was not a participating state on that task force. The Kentucky Sierra Club complained about this lack of representation and today, the Commonwealth of Kentucky does participate in these meetings.

We submit these comments to ORSANCO regarding the 2018 review of ORSANCO's Pollution Control Standards ("PCS"). In its solicitation of comments, ORSANCO indicated that a majority of Commissioners support withdrawing from its role in maintaining, administering, and periodically updating the current Pollution Control Standards. We strongly oppose that proposal and urge ORSANCO to continue in its role as a source of consistent and expert input on appropriate pollution control standards for the Ohio River. We therefore ask the Commission to reject proposed Alternative 2 in favor of an approach that, consistent with Alternatives 3 and 4, allows ORSANCO to continue to apply its expertise and unique interstate perspective to protect and improve water quality for the entire Ohio River.

We have signed on to the letter submitted on Friday, February 23, 2018 by the Environmental Law & Policy Center, (Madeline Fleisher) and the “Environmental Organizations.” We are writing separately to add several concerns and specifics that are unique to Kentucky.

We begin with our expression of disappointment in the Kentucky Commissioners, who appear to have played a leadership role in the advocacy of Alternative 2. As such, Commissioner Bruce Scott and Director Peter Goodmann have done a disservice to the Commonwealth of Kentucky. We recognize that the Commonwealth of Kentucky special responsibility for the Ohio River. We recognize the long southern border of the Ohio River that is the Commonwealth of Kentucky. The Commonwealth of Kentucky has always claimed jurisdiction over the waters of the Ohio River to the water line on the northern boundary. These claims have been upheld by the United States Supreme Court.

From the DOW 2014 Integrated Report to Congress, Volume 1, Page 76:

*Of note, the Ohio River mainstem drains all but the Jackson Purchase region of westernmost Kentucky. That over two-thirds of the Ohio River mainstem fully supports the two aquatic life DUs (WAH and OSRW) of that river is an important result. This river ultimately drains the watersheds for every major Kentucky river tributary except the Tennessee River and Mississippi River minor tributaries. Of the 90,961 stream miles in the Commonwealth, the Ohio River tributaries account for 84,462 stream and river miles, or 93 percent of miles that drain the Kentucky landscape.*

As the state with the greatest responsibility for the condition of the Ohio, it is Kentucky that most needs all the help it can get, from ORSANCO and from the other states that also impact the Ohio and that need and depend on the Ohio River.

While the Commonwealth of Kentucky has a greater responsibility, the Kentucky Division of Water has suffered many years of inadequate funding and staffing, and political will. The Kentucky total maximum daily load backload (CWA TMDL) is huge, and - unless funding and staffing and political will change – unmanageable.

From the 2014 Integrated Report to Congress, Volume I, page 19:

*States are now faced with the situation where they are asked to maintain a robust ambient monitoring program to characterize and track conditions of the state’s waters (305[b] reporting) and at the same time collect data for TMDL development in hundreds of impaired water bodies and segments, eventually tracking the success of implementation. Like most states, Kentucky’s schedule requires hundreds (over 2,500 as of the 2014 IR cycle) of TMDLs be developed. The 2002 303(d) list had 946 pollutant/water body combinations and those TMDLs are scheduled to be*



*developed by 2015. Additional staff, lab resources, and especially contractual monies, must be obtained to accomplish this workload. KDOW is working to establish arrangements to fund TMDL planning, data collection, lab analysis, and development with internal, contractual, and interested third-party resources, including volunteer organizations.*

From the 2014 Integrated Report to Congress, Volume II, page 2:

*As of May 2012, KDOW has submitted and EPA has approved TMDLs for 313 pollutant/waterbody combinations.*

The Clean Water Act is not being adequately implemented within the boundaries of Kentucky. It is disingenuous for Kentucky Energy and Environment Cabinet leadership to suggest that ORSANCO's role of setting standards, and helping to implement such standards, is no longer needed. It is needed now more than ever. 2015 saw the largest harmful algae bloom in history on the Ohio. 2018 saw the largest Gulf of Mexico "dead zone" in history.

As part of ORSANCO's consideration of this proposed action, questions were asked about the comparison of ORSANCO standards and state standards. After providing overviews, ORSANCO was requested to provide more specific detail. ORSANCO provided tables containing the information underlying this comparison on February 20, 2018, four days before the deadline for comment, and therefore we have not undertaken a thorough analysis of individual water quality criteria. However, as the "Environmental Organizations" noted, even an initial survey of the data shows that there are concerning inconsistencies and gaps among the state standards. For example, the human health criteria table shows that as of 2015, Ohio and Kentucky both had limits of 10 micrograms per liter for arsenic – significantly higher than ORSANCO's 0.1 microgram per liter criterion.

Kentucky currently relies on ORSANCO for the Kentucky 305(b) and 303(e) integrated reports to congress concerning water quality in the Ohio River Main Stem.

From the 2014 Integrated Report to Congress, Volume I, page 2:

*The KDOW operates its primary monitoring programs under a five-year rotating watershed management approach implemented in 1998. This IR represents monitoring efforts from the third cycle of the BMU (basin management unit) monitoring strategy; the Green River – Tradewater River BMU is the primary focus in this IR; these BMUs were monitored beginning in April 2011 – March 2012. This report also incorporates assessment data and results from monitoring that occurred during this reporting cycle outside of the BMU of focus; thus providing a statewide update of monitoring results. Monitoring of the Ohio River mainstem is*

*primarily accomplished by the Ohio River Valley Water Sanitation Commission (ORSANCO).*

From the 2014 Integrated Report to Congress, Volume I, page 57:

*Historically, the agency deferred to ORSANCO's 305(b) report for the Ohio River, but now takes the associated data and populates the 305(b) assessment results in its ADB submission to EPA.*

Kentucky DOW also relies upon ORSANCO methods and standards in other areas. From 2014 Integrated Report to Congress, Volume I, page 89:

*The fish community multimetric index (modified Ohio River Fish Index or mORFI<sub>n</sub>) derived by ORSANCO and member states is utilized to measure the health of that community and, by extension, the overall health of the biological community as a whole. This index is similar to other multimetric fish indices that have been developed and considers the ecological characteristics of the community, relative 90 condition of the physical habitat, species diversity and composition. Multiple (13) indices are combined to calculate a single score used to determine the condition of that biological community relative to overall water quality. Additional information on the mORFI<sub>n</sub> can be obtained from the ORSANCO website at: <http://www.orsanco.org/>.*

Kentucky currently sets standards that are specific to the Ohio River Main Stem, in recognition of the standards set by ORSANCO.

**401 KAR 10:031. Surface water standards.**

*Section 9. Water Quality Criteria for the Main Stem of the Ohio River. (1) The following criteria apply to the main stem of the Ohio River from its juncture with the Big Sandy River at River Mile 317.1 to its confluence with the Mississippi River, and shall not be exceeded.*

*(2) These waters shall be subject to all applicable provisions of 401 KAR 10:001, 10:026, 10:029, 10:030, and this administrative regulation, except for those criteria in paragraphs (a) and (b) of this subsection.*

*(a) Dissolved oxygen. Instream concentrations shall average at least five and zero-tenths (5.0) mg/L per calendar day and shall not be less than four and zero-tenths (4.0) mg/L except during the April 15 - June 15 spawning season when a minimum of five and one-tenth (5.1) mg/L shall be maintained.*

*(b) Maximum allowable instream concentrations for nitrite-nitrogen for the protection of human health shall be one and zero-tenths (1.0) mg/L and shall be met at the edge of the assigned mixing zone.*

ORSANCO is as needed today as it was in 1948 and in 1972, and that need includes setting, updating and helping to implement pollution control standards for the entire Ohio River.

ORSANCO should take the lead in setting numeric nutrient standards for the Ohio River. This need is longstanding and ORSANCO is in the best position to lead. Clearly, the current leaders within the Commonwealth of Kentucky are not going to lead in this area.

Hank Graddy  
Chair, Water Committee  
Cumberland Chapter (Kentucky), Sierra Club  
137 North Main Street  
Versailles, KY 40383  
Cell: 859-229-4033  
[hank.graddy@gmail.com](mailto:hank.graddy@gmail.com)

**James Brent (J.B.) Turley**  
**Environmental Engineer II**

February 24<sup>th</sup>, 2018

ORSANCO  
5735 Kellogg Avenue  
Cincinnati, Ohio 45230

**RE: ICL-IP America, Inc.**  
**Pollution Control Standards**  
**Comments**

To Whom It May Concern:

The Ohio River Valley Water Sanitation Commission has invited comments on five alternatives for its Pollution Control Standards (PCS). ICL-IP America, Inc. (ICL) is a chemical manufacturing facility with operations in Mason County, WV. This physical location is at 11636 Huntington Road, Gallipolis Ferry, WV 25515.

ICL is a global manufacturer of products based on unique minerals, fulfilling humanity's essential needs, primarily in three (3) markets: agriculture, food and engineered materials. The ICL facility located near Ohio River Mile Marker 271 is just one of many ICL manufacturing facilities. The ICL Gallipolis Ferry Facility has been a RC 14001<sup>®</sup> registered facility for several years. This Management System which was launched by the American Chemistry Council (ACC) ensures that the chemical industry makes environmental, safety, health, and security top priorities in everyday activities and decision-making.

Additionally, ICL is unconditionally committed to sustainable development and environmental protection. As part of that commitment, ICL collaborates as a full partner with regulators, customers, academia, and industry bodies working together to achieve a joint goal of balancing environmental responsibility with civilization's needs for natural resources and products. ICL believes that this is the key to the future success and long-term sustainability of manufacturing operations.

ICL operates according to the following environmental guiding principles:

- Transparency and reporting of environmental and economic data.
- Complying with all laws and regulations in all global operating locations, and adopting standards and regulations beyond requirement.

**James Brent (J.B.) Turley**  
**Environmental Engineer II**

- Reducing the consumptions of energy, water and raw materials, and reducing air emissions, greenhouse gas emissions, wastewater and wastes, through corporate wide efficiency and operation excellence programs, and through using best available technology (BAT).
- Commitment to landscape restoration and biodiversity preservation in the organization's operating locations.

ICL understands that ORSANCO strives to keep the Ohio River in excellent environmental condition and also strives to continually make it environmentally better for aquatic life and public use each and every year. With that said, ICL believes that this PCS issue is a very important decision. ICL supports both, the first and second alternatives offered by ORSANCO. However, ICL feels that the first alternative is the better of the two (2). The basis of this choice includes the following:

- Terminating ORSANCO's PCS and relying upon state and federal programs provided for under the Clean Water Act and related state statutes would be the best choice (Alternative I). This alternative recognizes the most important change in environmental regulation relative to the Ohio River that has occurred since ORSANCO's founding: the passage of the Clean Water Act in 1972 and its subsequent amendments.
- The Clean Water Act is a comprehensive approach to protecting the health of the nation's interstate waters, like the Ohio River, and it has augmented, and eventually supplanted, the work of multi-state compacts like ORSANCO. More specifically, in the area of water quality standards, the Environmental Protection Agency and the states have now assumed lead roles in developing and implementing water quality criteria.
- Alternative 2 would be acceptable as well, as it would provide a clear statement that compliance with state water quality standards constitutes compliance with the PCS, and would remove all or parts of Chapters 3, 4 and 5. Once those Chapters are removed or modified, though, it is unclear what would be left, and how the remaining sections would be applied.
- If Chapter 1, which contains narrative criteria and site-specific criteria and variance provisions, would still be effective, how would it be enforced?
- It is also unclear why the use designations and the clarification of their application in Chapter 2 should remain in the PCS, since designated uses are already set forth in the Compact, and the Compact requires adoption of state programs to protect those uses. In fact, there is no point to any of the PCS, if compliance with state standards constitutes compliance with PCS.
- Leaving parts of the PCS in place, but providing that they don't apply to states that are meeting their Clean Water act obligations, could result in confusion as to how the rule is meant to be applied.

**James Brent (J.B.) Turley**  
**Environmental Engineer II**

ICL wishes many thanks for all of the research and efforts that ORSANCO has put forth over the years, and for taking time to reevaluate this issue. We understand that ORSANCO has a momentous decision in determining what makes the most sense moving forward after all of the changes and additional efforts by both state and federal agencies in developing and implementing water quality criteria in recent years.

Thank you for your time and consideration of these comments.

Sincerely,

A handwritten signature in black ink, reading "James Brent Turley". The signature is written in a cursive, flowing style.

James Brent Turley  
Environmental Engineer II  
ICL-IP America, Inc.

## Comments on REVIEW OF ORSANCO POLLUTION CONTROL STANDARDS by Michael C. Miller

I am writing these comments in support of ORSANCO and an experienced Ohio River researcher, having begun with 316 a and b studies in 1970 and recently sampled the Ohio River from Pittsburgh to Cairo with an interuniversity team every 5 miles in Aug of 2001-2007. As an emeritus professor from the 40 years at the University of Cincinnati studying our rivers and lakes, I now serve on boards of the Rivers Unlimited, Oxbow, Inc., Friends of the Great Miami, Ohio River Consortium Research and Education, and have been elected to the Board of Supervisors of Hamilton County Soil and Water Conservation District and attend one of the meetings of the Ohio River Mollusk Group. In addition I work to coordinate the study of water quality using 6 parameters (TP, Nitrate, Turbidity, pH, Conductivity, E. coli and total coliforms) at 230 sites in streams of Hamilton County for the Green Umbrella Watershed Group and their STREAMBANK data BASE including sites in the Ohio River, GMR, LMR, Mill Creek and Whitewater River in Ohio.

ORSANCO compact sets out the guiding principles for its operation:

Article VI states “the guiding principle of this Compact shall be that pollution by sewage or industrial wastes originating within a signatory State shall not injuriously affect the various uses of the interstate waters.” Minimum requirements for the treatment of sewage and industrial waste then are established in Article VI, as well as the authority of the Commission to require higher degrees of treatment where they are determined to be necessary after investigation, due notice, and hearing. Article VI concludes by authorizing the Commission to “adopt, prescribe, and promulgate rules, regulations and standards for administering and enforcing the provisions of this article.” Reduction in their actions as defined will lessen the likely quality of the Ohio River and its immediate tributaries.

Water Quality Standards for the Ohio River, need periodic critical review to force the states to do the same or accept ORSANCO Pollution Control Standards (PCS). The water quality standards historically were targeted at gross pollution of settled solids and floating scums in lieu of quantitative appreciation of Water Quality Standards (WQS) required for life in the Ohio River and its immediate tributaries that have been developed since the Clean Water Act (1972 and amendments). Often even today ORSANCO insists upon a single water quality standard for the entire river whose chemistry changes from Calcium-poor to Calcium-rich moving from upriver to down river. We need PCS and WQS that are protective of the water along that gradient. **ORSANCO has the historical data to judge better than any other agency to define the needs of the healthy ecosystems of the Ohio River.** Although governed by political entities (State Governors), it is a collective judgment that sets standards and expectations of the states collectively. The States individually are often biased by local political realities and often by corrupt or industry-dominated state governments. Clearly, letting each state enforce its requirements on the Ohio River brings inconsistencies in time as state governments change. Titular compliance to USEPA guidelines can readily be simulated by state agencies by variances allowed under the NPDES setting powers of the state for any effluent. Even in Ohio where the Ohio EPA does an exemplary job of monitoring water quality, setting WQS, and generating TMDLs, the enforcement are of OEPA may not pay any attention to the data for assigning requirements on a NPDES permit. This disparity influenced our formative EPA director to resign and begin his own company, where politics were not an influential

factor. As the USEPA falters under an unusual national administration, ORSANCO can still act under the Clean Water Act that allows states to meet or exceed the federal WQS. This could be critical since these 5 options were put forth.

**Most of the 6 mainstem states no longer monitor the Ohio River and are dependent on ORSANCO data** and some USGS or USEPA data sets to interpret the health of the river. Alternative 1 will likely require the states to redevelop their Ohio River mainstem programs. Many of the States will maintain that they too are monetarily stressed and will not want to do as exhaustive work as does ORSANCO. We used to believe that the USEPA was the rock, a stable standard against which the states would not violate; however, recent political elections have shown that temperament, emotion, and ignorance rather than data, history and future projections are used to modify WQS. **Having a third layer of a group of vested states arguing to develop a compromised PCS and WQS is now required to guarantee the future of clean water in the Ohio River that ORSANCO has directed through the years.**

States monitor their waters on a very different schedule than does ORSANCO for human health, for fish contaminants, for fish community and invertebrate community health, and WQS that support those end uses. Even Ohio uses 5 to 10 years between intensive water quality determinations for fish and macroinvertebrates in most of their watersheds and have a schedule for implementing TMDLs. Other states are less frequent and not as comprehensive. WQS cannot be changed in time periods less than sampling. ORSANCO is in the river every year in 2-4 dam pools and is available to study over 600 reported spills in the river that may affect human and ecological health of the river. They currently use a triennial reviewing WQS. **Minimally perhaps they could to a PCS and WQS review once every five years.** The less frequent review might cost a little more per review, but would save money for ORSANCO overall.

Director Harrison has been eager **to involve ORSANCO in more types of data compilation from other national and local agencies doing approved analyses.** This could be a cost saving move and help generate better analyses for determining WQS and PCS. Clearly the agency and methodology would have to be followed for each data set that ORSANCO does not collect. Using more data sources would require more analytical time, but if done once every 5 years instead of once per three years the costs should be less. Major water works analyze water quality and algal composition that could be valuable under future climate change scenarios.

**ORSANCO does specific analyses on the river for target problems** like total solids, Hg and Methyl Hg, chloro- and bromo-halogens from fracking wastes, climate change scenarios and ORFIN fish index an Ohio River specific IBI. Anticipating problems and reacting to them to potentially set new PCA and WQS is a major advantage for us as citizens and the environment. These studies suggest what more needs to be done to change the PCS or WQS. Experimental studies and specific site studies around specific industries certainly help keep the river cleaner and the decisions on WQS and PCS standards more adept.

No other agency that collects the data is able to make standards from their own data. Other agencies can suggest changes to WQS but an administrative hierarchy and public reviews may change the intent



and effectiveness of the regulated WQS values. **We have few agencies that are adept on big river analysis and regulation:** Upper Mississippi, perhaps the Great Lakes Program as it affects the St. Lawrence seaway, and perhaps the Columbia River. Large rivers require special skills, modification from small and mid-sized rivers that ORSANCO can and does do. The budget of ORSANCO for what they do is minimal. Their output and productivity is enviable as a government agency. **Let us find ways to get them more money, not less. Ohio wants all of its programs tied to fixed funding sources like gas taxes, license-sales, hunting and fishing licenses, etc. We should find a way that barge transport, highway or bridge construction, or services to US Army Corps are designated for ORSANCOs monitoring, data analysis and WQS reviews.**

We use a system similar to the modified versions of decentralization for public health warnings for fish consumption that may be contaminated with methyl mercury, PCBs, chlorinated organic compounds not even used today. The fish analysis data is given to the states and they make different and independent decisions about number of fish meals per week for males and females. These vary. Is this the future for [NO<sub>3</sub>], [PO<sub>4</sub>-3], Hg, Pb, Zn, Cd, Cu, etc., etc., etc? No. Leave the power and the authority with ORSANCO as a democratic decision maker working towards our collective best societal solutions to water quality problems, that is least likely to be swayed by political and industrial money.

Find more ways to fund ORSANCO, reduce the frequency of reappraisal of WQS and PCS to save money, rely on more sources of data where available, but keep the ability to regulate the open water and 'mixing zone' concentrations to support fish and macroinvertebrates to meet the Clean Water Act goals. The minority report on Alternative 2 identifies most of these problems of the others.

Sincerely yours,

A handwritten signature in black ink on a light-colored background. The signature is cursive and reads "Michael C. Miller".

Michael C. Miller, Ph.D. Aquatic Ecologist.

**From:** [Paul Heckbert](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Paul Heckbert](#)  
**Subject:** pollution control standards for Ohio River  
**Date:** Saturday, February 10, 2018 5:45:11 PM

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Do not relax your standards for pollution control on the Ohio River.

We have too much pollution and too many new sources of pollution in recent years (fracking being the big one). Now is not the time to relax pollution monitoring or enforcement. Now is a time to strengthen them.

I'm a resident of the eastern suburbs of Pittsburgh, PA, so my drinking water comes from a water intake near Verona, PA, along the Allegheny River. I'm concerned whenever I learn of pollution in the Conemaugh River watershed, or the French Creek watershed, or other parts of the Allegheny River watershed. I'm also conscious that there are communities downstream of Pittsburgh in Ohio, West Virginia, Kentucky, etc that get their water from the Ohio.

Keep the rivers clean!

Paul Heckbert  
Edgewood, PA 15218

**From:** [Cathleen Arnold](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution Control Standards  
**Date:** Monday, February 12, 2018 12:54:29 PM

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Comment from a Resident of the City of Cincinnati:

Please continue to maintain the current Pollution Control Standards. Why would the Board want to lessen the standards which have been serving the community so well?

Changing and lessening the standards as they exist - or simply relying on standards put forth by the EPA - would eventually endanger the health of all residents of the community, not to mention doing harm to businesses which rely on the best water quality possible.

Cathleen Arnold

Mt. Washington

**From:** [Beth](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Maintain Pollution Control Standards  
**Date:** Monday, February 12, 2018 4:40:24 PM

---

Dear Orsanco,

Please maintain the current standards of pollution control.

Sincerely,

Beth Sheehan

**From:** [Gwen's gmail](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** 2018 Review of Pollution Control Standards:  
**Date:** Wednesday, February 14, 2018 9:26:59 AM

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from Gwen Marshall  
1417 Bercliff Ave, Cincinnati, OH 45223

On the question of whether ORSANCO should continue to maintain, administer, and periodically update the current Pollution Control Standards, or should eliminate the Pollution Control Standards and withdraw from the process of maintaining and updating such standards I suggest that no change be made at this time.

I appreciate the logic of not duplicating the efforts of other governmental entities but there are more pressing issues at this time. Safe drinking water is the shortage of today and the future and very necessary for us to protect. For example with fracking and the secrets related to that industry as to what they are putting in our ground water. The Ohio River is a extremely important source for drinking water as well as a wildlife habitat and recreation area. In addition, we are in a volatile period of time politically with a President and his administration exhibiting such erratic behavior, so we don't know what will happen with the EPA and the rules that are meant to protect us from industry and greed making our environment unsafe.

I strongly oppose rolling back the standards and their enforcement in anyway by ORSANCO at this time.

Gwen Marshall

**From:** [Lisa Meadows](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** REVIEW OF POLLUTION CONTROL STANDARDS  
**Date:** Thursday, February 15, 2018 7:33:25 PM

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Dear Manager,

As a frequent consumer of using the Ohio River for recreation including kayaking, fishing, and birding...Please do not get rid of pollution control standards. Our rivers struggle to deal with combined sewer overflow days because our sewage systems are not equipped to deal with every rain events. Working in Beaver County, I've seen a long history of how industrial pollution has caused major sickness in the local communities. Riverfront real estate was once despised because of how nasty the Ohio looked and smelled. No one wants to see trash or smell dirty water.

The Ohio along with the Allegheny and Mon have just started to reap the benefits of a recreation and river landscape communities of trails due to strict pollution control standards. One does not need to look hard at how riverfront property was once despised and is now becoming one of the most valued real estate in our communities. People want to be near the water for walking, biking, kayaking, & outdoor recreation because the water become so much cleaner. Nobody wants to smell chemicals, sewer, or worry about the fish they are going to consume or how pollution can affect human health. Outdoor recreation, entertainment, and residential living are increasing becoming valued along our riverfronts.

Many communities get their drinking water from the Ohio River as well. Please keep Pollution Control Standards. Our rivers deserve it and our communities can continue to reap the economic, social, and health benefits of clean water.

Sincerely,

Lisa Meadows

**From:** [tom.lindah1](mailto:tom.lindah1@gmail.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution standards changes  
**Date:** Thursday, February 15, 2018 7:53:11 PM

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As a long time Pittsburgh resident and user of the rivers for many decades, I find the idea of changing or eliminating some of the standards protecting our rivers very disturbing. I have lived in this town long enough to remember when you could watch the rivers run white with pollution and debris and this is not a time I wish to return to. The bass master tournament a few years back allowed the city to showcase the good work these regulations performed. The reason that the city is such a beautiful place to live at this point is exactly because of these regulations, to change them is to invite return to the good old days when no one would even consider going into the rivers. Please leave the standards as they are, because the good work they do is evident every time I visit the rivers as a frequent bicyclist and kayaker. Thank you for taking the time to read my opinion and please leave the pollution regulations alone.

Sincerely,

Tom Lindahl  
T.lindah1@gmail.com

**From:** [John shirey](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Friday, February 16, 2018 12:28:34 AM

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Do not eliminate the need for keeping the river clean and safe. Progress has been made in improving the quality of the river. Why stop now? We do not want to have the river revert back to its industrial waste days. Please keep the progress ongoing to continue improvement to the river. Thank you.



**From:** [malivingood@gmail.com](mailto:malivingood@gmail.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Clean water  
**Date:** Friday, February 16, 2018 12:58:35 AM

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Do NOT gut environmental protection of our water. Most of us aren't d-rump trumpstain morons. I don't want my grandchildren drinking tainted water. Compare the cost of compliance vs the cost of clean ups and health disasters (flint mi.)

Sent from my iPhone

**From:** [Drahos, Ronald W](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Saturday, February 17, 2018 4:20:15 PM

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ORSANCO's work setting pollution limits is critical to the health of the Ohio River. Your work is critical to the health and safety of all the communities living downstream and/or drawing water from the Ohio river. I request that you OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

**From:** [James A Clark Jr](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** no to not setting pollution standards for the Ohio River  
**Date:** Saturday, February 17, 2018 4:22:45 PM

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To ORSANCO

Keep your pollution protections in place to increase its efforts to protect the Ohio River and restore the quality of America's most polluted river.

- 1) Your work setting pollution limits is critical to the health of the Ohio River.
- 2) I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you  
James A Clark Jr  
Colorado Springs, CO

**From:** [cmarie239@aol.com](mailto:cmarie239@aol.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River pollution limits  
**Date:** Saturday, February 17, 2018 6:21:15 PM

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Please keep the mandatory pollution limits for the Ohio River as they are. As a resident of Indiana, I strongly oppose any changes to the pollution limits.

**From:** [Linda Haas](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution limits for Ohio River  
**Date:** Saturday, February 17, 2018 7:14:11 PM

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Your work setting pollution limits to the Ohio River is crucial for the health of all who use the water from the river as well as the rivers ecosystem. Please help us guarantee safe limits.

Thanks, Linda Haas

**From:** [Nathan Pate](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** ohio river  
**Date:** Saturday, February 17, 2018 7:32:54 PM

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greetings,

Your work setting pollution limits is critical to the health of the Ohio River.  
I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits  
for the Ohio River!

Sincerely,  
nathan pate

**From:** [Newton, Nancy A.](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Vital pollution control standards for the Ohio River  
**Date:** Saturday, February 17, 2018 10:07:57 PM

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I am a long-term resident of south-central Indiana and my nephew and his family live in Evansville, on the great Ohio River.

The Ohio, centrally important in our national history and to the quality of life for present-day humans and wildlife who rely on it for life-sustaining water, is, sadly, one of our most polluted, toxic rivers.

The Ohio needs our good stewardship. It needs you to continue to set mandatory pollution controls. We residents of Indiana need your commission's standards to stand firm: they are essential to improving the quality of the Ohio's waters.

I add my voice to entreat you to act responsibly: to keep the mandatory pollution control standards firmly in place, and to resolutely monitor and enforce them.

My health, the health of my nephew and of his young sons, the health of countless citizens and the life of precious marine and other wildlife -- all this is significantly affected.

Act responsibly. Thank you.

Sent from my iPhone

**From:** [Janet Ellis](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Please protect the Ohio River  
**Date:** Saturday, February 17, 2018 11:56:59 PM

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Your work setting pollution limits is critical to the health of the Ohio River.

I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

When deciding how to protect the Ohio River, please consider our children and their children and their children's children.....We don't inherit the earth from our parents; we borrow it from our children.

Thank you for listening,

Janet Ellis  
Resident of Bloomington, IN, and  
Frequent visitor to the Ohio River

Sent from my iPhone



**From:** [Leneta Kitchel](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Sunday, February 18, 2018 8:18:12 AM

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Please do all you can to maintain and improve river quality standards on the Ohio River. It's the right thing for EVERYONE.

Larry & Leneta Kitchel  
8425 Los Robles, Fishers, IN 46038

**From:** [Brenda Haddock](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Protecting the Ohio River  
**Date:** Sunday, February 18, 2018 8:40:34 AM

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I understand ORSANCO is considering eliminating pollution control limits on the Ohio River. I totally disagree with any such plan. The Ohio River is one of the most polluted rivers in the U.S., but thousands of Hoosiers get their drinking water from the river. The Ohio River also provides diverse recreational opportunities and habitat for wildlife, including threatened and endangered species.

Please continue with the pollution control limits so we may, in the end, have a clean and safe Ohio River. I OPPOSE ANY proposal eliminating ORSANCO's mandatory pollution limits for the Ohio River.

***Brenda Haddock***  
[bahaddo@att.net](mailto:bahaddo@att.net)

**From:** [Hugh](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Quinn Bowden](#)  
**Subject:** Please keep strict pollution standards for our sacred, revered and loved Ohio River!  
**Date:** Sunday, February 18, 2018 3:08:42 PM

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Sent from my iPhone  
Respectfully, Hugh Red Baker

**From:** [Randi Pokladnik](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Comments  
**Date:** Sunday, February 18, 2018 9:06:51 PM

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## ORSANCO

5735 Kellogg Avenue  
Cincinnati, Ohio 45230

Attn: PCS Comments

To whom it may concern:

Like many of the commissioners in ORSANCO, I also feel that “the elimination of the ORSANCO Pollution Control Standards is unwise and will compromise, rather than further, the goals of the Compact and the health of the Ohio River.”

The suggested “removal of the water quality criteria (Chapter 3), and mixing zone designation (Chapter 4) and potentially revisions to other portions of the PCS including the “free from” requirements (Chapter 1) and wastewater discharge requirements (Chapter 5)” would basically leave most of the pollution monitoring to the member states. As mentioned in ORSANCO documents, these states are implementing programs. Do we know how well these programs are working currently and do we have enough data to feel assured that all states can meet the requirements for a successful program?

As mentioned by other committees, “ORSANCO’s Pollution Control Standards reflect that there are at least 188 parameters among the 6 signatory states and EPA, for which ORSANCO has a criteria but the state or EPA does not.” Additionally, some of the sampling areas along the Ohio River are over twenty miles apart. Where will states collect their samples from geographically speaking?

There has been a tremendous buildup of oil and gas development along the Ohio River. Watersheds within the Ohio River will now be contaminated with other chemicals, many of which are unknown due to proprietary concerns. How will states deal with testing and instrument standardization if they are not even aware of what may be in water samples? Testing for many of these chemicals requires the use of gas chromatography /mass spectrophotometry.

Currently ORSANCO relies on the assistance of other utilities and industries for this type of testing. They test for 22 purgeable compounds including: 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,1-Dichloroethylene, 1,2-Dichlorobenzene, 1,2-Dichloroethane, 1,2-Dichloropropane, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, Benzene, Bromodichloromethane, Bromoform, Carbon Tetrachloride, Chlorobenzene, Chloroform, 1,6 Dibromochloromethane, Ethylbenzene, Methylene Chloride,

Tetrachloroethylene, Toluene, Trichloroethylene, Trichlorofluoromethane, and Styrene.: Will these agencies continue this type of testing for states?

Mercury has posed a problem as quantities have steadily increased in the Ohio River from 61 pounds in 2007 to 380 pounds in 2013. Will states maintain a mixing zone ban or will they take a stronger stance on mercury pollution?

Additionally, a recent article published in the *Journal of Environmental Health and Science*, March 2015, titled "Marcellus and Mercury: Assessing potential impacts of unconventional gas extraction on aquatic ecosystems in Northwestern Pennsylvania" showed there are significantly higher levels of mercury in samples of aquatic life (macroinvertebrates) as well as in surface water in fracked sites.

If a lack of funding has played a role in the decision to stop ORSANCO's role as a watchdog for the Ohio River, I suggest a cut in other areas of funding rather than a cut to water quality monitoring. The Ohio River has the unenviable position of being the most contaminated river in the nation. Yet, industry, especially oil and gas, continue to expand and proposes siting additional facilities along the Ohio River (such as ethane cracker plants) that would additionally threaten the drinking water source for millions of people.

Instead of cutting back on monitoring, I feel that ORSANCO should be keeping its current programs in place and possibly expanding them.

Respectfully,

Randi Pokladnik

Ph.D. Environmental Studies  
MA. Environmental and Community Issues  
BA Chemistry  
AAS Environmental Engineering  
ISO-14001 Environmental Auditor Certified  
Hazardous Materials Certified

--

Dr. Randi Pokladnik  
86200 Tappan Highland Road  
Tappan Lake  
Uhrichsville, Ohio 44683

We forget that the water cycle and the life cycle are one.

- **Jacques Cousteau**

I understood when I was just a child that without water, everything dies.  
I didn't understand until much later that no one "owns" water.  
It might rise on your property, but it just passes through.  
You can use it, and abuse it, but it is not yours to own.  
It is part of the global commons, not "property" but part of our life support system.  
**- Marq de Villiers, *Water*, 2000**

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Virus-free. [www.avast.com](http://www.avast.com)

**From:** [Bill Hurley](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Ohio River pollution standards  
**Date:** Sunday, February 18, 2018 10:54:42 PM

---

Dear Sirs

I strongly oppose any reduction in Ohio River pollution standards. Thousands of people use the Ohio for recreation in Indiana and Kentucky and hundreds of thousands Depend on the Ohio for Drinking water. WP Hurley Box 217 Memphis Indiana 47143

**From:** [marianne b](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio river  
**Date:** Monday, February 19, 2018 9:51:25 AM

---

Hello,

Protect our waterways! I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you,  
Marianne Beck

Sent from my iPhone



**From:** [Shaunna Graf](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO needs to continue to Regulate Pollutants in the Ohio River  
**Date:** Monday, February 19, 2018 3:48:44 PM

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I understand that ORSANCO is now proposing to permanently eliminate pollution limits for toxic and human waste in the Ohio River from its rules.

ORSANCO's pollution control standards are critical to guarantee that pollution from upstream states will not harm Indiana's waters. ORSANCO should keep its pollution protections in place. ORSANCO should increase its efforts to protect the Ohio River and restore the quality of America's most polluted river.

Orsanco's work setting pollution limits is critical to the health of the Ohio River.

I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Shaunna Graf  
5003 E. Shoreline Dr  
Floyds Knobs, IN 47119  
(812) 989-9262

**From:** [Staci Marshall](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** PCS Comments  
**Date:** Monday, February 19, 2018 4:34:48 PM

---

ORSANCO  
Attn: PCS Comments.  
5735 Kellogg Avenue  
Cincinnati, OH 45230

I understand that ORSANCO is now proposing to permanently eliminate pollution limits for toxic and human waste in the Ohio River from its rules.

ORSANCO's pollution control standards are critical to guarantee that pollution from upstream states will not harm Indiana's waters. ORSANCO should keep its pollution protections in place. ORSANCO should increase its efforts to protect the Ohio River and restore the quality of America's most polluted river.

Orsanco's work setting pollution limits is critical to the health of the Ohio River.  
I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Staci Marshall  
613 West Spring Street  
New Albany, IN 47150  
812-653-5113

**From:** [Sarah Eddy](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 4:40:47 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Sarah Eddy  
859 W Newport Ave  
Chicago, IL 60657

**From:** [David Unger](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:05:01 PM

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Dear Commissioners,

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
David Unger  
969 N Ritter Ave  
Indianapolis, IN 46219

**From:** [Madeline Gelis](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:05:18 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Madeline Gelis  
1035 Hull Terrace  
Evanston, IL 60202

**From:** [Kristin Rivera](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:06:50 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Kristin Rivera  
3917 W Belden Ave  
Chicago, IL 60647

**From:** [Patrick Brown](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:12:07 PM

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Dear Commissioners,

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Regards,  
Patrick Brown  
800 Lyman Ave  
Oak Park, IL 60304

**From:** [Aaron Turkewitz](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:14:15 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Aaron Turkewitz  
5410 S Blackstone Ave  
Chicago, IL 60615



**From:** [Garland Hicks](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:14:40 PM

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Dear Commissioners,

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Regards,  
Garland Hicks  
702 Washington St  
Valparaiso, IN 46383

**From:** [Connie Schmidt](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:16:24 PM

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Dear Commissioners,

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Regards,  
Connie Schmidt  
3S501 Landon Ave  
Warrenville, IL 60555

**From:** [Cathy Felix](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:20:14 PM

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Dear Commissioners,

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Regards,  
Cathy Felix  
2706 Deerfield Ln  
Rolling Meadows, IL 60008

**From:** [Amy Itescu](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:21:58 PM

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Dear Commissioners,

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Regards,  
Amy Itescu  
2275 Madison Ave  
Cincinnati, OH 45212

**From:** [Anne Nepokroeff](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:22:38 PM

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Dear Commissioners,

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Anne Nepokroeff  
1900 W Cornelia Ave  
Chicago, IL 60657

**From:** [Nick Hennessy](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:24:32 PM

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Dear Commissioners,

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Regards,  
Nick Hennessy  
459 S Grove St  
Bowling Green, OH 43402

**From:** [Ada Gugenheim](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:26:15 PM

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Dear Commissioners,

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Ada Gugenheim  
1359 E 52nd St  
Chicago, IL 60615

**From:** [Mary Barbezat](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:28:59 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Mary Barbezat  
789 Rocky Gap Drive  
Elgin, IL 60124



**From:** [Angela Daidone](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:30:05 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Angela Daidone  
21 E Chestnut St  
Chicago, IL 60611

**From:** [Dolores Pino](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:31:13 PM

---

Dear Commissioners,

I strongly urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards!!!!

As you know, the Ohio River flows through six states, and along its thousand-mile length there are MANY, MANY sources of water pollution caused by us stupid humans!!!!

ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth.

As you know, without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River, FOR THE SEVENTH GENERATION HENCE!!!!!!!!!!

Regards,  
Dolores Pino  
7200 Wilson Terrace  
Morton Grove, IL 60053

**From:** [James Jachimiak](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:32:37 PM

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Dear Commissioners,

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
James Jachimiak  
835 S Old US Hwy 31  
Franklin, IN 46131

**From:** [Bartholomew Casper](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:36:36 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Bartholomew Casper  
800 Oxford St  
Downers Grove, IL 60516

**From:** [Ellen Moderhack](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:42:41 PM

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Dear Commissioners,

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Regards,  
Ellen Moderhack  
2717 W Sunnyside Ave  
Chicago, IL 60625

**From:** [nancy strickland](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:44:53 PM

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Dear Commissioners,

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Regards,  
nancy strickland  
204 Kiowa St  
Edwardsville, IL 62025

**From:** [Kevin Brubaker](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:46:47 PM

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Dear Commissioners,

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Regards,  
Kevin Brubaker  
1039 S Humphrey Ave  
Oak Park, IL 60304

**From:** [William Miller](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:47:33 PM

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Dear Commissioners,

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Regards,  
William Miller  
2204 Asbury Ave  
Evanston, IL 60201



**From:** [chris berti](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 5:53:49 PM

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Dear Commissioners,

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Regards,  
chris berti  
411 W Nevada St  
Urbana, IL 61801

**From:** [Harry Drucker](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:07:52 PM

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Dear Commissioners,

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ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Harry Drucker  
2500 Greenwood Ave  
Wilmette, IL 60091

**From:** [Laura Haber](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:09:36 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Laura Haber  
412 W Green St  
Urbana, IL 61801

**From:** [Nancy Brandt](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:15:28 PM

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Dear Commissioners,

There are six states depending on the standards that have been set for the Ohio River and millions of people. I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. Along its thousand-mile length of the Ohio River there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Nancy Brandt  
222 E Chestnut St  
Chicago, IL 60611

**From:** [Carole Arett](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:26:48 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Carole Arett  
2945 Stockton Ct  
Naperville, IL 60564

**From:** [Janet McDonnell](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:28:22 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Janet McDonnell  
1322 N Vail Ave  
Arlington Heights, IL 60004

**From:** [William Bromer](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:38:16 PM

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Dear Commissioners,

I am a PhD Biologist who studies rivers in Illinois and I am concerned about the rivers upstream and how they are regulated. I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
William Bromer  
1509 N William St  
Joliet, IL 60435

**From:** [Lenore Reeves](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:54:36 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Lenore Reeves  
19934 Hickory Stick Ln  
Mokena, IL 60448



**From:** [John Massman](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:54:55 PM

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Regards,  
John Massman  
42861 N Janette St  
Antioch, IL 60002

**From:** [Monica Brown](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 6:57:00 PM

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Dear Commissioners,

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Regards,  
Monica Brown  
2512 W Farwell Ave  
Chicago, IL 60645

**From:** [James Jachimiak](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:18:31 PM

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Dear Commissioners,

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Regards,  
James Jachimiak  
835 S Old US Hwy 31  
Franklin, IN 46131

**From:** [David Westerfield](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:19:40 PM

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Dear Commissioners,

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Regards,  
David Westerfield  
2125 Prairie St  
Glenview, IL 60025

**From:** [Cindy Acker](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:27:44 PM

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Dear Commissioners,

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Regards,  
Cindy Acker  
2625 Techny Rd  
Northbrook, IL 60062

**From:** [Eric Ribbens](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:29:45 PM

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Dear Commissioners,

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Regards,  
Eric Ribbens  
136 Holden Terrace  
Macomb, IL 61455

**From:** [Matthew Alschuler](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:29:56 PM

---

Dear Commissioners,

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Regards,  
Matthew Alschuler  
61087 Private  
Mason, WI 54856

**From:** [James Donnelly](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:42:11 PM

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Dear Commissioners,

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Regards,  
James Donnelly  
4622 N 525 W  
La Porte, IN 46350



**From:** [Chris Moran](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:47:48 PM

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Dear Commissioners,

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Regards,  
Chris Moran  
2859 Gilna Ct  
Cincinnati, OH 45211

**From:** [Noreen lassandrello](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 7:55:20 PM

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Dear Commissioners,

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Regards,  
Noreen lassandrello  
307 Briargate Terrace  
Hinsdale, IL 60521

**From:** [Rebecca Bierbaum](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 8:02:44 PM

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Dear Commissioners,

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Regards,  
Rebecca Bierbaum  
3719 Horn Ave  
Alton, IL 62002

**From:** [Gloria Picchetti](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 8:12:21 PM

---

Dear Commissioners,

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Regards,  
Gloria Picchetti  
3920 N Clark St  
Chicago, IL 60613

**From:** [Patricia Pruitt](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 8:52:13 PM

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Dear Commissioners,

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Regards,  
Patricia Pruitt  
1032 Randolph St  
Oak Park, IL 60302

**From:** [Marlene Borton](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 8:57:49 PM

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Dear Commissioners,

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Regards,  
Marlene Borton  
10984 Frederick Pike  
Vandalia, OH 45377

**From:** [Susan Spengler](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 9:12:33 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Susan Spengler  
620 E Kenilworth Ave  
Palatine, IL 60074

**From:** [Dr. McDaniel](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 9:20:06 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Dr. McDaniel  
495 E College St  
Oberlin, OH 44074



**From:** [David Sickles](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 9:45:37 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
David Sickles  
4965 Highland Dr  
Willoughby, OH 44094

**From:** [Wallace McMullen](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 10:29:00 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Wallace McMullen  
4324 Dover Rd  
Louisville, KY 40216

**From:** [avis fisher](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 10:40:42 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
avis fisher  
1623 Court St  
Mchenry, IL 60050

**From:** [Georgianna Whalen](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 11:08:52 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Georgianna Whalen  
533 Elmore St  
Park Ridge, IL 60068

**From:** [Luciana Tytenicz](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 11:09:01 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come. We certainly don't want any other problems like the Flint, Michigan case to arise, and ORSANCO's Pollution Control Standards need to stay in place in order to avoid that from happening in the Ohio River watershed.

I hope you will act to protect the people and the environment that are served by the Ohio River. Please, reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. We need these standards, today more than never.

Regards,  
Luciana Tytenicz  
40 E Delaware Pl  
Chicago, IL 60611

**From:** [Sara Schroeder](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 19, 2018 11:31:07 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Sara Schroeder  
901 Center St  
Des Plaines, IL 60016

**From:** [Catharine White](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 12:10:43 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Catharine White  
5001 Golf Rd  
Skokie, IL 60077

**From:** [Brock Auerbach-Lynn](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 12:31:03 AM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Brock Auerbach-Lynn  
435 W Oakdale Ave  
Chicago, IL 60657



**From:** [Karen DeForest](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 12:43:34 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Karen DeForest  
615 Ln 101 Ball Lake  
Hamilton, IN 46742

**From:** [Jacqui Foster](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 1:23:58 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Jacqui Foster  
731 State St  
Belleville, IL 62220

**From:** [Susan Balaban](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 2:42:19 AM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Susan Balaban  
204 Lockerbie Ln  
Wilmette, IL 60091

**From:** [Brian Erickson](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 6:01:25 AM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Brian Erickson  
335 E Longview Ave  
Columbus, OH 43202

**From:** [LAUD AZU](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 6:22:35 AM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
LAUD AZU  
1100 Periwinkle Dr  
Florence, KY 41042

**From:** [Diane Winkler](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Date:** Tuesday, February 20, 2018 7:09:24 AM

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**ORSANCO's pollution control standards are critical to guarantee that pollution from upstream states will not harm Indiana's waters!** Please keep its pollution protections in place to increase its efforts to protect the Ohio River and restore the quality of America's most polluted river. Speak out to ensure that the Ohio River's pollution control standards are not eliminated.

**Diane Winkler**  
**710 Clay st**  
**Jasper, IN 47546**

**From:** [Carol Hatfield](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 8:17:35 AM

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Dear Commissioners,

I am writing to very strongly urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

This is the 21st century, not the 12th - clean water is critical!

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

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Regards,  
Carol Hatfield  
850 E Berwyn St  
Indianapolis, IN 46203

**From:** [Elizabeth Walters](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 8:23:09 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Elizabeth Walters  
1281 W Oak Spring Rd  
Libertyville, IL 60048



**From:** [Laura Derks](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 8:26:59 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Laura Derks  
316 N Scoville Ave  
Oak Park, IL 60302

**From:** [Scott Myerly](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River pollution  
**Date:** Tuesday, February 20, 2018 9:55:06 AM

---

We need stricter pollution controls, not fewer.

Scott Hughes Myerly,  
Evansville, Indiana

**From:** [Robin Wilson](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 9:56:10 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Robin Wilson  
1106 S East Ave  
Oak Park, IL 60304

**From:** [Kate Caldwell](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 10:14:10 AM

---

Dear Commissioners,

Are you INSANE? Do you know how precious our fresh water is? You need fresh water just as much as your constituents. Please change your direction!

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Kate Caldwell  
27064 Dutton Rd  
Beecher, IL 60401

**From:** [Paul Hill](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 10:23:44 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Paul Hill  
3800 W H And H Rustic Ln  
Madison, IN 47250

**From:** [Frank Van Bree](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 10:30:16 AM

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Dear Commissioners,

My family and I depend on the Ohio River for clean drinking water, therefore I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Frank Van Bree  
1502 Allentown Rd  
Sellersburg, IN 47172

**From:** [John O'Brien](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 10:40:34 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
John O'Brien  
1429 Marigold Ln  
Minooka, IL 60447

**From:** [Teri Bradley](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 11:14:39 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Teri Bradley  
419 W Grant Pl  
Chicago, IL 60614



**From:** [Fr. OFM](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 11:17:54 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Fr. OFM  
110 W Madison St  
Chicago, IL 60602

**From:** [David Woronecki-Ellis](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 11:20:57 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
David Woronecki-Ellis  
2833 W 38th Pl  
Hobart, IN 46342

**From:** [Tom and Ann](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO  
**Date:** Tuesday, February 20, 2018 11:38:55 AM

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ORSANCO please keep your pollution protections in place to increase your efforts to protect the Ohio River and restore the quality of America's most polluted river. Ohio River's pollution control standards should not be eliminated.

Tom Hougham  
Trafalgar, IN

**From:** [Andrea Keeble](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 12:24:25 PM

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Dear Commissioners,

This directly effects our entire water source throughout the United States. I urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Andrea Keeble  
474 N Lake Shore Dr  
Chicago, IL 60611

**From:** [Cynthia Roberts](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 1:26:59 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Cynthia Roberts  
5296 S Shore Dr  
Nashville, IN 47448

**From:** [Thomas Schmidt](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 1:45:28 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Thomas Schmidt  
401 S Coler Ave  
Urbana, IL 61801

**From:** [Barbara Steinke](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:02:23 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Barbara Steinke  
Po Box 75025  
Charleston, WV 25311  
304-552-3063

**From:** [Lisa Murphy](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:02:37 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Lisa Murphy  
494 Ridge Rd  
Shenandoah Jct, WV 25442  
3046204202



**From:** [Michael Klausing](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:02:41 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Michael Klausing  
624 Cross Lanes Dr Apt 11  
Nitro, WV 25143  
25143

**From:** [Bruce Russell-Jayne](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River Pollution  
**Date:** Tuesday, February 20, 2018 4:02:46 PM

---

Your work setting pollution limits is critical to the health of the Ohio River.  
I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Regards,

Rev. Bruce R. Russell-Jayne

Mitigate Global Warming - Take the Paris Pledge! [www.parispledge.org](http://www.parispledge.org)

**From:** [Hedda Haning](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:04:08 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Hedda Haning  
268 Baker Lane  
Charleston, WV 25314  
304-344-0469

**From:** [Elaine Eudy](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:04:55 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Elaine Eudy  
2501 remain way  
Atlanta, GA 30344  
4047618004

**From:** [Jack Stansfield](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:05:16 PM

---

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ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jack Stansfield  
16314 62nd Ave NW  
Stanwood, WA 98292  
3606548205

**From:** [Penny Manion](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:06:00 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Penny Manion  
PO Box 1307  
Shepherdstown, WV 25443  
304-904-1983

**From:** [PETER SCHUMACHER](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:06:30 PM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

PETER SCHUMACHER  
2335 Burton Run Road  
Pennsboro, WV 26415  
3043772329

**From:** [Luis Andres Guillen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:06:59 PM

---

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Luis Andres Guillen  
1029 Olivia Way  
Morgantown, WV 26508  
6816687440



**From:** [Sandi Aden](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:08:12 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Sandi Aden  
1621 Old Glory Road  
Lincoln, NE 68521  
4809650705

**From:** [Spencer Spencer](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:08:25 PM

---

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Spencer Spencer  
988 Henry Mountain Road  
Brevard, NC 28712  
8288852680

**From:** [Dianne Douglas](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:08:29 PM

---

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Dianne Douglas  
2723 E Valencia Drive  
Phoenix, AZ 85042  
6022687065

**From:** [Carol Sheffield](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:08:41 PM

---

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Thank you.

Carol Sheffield  
297 Upper Childers Run  
Buckhannon, WV 26201  
3044721463

**From:** [Richard Barker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:08:52 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Richard Barker  
11103 SW Davies Road  
Beaverton, OR 97007  
4804153672

**From:** [Linda Carroll](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:09:06 PM

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As an American who is informed and concerned about environmental and health issues, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Linda Carroll  
215 West Waverly Place  
Spokane, WA 99205  
504 865-1244

**From:** [Rose Marie Wilson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:10:50 PM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Rose Marie Wilson  
62 Valley Court  
Shepherdstown, WV 25443  
304-433-0224

**From:** [Dagmar Grabsch](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:11:08 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Dagmar Grabsch  
34 saragossa street  
Saint Augustine, FL 32085  
000000000



**From:** [Terry WOLFE](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:11:53 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Terry WOLFE  
1199 EAST THIRD STREET  
MORGANTOWN, WV 26508  
3042907065

**From:** [Bret Rosenblum](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:12:07 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Bret Rosenblum  
11303 Lower Cheat Rd  
Elkns, WV 0  
14127599303

**From:** [Carole Williams](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:12:15 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Carole Williams  
2223 Heritage Point  
Morgantown, WV 26505  
3045540199

**From:** [Adam Johnson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:16:46 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Adam Johnson  
334 Green Street  
Morgantown, WV 26501  
3042937389

**From:** [Frederick Ripley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:17:12 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Frederick Ripley  
PO Box 21491  
Columbus, OH 43221  
2707533104

**From:** [James Dixon](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:17:25 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

James Dixon  
206 W. Washington Ave.  
Terra Alta, WV 26764  
3047896212

**From:** [Sarah Wiedel](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 4:21:56 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Sarah Wiedel  
9319 S Claremont Ave  
Chicago, IL 60643

**From:** [Salt Salt](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:23:16 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Salt Salt  
1 Nomial St  
Coventry, RI 02816  
4015551111



**From:** [Dan Taylor](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:26:04 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Dan Taylor  
Taylor  
Charleston, WV 25311  
3045219865

**From:** [Elaine Komarow](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:26:57 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Elaine Komarow  
201 Warden Lake Hollow  
Wardensville, WV 26851  
703-560-1964

**From:** [Damon Mills](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:27:45 PM

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As a citizen of Huntington West Virginia, and someone who depends on the Ohio River for their drinking water, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River. Do not roll back pollution standards for our waters.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Damon Mills  
338 11th ave west  
Huntington, WV 25701  
3045226887

**From:** [Engle Engle](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:28:26 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Engle Engle  
324 Point Drive  
Parkersburg, WV 26101  
(304) 488-4384

**From:** [Kathy Sanders](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:29:18 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Kathy Sanders  
4733 Fisher Bowen Br. Rd.  
Wayne, WV 25570  
3045236796

**From:** [Phyllis Chavez](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:32:25 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Phyllis Chavez  
2112 Ocean Park Blvd  
Santa Monica, CA 90405  
3103968108

**From:** [Cindy Lewellen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:34:40 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Cindy Lewellen  
546 Westwood Ave  
Morgantown, WV 26505  
3045991764

**From:** [Leslie Cassidy](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:34:48 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Leslie Cassidy  
534 East 83rd Street, Apartment 2B  
New York, NY 10028  
2127342534



**From:** [William & Myrna F](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:38:37 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River. These changes would be a travesty. Why would you reverse pollution controls for water that sooner or later somebody is going to drink, or fish in, or swim in?

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River. Remember, we all live downstream!

Thank you.

William & Myrna F  
588 Breakiron Hiill Road  
Morgantown, WV 26508  
304 296 1202

**From:** [Bob McKeon](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:39:10 PM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Bob McKeon  
Central Parkway  
Ashland, KY 0  
6069235890

**From:** [Aaron Lancaster](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:41:54 PM

---

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Aaron Lancaster  
359 Wake Robin Trail  
Lewisburg, WV 24901  
3046457788

**From:** [Lorne Stockman](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:42:39 PM

---

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Lorne Stockman  
216 N Madison St.  
Staunton, VA 24401  
5406791097

**From:** [Dan Henninger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:46:03 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Dan Henninger  
800 North Main St.  
Meadville, PA 16335  
814-724-1501

**From:** [Rivers Rivers](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:46:35 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Rivers Rivers  
8-gombert place  
Roosevelt, NY 11575  
516-670-4461

**From:** [Joseph Alfano](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:47:08 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Joseph Alfano  
235 East 57th street  
NY, NY 10022  
2127508533

**From:** [Susan Hamann](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:47:41 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Susan Hamann  
1 Ming Court  
Chester, NJ 7930  
7324812472



**From:** [Ned Savage](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:51:53 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Ned Savage  
8094 Upper Craig Creek Rd.  
Thomas, WV 26292  
5405204154

**From:** [Judy Hamilton](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:53:57 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Judy Hamilton  
907 Mathews Avenue  
Charleston, WV 25302  
304-346-9210

**From:** [James Wood](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Don't roll back pollution control standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:55:17 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

James Wood  
120 Maple ave  
Wheeling, WV 26003  
828-292-6800

**From:** [Susan Blain](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:00:10 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The proposal is absurd in light of the fact that clean drinking water is a basic right.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Susan Blain  
156 Vernon St  
Gardner, MA 1440  
9786324435

**From:** [marilyn\\_evenson](mailto:marilyn_evenson@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:01:13 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

marilyn evenson  
408 Wine St  
Vermilion, OH 44089  
3304612000

**From:** [TOM ROSE](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:04:59 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

TOM ROSE  
3207 Windsor Green Drive  
Murfreesboro, TN 37129  
(615) 848-9157

**From:** [krause krause](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:10:08 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

krause krause  
1201 University Dr NW  
Marion, ND R3Y 1K4  
5555555555

**From:** [Diane Kraft](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:13:28 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Diane Kraft  
919 James Drive  
Lewiston, NY 14092  
7162821658



**From:** [Tonya Stiffler](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:25:06 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Tonya Stiffler  
18051 Sunnyside Ave N  
Seattle, WA 98133  
2066019688

**From:** [Collin Bisignani](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:28:05 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Collin Bisignani  
254 Kingwood Street  
Morgantown, WV 26501  
724-961-4170

**From:** [Stephan Donovan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:28:11 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Stephan Donovan  
4851 North Bernard Street  
Chicago, IL 60625  
13122132926

**From:** [Kristen Keller](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 5:30:38 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Kristen Keller  
1247 W Wrightwood Ave  
Chicago, IL 60614

**From:** [Amelia Walker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:34:09 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Amelia Walker  
416 Central Ave  
Williamstown, WV 0  
(304) 210-1966

**From:** [Sally Small](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 5:39:13 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Sally Small  
802 N Layman Ave  
Indianapolis, IN 46219

**From:** [Don Lowe](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:51:41 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Don Lowe  
#10 Ashwood Dr.  
Vienna, WV 26105  
304-295-6819

**From:** [James Mulcare](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:54:39 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

James Mulcare  
1110 Benjamin St  
Clarkston, WA 99403  
(509) 758-3934



**From:** [Sylvia Bondurant](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:55:37 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Sylvia Bondurant  
28 Creekside Valley View Drive, Apt 1  
Union, WV 24983  
208-539-0018

**From:** [Jane Butler](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:56:30 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jane Butler  
314wildrose dr  
Hedgesville, WV 25427  
3042585594

**From:** [Terry Wyrostok](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:16:42 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Terry Wyrostok  
230 griffith run  
spencer, WV 25276  
304-927-2978

**From:** [Martha W D Bushnell](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:18:13 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Martha W D Bushnell  
1331 E. Hecla Dr.  
Louisville, CO 80027  
3039263100

**From:** [Tia Triplett](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:26:36 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Tia Triplett  
3959 berryman avenue  
Los Angeles, CA 90066  
3105520035

**From:** [Thomas Wilson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:30:07 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Thomas Wilson  
856 Edgewood Drive  
Charleston, WV 25302  
3043455508

**From:** [Debbie Naeter de](mailto:Debbie.Naeter.de)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:32:52 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Debbie Naeter de  
375 Hillside pass  
Frankford, WV 24938  
5734501401

**From:** [Francis Sullivan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:33:03 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Francis Sullivan  
5506 Shawnee Drive  
Huntington, WV 0  
3046341916



**From:** [jerry carson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:34:01 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

jerry carson  
5215 beechcrest dr  
cross lanes, WV 25313  
304-776-1422

**From:** [Robert A. Mertz](mailto:Robert.A.Mertz@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:36:57 PM

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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 inherit. 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. The natural ecosystems stabilize the atmospheric gasses and maintain our freshwater systems. 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 eight year old granddaughter and her little sister, born in October. Our other son and wife are expecting a son. 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.

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Robert A. Mertz  
1205 Mulberry Ridge  
Spencer, WV 25276  
(304) 927-5055

**From:** [Janet Robinson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:44:13 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Janet Robinson  
6391 Toulon Dr.  
Boca Raton, FL 33433  
5614162247

**From:** [Brady Brady](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:44:51 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Brady Brady  
77 Singletree Drive  
Shepherdstown, WV 25443  
304-876-2516

**From:** [Rebecca Berlant](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:46:01 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Rebecca Berlant  
8A First Place  
Brooklyn, NY 11231  
7185551212

**From:** [Tom Anderson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:48:06 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Tom Anderson  
109 Coventry Road  
Marietta, OH 45750  
740-525-0594

**From:** [Darrell Dean](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:57:59 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Darrell Dean  
3800 STANLEY RD  
HUNTINGTON, WV 25702  
3049628359

**From:** [Paul Eisner](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:01:06 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Paul Eisner  
9725 McCutcheon Ave.  
Pittsburgh, PA 0  
412 635-9584



**From:** [Jaegers Jaegers](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:09:20 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jaegers Jaegers  
4095 Robert Ave.  
St. Louis, MO 63116  
(314) 351-5901

**From:** [Jennifer Edelen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:13:12 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jennifer Edelen  
6304 Hanses Dr  
Louisville, KY 40219  
5025280037

**From:** [garvey.garvey](mailto:garvey.garvey@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:16:29 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

garvey.garvey  
429 s 24th  
clinton, OK 73601  
5803232327

**From:** [Kate Leary](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:17:17 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Kate Leary  
407 William Avenue, Apt. 3  
Davis, WV 26260  
304-345-7663

**From:** [Marion Albu](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:26:34 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Marion Albu  
1906 SW 20th Cr  
Boynton Beach, FL 33426  
5613858699

**From:** [Claudette Simard](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:36:21 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Claudette Simard  
376 Wildwood Lake Road  
Morgantown, WV 26508  
304-216-2942

**From:** [Dixie Mullineaux](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:42:10 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Dixie Mullineaux  
568 Preston Unger Court  
Berkeley Springs, WV 25411  
304-258-7288

**From:** [Karen Tabor](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:42:43 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Karen Tabor  
Benedict Road  
Culloden, WV 25510  
479-790-7213



**From:** [Esther Murphy](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:46:55 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

I don't believe that ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Esther Murphy  
134 Reachcliff Drive  
Shepherdstown, WV 25443  
304 876-8133

**From:** [AnnaMary Walsh](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:55:06 PM

---

I wish to express my concern regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This jeopardizes the ongoing clean up and restoration of the Ohio River. The importance of watershed-wide cooperation through a joint or common agency is imperative.

The Ohio River is topping the list of most polluted rivers in the country. Because strategies and decisions must be made across states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin needs to be a shared responsibility.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

AnnaMary Walsh  
254 Chandler Drive  
Shepherdstown, WV 25443  
304-876-682

**From:** [Julie Riffle](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 8:10:43 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Julie Riffle  
3068 E 79th St  
Chicago, IL 60649

**From:** [Christine Stewart](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:14:01 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Christine Stewart  
307 Whippoorwill  
Escondido, CA 92026  
760 489-1318

**From:** [Francis Slider](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** re: Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:17:42 PM

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As a property owner in Tyler County, WV, on the Ohio River, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Francis Slider  
PO Box 131  
Middlebourne, WV 26149  
304-771-2150

**From:** [Linda Jones](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:20:26 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Linda Jones  
1004 Tanner Hill Road  
Tanner, WV 26137  
3044628549

**From:** [Lynch Lynch](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:28:10 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Lynch Lynch  
128 Willow Spring Drive  
WV, WV 26070  
304-737-9840

**From:** [Patricia Armstrong](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 8:28:58 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Patricia Armstrong  
612 Staunton Rd  
Naperville, IL 60565



**From:** [Julie Darling](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:32:12 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Julie Darling  
105 Martha Avenue  
Spencer, WV 25276  
3049276913

**From:** [Theresa WOOD](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:42:05 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Theresa WOOD  
512 Ox Creek Rd  
Weaverville, NC 28787  
8286588894

**From:** [Mary Madsen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:42:40 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Mary Madsen  
424 North Blvd W  
Huntington, WV 0  
3045258319

**From:** [Diane Gioe](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Tuesday, February 20, 2018 8:48:48 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Diane Gioe  
733 Holly Dr  
Bartlett, IL 60103

**From:** [John Pasqua](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:48:58 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you. john pasqua

John Pasqua  
843 S ESCONDIDO BLVD  
Escondido, CA 92025  
7604843741

**From:** [Cynthia Ellis](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:50:37 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Cynthia Ellis  
3114 Steel Ridge Rd  
Red House, WV 25168  
304-586-4135

**From:** [Kaitlyn Snyder](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** PLEASE Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:30:40 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Kaitlyn Snyder  
1723 d mileground rd  
Morgantown, WV 26505  
6102943019

**From:** [Leonard Leonard](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:31:53 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Leonard Leonard  
19499 Coshocton Rd  
Mount Vernon, OH 43050  
740-397-6725



**From:** [Jody Ross](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:33:36 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jody Ross  
2208 Donald Ave  
Huntington, WV 25701  
3046385439

**From:** [Michelle Sewald](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:33:57 PM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Michelle Sewald  
1401 Wewatta st  
Denver, CO 80202  
5555555656

**From:** [Steve Malafy](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:36:38 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Steve Malafy  
280 Centerville Harp Rd  
French Creek, WV 26218  
304-460-1511

**From:** [Marlene Cross](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:54:06 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Marlene Cross  
274 U Rd, PO Box 349  
Arthurdale, WV 26520  
814-923-1118

**From:** [Watts Watts](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:03:22 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Watts Watts  
16 Starks Place  
Lynbrook, NY 11563  
5165555555

**From:** [Lelani Landis](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:19:20 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Lelani Landis  
36 Jerichio Lane  
Smithfield, WV 26437  
304 334 5862

**From:** [Lenore Reeves](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:22:16 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Lenore Reeves  
19934 Hickory Stick  
Mokena, IL 60448  
7087557010

**From:** [Suzanne Kruger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:24:16 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Suzanne Kruger  
60 Huckleberry Ln  
Harpers Ferry, WV 25425  
3047281339



**From:** [Lorenz Steininger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:03:48 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Lorenz Steininger  
13 main st  
stafford, VA 22554  
1111111111

**From:** [Gayle Janzen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Please Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:06:45 PM

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It makes no sense to be rolling back environment standards on the Ohio River that is already extremely polluted. Your job is protect the river from getting even more polluted. Putting the polluters' interests ahead of the citizens' needs is a Flint water tragedy in the making.

Therefore, I OPPOSE the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Gayle Janzen  
11232 Dayton Ave N  
Seattle, WA 98133  
2063629278

**From:** [Steven Runfola](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:10:26 PM

---

Hello :

My name is Steve Runfola and Im writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Steven Runfola  
Morgantown WV

steven Runfola  
45 Park Ridge Drive  
MORGANTOWN, WV 26508  
304-291-0770

**From:** [Greg Sells](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:29:04 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Greg Sells  
3300 Parker Ln. Apt. 258  
Austin, TX 78741  
512-443-6461

**From:** [Jim Steitz](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Is Ohio River Not Sufficiently Polluted Already?  
**Date:** Tuesday, February 20, 2018 11:34:47 PM

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\*\*\*To retrench from the commitments made in 1948 to future generations, acknowledging their entitlement to a healthy Ohio River, would be an outrageous abdication of responsibility. It is inevitable that industrial interests would grow irritated by constraints on their activity from the ORSANCO review process, but these concerns pale beside the importance of restoring an Ohio River that can support human and animal life.\*\*\*

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jim Steitz  
849 Glades Road #1203  
Gatlinburg, TN 37738  
4357704797

**From:** [Martha Glock](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:48:13 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Martha Glock  
8360 Greensboro Rd. #909  
McLean, VA 22102  
7036980971

**From:** [Hersha Evans](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:00:20 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Hersha Evans  
55 Griggs St  
Christiansburg, VA 24073  
540-381-0474

**From:** [mauricio.carvajal](mailto:mauricio.carvajal@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:36:06 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

mauricio carvajal  
viento norte 4018  
Santiago, ot 92915  
7420081



**From:** [Susan VanMeter](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:05:22 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Susan VanMeter  
28 Critton Owl Hollow Road  
Paw Paw, WV 25434  
3049470000

**From:** [Gallaher Gallaher](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:06:14 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.  
Linda Gallaher

Gallaher Gallaher  
157 Gallaher Street  
Huntington, WV 25705  
3047107956

**From:** [Kat Cooper](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:13:29 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Kat Cooper  
2832 Mountain Lake Rd  
Hedgesville, WV 25427  
5555555555

**From:** [hatfield Hatfield](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:43:35 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

hatfield Hatfield  
1077 foley drive  
saint albans, WV 25177  
304-727-6138

**From:** [Jenna Glass](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:50:39 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jenna Glass  
69 west Jefferson Street  
Westover, WV 0  
3042826448

**From:** [Christopher Ecker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:57:16 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Christopher Ecker  
112 Calvert Road  
Rockville, MD 20850  
3014903833

**From:** [Monique TONET](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:33:06 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Monique TONET  
14 boulevard Jean Baptiste Verany  
Nice, ot 0  
049226973

**From:** [Jennifer Hall](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:39:04 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jennifer Hall  
34 Pebblehill Park  
Greeneville, TN 37745  
423-217-3700



**From:** [Amy Hyde](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio river quality comments  
**Date:** Wednesday, February 21, 2018 4:39:51 AM

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The river quality is so toxic as it is. We drink water from this river! There are toxic spills constantly.

There needs to be greater control and regulations over the pollution.

We are concerned because one option the ORSANCO [Commissioners](#) are considering is to abdicate their pollution control setting standards role on the river—giving standard setting jurisdiction to State agencies, (like the WV DEP), or Federal entities (like EPA, and the Army Corps of Engineers).

For reasons why this is a concern, we need look no further than [reports](#) about pollution on the Mississippi River—where pollution control standards vary widely from state to state as the river passes through. We believe well coordinated pollution control standards are very important throughout the entire Ohio River watershed, especially in view of the impending rapid development of a new wave of oil and gas Industry infrastructure along the river and many of its tributaries.

Sincerely, Amy Hyde

1337 Herlin place

Cincinnati Ohio 45208

Sent from my iPhone

**From:** [M. Miller](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:15:11 AM

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I have strong concerns about the proposed changes to the Pollution Control Standards for discharges into the Ohio River. You should, too.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

M Miller  
606 Cely Rd  
Easley, SC 29642  
864-236-4110

**From:** [Wiley McIntyre](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:15:44 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Thank you.

Wiley McIntyre  
197 Spur Road  
Martinsburg, WV 25404  
3042670000

**From:** [D'Onofrio D'Onofrio](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:25:40 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

D'Onofrio D'Onofrio  
25118 Smith Grove Rd  
North Dinwiddie, VA 23803  
8048612390

**From:** [Luwana Dyer](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:59:05 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Luwana Dyer  
50 Woodridge Dr  
Steep Falls, ME 4084  
2072982740

**From:** [Erin Shaw](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:02:25 AM

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ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Erin Shaw  
384 Tweed Lane  
Petersburg, WV 26847  
3047032510

**From:** [DK Anestis](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:11:40 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

DK Anestis  
Nitro  
Nitro, WV 25143  
3047556789

**From:** [Eric Harder](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep strict water quality standards and hold polluters accountable.  
**Date:** Wednesday, February 21, 2018 8:23:13 AM

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I'm writing to express my disappointment regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

Millions of dollars are spent annually by upstream stakeholders, citizens, and organizations in an attempt to keep their waters clean for downstream users. As the Youghiogheny Riverkeeper, I'm proud to protect our watershed knowing that the water leaving is as clean as we can keep it.

Strict pollution standards and holding polluters accountable. That's what has a positive impact on water quality. Industry has a negative impact on water quality. With the increasing amount of industrial activity and the proposed petrochemical (petrochemical = pollution) infrastructure within the Ohio River Valley increases the importance of protecting our waters.

The Ohio River has topped the list of most polluted rivers in the country for years. The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.  
Eric Harder  
Youghiogheny Riverkeeper



[Mountain Watershed Association](#)  
[eric@mtwatershed.com](mailto:eric@mtwatershed.com)  
262-716-7151



**From:** [harris harris](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:32:00 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

harris harris  
17 gate court  
Burlington, NJ 8016  
6097443953

**From:** [Patricia Jacobson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:43:50 AM

---

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ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Patricia Jacobson  
20 Fairfax Drive  
Wheeling, WV 26003  
304-242-8873

**From:** [Val Bosscher](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 8:48:47 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Val Bosscher  
10335 S Hale Ave  
Chicago, IL 60643

**From:** [Larry Orr](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:55:20 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Larry Orr  
104 Hillcrest Ave  
Elkview, WV 25071  
304-965-7185

**From:** [Jonathan Rugh](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:00:24 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jonathan Rugh  
1513 Boxwood Dr  
Blacksburg, VA 24060  
8142410572

**From:** [Richard Han](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:08:33 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Richard Han  
1795 W. Stadium Blvd.  
Ann Arbor, MI 48103  
7346623377

**From:** [Carla Beaudet](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:29:49 AM

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ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Carla Beaudet  
PO Box 33  
Green Bank, WV 24944  
3044562126

**From:** [Barrett Barrett](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:34:28 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Barrett Barrett  
923 Short Street  
Loves Park, IL 61111  
8155169296



**From:** [Larry V. Thomas](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:56:29 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Larry V, Thomas  
Teter Gap Road  
Circleville, WV 26804  
304-567-2602

**From:** [Stephen LaFollette](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 9:57:23 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Stephen LaFollette  
8898 S County Road 200 E  
Muncie, IN 47302

**From:** [Bushkoff Bushkoff](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:04:29 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Bushkoff Bushkoff  
3 Gordon Way  
Princeton, NJ 8540  
1111111111

**From:** [FRANK J. SECOND](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:20:14 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

FRANK J. SECOND  
10 CORTESE RD,  
CLARKSBURG, WV 26301  
304 669 7908

**From:** [Holly Groves](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:25:14 AM

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Thank you.

Holly Groves  
147 Lutheran Church rd  
Albright, WV 26519  
3042667966

**From:** [vicki.cooper](mailto:vicki.cooper@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:46:29 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Thank you.

vicki cooper  
2928 mountainlake road  
hedgesville, WV 25427  
304-754-9201

**From:** [Karen Arbogast](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 11:06:14 AM

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Thank you.

Karen Arbogast  
214 Main Street  
Cass, WV 24927  
814-371-1454

**From:** [Constance Stephens](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 11:14:52 AM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Constance Stephens  
6425 S Sunbury Rd  
Westerville, OH 43081



**From:** [John Williams](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 11:29:16 AM

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Dear Commissioners,

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Regards,  
John Williams  
5575 Joyce Ann Dr  
Dayton, OH 45415

**From:** [Bruce Troutman](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 11:29:52 AM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Bruce Troutman  
9 Taylor Street  
Staunton, VA 24401  
5404488048

**From:** [Henrietta R](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Public Comment  
**Date:** Wednesday, February 21, 2018 12:12:38 PM

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Name: Henrietta Reily  
Address: 1074 Cherokee Road Louisville Ky 40204

Please do not reconsider these standards. Compromising water quality is unfair and dangerous. The narrow period for public comment is a testament to the fact that you know that and are unwilling to listen to the response citizens are sure to have.

I would like to keep updated on this and the public deserves a clearer explanation for why this is taking place.

Thank you,  
Henrietta

**From:** [Ben Badger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:24:30 PM

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Thank you.

Ben Badger  
216 Eastland Ave  
Morgantown, WV 26505  
3045985954

**From:** [Levi Rose](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:51:30 PM

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Thank you.

Levi Rose  
211 Myrtle St.  
Fayetteville, WV 25840  
740-591-1750

**From:** [Pappano Pappano](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:53:31 PM

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Thank you.

Pappano Pappano  
330 River Rd.  
Mattawamkeag, ME 4459  
(

**From:** [India Carvell](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:20:31 PM

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Thank you.

India Carvell  
238 Forest Drive  
Bridgeport, WV 26330  
3046297429

**From:** [Kathryn Hawbaker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:26:15 PM

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Thank you.

Kathryn Hawbaker  
Ferncliff Dr.  
Marietta, OH OH  
740-371-4547



**From:** [Debra Harlan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Flint  
**Date:** Wednesday, February 21, 2018 3:01:18 PM

---

Michigan is not a national standard ! I guess if the guns don't kill the children our polluted water will. Please don't turn Pure Tap into Putrid Crap . If this rich overly indulged country cannot bear to shoulder the responsibility of simple rights like clean water, clean air, and safer solutions to fossil fuel abuse, then I guess Orsanco's involvement in maintaining standards is indeed superfluous .

I weep for the generations ahead with no future. Water cleanliness is BASIC. No water no planet .

Debra Richards  
1734 Chichester Ave  
40205

Sent from my iPhone

**From:** [Cheryl Johncox](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 3:24:46 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Cheryl Johncox  
131 N High St  
Columbus, OH 43215

**From:** [Sean Borst](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** public comments  
**Date:** Wednesday, February 21, 2018 3:58:46 PM

---

To: ORSANCO

From: Sean Borst  
1201 St Christopher Dr  
Ashland KY 41101  
606-836-7000  
[spborst@verizon.net](mailto:spborst@verizon.net)

Date: February 21, 2018

Subject: Public Comment

I oppose the dismantling of the ORSANCO Pollution Control Standards. I live in Ashland KY, this area is home to some very large industrial companies, that contribute pollution to the Ohio River. Our main source of drinking water for the Ashland and other areas comes from the Ohio River. It concerns me a great deal when we are taking a step backwards and eliminating clean water standards. When your only source of clean drinking water is the Ohio River, more oversight is welcome. I please ask that you keep the ORSANCO Pollution Control Standards. I also please ask that public comment be extended.

Thank You

Sean Borst

**From:** [Angela Piro](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 4:53:37 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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Regards,  
Angela Piro  
229 E Oakland Ave  
Columbus, OH 43201

**From:** [david.childers](mailto:david.childers@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:01:46 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

david childers  
4049 blue sulphur rd  
ona, WV 25545  
304 733 5302

**From:** [Bonnie Faith-Smith](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:02:31 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Bonnie Faith-Smith  
290A Washington Street  
Cambridge, MA 0  
617-492-3821

**From:** [Constance Grubbs](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Public Comments  
**Date:** Wednesday, February 21, 2018 5:27:28 PM

---

Dear All,

Pardon my rushed email, but I'm trying to get dinner on the table for my 2 children. Two kids who live within a few miles of the Ohio River in Kentucky.

I want to encourage you to move in a direction that does not take the EPA for granted. The current climate in DC doesn't not inspire confidence that the EPA is acting in the interests of actually preserving our environment. That coupled with the legislation my congressman (Massie) introduced last year to disband the EPA makes me appreciate what you do all the more.

To be clear, I find the work of the EPA of great importance to keep all states accountable, fund research, and provide clear guidelines for the country to follow. I think it needs more money and leadership, not less. But for now, we are where we are.

Please keep up the important and good work.

Connie Grubbs  
425 Highland Ave.  
Fort Thomas, KY 41075

**From:** [Terry Johnson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:34:07 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Terry Johnson  
114 Riverview Dr.  
Tornado, WV 25202  
3047222469



**From:** [Michael Daly](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 5:50:51 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Michael Daly  
935 Francis Ave  
Columbus, OH 43209

**From:** [Tarus Tarus](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:55:30 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Tarus Tarus  
206 forestview dr.  
huntington, WV 25705  
717-649-0551

**From:** [James Rupert](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 6:39:16 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

James Rupert  
Rams Lane  
Martinsburg, WV 0  
304-839-1247

**From:** [R Mill](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:06:17 PM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

R Mill  
3414 maple  
Toledo, OH 43608  
4197544668

**From:** [Stephanie Wibfrey](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:12:32 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Stephanie Wibfrey  
143 Glen Ridge Pkaxe  
Princeton, WV 24740  
3043201907

**From:** [Thomas Poteet](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Wednesday, February 21, 2018 9:21:20 PM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

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ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Thomas Poteet  
820 W Mill St  
Carbondale, IL 62901

**From:** [Suzanne Bompensa](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:08:59 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Suzanne Bompensa  
2730 SE Eagle Drive  
Port Saint Lucie, FL 34984  
1111111234

**From:** [Diana Greenhalgh](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 11:01:24 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Diana Greenhalgh  
2051 Red Lick Rd  
New Milton, WV 26411  
304-873-1376



**From:** [Brenda walters](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 1:52:59 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Brenda walters  
8905 Seneca Trail  
hillsboro, WV 24946  
3045201660

**From:** [Lin Billingsley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO  
**Date:** Thursday, February 22, 2018 6:05:07 AM

---

Putting states in charge of Ohio River quality means industry will have its way to the detriment of water quality. Kentucky already has a high cancer rate. For the sake of public health, the river should be regulated by a coalition, not individual states! If states regulate, we will have no downstream protections.

Linda B. Billingsley

Sent from my iPhone

**From:** [John Rossbach](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Pollution Control Standards for Ohio River  
**Date:** Thursday, February 22, 2018 6:59:44 AM

---

The proposed changes to the Pollution Control Standards for discharges into the Ohio River are unacceptable.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

John Rossbach

John Rossbach  
205 Davis and Elkins St.  
Elkins, WV 26241  
304 637 3588

**From:** [Mary Wildfire](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO WQS  
**Date:** Thursday, February 22, 2018 7:07:30 AM

---

Dear ORSANCO,

I wish to comment on the five proposals on how ORSANCO should move forward in terminating, continuing or changing its review and attempts to enforce water quality standards.

I don't have technical expertise, and surely miss much but reading through these five alternatives it seems that the general discussion is over whether ORSANCO should continue as it was originally mandated to do, or whether this is redundant with both EPA and the six states' individual standards...and whether it should therefore drop this function entirely to instead direct all its resources to monitoring and enforcement (enforcement of what?). Some of the Alternatives seem to suggest a modification, in which either ORSANCO continues its current functions but focuses on harmonizing among the states' standards or merely suggests rather than trying to mandate its own standards.

My preferences would be for options 3 or 4, in which ORSANCO continues setting standards. The reason is that in twenty years as an environmental activist, mostly in West Virginia but some in Pennsylvania, I've seen overwhelming evidence that the WV DEP and the PA DEP are captured agencies, and I strongly suspect that the equivalent DEPs or DEQs of other states are in the same condition. Every year the WV legislature considers new bills to weaken water and air quality standards on behalf of industry. The budgets are also cut, leaving these agencies unable to do enough inspections to actually enforce the standards they have. As for EPA, it seems it has been completely eviscerated by Pruitt in one year. Therefore, IF ORSANCO is not also a captive agency, I would prefer that it continue to at least try to enforce standards. Throughout this letter I use the language of "trying to enforce" because I suspect that part of the reason this change is being contemplated is that in the current regulatory environment, government agencies and corporations are increasingly empowered to ignore regulations and get away with it. Thus even those commission members who want to strong standards enforced may be frustrated. Others may actually believe that ORSANCO

standards and duplicative and unnecessary...or perhaps, like the DEP heads, they may be appointed by governors doing payback for campaign contributions.

If state and EPA agencies' work is adequate, why do I keep reading that the Ohio River is the most polluted inland waterway in the country? A river that is about to be impacted by multiple gas pipelines crossing under it, fracking directly under it, NGL storage caverns alongside it, and perhaps barging of fracking wastes on it. None of which will do any harm as long as there is never a leak, accident, fire, explosion, crash...

Thank you for your attention.

Mary Wildfire  
1069 Steel Hollow Rd  
Spencer, WV 25276

**From:** [Mike Walton](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Public comment on Ohio River protection  
**Date:** Thursday, February 22, 2018 7:34:41 AM

---

Please add my voice to those opposed to easing restrictions on what pollutants are allowed to defile the Ohio River. Does it have to catch fire before someone says "Oops, maybe that was a bad idea?"

Mike Walton  
4125 BROWNS LN UNIT 208  
LOUISVILLE KY 49220-1564

Sent from my iPhone

**From:** [Mary Webb](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:04:23 AM

---

Why must you be told to protect our rivers? Public servants either serve the people properly or leave our service!

**From:** [merrill](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:04:43 AM

---

PROVE THAT YOU HAVE ETHICS, MORALS AND SCRUPLES!!!!



**From:** [Carol Bodenmiller](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:08:14 AM

---

Sent from my iPhone

**From:** [Nick Valentine](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:08:41 AM

---

It is inconceivable that you want to permanently eliminate limits on toxic chemicals in the Ohio River. Our beautiful state is now threatened by those who want to destroy our natural resources. As a citizen, a Republican, and a Christian, I do not believe this is in our state or countries best interest. I will not support anyone who seeks to destroy this beautiful planet given to us by God. This will become an issue in up coming elections as we all force our political leaders to defend their actions.

Nick Valentine  
317 Cherry Laurel CT  
Maineville, OH 45039

Sent from [Mail](#) for Windows 10

**From:** [Jane](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:11:32 AM

---

To whom it may concern,

I've recently heard that your organization is proposing to eliminate pollution limits in the Ohio River. I'm writing to inform you that myself, my household and many others in my community strongly **OPPOSE ANY** proposal that would decrease or eliminate pollution limits. It's 2018 and the fact this is even a consideration is ethically irresponsible, and could lead to the decline of natural habitats, wildlife and would contribute to the issues compacting global warming.

Do the right thing.

-Jane

**From:** [werner.lange](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:12:08 AM

---

As a resident of Ohio and a congressional candidate, I strongly urge you to retain the mandatory pollution limits for our beloved Ohio River.

As a public agency it is your moral and legal duty to protect the health of the Ohio River and all life, including human, which, in large part, depends upon it.

NO ELIMINATION OF MANDATORY POLLUTION LIMITS1

Rev. Dr. Werner Lange  
Democratic Candidate for Ohio's Sixth Congressional District

**From:** [Leo Bistak](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:13:31 AM

---

Eliminating pollutant limits on the Ohio River means you have given up on helping the river and inhabitants to have healthy living. This Trump inspired cutting of limits is another slap at sensible rules

--

Leo Bistak  
12984 Martin Dr  
Parma, oh 44130

**"If you feed the horse enough oats, some will pass through to the road for the sparrows." (John Kenneth Galbreath, 1982, on trickle down economics)**

**From:** [Att](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** ohio river pollution  
**Date:** Thursday, February 22, 2018 8:16:48 AM

---

dear orsanco,

i write to urge you to keep pollution protections in place. keep our waters cleaner for drinking, recreation and wildlife. your work setting pollution limits is critical to ohio river health. i oppose any proposal that eliminates orsanco's mandatory pollution limits for the ohio river.

sincerely  
william nelson

Sent from my iPhone

**From:** [Lew](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:17:19 AM

---

I oppose any proposal that eliminates ORSANCO mandatory pollution limits for the Ohio River. Setting pollution limits is critical for maintaining health of the Ohio River.

Sent from my iPhone

**From:** [brendaoh@aol.com](mailto:brendaoh@aol.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio river  
**Date:** Thursday, February 22, 2018 8:18:09 AM

---

I oppose any change in regulations regarding the Ohio river. I want current regs to be enforced. We need to keep the Ohio River clean for wildlife and humans.

Sent from AOL Mobile Mail



**From:** [Debra Murphy](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:20:09 AM

---

Please remember the many communities that draw public water supplies from the Ohio River when you consider regulations. You are guardians of Public Safety and Public Health, not of commercial profit.

Debra Murphy P.T.  
Pilates and More

Sent from my iPhone

**From:** [Virginia](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:20:37 AM

---

To Whom It May Concern: If your choice of actions is to stop protecting Ohio's' citizens from pollution then it is time for you to find another career!! This is NOT rocket science!! Do your job or leave it to others who have greater intelligence, greater commitment to Ohio's' citizens, & greater concern for what is best for this planet!! Most sincerely, Mrs. Virginia Cousins

**From:** [Ldi Ain](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:23:52 AM

---

Lynda Ream here.. Oppose any proposal that eliminates ORSANCO'S mandatory pollution limits for Ohio River! This is critical for the health of our river.

**From:** [Derek West](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:24:45 AM

---

I am opposed to any reduction in the rules governing emissions and the cleanliness of Ohio's rivers, in particular, the Ohio river.

People, wildlife and the health of the river depend on clean water and reducing your control will affect us all.

We've spent too many years cleaning the river from the pollution of the past to allow it to again become more polluted.

Thank you,

Derek West

Sent by Derek from my iPad

**From:** [Sue Stromberg](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:25:23 AM

---

Sir,

I oppose any effort that eliminates mandatory pollution controls of the Ohio River. The health of our state cannot be marginalized.

Mandatory pollution controls should be left in place to protect the Ohio River.

Sue Stromberg  
Mentor, Ohio

**From:** [patty sheehan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:28:31 AM

---

please continue to have the strongest protections for our River. we see so much damage already in our waterways and water is life as the Native Americans say!

thank you, Patty Sheehan

**From:** [Patrick Oliss](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:31:31 AM

---

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River! We need to keep the current standards in place to avoid causing additional environmental damage to Ohio's water.

Sincerely,

Pat Oliss

**From:** [Wainer, Jody](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:39:28 AM

---

ORSANCO,

Clean water is our most precious resource, the bases of life.  
our work setting pollution limits is critical to the health of the Ohio River and to all Ohioians.  
Please OPPOSE any proposal that eliminates ORSANCO'S mandatory pollution limits for the Ohio River.

In this very challenging time in which there are forces at play that do not value clean air and clean water  
I am counting on you actually begging you to stand firm,  
stop Senate Bill 210 which would halt local governments' efforts to reduce waste and litter associated  
with disposable food packaging and carryout bags.

SB 210 not only threatens the environment but our democracy. This is a direct attack on the principle of  
home rule and the ability of local governments to govern themselves.

Thank you  
Jody Wainer  
30 Farmcote Drive  
Moreland Hills, Ohio 44022

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this message and any attachments is strictly prohibited and may be unlawful. If you have  
received this communication in error, please notify the sender by return e-mail and  
immediately and permanently delete this message and any attachments from your system.  
Thank you.



**From:** [Mary Pidock](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:41:21 AM

---

Please show some respect...it's not nice to fool with Mother Nature....and she ALWAYS  
WINS in the end  
Love & respect OUR MOTHER  
Mary

**From:** [Jane Heltebrake](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:41:40 AM

---

**Eliminating the standards; even weakening them, is a disaster! Selfish; greedy jerks!!  
STOP.**

**From:** [Elizabeth McGinnis](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:45:37 AM

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To the policy makers at ORSANCO,

I read recently that you are considering eliminating pollution limits on heavy metals, toxic chemicals and human waste in the Ohio River. I **strongly oppose** any proposal that would eliminate these mandatory pollution limits. It seems ridiculous to me that we would move backwards in terms of environmental protection, and I do not understand why you would consider this proposal. Obviously, we all need clean water, and these terms appear to prevent water pollution. Please do not eliminate these limits. Keep the Ohio River beautiful and clean and continue to progress forward in the fight for environmental protection.

Thank you for your time,

Liz McGinnis  
Franklin County Resident

**From:** [Earl Grove](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:49:34 AM

---

I really can't think of any reason why you would want to pollute the Ohio River. I'd be interested in hearing your reasoning on this. Please get back to me and fill me in on it.

[egrove06@gmail.com](mailto:egrove06@gmail.com)

Thank you'

Earl Grove  
128 W. 3rd St.  
East Canton, OH 44730-1010

**From:** [Emile Gantous](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:55:26 AM

---

Clean water is essential to our very survival. Please continue to set pollution limits on the Ohio River. I want you to know that I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Regards,

--

*[Emile Gantous](#)*  
*Twinsburg, Ohio Resident*

**From:** [Maryann Weber](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:58:37 AM

---

I strongly oppose any attempts to remove pollution limits on the Ohio River and any of the waterways in the state. Please look beyond special interests and the greed of the few to the needs of all Ohio residents for clean water for drinking and recreation. The water we keep clean today is part of our legacy to our grandchildren, our future generations.

Maryann Weber  
2420A Lexington Ave.  
Salem, OH 44460

**From:** [carol.hughes](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:00:57 AM

---

please do NOT eliminate pollution limits!

**From:** [Jeffery Watt](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:03:51 AM

---

Hello,

As a citizen of Ohio, I understand the importance of keeping the waters of the Ohio River safe and clean. The work of ORSANCO does setting pollution limits is critical to the health of the Ohio River. I strongly oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you,

Jeffery Watt  
1299 Westwood Ave.  
Columbus Ohio 43212



**From:** [Marsala Marsala](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:03:54 AM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Marsala Marsala  
158 SE 1181  
Knob Noster, MO 65336  
6605635106

**From:** [Julie Wilson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:05:15 AM

---

Please do not eliminate the pollution protections for the Ohio River. The health of many people would be greatly harmed. These standards were put in place for important reasons and should not be lifted.

Please oppose the changes that would allow harmful pollutants in the Ohio River.

Sincerely,  
Julie Wilson

**From:** [safehaven848@gmail.com](mailto:safehaven848@gmail.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Protecting the Ohio River from pollution  
**Date:** Thursday, February 22, 2018 9:06:32 AM

---

Hello,

Setting pollution limits for the Ohio River is critical to the river's health. We need clean water for drinking, wildlife, and recreation. I'm opposed to any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Thank you.

**From:** [Kimmer Schmidt](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:07:29 AM

---

To Whom it may concern:

Water is life and we must do all we can to protect it from contamination. The Ohio River is a very important fresh water source for Ohio and regulations must be in place to assure it's safety from ignorant individuals and corporations. Thank you for your consideration.

Sincerely,

Kimberly A. Schmidt  
1340 North Portage Path  
Akron, OH 44313  
PH: 330-461-1753

**From:** [Julie Michelson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:08:20 AM

---

I oppose any elimination of the mandatory pollution control on Ohio's waterways by ORSANCO.  
PLEASE KEEP OUR RIVERS FREE OF TOXINS!!

If you eliminate the limits on toxins dumped into or leaking into our Ohio rivers,

THEN YOU ARE CHOOSING PROFITS OVER HUMAN LIFE!!

Julie Chopin Michelson  
Bay Village, Ohio

**From:** [Gail Steward](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:12:52 AM

---

I'm writing to let you know that I want the Ohio River to have the highest levels of protection from pollution.

Your work setting pollution limits is critical to the health of the Ohio River.

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Please keep the health of our environment ahead of industry's desire to save money by polluting our natural resources.

**From:** [Diane Jahnes](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:13:16 AM

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I totally oppose any changes that would reduce the protections of our waterways in Ohio. People and wildlife depend on clean water. Should we have to pay further increased healthcare costs for increased disease if someone is able to save some dollars by dumping unsafe waste in our waterways and rivers? Please keep protection in place!

Thanks!

Diane Jahnes

**From:** [Patricia Gulledge](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:13:32 AM

---

Please protect our rivers from pollution. Do not change the pollution limits.

From, Patricia J. Gulledge



**From:** [Vicki Parks](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:13:46 AM

---

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Please as a voter in Ohio who lives next to the river, I don't want to see pollution levels of our source of drinking water get any higher. Keep the river clean safe and beautiful by not supporting any bills that would allow any pollution levels to get higher.

We've already had boil water orders here with protections in place. Without any of them we will have more, and I don't even want to think of what it would do to the fish and ducks that call the Ohio river home.

Thank you.

Vicki Parks

**From:** [Avery Kolers](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** do not dump Ohio River responsibility onto states  
**Date:** Thursday, February 22, 2018 9:17:18 AM

---

To Whom it May Concern:

I am very concerned about the plan to transfer water quality regulation for the Ohio River onto the bordering states. At this time, and most likely permanently, the state governments are both ideologically committed to supporting corporate power, and anyway face strong incentives to do so, sucking us into a race-to-the-bottom as far as regulating water quality goes. The worst-regulated state will set the tone for all of us, unless we engage in costly legislation just to get partway back to what we have now.

Please do not wind down ORSANCO's water quality protection work. The one consistent feature of state regulation will be that our bodies store the chemicals that corporations dump into the river. State regulation will make us sick.

Thank you for your attention.

Sincerely,

Avery Kolers

1921 Deerwood Ave.

Louisville, KY 40205

**From:** [Paul Maron](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Comment on Proposed Changes to Regulating Authority  
**Date:** Thursday, February 22, 2018 9:22:38 AM

---

My name is Paul Maron and I live at 2601 Boulevard Napoleon, Louisville, KY 40205.

I am strongly opposed to ORSANCO abdicating their authority to set water quality and discharge standards to the Ohio River.

ORSANCO has a unique role in protecting our environment and should continue its mission as it was directed to at its founding.

Paul Maron

**From:** [julieandmichael@zoominternet.net](mailto:julieandmichael@zoominternet.net)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:24:11 AM

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Please keep pollution protections in place for the Ohio River. Setting pollution limits is critical to the health of the river. I oppose ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River. We need clean water for drinking, wildlife, and recreation. Julie Lynch, North Lima, Ohio.

Sent on my Virgin Mobile Phone.

**From:** [TN Briggs](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:25:01 AM

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I've lived in Ohio River communities for most of my 65+ years. In that time I've been able to see it go from a polluted waterway to a relatively clean one, primarily because of the efforts of ORSANCO. It is imperative that you retain the current pollution standards in place. We must not return to the polluted past.

In my early years at Gallipolis I would have never in my wildest dreams imagined that bald eagles would be native to the Ohio River. Now they are prevalent. Isn't it worth preserving the ability of our national bird to call the Ohio River its home?

TN Briggs  
[tnbriggs@att.net](mailto:tnbriggs@att.net)

**From:** [Alice Dugar](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:37:04 AM

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Dear Commission Board,

As an Ohio resident over my entire lifetime, I urge ORSANCO in the strongest possible words to keep in place pollution protections for the citizens of Ohio. The human body is 70% water and the % of water of a new born baby is 90%. Human health demand strong water protection.

I commend you for doing your job to protect life.

Alice Dugar

**From:** [jelto119@aol.com](mailto:jelto119@aol.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:40:17 AM

---

Do NOT remove sanitation protections from the Ohio River! --J. Hanson, Avon OH

**From:** [Tracy Asbury](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:47:58 AM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Tracy Asbury  
PO Box 535  
White Sulphur Springs, WV 24986  
3045361417



**From:** [Don Thacker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:48:21 AM

---

Your work of setting pollution limits is critical to the health of the Ohio River.

I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Citizens dependent upon a healthy Ohio River are counting on your agency to do the right thing by maintaining pollution limits.

Frank Thacker

Ironton, Ohio 45638

Sent from my iPad



**From:** [Borland, Katherine](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:49:14 AM  
**Importance:** High

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I understand that you are considering eliminating pollution limits for heavy metals, toxic chemicals and human waste in the Ohio River. I'm writing to express my alarm at this idea. The health of Ohio citizens is more important than unthinking, irresponsible industrial development. I strongly oppose any proposal that would limit or eliminate ORSANCO's mandatory pollution limits for the Ohio River. Not too many years ago, the rivers throughout our country were understood to be nothing more than sewers for industrial waste. The Cuyahoga caught fire 12 times, because it was so polluted, sparking the passage of the Clean Water Act. Do we really want to go back to that dystopic reality, now at a time when we have made such wonderful steady progress towards environmental repair? I beg you to remember the Burning River. Don't think it can't happen again.

A very concerned citizen of Ohio,

Katherine Borland  
95 Orchard Lane  
Columbus OH 43214

**From:** [Adele Looney](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:49:15 AM

---

Please do not deregulate the pollution regulations in your operations. We need to protect the water for our drinking ,recreation and health of wildlife.A citizen from Wadsworth, Ohio.

Sent from my iPad

**From:** [Nicole Foster](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:53:18 AM

---

Your work setting pollution limits is critical to the health of the Ohio River

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Sent from my iPhone

**From:** [jrg@zoomtown.com](mailto:jrg@zoomtown.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:53:33 AM

---

Hello,

As a Cincinnati resident I believe we need environmental protections and the proposed changes to eliminate pollution limits from its rules is a serious mistake. For a healthy environment for our future children we need to keep pollution protections in place. We need clean water for drinking, recreation and wildlife.

Sincerely,  
Jerry Gilden  
6130 Clough Pike  
Cincinnati, Ohio 45244

**From:** [Mary Ann Rickus](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:54:10 AM

---

I oppose your plan to eliminate protections of the water in the Ohio River Valley.  
All who use this water for drinking and agriculture must stay healthy with the help  
of the current protections.

George Marsh  
192 St. Francis Ave., # 12 a  
Tiffin, OH 44883-4412  
419-455-9217

**From:** [Ronnie Cooley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Thursday, February 22, 2018 9:56:06 AM

---

I have used the river for recreation for over 50 years and would much appreciate Orsanco staying put. We need more help keeping our waterways safe for generations to come. Please don't disband this vital group.

**From:** [Allen Bush](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Thursday, February 22, 2018 10:02:58 AM

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I live on a bend of the Salt River, that heads north for a little bit, before it feeds into Taylorsville Lake and eventually into the Ohio River at West Point.

I want to protect the Ohio River from pollutants. The river is safer—ordinarily—from the raw sewage, although this week's flooding will have an impact.

Chemical pollutants are a persistent worry. I worry that the individual state may go their own way, creating a worrisome mess of consequences.

Please protect the Ohio River.

Allen Bush  
PO Box 162  
Salvisa, KY 40372



**From:** [Laurence Bove](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:07:36 AM

---

Can you please give me additional information as to why you want to eliminate pollution limits in the Ohio river?

Thank you.

Laurence Bove

Sent from my iPad

**From:** [Larry Eicher](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** pollution in the Ohio River  
**Date:** Thursday, February 22, 2018 10:08:51 AM

---

Dear Sirs:

I am writing to request that you not eliminate pollution limits for the Ohio. Our clean water is a irreplaceable resource. We can't go back. I oppose any proposal that eliminates ORSANCO's mandatory pollution limits.

Regards,

Larry Eicher

**From:** [Christine Mendel](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:09:22 AM

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I am appalled that in this day and age that pollution standards would be set backwards instead of planning for safe and clean waterways. The Ohio river is NOT a dumping ground for greedy, short term, profit-seeking corporations. The Ohio river is all the citizens of Ohio, Kentucky, Tennessee, etc to be enjoyed and clean for the next seven generations. So don't screw this up just because we have a president that is incompetent and does not make decisions for the next seven generations and is lining himself and his family's pockets with money and trying to make his family a Romanov dynasty like the Russians. **KEEP THE STANDARDS AS THEY ARE AND DO NOT REMOVE THEM!!!!** For the love of God, do your job!!! Keep the Ohio river **CLEAN AND UNPOLLUTED**. Thank you for an Ohio citizen.

**From:** [Sherry Stischok](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:11:17 AM

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Sent from my iPad

**From:** [George Felton](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Protect Ohio River water  
**Date:** Thursday, February 22, 2018 10:13:55 AM

---

I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

ORSANCO's proposal to permanently eliminate pollution limits from its rules is dangerous and irresponsible.

Please keep pollution protections in place. Clean water is essential for all living things.

George Felton  
1143 Oxley Road  
Columbus, OH 43212  
614 886-0244

**From:** [Jessica Paine](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Protect the Ohio River from Pollution  
**Date:** Thursday, February 22, 2018 10:16:08 AM

---

As members of the Ohio River Valley Water Sanitation Commission, you **MUST** preserve pollution limits for heavy metals, toxic chemicals, and human waste in the Ohio River! As an Ohio resident and as someone who cherishes the natural beauty of our state, I'm urging you reject any proposals to permanently eliminate mandatory pollution limits from ORSANCO rules. Your work setting pollution limits is critical to the health of the Ohio River.

We need clean water for drinking, recreation, and wildlife. The health of Ohio citizens and our pride in our beautiful state are at stake. Please do the right thing and protect people and the environment over the interests of corporate polluters.

Regards,  
Jessica Paine  
Cleveland, OH 44121

**From:** [Steven M. Carter](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Mandatory Pollution Limits for the Ohio River  
**Date:** Thursday, February 22, 2018 10:16:39 AM

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Mandatory pollution limits for the Ohio River are absolutely essential to maintaining the Ohio River's ability to support multiple uses (for drinking water, recreation, and wildlife). Without mandatory enforceable limits, the Ohio River becomes a sewer system where upstream users are able to economically shift the cost of cleaning up their wastes to those down stream who use the water.

I oppose any proposal that eliminates ORANSCO's mandatory pollution limits for the Ohio River.

Thank you for your time and consideration in this matter.

Steven M. Carter  
251 E Weisheimer Road  
Columbus, Ohio 43214-2166

**From:** [Gayle Schuett](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:18:54 AM

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For many years the Ohio River Valley Water Sanitation Commission (ORSANCO) has set pollution limits for heavy metals, toxics chemicals and human waste in the Ohio River. Now you are proposing to permanently eliminate those pollution limits.

**Please keep your pollution protections in place!!**

We need **clean** water for drinking, recreation and wildlife.

Your work in setting pollution limits is *critical* to the health of the Ohio River.

**I OPPOSE ANY** proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you for your prompt attention to this very important matter.

Gayle Schuett

[placeholder\\_image](#)





**From:** [Melissa Morgan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution Limits are Critical  
**Date:** Thursday, February 22, 2018 10:19:07 AM

---

To Whom It May Concern:

Healthy rivers are critical for a healthy ecosystem. We are extremely lucky here in Ohio to have some of the best river ecosystems in the country. Please keep our rivers healthy by reinforcing pollution limits. I strongly oppose eliminating mandatory pollution limits from the Ohio River. Thank you!

Sincerely,

Melissa Morgan

**From:** [laurelgress@neo.rr.com](mailto:laurelgress@neo.rr.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Thursday, February 22, 2018 10:21:54 AM

---

To Whom it May Concern:

Please keep your pollution protections in place for the Ohio River. We need clean water for drinking, recreation and wildlife.

Your work setting pollution limits is critical to the health of the Ohio River. I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for this important waterway.

Laurel Gress  
Wadsworth, OH

**From:** [Carol Stephenson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:30:38 AM

---

I have heard you are proposing to eliminate pollution protection rules on the Ohio River—DO NOT do this. We need all agencies to maintain anti-pollution rules to protect our waterways and drinking water.

Your work setting pollution limits is critical. I strongly OPPOSE any move to decrease or eliminate mandatory pollution limits for the Ohio river or any other waterway.

Sincerely,  
Carol M Stephenson  
Loveland, OH  
[cstephenson@fuse.net](mailto:cstephenson@fuse.net)

Sent from [Mail](#) for Windows 10

**From:** [Marian](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:34:43 AM

---

Your abuse your right that the public entrusts you with.  
We need clean water, no acceptable amounts!

Sent from my iPhone

**From:** [Roberta Miller](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:46:19 AM

---

What in Heavens name do you seek to gain by eliminating pollution controls for the Ohio River--money? We the people of Ohio and all those who live along and use the waters from the Ohio-Mississippi rivers depend upon waters free from chemicals. oil, wastes of all types. heavy metals. What we eat/ingest==from agriculture to animals to the air we breath depends upon clean water. Please forget dropping or easing pollution restrictions!!!

Sister Roberta Miller.op

**From:** [Laurence Bove](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org); [Laurence Bove](#)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:47:05 AM

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I have read through the five alternatives being considered and have the following observations.

1. The Ohio River belongs to six states and they share a responsibility for its health.
2. Proposals that do not support collaboration do not guarantee its health.
3. Alternatives one and two fail the collaboration test.
4. Collaboration is built into the OSANCO and should not be dismantled. This is not a redundancy because federal laws leave it to states self interest, agency and ability.
5. Alternative 3 saves but poses risk of eroding the effectiveness of ORSANCO collaborative effect.
6. Alternative 4 seems best suited as a change that continues the collaboration and can reduce redundancies and increase efficiencies.
7. Alternative 5 is the least change oriented and may underplay communal pressures. It lets the least go in face of demands that would force ORSANCO to change and never regain the influence it now has.
8. In conclusion - In my judgment Alternative 4 is the one that seems most reasonable to support.

Sincerely,

Laurence Bove  
Professor Emeritus  
Walsh University

Sent from my iPad

**From:** [Ralph Hendrick](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:52:38 AM

---

PLEASE don't eliminate safe water chemical limits from the Ohio River or any Ohio river.

Sent from my iPhone

**From:** [Julia Johanan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:53:32 AM

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Hello, My name is Julia Johanan and I am resident of Cincinnati Ohio. As someone who lives very close to the river I wanted to write and express my concerns that ORSANCO is proposing to eliminate pollution protections from it's rules.

How could you possibly be considering that? Our river has barely recovered from days of heedless polluting and dumping and is now suffering from a huge fertilizer spill that happened last fall.

It is obviously that the Trump administrations hostility to the environment has transferred to many aspects of government.

I urge ORSANCO to keep this pollution limits in place. As weak as they are we need something to protect our waterway for people, wildlife and others who depend on clean water for LIFE and secondary for recreation.

Thank you  
Julia Johanan  
Cincinnati, Oh  
45223



**From:** [Ken Carolus](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:58:08 AM

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Dear Sir or Madam,

I am very opposed to you even considering, let alone actually removing pollution limits from your rules. Cincinnati gets 85 to 90% of our water from the Ohio River and we all cannot afford personal water filtration systems in our home.

I vehemently oppose any proposal to remove mandatory pollution limits for the Ohio River. The limits need to be stricter, not removed.

Sincerely,  
Kenneth Carolus  
Montgomery Rd.  
Cincinnati, Ohio

**From:** [Judith Clister](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 10:59:14 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Judith Clister  
640 Bolyard Rd  
Bruceton Mills, WV 26525  
304-379-3564

**From:** [Jose De arteaga](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 11:00:46 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jose De arteaga  
2014 31st Place, SE  
Washington, DC 20020  
2027898087

**From:** [Dyck, Reginald](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:05:22 AM

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Your work in setting pollution limits is very important and must be maintained. I strongly urge you NOT to eliminate them. We need clear water for a healthy Ohio.

Reginald Dyck  
3327 Bishop Street  
Cincinnati OH 45220

**From:** [duppsms](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:10:03 AM

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Do the right thing, for U.S., not big business!

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Frederick Ripley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:11:07 AM

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Feb. 22

Dear ORSANCO:

I write concerning your proposal to eliminate pollution limits for heavy metals, toxic chemicals and human waste in the Ohio River. This is a wrong, dangerous, and destructive idea. You are opening the door to a permanently degraded state for one of American's great rivers. We need clean water for drinking, recreation and wildlife. Do the right thing and keep these minimum standards in place!!

F. Ripley  
Columbus, OH

**From:** [Randy James](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:16:48 AM

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I do NOT want the Ohio River to go back to what it was like while I was growing up here. You could not eat the fish that you may have been able to catch in the open SEWER that it was then. I remember several times that there were fires that started because of the flammable toxic waste that covered the banks of the river. You certainly did not want to take your boat onto it or go skiing or swimming in it. NOW we are able to do these things BECAUSE the of EPA .

You should NOT allow corporate or YOUR OWN GREED to return this river to the open cess pool that it was.

You can be sure that I will do everything in my power to see that ANY politician that supports this kind of stuff DOES NOT GET ELECTED AGAIN!

You are SUPPOSED tom REPRESENT the citizens of OUR COUNTRY not some greedy corporations that may not even be AMERICANS!

***Randal L. James***

**From:** [Bruce Ebanks](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** comment on proposal to abandon your role  
**Date:** Thursday, February 22, 2018 11:20:21 AM

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To whom it may concern,

I am disheartened by your proposal to abandon your job of setting pollution standards for the Ohio River and leave things for the states to decide. According to your own assessment in 2015, the Ohio River is the number one American waterway in receiving industrial pollution. Why would you now declare that your job is finished? Progress has been made, but we still have FAR to go!

Leaving the decision about how clean the river needs to be to the states is not a viable option. What is a downriver state to do if an upriver state decides it is fine to dump more pollutants into the river? You cannot escape the conclusion that the Ohio River is an interstate resource, and what happens upriver affects everyone downriver (as well as across the river). This is true not only for the Ohio River, but also for the Mississippi River which it feeds into.

Please DO NOT STOP enforcing pollution standards for the Ohio River!

Sincerely yours,

Bruce Ebanks  
1130 Rostrevor Circle  
Louisville, KY 40205



**From:** [danielle blazer](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:25:40 AM

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Its work setting pollution limits is critical to the health of the Ohio River! I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!!!!!!

Danielle blazer

**From:** [Edna Chun](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:26:22 AM

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Please protect the Ohio river from pollution. It is critically important. Thank you!

Sent from my iPad

**From:** [Michael Whitten](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 11:31:43 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Michael Whitten  
227 whitten spring rd.  
PEYTONA, WV 25154  
3048368116

**From:** [Caryn Dieter](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:52:17 AM  
**Attachments:** [image001.png](#)

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Please set beneficial pollution limits to keep the Ohio River safe for human and animal life!

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thanks!

CARYN DIETER  
Transcription Supervisor  
Direct 419.725.4028  
[caryn.dieter@maritzcx.com](mailto:caryn.dieter@maritzcx.com)



**From:** [Bike Courier Bike Shop](#)  
**To:** [ORSANCO](#)  
**Subject:** Please tighten regulations on what goes into the OH.  
**Date:** Thursday, February 22, 2018 11:57:59 AM

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I read with incredulity that ORSANCO would consider relaxing standards on what can be added to the waters of the Ohio River. Please tighten regulations on what goes into the OH R. It is already much too polluted and littered.

Grateful.

Jackie Green

Bike Courier Bike Shop

Downtown - 107 W Market St - 583 2232

Bicycle Sales, Repair & Rental

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

**From:** [Charlotte Novotny](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 12:04:40 PM

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- 1) Your work setting pollution limits is critical to the health of the Ohio River.
- 2) I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

**From:** [G. Bruce Lott](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 12:13:07 PM

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I was surprised and disappointed to learn that ORSANCO is proposing to eliminate mandatory pollution limits for the Ohio River from its rules. I think it is critical for ORSANCO to maintain such rules to protect the health and safety of citizens who use the river for their water supply and recreation, and to protect the wildlife that depends on a clean river. Please keep your mandatory pollution limits in place, and strengthen them going forward, to keep the Ohio River clean!

Thank You,  
Bruce Lott  
(Hamilton County, OH resident)

**From:** [Barry Benjamin](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 12:16:12 PM

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I believe that setting standards for pollution is needed to keep Ohio healthy.

- 1) Please continue your work setting pollution limits which is critical to the health of the Ohio River.
- 2) Please continue to OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Barry Benjamin  
[barryjb@att.net](mailto:barryjb@att.net)  
561-309-6048



**From:** [Dawn Seigneur](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio river  
**Date:** Thursday, February 22, 2018 12:27:12 PM

---

Please fight to maintain pollution standards in the Ohio river.

Dawn Seigneur

**From:** [Judy Von Busch](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Proposed changes to Pollution Control Standards  
**Date:** Thursday, February 22, 2018 12:35:59 PM

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Hello,

I am OPPOSED to any proposal that reduces, restricts, or eliminates ORSANCO's pollution limits for the Ohio River or any tributary to it.

Far from being reduced, protections should be INCREASED.

Relying on the Federal Clean Water Act alone to ensure water quality is inadequate already. Water quality standards are NOT ROBUST, as was claimed by Richard Harrison in the WVXU program on 2/21/18. Many new chemicals are being invented all the time, are released into the water, and are not covered by the Act.

Relying on individual states to establish and enforce adequate protections is a faulty strategy. Industry pressure is always forcing variances and less protections. Then the states are pushed to match the lower standards of other states to remain "competitive", causing a race to the bottom. ORSANCO was established for this very reason - to have all states that share this resource protect it with a common set of standards

Reducing the role of ORSANCO is highly risky in a climate where the current Federal Administration wants to reduce environmental protections of all kinds. For the same reasoning as above, states will be driven to follow any reduction of protections at the Federal level.

The Fracking industries are creating enormous new pressures (pun intended) on ground and surface water in our region. Many chemicals used in this process are suspected of being carcinogenic, yet are still allowed by regulators, Fracking waste is being transported on the Ohio River already. Predictions are that the petrochemical industry will grow rapidly in our region. We should be making water quality regulations stronger.

ORSANCO's rationale for eliminating it's standards is to save money, which can then be applied to other programs in ORSANCO. Not for long. When you reduce effort spent on what is your CORE mission - or should be - you can expect reductions in your funding, especially in the current climate to reduce funding to regulatory agencies.

The effect of dropping ORSANCO's protections will be to reduce the cost of pollution on the polluters and transfer that cost to water supply companies and the public. The public will pay the cost in increased medical bills and lower work productivity.

We all agree the Ohio River is better than it used to be. We can thank the Clean Water Act, ORSANCO, and the many thousands of volunteers who help clean the river and its banks, But as one Ohio River watchdog describes it, it's still the most polluted inland waterway in the country. This is not the time to back away from protecting the river.

Harry Von Busch  
8081 Forest Road  
Cincinnati, OH 45255

**From:** [Ben Taylor](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 12:36:06 PM

---

To Whom It May Concern,

Eliminating pollution limits for the Ohio River would be catastrophic to our drinking water, to flora and fauna, and to environmental health overall. Your work setting pollution limits is critical to the health of the Ohio River. Any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River is an incredibly stupid idea.

Ohio constituent,

Ben Taylor

**From:** [Sara Pandolfi](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 12:44:37 PM

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How dare you allow the dumping of heavy metals and toxic chemicals into our river? You should go to jail! Maybe you should take a big long drink of that water, and then say it's fine.

Do your job or resign!

Sara Pandolfi

**From:** [eileen.mallesch](mailto:eileen.mallesch@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 12:51:54 PM

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Dear PCS,

- 1) Your work setting pollution limits is critical to the health of the Ohio River.
- 2) I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

If I can be of any help in this effort, please let me know.  
Thank you for all your do.

Regards,  
Eileen Mallesch  
Gahanna, Ohio

**From:** [David Billups](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 1:11:09 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

David Billups  
1050 Valley View Ave, Lot 14  
MORGANTOWN, WV 26505  
(804) 767.0690

**From:** [lks11645@aol.com](mailto:lks11645@aol.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 1:16:24 PM

---

Your job is to protect Ohioans, not the industry's bidding.

**From:** [Kathie Brown](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 1:22:27 PM

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Dear Sir/Madam,

For many years the Ohio River Valley Water Sanitation Commission (ORSANCO) has set pollution limits for heavy metals, toxics chemicals and human waste in the Ohio River.

My understanding is that ORSANCO is now proposing to permanently eliminate those pollution limits from its rules. This should not occur since setting pollution limits is critical to the health of the Ohio River.

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you!

Kathryn Brown  
Hudson, OHIO



**From:** [melissa.rapp](mailto:melissa.rapp@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 1:34:26 PM

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To the Ohio River Valley Water Sanitation Commission:

I am an Ohioan, whose parents grew up along the Ohio River (in Powhatan Point and Bellaire) and I oppose the elimination of pollution limits for heavy metals, toxic chemicals and human waste in the Ohio River. I am pleading with you to leave current pollution protections in place.

As a child growing up my father swam in the river, and my grandfather worked in a coal mine along the river. And for many years the river was a disgusting bed of water with chemicals from factories being dumped into the water, leaving many who live in the towns along the waterway in danger of health concerns.

We need clean water for drinking, recreation and wildlife. By eliminating these pollution limits we are opening up every town and city along the Ohio River to becoming another Flint, Michigan, a health hazard to live in.

Melissa Rapp  
447 Woodside Meadows Place  
Gahanna, OH 43230

**From:** [Marjorie Deane](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Don't change limitations on the amount of waste reaching the Ohio River  
**Date:** Thursday, February 22, 2018 1:49:03 PM

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I object to loosening limitations on waste entering the Ohio River. We have come so far in environmental cleanup. Don't go back. Your decisions will affect all of us, even you. Sincerely, Marjorie W. Deane

**From:** [john.carmichael](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 1:58:09 PM

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Do not eliminate pollution limits for heavy metals, toxic chemicals & human waste in the Ohio River. We need clean water for drinking, wildlife & recreation--not human waste- & toxin-infected sludge! I oppose any proposal that eliminates ORSANCOs mandatory Ohio River pollution limits!! John Carmichael Citizen of Cincinnati, Ohio

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Virus-free. [www.avast.com](http://www.avast.com)

**From:** [Carol Boram-Hays](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 2:24:54 PM

---

Dear Sirs/Madams:

I understand that ORSANCO is considering lifting the limiting pollution levels for the Ohio River. I urge you to oppose this measure. Ohio rivers have only recently recovered from industrial pollution which impacted the state in the mid 20<sup>th</sup> century, and Cincinnati is still dealing with the impacts of C8 pollution. We only have so much clean water on the planet. Please do not waste this precious resource and endanger the health of all Ohioans.

Sincerely, Carol Boram-Hays

Columbus, OH

**From:** [Connie Roadcap](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 2:27:08 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Connie Roadcap  
100 Breezy Place  
Elkview, WV 25071  
304-965-0037

**From:** [Ricki Huff](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 2:32:55 PM

---

I am so disturbed that your organization would even CONSIDER lowering pollution standards. The rivers of our state should not be 'up for sale' -- which is, in essence, what lowering standards would be doing. Please show some integrity and stand up for our rivers and for the benefits of clean water and recreational use that we and future generations should be able to expect.

Rae Huff  
303 Hacker Rd  
Dayton, OH 45415

rickihuff25@gmail.com  
937-454-1961

**From:** [Jane yoder](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 2:41:03 PM

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To whom it may concern:

I believe setting pollution limits for the Ohio River is critical to maintaining the health of the river as well as humans, animals and plants!

I OPPOSE any proposal that would eliminate these mandatory pollution limits set by ORANSCO for the Ohio River!

Jane Yoder  
12801 Olympus Way  
Strongsville OH. 44149

Sent from my iPad

**From:** [Gtruxton](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 2:48:17 PM

---

I oppose any changes in the pollution limits for the Ohio River. We need to maintain a clean river so it can be enjoyed for recreation and safe drinking.



**From:** [Derrick Woodham](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 2:55:13 PM

---

Dear Sirs,

Please maintain the pollution limits for heavy metals, toxics chemicals and human waste in the Ohio River. They are essential for preserving the river water for safe wildlife and recreational use and human consumption. I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Sincerely,

Derrick Woodham,  
Cincinnati, Ohio.

**From:** [Aemie Sigler](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 2:56:01 PM

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To Whom it May Concern, Protecting our waterways and the environment should remain a top priority. These standards were put into place because there was a need for them, and that need has not diminished. If the protections are repealed, people and companies will, of course, go back to treating our precious Ohio River and its tributaries and the surrounding lands as their personal dump sites. People- and especially businesses- do not treat the environment with respect unless they are legally bound to do so. The human beings and the wildlife that depend on the cleanliness and safety of the Ohio River deserve your continued protection. Thank you for your time. Sincerely, Aemie Sigler, Holmes County, Ohio aemie123@yahoo.com

**From:** [jlipari@zoomtown.com](mailto:jlipari@zoomtown.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution limits rules  
**Date:** Thursday, February 22, 2018 3:00:37 PM

---

Dear ORSANCO, I am deeply concerned about proposals that would permanently eliminate pollution limit rules. I believe that your work in setting pollution limits is critical to the health of the Ohio River. Heavy metals, toxic chemicals and human waste can cause health problems for all of us who depend upon the Ohio River for clean drinking water.

Therefore, I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.  
Joseph Lipari, 3220 Ashwood Drive/ Cincinnati, OH 45213.

**From:** [anne.berlin](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 3:12:38 PM

---

Please keep pollution limits. We oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.  
Clean water is an absolute must for all people and wildlife.  
Sincerely, Anne Berlin

Sent from [Mail](#) for Windows 10

**From:** [Dan Borsch](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Regulating discharge into the Ohio River  
**Date:** Thursday, February 22, 2018 3:24:55 PM

---

To whom it may concern:

As a resident of Louisville, and a boater on the Ohio River, I am in favor of ORSANCO following the recommendations of the minority report. As a graduate of the University of Michigan School of Natural Resources and Environment with a BS degree I have followed with disappointment the failure to make greater improvements in the reduction of pollutants in the Ohio River. I believe that ORSANCO is best positioned to achieve greater reductions in the future with more support from future administrations in the bordering states.

Sincerely,

Dan Borsch, Esq.  
1450 S. Brook St.  
Louisville, KY 40208  
502-445-5133

**From:** [Patricia Foreman](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 3:36:04 PM

---

Please keep the pollution limits! We need your vigilance!  
Patricia Foreman

Sent from my iPhone

**From:** [Roberta Newcomer](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 3:52:28 PM

---

Do not eliminate pollution protections from your rules.

I am opposed to any proposal that removes the mandatory pollution limits for the Ohio River.

Roberta Newcomer, Copley, OH

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This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

**From:** [Joseph Etterling](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Erin Brockovich](#)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 3:54:09 PM

---

Hello,

I absolutely do not approve of the efforts you as a corporation are making at destroying the environment, of the Ohio River even further than it already is. We have to drink this water everyone along the borders of this River drinks this water. We have the right has citizens to say we are done with your corporation's dumping toxic waste, and other chemicals that are not only known carcinogens, most of them you don't even have to disclose to us. I will have you know I have alerted the attorney Erin Brockovich, as I have worked with her in the past efforts and keeping The Ohio River from becoming worse than it already is. As a matter of fact she will be receiving a cc of this very email exchange. My question to you is if you are families had to partake of and live around chemicals that could give them for example of uterine cancer, stomach cancer, and so many other disorders; would you stand for it? I didn't think so. Let's cut to the chase here...and stop it before it starts.

Concerned Citizen,  
Joseph Etterling  
Wheelersburg, Ohio.



**From:** [Lanie Strassburger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 3:55:04 PM

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Your work setting pollution limits is critical to the health of the Ohio River.

I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Sincerely,

Elaine Strassburger, Ohio resident

**From:** [Diane Bonar](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 3:57:16 PM

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Do not sink back into the polluted past.

Don't destroy the future for all who will be poisoned by your destruction of safety for millions.

DO the right thing.

Don't let your grandchildren suffer, and try live in the legacy of poison and death that the harmful pollutants you released will visit on them when these protections are withdrawn.

**From:** [ruthpro@roadrunner.com](mailto:ruthpro@roadrunner.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** PROTECT THE OHIO RIVER FROM POLLUTION  
**Date:** Thursday, February 22, 2018 4:02:43 PM

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ORSANCO's work in setting pollution limits is critical to the health of the Ohio River. I OPPOSE ANY proposal that eliminates ORSANCO's MANDATORY pollution limits for the Ohio River. I ask that it keep its protections from pollution in place. WE NEED CLEAN WATER for drinking, wildlife and recreation. DO NOT ELIMINATE pollution limits from ORSANCO's rules. I wish there was some way to impress upon you how important it is to protect all of our water resources.

Thank you.

Ruth Prochaska  
Brooklyn, OH

**From:** [bassman1@juno.com](mailto:bassman1@juno.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River pollution standards  
**Date:** Thursday, February 22, 2018 4:17:04 PM

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Commissioners

Please keep Orsanco in charge of regulating the quality of water in the Ohio River. They have done a good job so far, and having the states take over would be a mistake. The quality of my drinking water would inevitably suffer. The folks pushing this appear to be members of industry. That alone should tell you it will be bad for us ordinary citizens. But allowing states to take over usually results in them bidding for industries to locate in their state and promising to lower the standards as far as possible to accommodate them, reducing the quality of the river water.

Since the water companies are against Orsanco giving up control, that also tells me they expect the change to make their job harder.

There are instances where Orsanco's standards are a bit more rigorous than the bare minimum and it has resulted in situations where the public benefited directly [i.e., the ammonia standard].

Thank you for the opportunity to comment on this important subject.

Mike and Sue Chmilewski  
3404 Hycliffe Av  
St. Matthews, KY 40207

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Buckingham Confirms Unfortunate News  
[risingstarnewspaper.com](http://risingstarnewspaper.com)  
<http://thirdpartyoffers.juno.com/TGL3141/5a8f339cddaa2339c0659st01vuc>

**From:** [Olivia Nicole Dyleski](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 4:33:10 PM

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To Whom it May Concern:

As a Cincinnati native, and someone who has grown up enjoying life on the banks of the Ohio River, I am absolutely disgusted by the proposition to eliminate pollution limits. The Ohio River is the home to plethora of plants and animals, all of which who rely on the river as their water source. By eliminating pollution limits, wildlife is severely threatened.

The Ohio River is certainly not the healthiest body of water in the U.S, and it's critical pollution limits remain in place to not let the water quality deplete further, and also to promote the restoration of the Ohio River.

As a citizen of Ohio, I oppose the elimination of pollution limits and urge ORSANCO to stop the Ohio River from becoming contaminated beyond recovery.

Thank you.

**Olivia Dyleski**

**BGSU 2019**

**Ecology & Conservation Biology**

**E.A.G Event Coordinator**

**From:** [Susan](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Ohio River pollution standards  
**Date:** Thursday, February 22, 2018 5:11:52 PM

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Please don't step out and let the cleanliness of the Ohio be up to the state of Kentucky.

I live in Louisville, and love how the river has improved under your guidance (still won't swim in it).

It will quickly turn back into the swill it used to be without your standards.

Respectfully,

Susan Jones  
3702 Hillsboro Rd  
Louisville Ky 40207

**From:** [sampheasant@aol.com](mailto:sampheasant@aol.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 5:32:15 PM

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With regard to your proposals to rollback environmental protections of our Ohio waterways - Why?

Would you be happy for your friends and family to drink untreated water? I guess not so why would you increase the pollutants in water? Do you want all of America to experience the problems in Flint?

This is the United States of America. We have been the standard bearer for the world and as third world countries are fighting for pure water we are now fighting to eliminate it.

The only beneficiaries for this would be industry to make more profits, medical agencies to gain more patients and eventually great profits will come from the clean up which will be needed.

Shame on you for putting profit before your country.

S L Pheasant

**From:** [Carol Igoe](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 5:40:12 PM

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I am writing to ask you to continue your work setting pollution limits for the health of the Ohio River and I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Please keep me updates d on your decisions on this matter. Thank you, Carol Igoe

[placeholder\\_image](#)





**From:** [Alice Gosztyla](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 6:03:53 PM

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To ORSANCO:

I am a resident of Westerville, Ohio and I have vacationed along the Ohio River several times. I understand that you are considering removing the pollution limits for the Ohio River, and I am very disturbed by this. We need to improve and increase limits to pollution, not eliminate them.

The Ohio River is one of the country's most scenic and historic rivers. Lewis and Clark navigated this river on their historic exploration of the western part of our country. This river has provided a route to native Americans, early settlers, travelers, river boats, barges and canoes for hundreds of years. It is important to our economy and to the health of Ohio and the country as a whole.

Please reconsider any action to remove pollution regulations for the Ohio River.

Thank you for your consideration.

Sincerely,

Alice Gosztyla  
7385 Lee Rd.  
Westerville, Ohio 43081

**From:** [john.carmichael](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Thursday, February 22, 2018 6:18:13 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

john.carmichael  
1639 SYCAMORE ST  
CINCINNATI, OH 45202

**From:** [Lacrow88](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 6:29:33 PM

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Commissioners, I write out of concern for the health of the Ohio River. Removing pollution limits would be devastating not only to people who rely on the river for drinking and recreation, but to fish and wildlife. Having grown up near the Cuyahoga River, the butt of "burning river" jokes for decades, I am hard pressed to understand why you would even consider allowing toxins to be dumped at will into a body of water. Please continue to protect the Ohio River.

Sincerely,  
Laurine Crowther  
353 E Clearview Ave  
Worthington, OH 43085

Sent from my iPhone

**From:** [kate.cunningham](mailto:kate.cunningham@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Public Comment: ORSANCO needs to continue set/monitor/enforce Ohio River water quality standards  
**Date:** Thursday, February 22, 2018 6:44:37 PM

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To Whom It May Concern:

I rely on the Ohio River for my drinking water, so I have a stake in this issue. I think that setting water quality standards on a major body of water, i.e. the Ohio River, which flows through many states, is quintessentially beyond the power of one state to do. Our "Belle Riviere," as the French called it, running from Pittsburgh to Cairo, takes on one type of pollution after the other, from industries, highways, marine traffic, farms, lawns, etc. It would be too easy for one jurisdiction to blame another jurisdiction, upstream, for the toxic stew that washes by their city. It would be too easy also to "let" downstream communities take care of the cleanup.

Only a multi-state, multi-jurisdiction entity has the clout to set water quality standards on that moving target, the River, and enforce the standards, despite pleas from city fathers who want to maintain the status quo, "because that's the way we've always done it." ORSANCO has earned a reputation for studying the River's water quality and understanding the dynamics not only of pollution but also of the politics that can stand in the way of cleanup.

Please do not defer to smaller, less powerful and less knowledgeable entities to protect this wonderful asset that flows by our homes every day.

Thank you for considering my views and including my comment in the public record.

Sincerely,

Kate Cunningham, J. D.  
8606 Whipps Bend Rd  
Louisville KY 40222

**From:** [Jean C. Hosier](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 6:52:41 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jean C. Hosier  
155 Wood Lomond Way  
Huntington, WV 25705  
304-736-7931

**From:** [Nancy Givens](#)  
**To:** [ORSANCO](#)  
**Subject:** Do Not Lower Pollution Standards for Ohio River  
**Date:** Thursday, February 22, 2018 7:47:56 PM

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I strongly urge ORSANCO to NOT lower standards on pollution standards for the Ohio River. Regulations should be tightened not lessened since the River is already too polluted and littered. Thank you.

Nancy Givens  
3015 Brownsboro Rd., #11  
Louisville, KY 40206

**From:** [Mike](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:10:48 PM

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| OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

**From:** [Rhonda Whitten](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 8:43:18 PM

---

Please keep the pollution guidelines and controls over the Ohio rivers. The rivers are important as a water source and for transportation and for recreation and for helping to keep Ohio beautiful.

Sincerely,  
Rhonda Whitten



**From:** [storyteller](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:32:44 PM

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We need to keep bans and not permit companies and people dump poisons in the river. Its mandatory for wildlife and human life.  
Please, please, please for the sake of everything that exists in this area of the natural universe.  
Thanks in advance.  
Ms D

Sent from my Boost Mobile Phone.

**From:** [Melissa Paulesc](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:34:45 PM

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As an Ohio citizen I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River. We must do more to protect Ohio's natural beauty. Thank you for your time.

[Sent from Yahoo Mail on Android](#)

**From:** [fred powell](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 9:44:43 PM

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What is wrong with clean water? Keep the regulations in place. Don't vote their wallet, vote your conscience!

--

stroker

**From:** [davidtrout.sr@gmail.com](mailto:davidtrout.sr@gmail.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:06:47 PM

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Dear Sirs,

Please do not eliminate the allowable pollution limits for the Ohio River. We are the one of the worst states for abusing our natural resources. Lake Erie and the Ohio River are the worst examples of pollution in the the eastern part of the U.D. That's save these waters for the health and enjoyment of Ohio and surrounding states.

Dave Trout

Sent from my iPhone

**From:** [iroquois02@twc.com](mailto:iroquois02@twc.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River cleanliness standards  
**Date:** Thursday, February 22, 2018 10:07:45 PM

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Please do everything possible to make all of the Ohio safe for swimming (and this, swallowing). Please do everything possible to keep wastes out and to clean up whatever's already in there.

Never mind government regs -- please do the right thing. We deserve clean water and we need clean water.

Thank you.

Mrs. Jackie Fulner  
7311 Manslick Rd.  
Louisville, KY 40214

**From:** [karen Nagel](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep protections for our water!  
**Date:** Thursday, February 22, 2018 10:09:18 PM

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I drink water from the Ohio River! I don't buy bottled water! I rely upon all of you to make sure that my water is pure!!!Karen Nagel, Cincinnati, OH

**From:** [jadav](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 10:50:47 PM

---

I oppose ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River! Please do not roll back these necessary protections to our environment!

Laura Vadaj  
Broadview Heights, OH

placeholder\_image



**From:** [Kathy Tscheiner](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Thursday, February 22, 2018 11:13:08 PM

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We need less pollution in our rivers, not more! Please keep the regulations we already have and if anymore, make them stricter.



ORSANCO:

As a Longtime clean water Advocate, I write to urge ORSANCO to continue to be the overall governing agency supervising and coordinating the water quality rules of the 8 State Ohio River watershed.

The reason is well proven. Stalemate for development, by the practice of compromise, accommodate, and sacrifice of environmental and public interest safeguards, in order to attract polluting industry and business and municipal governments for small savings and growth. (A costly mistake!)

The bidding system means the cheapest + least restrictive program wins, to the great detriment of a clean, healthy environment.

Therefore, as with most other large or Federal agencies, we find our only protection is when all entities are treated the same, with standard common regulations of the highest order, that contribute to progressive improvements in health, quality of human, wild and aquatic life + water.

Thank you for continuing to do your best to protect the precious Ohio River and its inhabitants + communities - and thus reject giving any proposed Authority to the States!

W. W. H. H. P. L. E. R.  
117 FAIRVIEW AVE #2  
LOUISVILLE, KENTUCKY 40207

**From:** [The Revolution Continues Blog](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 12:18:50 AM

---

To all it may concern:

I wish it stated for the record that I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River. I mean, would YOU drink polluted water or want your children to drink and wash in it? You're out of your minds if you think private corporations will "voluntarily" watch their discharges into a body of water. Time and time again we've seen they do not. Time and time again we've seen our natural resources dirtied beyond comprehension by the greed of immoral corporations.

Again I wish to state for the record that I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Power to the people!  
Cindy A. Matthews  
Toledo, Ohio  
Editor, The Revolution Continues  
<http://bernie2016.blogspot.com>

**From:** [fredathens@intelliwave.com](mailto:fredathens@intelliwave.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 3:24:53 AM

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I am sending this to encourage you to continue the limits on  
contaminates in the Ohio River. Worse water is a waste.

Thank You

William A. Rickey

**From:** [Molly Stanley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Public comment on pollution control standards.  
**Date:** Friday, February 23, 2018 4:23:07 AM

---

I live in Louisville, Kentucky and my drinking water comes from the Ohio river. **ORSANCO should continue to maintain and administer the current Pollution Control Standards to regulate the pollution in the Ohio river.** Safe drinking water is critical for the city's wellbeing and relying on other agencies is not enough to ensure the river is kept as free of pollution as possible.

Sincerely,  
Molly B. Stanley

**From:** [Deborah Miller](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 7:19:43 AM

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PLEASE - keep your protections of our river - the beautiful Ohio. I remember when it was not clean enough that one could eat the fish, swim in its waters, drink the water. Let's not go backwards.  
I oppose the elimination of mandatory pollution limits. Keep our river clean.  
Thank you,  
Deborah Miller

**From:** [Debbe Oberhausen](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO comment  
**Date:** Friday, February 23, 2018 8:41:53 AM

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I agree with the Minority Report that the elimination of the ORSANCO pollution control standards is unwise and will compromise, rather than further, the goals" of the compact that formed the commission "and the health of the Ohio River."  
ORSANCO has dozens of water quality parameters that the states and EPA do not.

That the commission's standards are reached through agreement of representatives from across the basin provides "a degree of insulation from the vagaries of the political process,"

KEEP OUR WATER CLEAN

Debra Oberhausen  
1916 Lowell Avenue  
Louisville, KY. 40205

Sent from my iPad

**From:** [Natalie Hill](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio river  
**Date:** Friday, February 23, 2018 8:57:17 AM

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I'm just a boater who's family has enjoyed the river for years. Nevertheless, my friend's son is forever scarred from a bacterial infection caused from a day of swimming. Times have changed. Companies and individuals need to be responsible for the safe disposal of their own waste. Alternate disposal options, training, accountability and fines may be required. Using the river as a dumping zone should no longer be considered acceptable.

We need to raise the quality standards and expectations for the Ohio, not lower them. Our states need to agree on the steps to clean up and maintain the Ohio. Enforcement measures are needed. Can our states cooperate to get this done? I hope so. If not, why not?

Natalie Hill  
25 Airport Rd  
Taylorsville KY.  
40071

**From:** [Nancy Dawley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Nancy Dawley](#)  
**Subject:** Ohio River standards  
**Date:** Friday, February 23, 2018 9:42:11 AM

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From Nancy Dawley  
7497 Hosbrook Rd.  
Cincinnati, OH 45243

I prefer to have the ORSANCO involved in setting Ohio River pollution standards. The fact that some standards are “higher” and some “lower” than the EPA is comforting, in that they are making an effort to do their own research and evaluation. The EPA is sometimes at minimum standard pollution possible to slide by with – not public health standards.

We are drinking this water daily. Just because it is inconvenient for factories to remove toxins before dumping them into the river does not justify loosening the standards and putting poisons into human and animal bodies, nor into vegetation along the river. Checking after the fact is important, but you want the accurate goals – not just an interesting number that can be placed in a chart.

I want ORSANKO to continue planning ahead for what is good for the Ohio, not just a reporting facility. It has much more to offer residents along the Ohio than that.



**From:** [Linda Wamsley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 9:57:02 AM

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This is one of the worse proposals I have ever seen. Please reconsider.

As an Ohio resident, and former resident of the Ohio River town of Belpre, the damage caused by DuPont's C8 should be enough to stop this idea from ever being considered.

Your policy statement opens with: ORSANCO and its' member states have cooperated to improve water quality in the Ohio River Basin, ensuring the river can be used for drinking, industrial supplies, and recreational purposes; and can support a healthy and diverse aquatic community.

To permanently eliminate pollution limits is opening the door for disasters as bad, or beyond, what C8 has caused to thousands of residents in the Belpre/Parkersburg area.

Please continue to work to protect the river, and in doing so, the residents that live along the Ohio River.

Respectfully,

Linda Wamsley

**From:** [diane.black](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Friday, February 23, 2018 9:58:47 AM

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To Whom It May Concern,

My family and I join with those people who have expressed their concern that the elimination of the ORSANCO pollution control standards will affect the quality of the water which we consume as residents of Spencer County, Kentucky and will reduce the cleanliness of the Ohio River. We encourage you to retain the highest possible standards to ensure the safety of the life within the river and those who depend on it.

Thank you for your consideration.

Diane C. Black  
Robert F. Black

**From:** [Arlene Huber](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 10:27:16 AM

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Before I returned to the State of Ohio after practicing law and residing in the State of Florida for 18 years, I made many trips to visit children back in my home state; and the highlight for every return trip was crossing the bridge over my beloved Ohio River and spending the night in one or the other of the balcony rooms overlooking the River at the Lafayette Hotel.

One of the better considerations: the State was finally mandating for the river's care!

Now, to think that the Ohio River Valley Water Sanitation Commission may be eliminating the safety and care by eliminating pollution control mandates just boggles the mind of anyone other than perhaps those who care only for the size of their own profits, the lobbyists who gain thereby, and the politicians who love the dollars flowing into their campaign chests better than our State's signature river.

**DO NOT ELIMINATE MANDATORY POLLUTION CONTROLS NOW PROTECTING THE WATERS OF THE OHIO RIVER!**

Arlene B. Huber

307 Wooster Street

Lodi, OH 44254

(330) 948-4180

[ambhuber@gmail.com](mailto:ambhuber@gmail.com)

**From:** [Cate Pearson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** my opinion  
**Date:** Friday, February 23, 2018 10:32:41 AM

---

I would like the highest standards for water quality to be maintained in the Louisville, KY area and am a registered voter in this county, Jefferson.

Cate Pearson

[Sent from Yahoo Mail on Android](#)

**From:** [christiane.schneebeli](mailto:christiane.schneebeli@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 10:35:35 AM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

christiane.schneebeli  
Amazone 6, 1224, Geneva,  
Geneva, NY 0  
563296512

**From:** [Larry Stalnaker](#)  
**To:** [PCS Comments](#)  
**Subject:** eliminating pollution limits  
**Date:** Friday, February 23, 2018 10:43:21 AM

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For many years ORSANCO has set pollution limits for heavy metals, toxins, chemicals, & human & animal waste for the Ohio River. Now you want to permanently eliminate pollution limits from your rules. Unacceptable! Please keep these rules in place. Clean water is needed for the health of people, animals, wildlife, & the environment. The rules are critical for Ohio & neighboring states. I oppose any rule that lessens protection.

We only have one chance to protect our Earth & mankind is trying its best to ruin it. When we have polluted our planet to a severe extent, it will not be retrievable. When our pristine waters & lands are gone, they are gone forever.

Thank you.

Marilyn Evenson

408 Wine St

Vermilion, OH

lowrider3111@yahoo.com

**From:** [Kenny](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Orsanco public comment  
**Date:** Friday, February 23, 2018 10:54:25 AM  
**Attachments:** [20150607\\_084845.jpg](#)  
[20150607\\_084806-1.jpg](#)  
[20150616\\_121113-1.jpg](#)  
[20160621\\_115036.jpg](#)  
[20170612\\_110551.jpg](#)

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Dear Sirs,

Regarding the proposal that ORSANCO discontinue monitoring pollution in the Ohio River basin, I strongly oppose such a reduction in ORANCO's actions as the polluted river needs all the monitoring it can get and it will not happen properly if dependent on all the state governments along the Ohio River. There certainly would be a lack of coordination and continuity in policy of the states.

As a teacher, tour guide and author regarding the Falls of the Ohio State Park and National Wildlife conservation area, I am constantly conducting activities in and around the Ohio River with students and the public. As you also know, the Falls of the Ohio National Wildlife Conservation Area is a federally designated area and the monitoring of its waters, wildlife protection and interpretation is mandated by federal law, an act of Congress.

Sincerely,

Kenny Karem

738 Wicklow Road

Louisville, KY 40207

February 23, 2018

**From:** [Sally and Thorne Vail](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep ORSANCO functioning  
**Date:** Friday, February 23, 2018 10:59:07 AM

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23 February, 2018

Dear Sir or Madam,

The Ohio River is the source for drinking water for about 5 million people and is used for fishing and other recreational pleasures, so it is imperative not to be polluted. While the pollution levels have improved over the years there are still infection causing bacteria and industrial toxic pollution being dumped into the river which are deleterious to humans and aquatic creatures.

Orsanco has a good grasp of this critical situation with the Ohio River and continues to offer steps to improve the quality of the water. I have much more faith that Orsanco can and will continue to help improve the Ohio River rather than a state bureaucratic agency that will be influenced by political pressure.

Orsanco must be supported and allowed to pursue this important work to safeguard the millions of people impacted by the Ohio River.

Sincerely,

Robert Vail

3020 Altawood Court

Louisville, KY, 40245

[rtvails@twc.com](mailto:rtvails@twc.com)



**From:** [Paul Hohman](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Maintain and tighten pollution regulations for rivers and streams and all waterways under your jurisdiction please  
**Date:** Friday, February 23, 2018 11:15:38 AM

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keep all safeguards on water cleanliness and safety in place, regardless of whether you think they are redundant.

Corporate polluters and municipalities need to be forced to comply with the most stringent regulations possible to clean up the rivers and lakes of our country and keep them clean

AS WE ALL KNOW, YOU CAN NO LONGER RELY ON THE EPA TO ENFORCE THEIR REGULATIONS, NOR CAN YOU DEPEND ON THESE STANDARDS AND REGULATIONS TO EVEN EXIST WITH THIS CURRENT ADMINISTRATION IN OFFICE AND YOU ARE WELL AWARE OF THAT FACT.

Paul Hohman  
[phohman@archlou.org](mailto:phohman@archlou.org)  
502-807-0924

**From:** [DayJ](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Do NOT make Ohio River an open sewer again  
**Date:** Friday, February 23, 2018 11:29:35 AM

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Do NOT relinquish control of river water quality! I was an 18 year old in 1960 and contacted Hepatitis C by water skiing in Ohio River above the Louisville Water Co drinking water intakes. I was not an intravenous drug user or practicing risky sexual behavior. I was strong and healthy, but became deathly ill.

Do NOT place profits above health of people by reducing control standards.

Day Johnston  
157 East Main ST  
Georgetown, KY 40324

**From:** [Dave Sipes](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO water regs.  
**Date:** Friday, February 23, 2018 11:39:46 AM

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Please consider me as one person who is adamantly against ORSANCO giving up control. With the current federal administration attempt to destroy EPA and other environmental safeguards I DO NOT TRUST the future there. The Ohio has gotten so much cleaner, now is NOT the time to turn away from its protection.  
Dave Sipes

Sent from my iPhone

**From:** [Andrew Osborn](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Eliminating Pollution Standards  
**Date:** Friday, February 23, 2018 11:47:21 AM

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As a resident of Louisville, Kentucky who relies on the Ohio river for clean drinking water, I deeply oppose the suggestion that ORSANCO abrogate it's responsibilities to maintain pollution control standards for this crucial waterway. Given the lax oversight and general indifference to pollution by the current federal administration, ORSANCO is the only force standing between citizens who depend on the river for clean drinking water and flagrant, unmitigated pollution. If it is your goal to render your organization completely irrelevant, by all means continue on the course to drop your standards. Otherwise, I would implore you to maintain and even tighten your regulations.

Andrew Osborn

**From:** [Darren Lyle](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution Control Standards  
**Date:** Friday, February 23, 2018 11:51:11 AM

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As a resident of Southern Indiana for the majority of my life, I have witnessed the improvement in our water quality under the current Pollution Control Standards. I've reviewed the alternatives proposed. I believe these alternative plans would threaten the quality of our water and therefore request that ORSANCO make no changes to our current Pollution Control Standards.

Darren Lyle MD  
5730 Lentzier Trace  
Jeffersonville IN 47130

**From:** [Suzanne Hilliker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Clean Water  
**Date:** Friday, February 23, 2018 12:03:45 PM

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Please stay with us, we need clean water. Thank you for your past work.

Suzanne Hilliker  
6701 Falls Creek Road  
Louisville, Ky 40241  
E mail. [suzannehilliker@twc.comlk](mailto:suzannehilliker@twc.comlk)

Sent from my iPad

**From:** [Lori Frueauf](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 12:05:42 PM

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To all it concerns:

Protect the Ohio River for all; people, creatures and habitats in and around the Ohio River, Mississippi River, Gulf of Mexico and oceans.

- 1) Your work setting pollution limits is critical to the health of the Ohio River.
- 2) OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you for your protection of resources crucial to our lives.

Sincerely,

Lori Frueauf

Sent from my iPhone

**From:** [Allison Sasso](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 12:24:31 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Allison Sasso  
2825 Neil Ave APT 602  
COLUMBUS, OH 43202



**From:** [Linda Chernick](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 12:32:52 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is disturbing. This would jeopardize the ongoing clean up and restoration of the Ohio River, and is counter to the original 1948 compact outlining the importance of watershed-wide cooperation through a joint or common agency.

The River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water -- and approximately 25 million people's quality of life and local -- economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River, and your responsibilities to the millions of Americans who depend on the Ohio for drinking water, and the numerous businesses. Everyday we wait to protect and restore the Ohio River the problems become more complex, the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards. Do not roll back protections for one of our nation's vital resources.

Linda Chernick  
4 W. Herman Street  
Yellow Springs, OH 45387

**From:** [Laura Beardsley](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 12:38:55 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Laura Beardsley  
42 Indian Springs Dr  
Columbus, OH 43214

**From:** [Ruth Seeliger](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 12:47:38 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Ruth Seeliger  
4027 Lanark Lane  
Houston, TX 77025

**From:** [Carrie Kline](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 1:02:29 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Carrie Kline  
320 Center St.  
Elkins, WV 26241  
304-636-5444

**From:** [Paul Baumann](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution Control Standards  
**Date:** Friday, February 23, 2018 1:22:17 PM

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Dear ORSANCO Personnel,

To those of you assigned to read these comments (assuming they are read), best wishes! I was a member of the Biological Quality Subcommittee of the Technical Committee from 1979 until 2008, almost 30 years, representing first the USFWS and then the USGS. I was also on the faculty at Ohio State University in Zoology (now EEOB) and Natural Resources during that same period. I don't believe getting technical about the standards would help here. The Minority Report by some of the Commissioners sums things up very well, and I endorse what they said. ORSANCO standards provide an additional level of protection over the Clean Water Act. Of course the Clean Water Act is also being undermined at this time by President Trump and his minions. (And how I wish those were the little yellow dudes!) Seems to me as if Commissioners picked by red governors (political appointees) have seen an opening with the current administration in DC to basically gut most of the clean water regulations. I suspect that the public review is just a way to diffuse anger. That won't work in the long run. Even I, a fairly non-ideological sort, will spend my time and money working on huge blue waves in '18 and '20. Washing some of the red out of the system will let us rebuild clean water regulations as well as take care of a variety of other ills.

Please count this letter among the responses to keep the ORSANCO pollution control standards and the monitoring that goes along with them. The budget amount to support these efforts is less than the tax breaks often given to a single industry in a single state.

Sincerely,

Dr. Paul C. Baumann

**From:** [Jillian Forschner](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 1:26:46 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jillian Forschner  
34 Forest Ave, Unit 1  
Hudson, MA 1749  
7812183532

**From:** [chris@familyoptimized.com](mailto:chris@familyoptimized.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Public comment for Ohio River Pollution Control Standards  
**Date:** Friday, February 23, 2018 1:33:15 PM

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Please protect our families and maintain Ohio River Pollution Control Standards. It is simply the right thing to do — elimination of standards will only put people's health at risk.

Protect us.

Care for your fellow men and women. Please do the right thing.

Thank you,  
Chris Egan  
24 Rock Hill Lane  
Fort Thomas, KY 41075  
859-462-5558

**From:** [zengr@juno.com](mailto:zengr@juno.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** PSC Comments  
**Date:** Friday, February 23, 2018 1:38:23 PM

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## SEEKING PUBLIC COMMENT ON OHIO RIVER POLLUTION CONTROL STANDARDS:

We choose Alternative 4, and the minority report on Alternative 2.  
Greg & Becky Zahradnik  
1239 Royal Ave  
Louisville KY 40204



**From:** [Mary and G. R. Hamilton](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 1:40:04 PM

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ORSANCO ORSANCO,

As a constituents, we're writing to express our concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of the most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans' quality of life. Every day we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. We strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Mary and G. R. Hamilton  
3646 W. 148th St.  
Cleveland, OH 44111

**From:** [Tony Arnold](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [tonyarnold4ku@bellsouth.net](mailto:tonyarnold4ku@bellsouth.net)  
**Subject:** Ohio River Pollution Control Standards Review  
**Date:** Friday, February 23, 2018 1:44:14 PM

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Dear ORSANCO:

I am writing in opposition to the proposed relaxation or reduction of Ohio River pollution control and discharge standards by ORSANCO. I research and teach about water resources and resilience. As unprecedented disasters and shocks affect communities throughout the U.S., improving the resilience and reducing the vulnerabilities of our communities has become a very high public-policy priority for everyone. Examples like Flint, MI, New Orleans, LA, and Puerto Rico illustrate how disaster becomes catastrophe when institutional safeguards and regulations are reduced or ignored in the name of economic or administrative efficiency. The drinking water supplies of communities throughout the Ohio River Valley are vulnerable to pollution in the Ohio River. Those portions of Ohio River Valley communities that are low-income, fixed-income, disabled, rural, or substantially composed of racial or ethnic minorities are especially vulnerable, which is an issue not only of environmental injustice but also of resilience injustice. ORSANCO's Ohio River pollution control and discharge standards play critically important roles in improving overall systemic resilience in the Ohio River Basin and decreasing the vulnerabilities of all communities throughout the region.

ORSCANCO's standards address basin-specific needs and contexts in the Ohio River Basin that are not adequately addressed by national standards under the Clean Water Act, which have been adopted for application nationally to many different watersheds and waterways (including communities that rely less heavily on a river for drinking water supplies). At a very minimum, any proposed modifications to existing regulations should undergo a systematic resilience/vulnerability assessment, including a resilience justice assessment, that identifies and discusses the impacts of any regulatory modifications on the resilience and vulnerabilities of Ohio River Valley communities, their drinking water supplies, and their people. Any changes that would decrease resilience and increase vulnerability should be rejected or revised. Thank you for your kind consideration of my comments, which I submit solely in my personal capacity as a concerned citizen. Sincerely, Craig Anthony (Tony) Arnold, 3105 Dunlieth Ct., Louisville, KY 40241

**From:** [Patricia Ramey](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO changes  
**Date:** Friday, February 23, 2018 1:52:17 PM

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Louisville relies on water from the Ohio River and we count on ORSANCO and its pollution control standards to help keep it clean! Do not change this effective regional body and its work in keeping the Ohio River clean for people and water life.

Patricia Ramey  
1105 Sylvia St.  
Louisville, KY 40217  
774-270-0006

**From:** [Sandra M Cobb](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 2:28:16 PM

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I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River! Please continue to do your job of protecting the water quality of the Ohio River for all of us. Thanks

Sandra Cobb

3880 Ellendale Rd

Moreland Hills, OH 44022

and Athens Cty Ohio farm owner.

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This email has been checked for viruses by Avast antivirus software.  
<https://www.avast.com/antivirus>

**From:** [Ernest Montoro](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 2:29:54 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Ernest Montoro  
7724 Broadview Rd.  
Parma, OH 44134

**From:** [Pamela Myers](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 3:22:12 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Pamela Myers  
165 Woodland Ave.  
Marietta, OH 45750

**From:** [Paula](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Keep the Ohio River clean!  
**Date:** Friday, February 23, 2018 3:23:12 PM

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Keep your pollution control standards in place!!!  
Sincerely (and I'm paying attention),  
Paula Schoenhoff.

**From:** [Robi Baishnab](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** OPPOSITION proposal that eliminates ORSANCO's mandatory pollution limits  
**Date:** Friday, February 23, 2018 3:35:33 PM

---

Dear ORSANCO,

Please accept this email as my opposition to any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Robi J. Baishnab  
Hilliard, OH (Franklin County)



**From:** [Constance Keegan](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Clean water...  
**Date:** Friday, February 23, 2018 3:42:46 PM

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Louisville and other towns along the Ohio River want and need water to be as clean as possible, so we also want and need to keep counting on ORSANCO and its pollution control standards to help keep it clean!

The water used to be terrible. Thank you,  
Constance Keegan  
I live in Saint Matthews, KY.

**From:** [Margaret Lloyd](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 3:55:16 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Margaret Lloyd  
2114 Firestone Trace  
Akron, OH 44333

**From:** [Deirdre Seim](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Louisville needs clean water from the Ohio!  
**Date:** Friday, February 23, 2018 4:06:50 PM

---

I am writing to urge your group to continue to oversee Ohio river water safety. Our water is safe and clean, largely because of the successful clean up over the last 50 years.

Please don't abandon the river now!

Sincerely,  
Deirdre Seim

**From:** [Greg Leimeister](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 4:15:22 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Greg Leimeister  
7715 Hills and Dales Rd NW #6  
Massillon, OH 44646

**From:** [Kathleen Markus-Walczak](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 4:31:15 PM

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To Whom it may concern,

I am adamantly opposed to any and all efforts to eliminate pollution controls for the Ohio river and its associated watershed. I am outraged and sick that anyone could be so callous, heinous and short-sighted to even think about taking such a destructive and irresponsible action. Who ever is flashing money around to try to do this should at the very least be advised in the strongest possible terms that their money would be much better spent cleaning up the mess that they most likely helped to create and that they are now attempting to hide and exacerbate. This action would harm millions for decades to come and I say NO. Pollution controls should be strengthened and made more stringent - NOT Less. I urge you to not go along with this criminal action.

Thank you for your time and consideration,  
Kathleen Markus-Walczak

**From:** [Ellen Schaffer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 4:43:10 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Ellen Schaffer  
15518 Royal Ridge Road  
Sherman Oaks, CA 91403

**From:** [Richard Harrison](#)  
**To:** [jheath@orsanco.org](mailto:jheath@orsanco.org)  
**Subject:** Fwd: New Message From ORSANCO Website  
**Date:** Friday, February 23, 2018 5:01:34 PM

---

For the pcs update.

Sent from my iPhone

Begin forwarded message:

**From:** "'[noreply@orsanco.org](mailto:noreply@orsanco.org)'" <[noreply@orsanco.org](mailto:noreply@orsanco.org)>  
**Date:** February 23, 2018 at 3:58:12 PM EST  
**To:** [rharrison@orsanco.org](mailto:rharrison@orsanco.org)  
**Subject:** New Message From ORSANCO Website

<b>Your Name</b>
Ms. Vickie Ellis
<b>Email</b>
<a href="mailto:ellisvr41@gmail.com">ellisvr41@gmail.com</a>
<b>Are you looking for a certain person at ORSANCO?</b>
Richard Harrison
<b>Message/Comments</b>
<p>Mr. Harrison,</p> <p>I have just read with great concern that ORSANCO is considering reducing and/or eliminating its pollution control standards for the river. I have read the 5 options and have noted that the commision has decided the 1st option is best. I disagree with this decision and am troubled that there is no description of the services that budget would be supporting. Our water quality is the most important service you provide. Option #3 reads as the proper choice. I'm sure it's a harder choice than to just eliminate and consolidate but # 3 holds the best priorities in place. You are taking the easy way out with #1. You are there to represent the people, not corporations.</p>

**DO NOT REPLY TO THIS  
EMAIL! Reply to the address listed  
above in the "Email" section.**

**Beware of Spam and Spear Phishing attacks (emails targeting you)!!**



**From:** [Ronald B. Borgquist](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 5:24:09 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Ronald B. Borgquist  
7833 Strawberry Hill Road  
Lewis Center, OH 43035

**From:** [Joyce Kahle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 5:27:52 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk. It is totally unacceptable to even consider lowering the standards on water safety and it is immoral to knowingly endanger the health of millions of people of Ohio.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Joyce Kahle  
4000 Denlinger Rd  
Dayton, OH 45426

**From:** [Christine Hurst](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 5:28:45 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Christine Hurst  
4572 Rita St.  
Youngstown, OH 44515

**From:** [Leatra Harper](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 5:32:47 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Leatra Harper  
Freshwater Accountability Project, PO Box 473  
Grand Rapids, OH 43522

**From:** [Katharine Swett](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 5:36:19 PM

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Dear ORSANCO,

Your work setting pollution limits on the Ohio River is crucial for the health of our ecosystems and our human population! I want you to continue figuring out and setting pollution limits for the river. That's an important job. You are protecting public health and our precious natural resources. Don't stop now!  
Thank you.

Katie Swett  
407 Action Road  
Columbus OH  
43214

**From:** [Nancy Kuppersmith](#)  
**To:** [ORSANCO](#)  
**Subject:** Public comment  
**Date:** Friday, February 23, 2018 6:03:57 PM  
**Attachments:** [orsanco commissioners 2"18.docx](#)

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Nancy C Kuppersmith  
2404 Evergreen Road  
Louisville, KY 40223  
February 23, 2018

Dear ORSANCO Commissioners,

I read James Bruggers article in the Courier Journal February 23, 2018 regarding your groups' history of setting safer pollution standards for the Ohio River Basin. I understand

ORSANCO has been around since 1948 for the very important reasons - to protect the public from harmful pollutants in the Ohio River basin.

I applaud your work, which has often set higher standards than the EPA. The higher standards make it possible for the Ohio River water to be used for drinking water and some recreation and hopefully more recreation as you get the water even safer.

I urge you to continue your very important collegial work which has done so much for improving the quality of the whole Ohio River Valley. Each individual State would have difficulty doing your work on its own.

Don't give up on your very important work for the citizens of the Ohio River Valley!

Sincerely,

*Nancy Kuppersmith*

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**From:** [Gary Grice](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Friday, February 23, 2018 6:09:37 PM

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Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Gary Grice  
1906 N Drake Ave  
Chicago, IL 60647

**From:** [Allison Schacher](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 6:15:52 PM

---

ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Allison Schacher  
503 E Main St, Apt 4  
Bellevue, OH 44811



**From:** [Bobbie Castle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 7:01:04 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Bobbie Castle  
416 N Chestnut St  
Barnesville, OH 43713

**From:** [Susan Donaldson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 7:16:10 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Susan Donaldson  
610 Defiance Street  
Wapakoneta, OH 45895

**From:** [James Cooper](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 7:51:18 PM

---

I believe ORSANCO's work setting pollution limits is critical to the health of the Ohio River and the wildlife and people who depend on it. I strongly oppose ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River.

Thank you,

Jim Cooper

Granville, Ohio

**From:** [Rachelle Crouch](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 8:39:48 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Rachelle Crouch  
9967 Homestead Road  
Wadsworth, OH 44281

**From:** [Kevin Rolfes](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 8:51:51 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Kevin Rolfes  
14006 N Green Hills Loop  
Austin, TX 78737  
5123010838

**From:** [Blum, Mark E.](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** clean water, clean environment  
**Date:** Friday, February 23, 2018 9:22:10 PM

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Unfortunately this Federal administration shows little regard for ecological and safety issues. States will not exhibit leadership , shying away from making difficult decisions that are necessary to clean up our waterways. Please keep up this important work. Orsanco benefits us all. The earth needs all the watchdogs possible. Sincerely, Brenda Kepley-Blum, 8515 Twin Springs Drive, Sellersburg, In. 47172

**From:** [Heather Finke](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 9:44:30 PM

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ORSANCO's work setting pollution limits is critical for the health of the Ohio River. I oppose any proposal that eliminates ORSANCO'S mandatory pollution limits for the Ohio River. People in Ohio use the rivers for swimming and fishing and I am concerned that increasing pollution is hazardous to our health.

Heather Finke

**From:** [Clayton Lilly](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 10:20:31 PM

---

Setting pollution limits is critical to the health of the Ohio River. I oppose any proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Clayton Lilly



**From:** [Michael Goldman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Friday, February 23, 2018 10:58:48 PM

---

ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Michael Goldman  
448 siebert  
Columbus, OH 43206

**From:** [Heather Stuhlmann](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Friday, February 23, 2018 11:15:47 PM

---

To the Ohio River Valley Water Sanitation Commission,

Please continue to protect our river and drinking water from pollution and oppose any elimination of the pollution limits on the Ohio River.

Thank you.

Heather Stuhlmann, Ohio

**From:** [C. Corbitt](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** public opinion statement  
**Date:** Friday, February 23, 2018 11:51:49 PM

---

The Ohio River is part of the commons for multiple states and should be protected as such. In these times of increased skepticism about regulations designed to protect the common good, I fear that removing ORSANCO oversight will lead to increased pollution of the drinking water that many millions, including my family, depend on.

Cynthia Corbitt  
109 Tanglewood Trl  
Louisville KY 40223

**From:** [Scott Kane](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 12:29:16 AM

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It is bad science, bad politics, and bad governance to discard standards that have benefited the river and Ohio, that are the result of cooperation and research, and where the motivation to discard these standards is so secretive, autocratic and elitist.

Please do not discard this tradition of interstate collaboration, which became a model for other areas as well.

**From:** [Valerie Lockard](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Saturday, February 24, 2018 2:39:00 AM

---

ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Valerie Lockard  
4805 Winterset Dr  
Columbus, OH 43220

**From:** [Jay Kurz](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 4:01:48 AM

---

In regards to the vast Ohio River teaming with wildlife, I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River! We are largely connected to this web of life. When the river hurts, us as people will be affected. A healthy river benefits all. Help to keep pollution standards in place.

Thanks

Sent from my iPhone

**From:** [Stephen Peterangelo](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 7:23:08 AM

---

I urge you to keep pollution protections in place. Your work setting pollution limits is critical to the health of the Ohio River. I oppose any proposal that eliminates ORSANCO's pollution limits.

Thank you,

Steve Peterangelo

**From:** [sherman217@gmail.com](mailto:sherman217@gmail.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution control standards  
**Date:** Saturday, February 24, 2018 7:26:34 AM

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As a concerned citizen of Louisville, KY who regularly uses the Ohio River for recreational boating, I strongly encourage that the pollution control standards be kept in place. Your commission has many regulations not covered by the federal EPA regulations that makes our water safer both for recreational activities and as a source for drinking water for millions of people. Removing these standards would be a dereliction of your duty to protect us all.

-Andrew Sherman M.D.

Sent from my iPhone



**From:** [Marne Cario](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 7:55:09 AM

---

Dear ORSANCO:

I am a citizen of Girard, Ohio. I am writing to let you know that I oppose any proposal that eliminates mandatory pollution limits for the Ohio River.

It is critical that we put environmental actions that will sustain the livability of our planet ahead of corporate profits.

Sincerely,  
Dr. Marne Cario  
Ohio Citizen

**From:** [James Hauska](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 8:04:51 AM

---

Please do not allow ORSANCO to eliminate the pollution limits on the Ohio River from its rules. Please keep its pollution protections in place. We need clean water for drinking, recreation and wildlife. The pollution limits are critical to the health of our great river.

Sincerely,

Jim Hauska

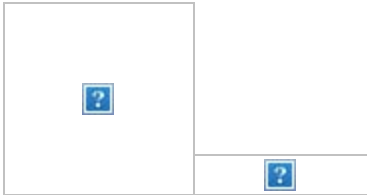
**From:** [Mary Earle](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 10:12:12 AM

---

We cannot afford to risk the quality of the Ohio River water. Water as a resource will soon become vital to our national security. Please oppose any lessening of water quality standards for the Ohio River.

Libby Earle 2987 Blue Heron Hamilton Ohio 45011

--



**From:** [Andy Meyer](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO As River Watchdog  
**Date:** Saturday, February 24, 2018 10:21:14 AM  
**Importance:** High

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I strongly support ORSANCO continuing in its current role as a watchdog for the Ohio River. Considerable progress has been made in improving the quality of our water during recent years and I believe strongly that this progress will be lost if oversight provided by ORSANCO is reduced. Additionally, I believe that anyone who relies on the Ohio River for drinking water should share this concern.

Thanks  
Andy Meyer  
1820 Rivers Landing Drive  
Prospect, KY 40059

Sent from [Mail](#) for Windows 10

**From:** [Mary Swain](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Saturday, February 24, 2018 10:45:27 AM

---

Keep stronger regulations for the Ohio River. ORANSCO has done good work.  
We cannot go backwards.

Mary Swain  
[maryswain@lorettocommunity.org](mailto:maryswain@lorettocommunity.org)

**From:** [mikeprz58@aol.com](mailto:mikeprz58@aol.com)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Regulation Changes  
**Date:** Saturday, February 24, 2018 10:49:38 AM

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Sirs:

In my opinion, the regulations should stay as written. I am a kayaker and have been in some pretty nasty water. We need to keep the water of the Ohio river clean.

Mike Rzesutock  
Fayetteville, OH

**From:** [stevhubbs](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Steve Hubbs](#)  
**Subject:** Fw: Comments to the 2018 Revisions of ORSANCO's Pollution Control Standards  
**Date:** Saturday, February 24, 2018 10:58:41 AM  
**Attachments:** [image.png](#)

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My name is Stephen A Hubbs, and I am a licensed engineer in the State of Kentucky. I was employed at the Louisville Water Company (LWC) from 1974 – 2004 with primary responsibility for water quality research, treatment, and production. In this role I was active in ORSANCO through the Water Users Committee for much of my tenure with LWC.

My background with ORSANCO began in 1974 through my water quality role at LWC, and specifically with the issue of the discharge of unregulated industrial chemicals into the Ohio River. With the development of analytical capabilities among the members of ORSANCO's Water Users Committee, the group initiated what was to become ORSANCO's Organics Detection System – ODS – to track and identify sources of a wide range of industrial organics in the Ohio River. Much assistance in the program came from a group of the industrial water users (and dischargers), owing to the cooperative culture that persisted at the time.

I was initially frustrated by what I considered to be the laborious process of implementing ODS, but have since come to realize that the deliberate and measured approach to development of programs and standards within ORSANCO helps distance deliberations from emotional and political influences, and instead allows focus on the scientific and public-health elements in decision-making. The elimination of current water quality criteria from the Pollution Control Standards (PCS) greatly reduces the motivation for this type of cooperation between water users and dischargers, and exposes these types of deliberations to additional political and emotional influence.

I suggest that the philosophy provided in Alternative 4 focusing on ORSANCO's role in modifying the PCS "... to increase the focus on harmonization of standards implementation among Compact states and EPA ..." is the best approach to take at this time. This includes the appropriateness of considering every contaminant of the current PCS for relevancy with regards to current science, health impact, and contaminant occurrence data. The wholesale elimination of all water quality criteria not included in federal regulations (currently being recommended under Alternative 2) disregards the years of research involved in developing the current PCS and the demonstrated effectiveness of this approach, and thus should be rejected from consideration.

In reviewing the mark-up copy of the proposed changes to the PCS, I was particularly concerned with what is being removed from the standards beyond the individual contaminant criteria. What is being stricken also includes:

1. ~~Section 2.1: It is the purpose of these Pollution Control Standards to safeguard the waters of the Ohio River for these 8 designated uses. No degradation of the water quality of the Ohio River that would interfere with or become injurious to these uses shall be permitted.~~
2. ~~Section 5.5: C-Industrial waste treatment facilities shall notify ORSANCO of all upsets and bypasses within two hours of their discovery.~~
3. ~~5.8 OTHER WASTES: The discharge of Other Wastes (other than those specified above) shall meet the requirements of Chapter 5.1 and shall not cause or contribute to a violation of the water quality criteria set forth in Chapter 3.~~

The removal of these elements of the PCS greatly reduces the entire impact of the standards and ORSANCO's role in protecting water quality in the Ohio River from contaminants of public health concern, both known and unknown.

In summary, ORSANCO's PCS have had a significant impact on addressing water quality issues over the past 7 decades. Changes to the individual criteria may be appropriate, but the removal of all criteria and deferring to federal regulations is unwarranted and will likely result in ORSANCO's greatly diminished role as guardian of water quality in the Ohio River.

Thank you for considering these comments.

A handwritten signature in black ink, appearing to read 'Stephen A. Hubbs', followed by a long horizontal line extending to the right.

Stephen A Hubbs, PE

3715 Hughes Road

Louisville, KY 40207



**From:** [Glenn or Pat Solomon](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 11:16:43 AM

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**KEEP OHIO RIVER POLLUTION PROTECTIONS IN PLACE!**

**WE NEED CLEAN WATER FOR DRINKING, RECREATION AND WILDLIFE.**

**YOUR WORK SETTING POLLUTION LIMITS IS CRITICAL TO THE HEALTH OF THE OHIO RIVER.**

**I OPPOSE ANY PROPOSAL THAT ELIMINATES ORSANCO'S MANDATORY POLLUTION LIMITS FOR THE OHIO RIVER!**

Patricia C. Solomon

**From:** [Dr. Fatima Al-Hayani](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Saturday, February 24, 2018 12:05:37 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Dr. Fatima Al-Hayani  
2323 E Greccourt  
Toledo, OH 43615

**From:** [kerren hall](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 12:12:37 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

kerren hall  
167 hess rd  
fayetteville, WV 25840  
304-731-8063

**From:** [dianne.adkinson](mailto:dianne.adkinson)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 1:02:41 PM

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To whom it may concern:

I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

dianne adkinson  
dayton oh

**From:** [catherine pardee](mailto:catherine.pardee@orsanco.org)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 1:05:58 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

catherine pardee  
55 moon ridge lane  
burlington, WV 26710  
304-289-3618

**From:** [Kim Evans](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Louisville water  
**Date:** Saturday, February 24, 2018 1:32:23 PM

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Please do not pull out of helping to set pollution standards for Louisville, Ky water quality. Your help is instrumental to the health and safety of thousands. Thank you, Kim Evans

Sent from my iPhone

**From:** [Jeff Holland](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 2:10:04 PM

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Please do not eliminate the pollution limits for the Ohio river, we are just getting the river cleaned up and its important to keep it that way

Jeff Holland  
Cincinnati, Ohio

**From:** [Gary Walters](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Pollution of Ohio waterways  
**Date:** Saturday, February 24, 2018 2:12:19 PM

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I'm sending this because:

- 1) I appreciate your work setting pollution limits is critical to the health of the Ohio River.
- 2) I OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for  
the Ohio River!



**From:** [Cathy Corbin](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Saturday, February 24, 2018 2:18:50 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources. **THIS PLANET HAS A FINITE AMOUNT OF WATER! PLEASE PROTECT AND HELP CLEAN THE WATER WE HAVE, DON'T DESTROY IT!**

Cathy Corbin  
18592 Edwards Rd. lot 164  
Doylestown, OH 44230

**From:** [Michael Patton](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [Judy Von Busch](#)  
**Subject:** Public Comment: Continue Regulaitng Ohio River  
**Date:** Saturday, February 24, 2018 2:39:40 PM

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Relative to the proposal for ORSANCO to no longer regulate pollutants in the Ohio River, I think it is telling that the Water Users Advisory Committee was strongly against this. While this is called a minority opinion, it is probably the most important one and is certainly one with which I am aligned. I would think that it is the users of the Ohio River water that should have the final say in the question as to whether there is currently too much regulation.

If the Ohio River were restored to its pristine condition, then I could understand the proposal, but that is not the case. I would think that the benefit of having one agency responsible for the entire basin would be obvious and not have the responsibility split up into multiple jurisdictions, or left to the EPA which has responsibility over the entire country. I understand that there has not been a cost-benefit analysis regarding the proposal to drop regulating from ORSANCO's mission, which only reinforces my opposition to this proposal.

Sincerely,

Michael Earl Patton  
3767 Millsbrae Avenue  
Cincinnati, Ohio 45209  
(513) 731-6884

**From:** [King, Judi](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Ohio River Water Quality  
**Date:** Saturday, February 24, 2018 2:52:06 PM

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My name is Judi King. I am a resident of Boyd County, Kentucky.

We need to, at the least, maintain current water quality standards of the Ohio River, which are not up to par. I read about warnings for limiting fish consumption from the river. I see far too much trash at all times in the river.

Judi King  
4440 Brookwood Ct.  
Catlettsburg, KY 41129

Sent from my iPhone

Sent from my iPhone

**From:** [Marilyn McGerry](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 3:40:04 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Marilyn McGerry  
1529 Virginia St. E  
Charleston, WV 25311  
304-546-6647

**From:** [Ann Deibert](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO review comments  
**Date:** Saturday, February 24, 2018 3:47:38 PM

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I am in favor of maintaining no less than the current oversight and pollution control standards for the Ohio River. At the federal level, many, many environmental regulations are being unwound. These are regulations that have, in the past, provided some protection for citizens and communities to have clean and safe water. In this time when companies who advocate for less regulation are getting greater freedom to ignore the health concerns of citizens and communities and the well-being of our water system to be free from pollutants, we need greater local regulations and oversight to maintain safe and clear water.

Please do not diminish the regulations and oversight that have, over the last decades, led to much a cleaner Ohio River and a much healthier ecosystem for all of us who are fed or watered, in one way or another, by the Ohio River Valley system.

Sincerely,  
The Reverend Ann J. Deibert  
2716 Shippen Avenue  
Louisville, KY 40206

**From:** [Fuse Email](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Please stay involved in pollution control of the Ohio River!  
**Date:** Saturday, February 24, 2018 4:02:40 PM

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Dear ORSANCO,

Our rivers are in more danger than ever and need all the help they can get. Please stay involved in protecting the Ohio River as much as possible. I fear what would happen without you!

Thank you,

Bryn Weller

Bryn Weller Photography, LLC  
859-240-4149

Sent from my iPhone

**From:** [Bethany Hellmann](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO  
**Date:** Saturday, February 24, 2018 4:48:39 PM

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Yes, I believe the Ohio River Sanitation Commission (ORSANCO) should continue to maintain, administer, and periodically update its Pollution Control Standards for the Ohio River.

Safe drinking water and clean water sources need to be ensured at every level possible.

Just consider the Flint, Michigan water crisis. Corruption can be found everywhere. More regulatory agencies increases the likelihood of safe drinking water. What one agency misses, another agency can find.

If you want to make a change, consider adding MORE water quality agencies to monitor the Ohio River.

Sent from Bethany's iPhone

**From:** [Katherine Zeitler](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Saturday, February 24, 2018 4:58:14 PM

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ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Katherine Zeitler  
3160 Kioka Ave  
Upper Arlington, OH 43221



**From:** [reiss@win.net](mailto:reiss@win.net)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Cc:** [jbruggers@courier-journal.com](mailto:jbruggers@courier-journal.com)  
**Subject:** ORSANCO must continue standards  
**Date:** Saturday, February 24, 2018 5:06:35 PM

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Please retain the authority and current exemplary role of ORSANCO in setting responsible environmental water pollution standards, and monitoring their enforcement for the Ohio River.

Particularly at times like the present, when the river and its tributaries are overflowing their banks, we see the very real need to address environmental and water quality concerns on a regional basis - apart from any overriding control of any one state, city, or community.

What happens on the Ohio River affects every citizen living along its entire length, as well as every creature living within it or coming into contact with it.

I believe we cannot afford to turn back the clock on the advances ORSANCO has brought to the benefit of all of these entities.

Please continue your work into the future, as you've made so many of us proud of your work in the past.

Respectfully,  
Jennifer M. Reiss  
3240 Locust Point Rd. SE  
Corydon, IN 47112  
(812)968-3579

**From:** [Dr. John Stolz](mailto:Dr. John Stolz)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** comment on proposed changes  
**Date:** Saturday, February 24, 2018 5:10:57 PM

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As someone who has researched water quality issues for many years now, I am expressing my concern with ORSANCO's plans to discontinue their vigilant monitoring of the Ohio River basin. ORSANCO has the unique role in assessing the water quality of the Ohio River as it passes from it's origin at the confluence of the Allegheny and Monongahela Rivers in Pittsburgh to it's confluence with the Mississippi River. It is the only authority that engages all the states within the watershed and monitors the health of the river. The Ohio River Basin touches many states and is the source of both drinking water and water for industry. The current plans, especially option 2, would in principle, undermine the existence of ORSANCO. The 3rd year review of ORSANCO regulations does not seem as onerous when one considers the industries exempt from EPA oversight. For example, hydraulic fracking is exempt from the Safe Drinking Water Act due to the 2005 Energy Policy Act, and there is significant activity in both Pennsylvania and Ohio.

I have expressed my concerns publicly on the NPR radio program Allegheny Front and am doing so here in print. Do not underestimate the importance of your charge to protect the water quality of the Ohio River, and the fact they you engage all the states that its waters pass through. There are over 180 provisions in the ORSANCO regulations that are not covered by EPA. Thus, the waters of the Ohio River are at risk if ORSANCO does not fully execute its charter. Healthy waters are go for the environment, the people who rely on its quality, and the economy of the states it passes through. Do not abandon your responsibility.

Sincerely,

John F. Stolz, Ph.D.  
Professor, Biological Sciences  
Director, Center for Environmental Research and Education  
Duquesne University  
Pittsburgh PA 15282  
phone: 412 396 4367 fax: 412 396 4092

**From:** [SandyCDT](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** ORSANCO  
**Date:** Saturday, February 24, 2018 5:24:28 PM

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I'm sitting next to the rising Whitewater, knowing that mine and every septic system along the river is now compromised.

This usually happens several times a year and I know that most home owners are not as responsible as I am in maintaining their system. I am one person...there are millions that live with the Ohio as their water source.

Ohio legislators think a healthy environment is a joke...Kentucky, Pennsylvania and West Virginia are deaf to any concerns about the environment.

So YES! We need ORSANCO!!!

**WE NEED A STRONG ORSANCO!!!!**

We need an ORSANCO that stands up to the filth that is dumped into the Kanawha. We need an ORSANCO that stands up to the coal ash ponds that give way and dump millions of gallons of putrid waste into the Ohio.

**WE NEED AN ORSANCO WITH SOME TEETH AND A STRONG ARM!!!**

Make it so!

Saundra Stehlin

5220 Lawrenceburg Road

Harrison, Ohio 45030

Sent via the Samsung Galaxy S® 6, an AT&T 4G LTE smartphone

**From:** [Betsy Reeder](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 7:09:52 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Betsy Reeder  
6085 Mount View Rd.  
Jumping Branch, WV 25969  
304-466-1087

**From:** [David Lillard](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 7:38:54 PM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

David Lillard  
82 Sybil Court  
Shepherdstown, WV 25443  
304-876-2860

**From:** [Terry Hitt](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Water protection  
**Date:** Saturday, February 24, 2018 7:55:45 PM

---

Please do all you can to insure the EPA does its job. Without public oversight government gets lazy and lacks concern in this current political climate. Thanks Terry Hitt

Sent from my iPhone

**From:** [Kim Geiger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 8:36:31 PM

---

Please protect the Ohio river and keep the laws protecting it from polluters

[Sent from Yahoo Mail on Android](#)

**From:** [Karen Kindel](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Saturday, February 24, 2018 8:51:04 PM

---

Protect the Ohio river from pollution. Do not lessen regulations or allow loopholes for polluters.



**From:** [Buffam, Ishi \(buffamii\)](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** comment on ORSANCO implementation of PCS  
**Date:** Saturday, February 24, 2018 9:32:14 PM

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To the Ohio River Valley Sanitation Commission:

I am writing to express my concern regarding the proposal that ORSANCO abandon its role in pollution control standards oversight for the Ohio River. A basin-wide approach to pollution control is vital to the long-term health of the river and those who live on it/from it, and is the most efficient and effective way to manage any river. ORSANCO's continued role is one of the key reasons why the river is in so much better shape now than it was a few generations ago. ORSANCO, as a federally-sanctioned compact among signatory states, is in a unique position with a degree of insulation from the political process, which is always important but particularly so right now when so many environmental regulations are under fire - including for instance the Waters of the US Rule.

I strongly support ORSANCO maintaining a strong role in maintaining the PCS, and especially, helping address inconsistencies that arise in implementation by the member states. The PCS set by ORSANCO are not redundant with those set by the Clean Water Act (though naturally there is some overlap). In the absence of ORSANCO's role in maintaining the PCS, the federal or state-by-state implementation of water quality standards may not be adequate to fully protect the Ohio River aquatic life or the many beneficial uses and ecosystem services the river provides. Please act to preserve this important function of ORSANCO.

I appreciate your consideration,  
Dr. Ishi Buffam  
University of Cincinnati

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Ishi Buffam  
Associate Professor  
Department of Biological Sciences and Department of Geography  
University of Cincinnati, 731H Rieveschl Hall  
312 College Drive, Cincinnati, OH 45221  
Email: [ishi.buffam@uc.edu](mailto:ishi.buffam@uc.edu)  
Phone: 513-556-9745

**From:** [Jessica Jackson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Comments for comment period  
**Date:** Saturday, February 24, 2018 10:12:23 PM

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Hello,

I would like to comment on the proposed reduction of Orsanco's role in river quality as published in the Courier-Journal and USA Today affiliate the Cincinnati Enquirer.

I would urge Orsanco to continue in the vital role they play in keeping the Ohio River clean and drinking water safe for all. While there are already water quality measures they are lax and vary from region to region. By keeping a standard through Orsanco it ensures the safest possible drinking water for all Ohio River Valley residents who receive water from the river.

In an era where environmental standards are becoming more lax and continually disregard the science behind what is safe Orsanco plays such a vital role for the average citizen. It is through the work of Orsanco that the Ohio River is cleaner than it has been in many years. I remember as a child when you were told not swim in the river or eat anything out of it because it was polluted. I don't want to see such a thing happen again and credit the hard work Orsanco does in keeping our water ways safe.

To think that Ohio River could become polluted and even become a potential EPA Superfund site like the Milford, OH Aquifer <https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0507973> is not something that will benefit the health and welfare of the average citizen. The Milford Aquifer has chemical know to cause cancer in humans which is being filtered, but not closely monitored. This is a tragedy for the residents of Milford and one that we should not let become reality on the Ohio River.

Please help keep our river clean and safe and do not allow shady practices of dumping chemicals or reducing safety standards to become reality. While standards are in place they are extremely lax and without the pro-active work Orsanco does we are only setting up the Ohio River Valley for failure. When it come to the health and saftey of residents we need every bit of protection we can get. We NEED Orsanco and the vital work you do to continue.

Thank you,

Jessica Jackson  
4129 Club View Dr.  
Cincinnati, OH 45209

**From:** [Margaret Goslee](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River Pollution Standards  
**Date:** Saturday, February 24, 2018 10:13:38 PM

---

ORSANCO must not cease to regulate pollution in the Ohio River! I strongly support more regulation with effective enforcement to continue to improve Ohio River water quality and safety. How can there be any other choice? What else will millions of us have to drink? Regulation and reduction of pollution is vital!!

Thank You--

Margaret Goslee  
826 E Chestnut St  
Louisville, KY 40204

**From:** [Debbie Hoblitzell](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Ohio River  
**Date:** Saturday, February 24, 2018 10:30:17 PM

---

I read with incredulity that ORSANCO would consider relaxing standards on what can be added to the waters of the Ohio River. Please tighten regulations on what goes into the OHio River. It is already much too polluted and littered.

Sincerely,  
Debbie Hoblitzell  
1019 E. Breckinridge St.  
Louisville, KY 40204

Sent from my iPad

**From:** [Lisa Gorsuch](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Re: Proposed changes to the Pollution Control Standards for discharges into the Ohio River  
**Date:** Saturday, February 24, 2018 11:16:17 PM

---

ORSANCO ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. Eliminating these standards puts approximately 5 million Americans' drinking water and approximately 25 million people's quality of life and local economies at risk.

It is imperative for the Commission to uphold its responsibilities to ensure the protection and restoration of the Ohio River and the millions of Americans who depend on the river for drinking water, the numerous businesses, and approximately 25 million Americans quality of life. Everyday we wait to protect and restore the Ohio River the problems become more complex and the solutions more costly. I strongly encourage ORSANCO to uphold its responsibility and protect the Pollution Control Standards, rather than rolling back protections for one of the nation's most important resources.

Lisa Gorsuch  
5756 Balfour Rd  
Sylvania, OH 43560

**Deborah Christie**

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To: [www.orsanco.org](http://www.orsanco.org)  
Subject: Attention Commissioners

ORSANCO Commissioners,

I am sending this e-mail to advocate for continuing ORSENCO's valuable environmental protection services. ORSENCO was established to control and abate pollution in the Ohio River Basin. Reducing the role of ORSENCO is dangerous for all citizens who depend on the Ohio River for their water supply. Our current Administration is reducing environmental protections. The Federal Clean Water Act is inadequate and cannot provide all the required programs to improve and monitor water quality. ORSANCO's studies and surveys are not performed by other organizations. I am aware that ORSENCO is a 3<sup>rd</sup> tier organization. We need the current tiers of organizations to minimally provide protection and hopefully improve the water quality.

I am opposed to any proposal that reduces, restricts or eliminates ORSANCO's pollution monitoring, standard setting programs and special studies/surveys to improve water quality. The Ohio River has improved, but remains one of the most polluted rivers in the country with new chemicals being added to the pollution. How can we put a price tag on water safety? If protection is reduced — cancer and other related illness rates will increase. We need to increase the protection and standards ORSANCO provides not decrease them.

Thank you for Your Consideration,

Deborah Christie  
7771 Meadowcreek Dr.  
Cincinnati, Ohio 45244



**From:** [Bernie Fiedeldey](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Monitoring  
**Date:** Sunday, February 25, 2018 12:14:35 PM

---

Please stay the course . Thank you !

**From:** [kathleen querner](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Sunday, February 25, 2018 7:22:15 PM

---

We must keep pollution limited, and keep our pollution protections in place. We need clean water for drinking, recreation and wildlife. Water is our most valuable resource and must keep it cleaner in Ohio!!

*"To give anything less than your best is to sacrifice the gift"- Steve Prefontaine*

Kathleen Querner



**From:** [Pat Johnson](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Sunday, February 25, 2018 8:26:46 PM

---

Please keep pollution is effect. People will do anything for a buck including polluting the Ohio River and our entire planet.

\_\_\_\_\_ Information from ESET NOD32 Antivirus, version of detection engine 16964  
(20180225) \_\_\_\_\_

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

**From:** [lszyman51\\_](mailto:lszyman51_)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Monday, February 26, 2018 4:33:23 AM

---

Dear Sirs,

An imperative of a civilized country is being able to provide fresh, clean water to all its citizens. This water provides healthy access to our beautiful waters for swimming and boating recreation, drinking, bathing, and of course providing clean adequate waters for our wildlife. Rivers and Lakes are not Sewers! Industry MUST be held liable and accountable for their waste and contamination and it MUST NOT be tolerated!

Our land is equally valuable and contaminates are equally violating to our environment and must be contained and safely disposed of or recycled.

Our air has already been violated repeatedly and the result is being felt around the world! PLEASE demand competent handling industries waste and this waste includes runoff from our farming and livestock industry as well!

We have a beautiful earth we simply MUST DEMAND ITS PROTECTION!

Thank you.  
Linda NJ Szymanski

--

Linda Jesseph Szymanski  
President  
SALTS OF THE 7 SEAS  
Gourmet Sea Salts & Peppercorns  
**DELIGHT YOUR FOOD!**

[www.saltsofthe7seas.com](http://www.saltsofthe7seas.com)

419-842-8525 Office/Fax

419-787-7803 Cell

[linda@saltsofthe7seas.com](mailto:linda@saltsofthe7seas.com)

**From:** [Barbara Klinger](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Monday, February 26, 2018 9:33:11 AM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Barbara Klinger  
4943 Mayfield Rd  
Lyndhurst, OH 44124  
2163810422

**From:** [Susan Hickey](#)  
**To:** [Stuart F. Bruny](#)  
**Subject:** Please Keep Pollution Control Standards to Protect the Ohio River  
**Date:** Monday, February 26, 2018 10:13:56 AM

---

Dear Commissioners,

I am writing to urge you to reject the proposal for ORSANCO to eliminate its role in setting and maintaining Pollution Control Standards. The Ohio River flows through six states, and along its thousand-mile length there are myriad sources of water pollution. ORSANCO plays a vital role in ensuring the entire river is governed by one consistent set of standards, so that every state is strictly protected from pollution flowing downstream.

ORSANCO's own staff surveyed state water quality standards in 2015 and found 188 instances where Ohio River states had no limit for a pollutant covered by ORSANCO's Pollution Control Standards, and 252 instances where a state's standard was less stringent than ORSANCO's. These figures represent over 400 examples where state standards alone are not enough, and do not even include information on dozens of contaminants which were not part of the survey.

ORSANCO also has a vital role to play in confronting new pollution problems facing the Ohio River, such as toxic algae blooms and the consequences of explosive fracking growth. Without river-wide standards, there is no guarantee that upstream states or states less willing to impose tough regulations on polluters will be held accountable for the consequences of these emerging issues.

ORSANCO's Pollution Control Standards have provided a vital and unique safeguard against interstate pollution for decades and should remain in place to preserve the Ohio River for generations to come.

Regards,  
Susan Hickey

Chicago, IL 60625

**From:** [Robert Stanley](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Monday, February 26, 2018 11:05:48 AM

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I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Please do all that is in your power to enforce and strengthen pollution control standards for the mighty Ohio River.

Thank you.

Robert Stanley  
1414 Continental Drive, Apartment 1005  
Saint Marys, WV 37405  
423-266-3198

**From:** [Lisa Cochran](#)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** FW: New Message From ORSANCO Website  
**Date:** Monday, February 26, 2018 1:06:22 PM

---

Lisa Cochran  
ORSANCO  
Communications Coordinator  
5735 Kellogg Ave  
Cincinnati, OH 45230  
513-231-7719, ext. 102  
[orsanco.org](http://orsanco.org)

---

**From:** [noreply@orsanco.org](mailto:noreply@orsanco.org) [mailto:[noreply@orsanco.org](mailto:noreply@orsanco.org)]  
**Sent:** Monday, February 26, 2018 1:00 PM  
**To:** [info@orsanco.org](mailto:info@orsanco.org)  
**Subject:** New Message From ORSANCO Website

<b>Your Name</b>
Mr. William McNulty
<b>Company / Organization (Optional)</b>
1946
<b>Email</b>
<a href="mailto:mcnulty918@gmail.com">mcnulty918@gmail.com</a>
<b>Are you looking for a certain person at ORSANCO?</b>
None/Anyone
<b>Message/Comments</b>
Totally opposed to reducing or eliminating regulatory standards. This plan is driven by industry polluters, and no doubt have a negative effect. Don't be lobbied; be righteous.

**DO NOT REPLY TO THIS EMAIL! Reply to the address listed above in the "Email" section.**

**Beware of Spam and Spear Phishing attacks  
(emails targeting you)!!**

**From:** [Jeff Iliff](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Keep Strong and Protective Pollution Control Standards for the Ohio River  
**Date:** Monday, February 26, 2018 3:55:43 PM

---

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Thank you.

Jeff Iliff  
21 Riggs Ln  
Berkeley Springs, WV 25411  
26411



**From:** [w.bruml](mailto:w.bruml@orsanco.org)  
**To:** [pcs@orsanco.org](mailto:pcs@orsanco.org)  
**Subject:** Attn: PCS Comments  
**Date:** Monday, February 26, 2018 11:19:51 PM

---

I am surprised and disappointed to here that scrapping pollution rules for the Ohio River is being considered. As it is, there are very few fish in any Ohio waters with low enough levels of mercury and other toxins to be safe to be eaten in unrestricted quantities. Allowing more pollutants into the river will just make food harvested from the river and water drawn from it less safe for human use.

In the course of my engineering career I watched as the plating industry went from declaring that pollution rules would put all American platers out of business, to realizing that changing to zero emissions was an inexpensive process that saved them far more money that the changeover cost. It leads one to wonder whether most industries that claim that they must pollute have really examined their processes to eliminate waste and pollution.

Allowing businesses to pollute the river grants them a huge subsidy which is paid for by all the wildlife and all the people downstream. A member of a regulatory body that allows this sort of thing is betting his families future on there never being a judge who would allow him to be held personally liable for such misdeeds.

Best wishes,  
William Bruml  
Cleveland Heights, Ohio

**From:** [Jodi Becker](#)  
**To:** [PCS@orsanco.org](mailto:PCS@orsanco.org)  
**Subject:** Fwd: Please help protect Ohio River water quality.  
**Date:** Sunday, February 18, 2018 3:59:43 PM

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Got this message today. I could start a whole new email but, they sum things up pretty well! Not that Indiana is known for its environmental leadership (or any other type) but, I DO care about the planet. Sierra Club Hoosier Chapter's main points being:

Please keep your pollution protections in place to increase your efforts to protect the Ohio River and restore the quality of America's most polluted river. Speak out to ensure that the Ohio River's pollution control standards are not eliminated.

- 1) Its work setting pollution limits is critical to the health of the Ohio River.
- 2) You OPPOSE ANY proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

Thank you!

-jodi  
Jodi Becker

-----Original Message-----

From: Sierra Club Hoosier Chapter <[hoosier.chapter@sierraclub.org](mailto:hoosier.chapter@sierraclub.org)>  
To: jodi27 <[jodi27@aol.com](mailto:jodi27@aol.com)>  
Sent: Sat, Feb 17, 2018 4:07 pm  
Subject: Please help protect Ohio River water quality.

Please help us protect the Ohio River.

Dear Jodi,

**Please tell ORSANCO To Keep Protecting the Ohio River From Pollution!**

Although the Ohio River is one of the most polluted rivers in the U.S., thousands of Hoosiers get their drinking water from the river. The Ohio River also provides diverse recreational opportunities and habitat for wildlife, including threatened and endangered species.

For many years the Ohio River Valley Water Sanitation Commission (ORSANCO) has set pollution limits for toxic and human waste in the Ohio River. ORSANCO is now proposing to permanently eliminate those pollution limits from its rules.

**ORSANCO's pollution control standards are critical to guarantee that pollution from upstream states will not harm Indiana's waters!** Please tell ORSANCO to keep its pollution protections in place to increase its efforts to protect the Ohio River and restore the quality of America's most polluted river. Speak out to ensure that the Ohio River's pollution control standards are not eliminated.

Write ORSANCO by midnight February 24 and let them know:

- 1) Its work setting pollution limits is critical to the health of the Ohio River.
- 2) You **OPPOSE ANY** proposal that eliminates ORSANCO's mandatory pollution limits for the Ohio River!

You may email your comments to: [PCS@orsanco.org](mailto:PCS@orsanco.org)  
or mail them to:

ORSANCO

Attn: PCS Comments.

5735 Kellogg Avenue  
Cincinnati, OH 45230

Thanks for all you do to protect the environment.

Sincerely,

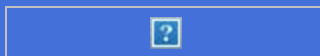
Bowden Quinn  
Hoosier Chapter Director

---

Sierra Club Hoosier Chapter, 1100 W. 42nd St., Suite 215  
Indianapolis, IN 46208



[Connect with us online.](#)



Sierra Club Hoosier Chapter, 1100 W. 42nd Street, Suite 215, Indianapolis, IN 46208

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Sent by [hoosier.chapter@sierraclub.org](mailto:hoosier.chapter@sierraclub.org) in collaboration with

**Constant Contact**



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**From:** [National Wildlife Federation Action Fund](#) on behalf of [Christy McCreary](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:16:03 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Christy McCreary  
9136 Lowell Ave  
Skokie, IL 60076-1663  
(630) 204-9447  
[christyogilviemcc@gmail.com](mailto:christyogilviemcc@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Savannah Judd](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:45:28 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Savannah Judd  
524 Sugar Maple Ct  
Cincinnati, OH 45255-3635  
(513) 503-4199  
[juddsavannah@yahoo.com](mailto:juddsavannah@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Sigismondi](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:45:35 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Dr. Linda Sigismondi  
474 Kathy St  
Gallipolis, OH 45631-1318  
(740) 446-9244  
lsigismondi@att.net



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Robert Guyton](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:45:44 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Robert Guyton  
10 Joneswood Dr  
Athens, OH 45701-1337  
(859) 559-6084  
[hike2paddle@yahoo.com](mailto:hike2paddle@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Rina Malerman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:45:44 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Rina Malerman  
653 Pinetree Rd  
Jenkintown, PA 19046-2229  
(215) 470-0990  
[rinamalerman@yahoo.com](mailto:rinamalerman@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [denise herbert](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:45:44 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. denise herbert  
PO Box 81  
Scotrun, PA 18355-0081  
(570) 223-3857  
rantor1@fastmail.fm

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Laurel Schwass-Drew](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:45:50 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Laurel Schwass-Drew  
7513 Boyer St  
Philadelphia, PA 19119-1604  
(215) 242-3933  
[jamadaru@aol.com](mailto:jamadaru@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Dawn Picard](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 12:47:52 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Dawn Picard  
6411 N 125 W  
La Porte, IN 46350-8722  
(219) 325-9992  
[d.picard@comcast.net](mailto:d.picard@comcast.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Trina Patton](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:15:41 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Trina Patton  
8260 S State Route 202  
Tipp City, OH 45371-9072  
(937) 667-5059  
tnottap@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Mary Ann Sochacki](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:15:41 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Mary Ann Sochacki  
2119 W Augusta Blvd  
Chicago, IL 60622-4837  
(773) 719-7511  
[masprod@mac.com](mailto:masprod@mac.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Samantha Gitman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:15:41 PM

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Feb 20, 2018

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Samantha Gitman  
1705 Whitpain Hls  
Blue Bell, PA 19422-1363  
(215) 527-4009  
[samantha.gitman@gmail.com](mailto:samantha.gitman@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Bazan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:15:41 PM

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Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Linda Bazan  
205 Elysian St  
Pittsburgh, PA 15206-4415  
(888) 888-8888  
[relatesolve@gmail.com](mailto:relatesolve@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Paula Barron](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:15:47 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Paula Barron  
2318 Parrish St  
Philadelphia, PA 19130-1940  
(215) 769-8308  
[paulapbarron@yahoo.com](mailto:paulapbarron@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Cathy Laughlin](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:15:54 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Cathy Laughlin  
494 Gilmore Rd  
New Castle, PA 16102-3712  
(555) 555-5555  
dogcat4498@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Robert Jehn](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:17:57 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. Robert Jehn  
180 S Atlantic Ave  
Cochrannton, PA 16314-8606  
(814) 425-8282  
[marseillejg27@hotmail.com](mailto:marseillejg27@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Dorothy Battle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:20 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. Dorothy Battle  
6088 Brookline Ct  
Lisle, IL 60532-2863  
(630) 886-3393  
mombattle@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Cathy Meyer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:25 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Cathy Meyer  
290 W. 7th St.  
Bloomington, IN 47404-3932  
(812) 339-8184  
[cmeyer@co.monroe.in.us](mailto:cmeyer@co.monroe.in.us)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Dorothy Stoner](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:27 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Dorothy Stoner  
1130 Longford Rd  
Bartlett, IL 60103-1939  
(715) 696-6253  
[dorothystoner@sbcglobal.net](mailto:dorothystoner@sbcglobal.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Cecelia Samp](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:37 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Cecelia Samp  
4265 Emerson Ave  
Schiller Park, IL 60176-1409  
(847) 671-2787  
[ceceliasamp@triton.edu](mailto:ceceliasamp@triton.edu)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Becky Connors](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:37 PM

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Sincerely,

Ms. Becky Connors  
1126 Woodbine Cir E  
Galesburg, IL 61401-2338  
(309) 299-8451  
bconnors1124@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Janet Bushinsky](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:42 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Janet Bushinsky  
1630 Fieldstone St  
Allentown, PA 18106-9287  
(610) 336-0997  
[jjbush@ptd.net](mailto:jjbush@ptd.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Dwight Hughes](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:42 PM

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Feb 20, 2018

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Sincerely,

Mr. Dwight Hughes  
657 Alameda Ave  
Sheffield Lake, OH 44054-1310  
(440) 522-3312  
dhughes1027@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Cathy Reid](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:37:53 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Cathy Reid  
34232 N Bluestem Rd  
Round Lake, IL 60073-5245  
(630) 665-0234  
[cathyreid2011@hotmail.com](mailto:cathyreid2011@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ellen Henaghan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:45:36 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Ellen Henaghan  
9s075 Nantucket Dr Unit A  
Darien, IL 60561-5100  
(708) 567-6144  
optimistic11@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Angela Roquemore](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 1:45:42 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Angela Roquemore  
505 S Jackson St Apt A  
Belleville, IL 62220-2678  
(618) 722-6520  
[ambermartingale@hotmail.com](mailto:ambermartingale@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Gange](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:07:24 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Linda Gange  
7920 Ferrell Ln  
Indianapolis, IN 46260-4907  
(317) 251-6823  
[lgange@gmail.com](mailto:lgange@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Rakowski](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:07:29 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Keep our rivers and lakes clean and safe.

Sincerely,

Ms. Linda Rakowski  
871 Sandalwood Rd W  
Perrysburg, OH 43551-3226  
(419) 874-0642  
[jrakowski@bex.net](mailto:jrakowski@bex.net)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Karla Corzatt](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:15:39 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Karla Corzatt  
10782 State Route 73  
New Vienna, OH 45159-9315  
(937) 725-0134  
[corzatt20@netzero.com](mailto:corzatt20@netzero.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Terri Barreras](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:15:52 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Terri Barreras  
6124 W Melrose St  
Chicago, IL 60634-4107  
(773) 283-0792  
tsb@pollina.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Matt Teeters](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:37:37 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Matt Teeters  
1590 Celina Rd  
Saint Marys, OH 45885-1211  
(419) 224-1150  
[mateeters@gmail.com](mailto:mateeters@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Donna Blomquist](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:37:37 PM

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Feb 20, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Donna Blomquist  
9749 N 1150th Ave  
Hennepin, IL 61327-5073  
815022808012  
[herecrookshanks@hotmail.com](mailto:herecrookshanks@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Judi Malinish](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:37:42 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Ms. Judi Malinish  
2900 Baughman Rd  
New Franklin, OH 44216-9331  
(330) 825-5089  
[heyjude0730@yahoo.com](mailto:heyjude0730@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [mark sebbby](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:37:42 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. mark sebbby  
292 Deerpath Ln  
Carpentersville, IL 60110-1410  
(847) 426-1845  
[marksebbby@yahoo.com](mailto:marksebbby@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stephanie Randall](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:45:40 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Stephanie Randall  
524 S Rosina Ave Apt 7  
Somerset, PA 15501-1920  
(814) 701-2929  
goddess9223@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Martha Schrader](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 2:45:48 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Martha Schrader  
2397 Pleasant Valley Rd NE  
New Philadelphia, OH 44663-8080  
(330) 343-9327  
[mlschrader1@gmail.com](mailto:mlschrader1@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Patricia Hanson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:07:36 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Patricia Hanson  
747 Cherokee Trl  
Marengo, IL 60152-2964  
(815) 568-8418  
leolioness43@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Pat DeWolfe](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:07:36 PM

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Feb 20, 2018

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Sincerely,

Ms. Pat DeWolfe  
1916 E Greenleaf St  
Allentown, PA 18109-8156  
(610) 435-3927  
[pdewolfe@hotmail.com](mailto:pdewolfe@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Karen Hughes](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:07:49 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Karen Hughes  
1055 Northridge Rd  
Columbus, OH 43224-2739  
(614) 805-3518  
ksdickel@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Erin McDonald RVT](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:15:41 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Miss Erin McDonald RVT  
40 Byers Ave Apt 1  
Akron, OH 44302-1312  
(330) 338-2678  
[weebreezy@yahoo.com](mailto:weebreezy@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Nicole Misnik](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:15:47 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Nicole Misnik  
760 Main St  
Pennsburg, PA 18073-1579  
(215) 541-1851  
[nmisnik@hotmail.com](mailto:nmisnik@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Michael Rand](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:15:47 PM

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Sincerely,

Mr. Michael Rand  
15716 Clifton Blvd  
Lakewood, OH 44107-2447  
(216) 228-6274  
[rienzilt@yahoo.com](mailto:rienzilt@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stephanie Keene](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:38:06 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Stephanie Keene  
PO Box 548  
Oley, PA 19547-0548  
(610) 987-0848  
[chilledoutchick9@aol.com](mailto:chilledoutchick9@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Helen Romaniuk](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:45:42 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Helen Romaniuk  
74 Lenin Rd  
Madisonville, KY 42431-6732  
(546) 465-4518  
[elen-magnolia@yandex.ru](mailto:elen-magnolia@yandex.ru)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Wendy Worth](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 3:45:42 PM

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Sincerely,

Ms. Wendy Worth  
4140 Windbud Dr  
New Albany, OH 43054-7011  
(614) 933-3324  
wendyworth2015@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lois Kendall](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:07:44 PM

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Feb 20, 2018

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Sincerely,

Mrs. Lois Kendall  
561 Red Oak Dr  
Elkins Park, PA 19027-1348  
(215) 643-5683  
lkendall605@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jeanine Taylor](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:07:49 PM

---

Feb 20, 2018

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Sincerely,

Mrs. Jeanine Taylor  
824 Washington St Apt 101  
Tell City, IN 47586-2298  
(812) 566-5106  
[stormtracker1961@yahoo.com](mailto:stormtracker1961@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Nancy Bent](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:37:47 PM

---

Feb 20, 2018

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Sincerely,

Ms. Nancy Bent  
425 W S College Street  
Yellow Springs, OH 45387  
(708) 784-1095  
[bentnancy@hotmail.com](mailto:bentnancy@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ellie Beck](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:37:47 PM

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Feb 20, 2018

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Sincerely,

Ms. Ellie Beck  
PO Box 11  
Le Roy, IL 61752-0011  
(309) 962-2500  
[ebnthewoods@yahoo.com](mailto:ebnthewoods@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ellen Eckerle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:37:47 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Ellen Eckerle  
5300 Saint Anne Dr  
Melbourne, KY 41059-1101  
(859) 444-4009  
[elmecdp@yahoo.com](mailto:elmecdp@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [marjorie knodle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:37:47 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. marjorie knodle  
6060 Yosemite Dr  
Cincinnati, OH 45237-4944  
(513) 873-3306  
[misknodle@gmail.com](mailto:misknodle@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Patrick Maloney](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:45:50 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Patrick Maloney  
1721 W Barry Ave  
Chicago, IL 60657-6778  
(773) 975-1123  
[patrickjj@sbcglobal.net](mailto:patrickjj@sbcglobal.net)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ryan Cek](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 4:45:50 PM

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Feb 20, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Ryan Cek  
413 Oakhill Dr  
Richmond Heights, OH 44143-2526  
(216) 409-6967  
cekadidas@live.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Marsha Magala](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:15:55 PM

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Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Save nature today...Save humanity tomorrow!

Sincerely,

Ms. Marsha Magala  
3145 S Emerald Ave  
Chicago, IL 60616-3012  
(312) 225-3420  
[marshamagala@yahoo.com](mailto:marshamagala@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Beth Allen](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:37:46 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Dr. Beth Allen  
1356 S Markoe St  
Philadelphia, PA 19143-3812  
(000) 000-0000  
[ruthiegoo4@gmail.com](mailto:ruthiegoo4@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [David Crawford](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:37:51 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Dr. David Crawford  
819 Huntington Rd  
Louisville, KY 40207-3671  
(502) 897-1775  
[drdmccrawford@gmail.com](mailto:drdmccrawford@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Pamela Smith](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:37:51 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

PLEASE, JOIN THE FIGHT AGAINST THESE CHANGES!!!

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Ms. Pamela Smith  
5841 N Kingsdale Ave  
Chicago, IL 60646-6624  
(773) 283-7504  
[smith2597@sbcglobal.net](mailto:smith2597@sbcglobal.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Richard Gray](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:37:56 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. Richard Gray  
451 W Oakdale Ave  
Chicago, IL 60657-5926  
(773) 348-4640  
[richtgray@gmail.com](mailto:richtgray@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Deborah Miller](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:45:55 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Deborah Miller  
305 Shady Ln  
Kouts, IN 46347-9657  
(219) 766-3475  
[newdeb7@hotmail.com](mailto:newdeb7@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Mark Blomfield](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:45:55 PM

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Feb 20, 2018

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Mark Blomfield  
2109 Main St  
Bethlehem, PA 18017-3751  
(570) 856-0448  
[markblomfield@gmail.com](mailto:markblomfield@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [c. fisher](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 5:45:55 PM

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Sincerely,

Dr. c fisher  
101 Morewood Ave  
Blairsville, PA 15717-1400  
(724) 459-0286  
[swordfish\\_1099@yahoo.com](mailto:swordfish_1099@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [sandra lujan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Polurintop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:15:58 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. sandra lujan  
3925 NRE. lot 92  
ashtabula, OH 44004  
(440) 536-5148  
[sareestd@yahoo.com](mailto:sareestd@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Gary Smith](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:15:58 PM

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While I don't think that regulations should be tightened, I don't feel they should be relaxed. Watersheds and wildlife are still recovering from the mistakes of the last century with DDT and the like. Keep it clean!

Sincerely,

Mr. Gary Smith  
2226 Ritts Farm Rd  
Emlenton, PA 16373-5012  
(814) 358-2506  
[pandanbear@yahoo.com](mailto:pandanbear@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Christine Mosley](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:37:54 PM

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Sincerely,

Ms. Christine Mosley  
7718 Mulberry Rd  
Clinton, IL 61727-9158  
(217) 935-3283  
[christyraasch@hotmail.com](mailto:christyraasch@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Judith Riddell](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:37:54 PM

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Sincerely,

Mrs. Judith Riddell  
305 E Dodson Dr  
Urbana, IL 61802-2257  
(217) 819-9817  
[oreocookiecow@hotmail.com](mailto:oreocookiecow@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Sheila Cottrell](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:37:54 PM

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Sincerely,

Ms. Sheila Cottrell  
23803 Bonny Bank Dr  
Westlake, OH 44145-3535  
(440) 759-6785  
[sheco513@yahoo.com](mailto:sheco513@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Katherine Boas](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 6:37:54 PM

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Feb 20, 2018

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Sincerely,

Mrs. Katherine Boas  
435 Hilton Dr  
Lancaster, PA 17603-5705  
(717) 330-8078  
[sweetdeenrastasmom@gmail.com](mailto:sweetdeenrastasmom@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [A A](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:07:58 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Ms. A A  
99 Longfellow St  
Vandergrift, PA 15690-1475  
(918) 237-2361  
axg824@yahoo.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Todd Zachritz](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:07:58 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. Todd Zachritz  
3100 Bergdolt Rd  
Evansville, IN 47711-2519  
(812) 479-8550  
tgodsend@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Joseph Tanke](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:16:05 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Mr. Joseph Tanke  
6220 W 64th Pl Apt 5  
Chicago, IL 60638-5065  
(708) 735-1431  
[josephtanke@aol.com](mailto:josephtanke@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Susan Humphress](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:16:05 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

Water is life.

Water is the most basic resource required to sustain life on this planet - earth. Not protecting every waterway from pollution is tantamount to slow suicide. It took decades to recognize that we are destroying our most precious resource with unregulated pollution entering our waterways. Why in the world would you want to rollback the protections in place??? Greed seems to be the order of the day.... So sad for our children, grandchildren... I would hate to think that I turned my back on the health and future of our world. Are you happy with the legacy you plan to leave to future generations??

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Ms. Susan Humphress  
204 N Hite Ave  
Louisville, KY 40206-2314  
(502) 897-2484  
[shumphress@brecherslighting.com](mailto:shumphress@brecherslighting.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jessica Schubert](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:28:36 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. Jessica Schubert  
227 Blue Cliff Pl  
Fort Wayne, IN 46804-6466  
(260) 745-6317  
[jjcs1022@yahoo.com](mailto:jjcs1022@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Shamili Ajgaonkar](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:58:08 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Dr. Shamili Ajgaonkar  
1663 Brentwood Ln  
Wheaton, IL 60189-8430  
(630) 588-9009  
[gaiadevi101@gmail.com](mailto:gaiadevi101@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [stacy wert](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:58:08 PM

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. stacy wert  
68660 Poplar Rd  
Walkerton, IN 46574-9055  
(219) 369-1092  
[spottedhawk677@gmail.com](mailto:spottedhawk677@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Eric Spaar](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 7:58:08 PM

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Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Eric Spaar  
209 Penn St  
Verona, PA 15147-1024  
(717) 343-2743  
[ecs\\_various@yahoo.com](mailto:ecs_various@yahoo.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Elizabeth Ruhe](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:03:35 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Rolling back standards is a mistake. The more we learn about the effects of the many pollutants, the more important it is that we strengthen, not weaken them.

It's about planning for the future, not protecting current profits.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Elizabeth Ruhe  
4553 Southern Pkwy  
Louisville, KY 40214-1414  
(502) 361-0622  
[bruhe@bellsouth.net](mailto:bruhe@bellsouth.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Thomas Avery](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:28:14 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Thomas Avery  
3013 Lynnwood Way  
Louisville, KY 40299-3101  
(502) 266-8522  
tomak66@aol.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Allen Musheno](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:28:14 PM

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Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Allen Musheno  
6007 Glenfinnan Ct  
Dublin, OH 43017-9760  
(614) 389-2946  
amusheno@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Kim Smith](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:33:39 PM

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Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Kim Smith  
65 Camaro Dr  
Beverly, WV 26253-8904  
(304) 704-3796  
[cudakim@yahoo.com](mailto:cudakim@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Barbara Kienzle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:58:19 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Barbara Kienzle  
443 Piedmont Rd  
Columbus, OH 43214-3817  
(614) 262-2922  
[bjkvv@aol.com](mailto:bjkvv@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Keelan Smith](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:58:27 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Keelan Smith  
8818 Powderhorn Ln  
Indianapolis, IN 46256-1358  
(317) 555-5555  
[concreteblonde27@gmail.com](mailto:concreteblonde27@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Brooks Rice](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 8:58:27 PM

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Feb 20, 2018

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Sincerely,

Mr. Brooks Rice  
4813 Wilson Rd NW  
Lancaster, OH 43130-9582  
(740) 654-4964  
brooksmrice@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [LJ Harris](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:28:32 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. LJ Harris  
2261 North Star Rd  
Columbus, OH 43221-3916  
(614) 888-8899  
lyoung7g@aol.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Chris McWilliams](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:28:32 PM

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Sincerely,

Ms. Chris McWilliams  
717 Hampton Ridge Dr  
Akron, OH 44313-5081  
(330) 431-6775  
[chrisab949@yahoo.com](mailto:chrisab949@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Carol Thompson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:58:23 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Miss Carol Thompson  
5304 Saint James Blvd  
Lorain, OH 44053-3088  
(440) 320-5212  
[carolthompson81@gmail.com](mailto:carolthompson81@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Richard Smartt](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:58:23 PM

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Sincerely,

Mr. Richard Smartt  
3352 E 140th St Fl 2  
Cleveland, OH 44120-4003  
(216) 334-4490  
[godschild72677@yahoo.com](mailto:godschild72677@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Angela Werner](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:58:24 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Angela Werner  
5522 Grassy Bank Dr  
Indianapolis, IN 46237-8498  
(317) 691-3092  
[anrizzo@indiana.edu](mailto:anrizzo@indiana.edu)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [wm lawrence](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:58:30 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. wm lawrence  
245 Rains Cir  
Zanesville, OH 43701-6289  
(740) 586-9913  
kriswm1022@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Abel Rivera](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 9:58:30 PM

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Sincerely,

Mr. Abel Rivera  
2414 W 36th St  
Chicago, IL 60632-1007  
(773) 823-7995  
[abel18620@comcast.net](mailto:abel18620@comcast.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [kristi lawrence](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:03:45 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. kristi lawrence  
245 Rains Cir  
Zanesville, OH 43701-6289  
(740) 586-9751  
[kriswm1022@gmail.com](mailto:kriswm1022@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Barb Hauser](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:03:45 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Barb Hauser  
1135 N Marion St  
Oak Park, IL 60302-1252  
(708) 386-8013  
[barbhauser10@yahoo.com](mailto:barbhauser10@yahoo.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Heather Townsend](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:03:45 PM

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Feb 20, 2018

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Sincerely,

Ms. Heather Townsend  
130 Eaton Ridge Dr Apt 311  
Northfield, OH 44067-1585  
(216) 233-5624  
htownse2@kent.edu

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Llew Taylor](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:28:24 PM

---

Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Llew Taylor  
PO Box 32  
Darlington, PA 16115-0032  
(724) 510-5010  
[future\\_worlds@live.com](mailto:future_worlds@live.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [John C. Kovalo](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:28:24 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent and one who grew up in the Ohio River town of Shadyside, Ohio, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. John C. Kovalo  
P.O. Box  
Bainbridge, OH 45612  
(740) 887-4328  
[heatspec@horizonview.net](mailto:heatspec@horizonview.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Annemarie Geffert](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:33:48 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Annemarie Geffert  
1405 Tampa Ave  
Cleveland, OH 44109-4464  
(216) 661-6316  
[acgeffert@ameritech.net](mailto:acgeffert@ameritech.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [James Murphy](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 10:58:38 PM

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Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. James Murphy  
303 Glen Ridge Rd  
Havertown, PA 19083-2716  
(610) 789-4689  
[jim303murphy@aol.com](mailto:jim303murphy@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Kathy Jakubowski](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:28:30 PM

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Feb 20, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Kathy Jakubowski  
2141 175th St  
Homewood, IL 60430-1002  
(708) 724-8920  
[klinlow@yahoo.com](mailto:klinlow@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Mary Janovick](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:28:43 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Mary Janovick  
1619 Sunrise Dr  
New Castle, PA 16105-5341  
657-5630  
[moonlightlily1619@gmail.com](mailto:moonlightlily1619@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Beverly Ann Conroy](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:28:43 PM

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Feb 20, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Beverly Ann Conroy  
739 S Elmwood Ave  
Oak Park, IL 60304-1414  
(708) 383-6112  
[beverlyannconroy@icloud.com](mailto:beverlyannconroy@icloud.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jo Carpenter](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:58:41 PM

---

Feb 20, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Jo Carpenter  
4108 Reed Rd  
Fort Wayne, IN 46815-4940  
(260) 348-2955  
[jec229@gmail.com](mailto:jec229@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Maria Whelan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Tuesday, February 20, 2018 11:58:41 PM

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Feb 20, 2018

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Sincerely,

Mrs. Maria Whelan  
317 N Derbyshire Ave  
Arlington Heights, IL 60004-6331  
(847) 253-6502  
frieden44@att.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Julie Griffith](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:58:39 AM

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Feb 20, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Julie Griffith  
1020 Kehoe Dr  
St Charles, IL 60174-3739  
377-9128  
[jjgrif2@gmail.com](mailto:jjgrif2@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lila Lahalih](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:04:06 AM

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Feb 21, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Miss Lila Lahalih  
750 Chippewa Dr  
Elgin, IL 60120-4015  
(847) 697-9833  
[lilasark@yahoo.com](mailto:lilasark@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Selena Harrison](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:28:56 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Ms. Selena Harrison  
2300 Keenan Ave Lot 75  
Dayton, OH 45414-4652  
(937) 503-1125  
tobeth65@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [jyn dornan-grey](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:58:56 AM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. jyn dornan-grey  
B1 better  
Pque, PA 17114  
9837629389389835  
[jynnekylugo@yahoo.com](mailto:jynnekylugo@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Rosemary delPino](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:58:56 AM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Rosemary delPino  
1001 Collins Ave  
Baden, PA 15005-1313  
(412) 310-3822  
rdelpino2002@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Soon Ling Wang](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 6:59:23 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Soon Ling Wang  
22 Chai Chee Road #07-544  
Singapore, IN 46102  
(659) 835-1763  
merz2610@hotmail.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Janet Parlett](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:59:30 AM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Janet Parlett  
108 Karen Cir  
Coatesville, PA 19320-5506  
(123) 456-7890  
[janetclara@hotmail.com](mailto:janetclara@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Christina Santiago](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:29:35 AM

---

Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Christina Santiago  
1485 Tyrell Ave  
Park Ridge, IL 60068-1445  
(224) 406-2550  
ccupello91@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Patricia Nick](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:29:35 AM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Patricia Nick  
213 Wayne Rd  
Wheeling, WV 26003-9670  
(304) 312-2398  
grandmafour@aol.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [James Porcello](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:29:35 AM

---

Feb 21, 2018

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Sincerely,

Mr. James Porcello  
1120 Chester Ave  
Cleveland, OH 44114-3546  
(440) 973-6479  
[osric22@gmail.com](mailto:osric22@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [David Haider](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:34:47 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. David Haider  
7136 Harrison Ave  
Swissvale, PA 15218-2024  
(412) 727-7331  
dhaid1@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stephanie Henry](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:59:37 AM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Stephanie Henry  
3550 Olentangy Blvd  
Columbus, OH 43214-4023  
(614) 299-2774  
[henrydesigninc@gmail.com](mailto:henrydesigninc@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stephanie Stover](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:59:37 AM

---

Feb 21, 2018

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Wildlife species such as the well-known kingfisher depend on the Ohio River Basin for their well-being. Their health and the health of our citizens could be jeopardized if pollution control standards are not maintained now.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Stephanie Stover  
324 E Washington Ave  
Bethlehem, PA 18018-2543  
(610) 974-9171  
soppoet@ptd.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Susan Sandusky](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:59:37 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Susan Sandusky  
13 Cranberry Cir  
Denver, PA 17517-9252  
(717) 335-0012  
[susandusky@gmail.com](mailto:susandusky@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [John Gajewski](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:29:39 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. John Gajewski  
PO Box 261  
Centre Hall, PA 16828-0261  
(812) 325-6680  
[john\\_gajewski@yahoo.com](mailto:john_gajewski@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Colleen Yeany](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:29:39 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As an active voter, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Colleen Yeany  
3801 Saxonburg Blvd  
Cheswick, PA 15024-2256  
(717) 507-2688  
[cyeany@gmail.com](mailto:cyeany@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Carol Azar](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:29:39 AM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Dr. Carol Azar  
7439 Richland Manor Dr  
Pittsburgh, PA 15208-2735  
(412) 371-1151  
cazar20@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Bob Steininger](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:59:44 AM

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Feb 21, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Bob Steininger  
100 Westridge Pl S  
Phoenixville, PA 19460-3376  
(610) 917-2202  
[steininger.bob@gmail.com](mailto:steininger.bob@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [George Starkey](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:59:44 AM

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Feb 21, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. George Starkey  
166 Parkview Dr  
Wintersville, OH 43953-9609  
(740) 264-6081  
[gstarkeyone@aol.com](mailto:gstarkeyone@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Scott Blum](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:59:44 AM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Scott Blum  
574 April Ct  
Miamisburg, OH 45342-3900  
(937) 859-5264  
blumscott@sbcglobal.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Wyman Whipple](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:29:45 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Wyman Whipple  
1427 Knox Highway 12  
Dahinda, IL 61428-9301  
(309) 289-4417  
[rwwhipple@grics.net](mailto:rwwhipple@grics.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jaci Riley](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:35:03 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Jaci Riley  
PO Box 233  
Curtice, OH 43412-0233  
(419) 297-7866  
[jacio110@gmail.com](mailto:jacio110@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Brenda Barbarino](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:00:21 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Brenda Barbarino  
767 Orchard Rd  
Willoughby, OH 44094-7259  
(440) 953-1536  
[brendabarbarino@hotmail.com](mailto:brendabarbarino@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ronald Kucynski](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:00:22 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. Ronald Kucynski  
956 Raintree Ln  
Maineville, OH 45039-7024  
(937) 545-2309  
rkucynski@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Sherri Rose](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:30:00 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Sherri Rose  
5660 Quercus Grove Rd  
Edwardsville, IL 62025-6412  
(618) 692-0589  
eds.sugie@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Terri Greene](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:30:10 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Terri Greene  
9510 S Snow Rd  
Bloomington, IN 47403-9556  
(812) 825-8546  
[tgreene@indiana.edu](mailto:tgreene@indiana.edu)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Gail Hyde](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 12:30:21 PM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Gail Hyde  
1725 Upper Schooner Rd  
Nashville, IN 47448-7104  
(812) 391-1803  
ghcritters@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Debra Staudt](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:30:20 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. Debra Staudt  
2700 Fessler Buxton Rd  
Russia, OH 45363-9717  
(937) 238-6661  
dkstaudt@embarqmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ben Stacey](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:30:20 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. Ben Stacey  
415 S 10th St  
St Charles, IL 60174-2615  
(630) 335-3692  
[benjamin\\_stacey@hotmail.com](mailto:benjamin_stacey@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Susan Lohrey](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 1:30:20 PM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Susan Lohrey  
527 Fawn Run Dr  
Newport, KY 41076-3790  
(859) 609-3202  
sklohrey@hotmail.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Rita Gagliani](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:00:16 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Rita Gagliani  
7500 Braewood Dr  
Independence, OH 44131-5553  
(216) 642-5910  
[rita.gagliani@mail.mcgill.ca](mailto:rita.gagliani@mail.mcgill.ca)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Susan Evilsizer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:00:16 PM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Susan Evilsizer  
20529 Brookstone Trl  
Cleveland, OH 44130-2489  
(555) 555-5555  
cybertigress2@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Marya Bradley](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:00:25 PM

---

Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Marya Bradley  
11 Prices Ln  
Rose Valley, PA 19063-4214  
(610) 256-4464  
mabstream@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Vilimek](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:30:19 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Linda Vilimek  
10350 S 75th Ave  
Palos Hills, IL 60465-2014  
(708) 233-9218  
lvilimek@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Judy Price](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:30:30 PM

---

Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Judy Price  
3200 Glendale Ave Apt 96  
Toledo, OH 43614-2499  
(419) 386-5051  
[columbiasun@bex.net](mailto:columbiasun@bex.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Nanez](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:30:30 PM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Linda Nanez  
6805 Convent Blvd  
Sylvania, OH 43560-2854  
(419) 885-3693  
[ezolinda56@gmail.com](mailto:ezolinda56@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Donna Bucher](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 2:30:36 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Donna Bucher  
5211 W Warwick Ave  
Chicago, IL 60641-3348  
(773) 805-7527  
mkjams@aol.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [James Cooper](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 3:30:30 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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As a resident of Ohio and someone who cares deeply about wildlife, clean water, and the environment in general, not to mention the millions of people affected, I'm appalled to read that the Commission may decide to abandon the current pollution control standards and its responsibility to maintain and update these standards. This is beyond irresponsible and unacceptable. Water, clean water, is essential to life.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. James Cooper  
75 Pinetree Dr  
Granville, OH 43023-9317  
(740) 587-1307  
cooperjw13@gmail.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stephanie Fairchild](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 3:30:40 PM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Stephanie Fairchild  
6885 Sherrard Rd  
Cambridge, OH 43725-9560  
(740) 432-2961  
[sdfair71@frontier.com](mailto:sdfair71@frontier.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Charlene Donovan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 4:00:38 PM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Charlene Donovan  
7434 Winchester Ln  
Schererville, IN 46375-1774  
(219) 227-8899  
[charlene47donovan@gmail.com](mailto:charlene47donovan@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lisa Allarde](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 4:30:57 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Dr. Lisa Allarde  
129 Milan Way  
Green Lane, PA 18054-2265  
(717) 992-6900  
[toothlessinpa@hotmail.com](mailto:toothlessinpa@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Janet Einfalt](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 4:30:57 PM

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Feb 21, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Janet Einfalt  
300 Warner Rd  
Hubbard, OH 44425-2722  
(330) 568-7018  
[janette1203@aol.com](mailto:janette1203@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Nancy O](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:09:27 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Nancy O  
810 Birch Field Ct  
Wexford, PA 15090-8780  
(724) 799-2324  
[nancy\\_810@yahoo.com](mailto:nancy_810@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jesse Soldal](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:10:05 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. Jesse Soldal  
17w548 Hawthorne Ave  
Wood Dale, IL 60191-1434  
(630) 595-2750  
[jessesoldal12@gmail.com](mailto:jessesoldal12@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Greg Nielson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:31:05 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. Greg Nielson  
19194 Hunt Rd  
Strongsville, OH 44136-8345  
(216) 390-2021  
[gxnl1@yahoo.com](mailto:gxnl1@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Melanie Shuter](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:31:53 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Melanie Shuter  
815 Dartmouth Dr  
Circleville, OH 43113-1291  
(740) 474-7995  
[mbshuter@columbus.rr.com](mailto:mbshuter@columbus.rr.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Debbie Bruegge](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:32:50 PM

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Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Debbie Bruegge  
7308 Jean Dr  
West Chester, OH 45069-2663  
(513) 777-2848  
[debruegge@zoomtown.com](mailto:debruegge@zoomtown.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Marcia Brehmer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 5:32:57 PM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Marcia Brehmer  
815 Dartmouth Dr  
Circleville, OH 43113-1291  
(614) 345-8018  
[mbrehmer@att.net](mailto:mbrehmer@att.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Matthew Ebbing](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 6:01:23 PM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Mr. Matthew Ebbing  
436 S Euclid Ave Apt G  
Oak Park, IL 60302-3922  
(708) 848-0209  
[mattebbing@sbcglobal.net](mailto:mattebbing@sbcglobal.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Maria Cadeddu](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 6:02:35 PM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Dr. Maria Cadeddu  
5 Copperfield Dr  
Hawthorn Woods, IL 60047-7544  
(847) 438-4885  
[honybee12@aol.com](mailto:honybee12@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ronald Rutzky](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 6:04:43 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. Ronald Rutzky  
18046 Cherrywood Ln  
Homewood, IL 60430-1503  
(708) 917-1305  
[rrutzky@sbcglobal.net](mailto:rrutzky@sbcglobal.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Brett Beil](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 6:30:56 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. Brett Beil  
7411 Chillicothe Rd  
Mentor, OH 44060-7171  
(440) 555-5555  
tubular8s@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [William Zupancic](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:06:18 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Dr. William Zupancic  
639 Davis Ave  
Rockdale, IL 60436-2535  
(773) 587-8996  
[williamzupancic@yahoo.com](mailto:williamzupancic@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Alice Keyes](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 7:32:22 PM

---

Feb 21, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Alice Keyes  
443 Oak St  
Cresco, PA 18326-7305  
(570) 236-1168  
[alicekeyes00@gmail.com](mailto:alicekeyes00@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Carol Gray](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:01:21 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I have grave concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is absolutely unacceptable. This approach jeopardizes the ongoing cleanup and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again, regrettably, topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial -- and increasingly critical -- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly requires a collaborative approach.

The Commission must continue to uphold its responsibility to protect our waterways, communities and wildlife, and to ensure all states work toward common goals and a cleaner Ohio River. It literally is a matter of life or death. Thank you.

Sincerely,

Ms. Carol Gray  
6940 E State Road 45  
Bloomington, IN 47408-9553  
(812) 855-7653  
[cjgrayy@hotmail.com](mailto:cjgrayy@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stacey Bradley](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 8:31:15 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Stacey Bradley  
193 Beaver St  
Hastings, PA 16646-5601  
(814) 247-5003  
[witchykitty@comcast.net](mailto:witchykitty@comcast.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jennifer Quick](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:03:58 PM

---

Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Jennifer Quick  
PO Box 163  
Hummelstown, PA 17036-0163  
(717) 555-1212  
[soindebt@hotmail.com](mailto:soindebt@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jennifer Dreher](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:04:25 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Jennifer Dreher  
5603 Burns Rd  
North Olmsted, OH 44070-4219  
(440) 385-7260  
[jendreher669@gmail.com](mailto:jendreher669@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Connie Swanson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:31:20 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Connie Swanson  
7638 Keeler Ave  
Skokie, IL 60076-3753  
(224) 420-1453  
cswanson1050@aol.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Brandi Frantz](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:31:43 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Brandi Frantz  
107 N Main St  
Freeburg, IL 62243-1011  
(916) 671-4443  
bandybrandi@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Kemmeth Rivers Walker](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:32:01 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Kemmeth Rivers Walker  
3513 Carpenter Ave  
Hurricane, WV 25526-1360  
(304) 549-8875  
[kemmethr@mac.com](mailto:kemmethr@mac.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Barbara Chidester](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 9:33:18 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Barbara Chidester  
5138 keexxx  
Chicago, IL 60630-2744  
(456) 789-0123  
bscats@sbcglobal.net



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Melissa Paulesc](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:01:11 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Melissa Paulesc  
11906 Lena Ave  
Cleveland, OH 44135-3022  
(216) 801-1121  
[mpaulesc@yahoo.com](mailto:mpaulesc@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Amy Hayworth](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:01:32 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Amy Hayworth  
111 College Park Dr  
Coraopolis, PA 15108-2310  
(111) 111-1111  
albright\_ab@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Joan Meyer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 10:32:16 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Joan Meyer  
1514 N William St  
Joliet, IL 60435-4152  
(815) 722-2729  
joanie7@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Judy Richey](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 11:01:25 PM

---

Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Judy Richey  
35582 Eisenhower Rd  
Genoa, IL 60135-8726  
(815) 784-2957  
[beatlemania.judy@yahoo.com](mailto:beatlemania.judy@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Janet Moline](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 11:34:02 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Janet Moline  
3836 28th Ave  
Rock Island, IL 61201-5801  
unlisted  
[jamoline@hotmail.com](mailto:jamoline@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Hannah Thomas](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Wednesday, February 21, 2018 11:35:19 PM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Hannah Thomas  
1026 Reasor Ave  
Louisville, KY 40217-1504  
(502) 291-0877  
[hannahdance\\_1@juno.com](mailto:hannahdance_1@juno.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Roe Jewell](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 12:00:21 AM

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Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Roe Jewell  
PO Box 6112  
Wheeling, WV 26003-0737  
(304) 312-8722  
[lenni2tuscany@hotmail.com](mailto:lenni2tuscany@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Paulette Geisler](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 12:20:15 AM

---

Feb 21, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Paulette Geisler  
371 Holbrook Rd  
York, PA 17402-5103  
(717) 586-4202  
[paulettegeisler.pg@gmail.com](mailto:paulettegeisler.pg@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Evan Hartman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 1:38:05 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Evan Hartman  
607 N 11th St  
Philadelphia, PA 19123-3309  
(215) 235-6121  
evandawn@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [E. Coblentz](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 1:39:10 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. E Coblentz  
1328 Valley Rd  
Woodlyn, PA 19094-1122  
(610) 833-2708  
[ec788@yahoo.com](mailto:ec788@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lisa Lester](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 1:43:26 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Lisa Lester  
317 Phillips St  
Johnstown, PA 15904-1225  
(814) 266-1122  
[lsunshine15904@atlanticbb.net](mailto:lsunshine15904@atlanticbb.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Polinski](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 4:40:34 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Linda Polinski  
404 Atwood St Apt 3  
Pittsburgh, PA 15213-4133  
(412) 735-1976  
[lpolinski@icloud.com](mailto:lpolinski@icloud.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Michael Baskett](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 4:40:38 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Michael Baskett  
PO Box 6170  
Cincinnati, OH 45206-0170  
(513) 288-0800  
[michaelbaskett47@icloud.com](mailto:michaelbaskett47@icloud.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Melody Huffman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 4:43:11 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Melody Huffman  
7841 Oak Valley Rd  
Reynoldsburg, OH 43068-1581  
(614) 864-5017  
mandmhuffman@att.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Joann Butkus](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 5:10:52 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Joann Butkus  
2502 W 38th St  
Chicago, IL 60632-1010  
(773) 718-7698  
[jb7698@att.net](mailto:jb7698@att.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jonathan Zahos](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 7:43:47 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Jonathan Zahos  
8228 Keating Ave  
Skokie, IL 60076-2502  
(847) 674-7639  
subzerohc@yahoo.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Annette Schwegmann](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:13:18 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Annette Schwegmann  
275 Midway Ct  
Verona, KY 41092-7954  
643-0204  
[nette\\_282@hotmail.com](mailto:nette_282@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jenny Collier](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:13:29 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Jenny Collier  
PO Box 22  
Tannersville, PA 18372-0022  
(570) 460-3202  
[jenwood57@hotmail.com](mailto:jenwood57@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Alexandra Sipiora](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:43:22 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Alexandra Sipiora  
40 E Chicago Ave # 202  
Chicago, IL 60611-2026  
(773) 272-6947  
[lexathegreek@yahoo.com](mailto:lexathegreek@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Elizabeth BINSTEAD](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:43:38 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Elizabeth BINSTEAD  
217 Lantwyn Ln  
Narberth, PA 19072-2005  
(610) 664-6989  
[betteannbinstead@gmail.com](mailto:betteannbinstead@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Regina DiTullio](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:43:49 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Regina DiTullio  
411 S 23rd St  
Allentown, PA 18104-6641  
(610) 434-1084  
[reginad2@ptd.net](mailto:reginad2@ptd.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Corey Fuhrer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:44:16 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Corey Fuhrer  
310 Fisher Dr  
York, PA 17404-8282  
(717) 266-0714  
cfuhrer76@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Karen Gushurst](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:14:06 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Karen Gushurst  
110 Heron Ct  
West Lafayette, IN 47906-5088  
(765) 404-8654  
[karen.gushurst@yahoo.com](mailto:karen.gushurst@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [James Ohlendorf](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:14:10 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. James Ohlendorf  
801 W Glover St  
Ottawa, IL 61350-3841  
(815) 993-2716  
[snoopybasset@sbcglobal.net](mailto:snoopybasset@sbcglobal.net)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Candy Brown](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:14:33 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Candy Brown  
603 W 1st St  
Arcanum, OH 45304-1005  
(937) 692-5954  
[candythomasgourdart@gmail.com](mailto:candythomasgourdart@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [j.m](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:44:18 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. j m  
3400 Gerold Dr  
Cincinnati, OH 45238-2116  
(000) 000-0000  
[maurer@fioptics.com](mailto:maurer@fioptics.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Margaret Keylin](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 10:13:34 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River. We cannot move backwards!

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Margaret Keylin  
304 N Woodlawn St  
Downs, IL 61736-9671  
(309) 378-4098  
pkeylin@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Kimberly Krull](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 10:14:09 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Kimberly Krull  
1737 Arley Dr  
Indianapolis, IN 46229-2220  
(317) 894-1084  
[ponderkim@aol.com](mailto:ponderkim@aol.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Katherine Sutton](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 10:14:26 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Katherine Sutton  
1229 Western Ave  
Northbrook, IL 60062-4459  
(847) 272-5927  
k14s@aol.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [J. White](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 10:14:49 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. J. White  
151 W Sunhill Rd  
Manheim, PA 17545-9776  
(267) 872-1247  
[jewwhite54@hotmail.com](mailto:jewwhite54@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Priscilla Powell](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 11:18:00 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Priscilla Powell  
296 Finland Ave  
Coventry Township, OH 44319-3246  
(330) 644-4056  
[priscilla\\_53@yahoo.com](mailto:priscilla_53@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Michelle Johnsen](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 11:43:57 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Michelle Johnsen  
1717 W Kirby Ave # 394  
Champaign, IL 61821-5507  
(217) 781-0122  
[ruffian58@gmail.com](mailto:ruffian58@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Tom Sunlake](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 12:14:43 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I have grave concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is absolutely unacceptable. This approach jeopardizes the ongoing cleanup and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again, regrettably, topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial -- and increasingly critical -- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly requires a collaborative approach.

The Commission must continue to uphold its responsibility to protect our waterways, communities and wildlife, and to ensure all states work toward common goals and a cleaner Ohio River. It literally is a matter of life or death. We deserve to have a clean Ohio River. Thank you.

Sincerely,

Mr. Tom Sunlake  
6940 E State Road 45  
Bloomington, IN 47408-9553  
(812) 855-7653  
[sulankec@exchange.iu.edu](mailto:sulankec@exchange.iu.edu)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Martin Wilcoxen](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 2:48:16 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Martin Wilcoxen  
14337 Perrysville Rd  
Danville, IL 61834-5869  
(217) 446-7330  
[martanna@sbcglobal.net](mailto:martanna@sbcglobal.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Janet Linhart](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 3:13:53 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Janet Linhart  
1465 McCormick Pl  
Wheaton, IL 60189-7136  
(630) 752-1330  
[janetlinhart@att.net](mailto:janetlinhart@att.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Michael Martin](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 3:48:22 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Michael Martin  
21w260 Walnut Rd  
Glen Ellyn, IL 60137-4739  
(815) 254-4207  
seraphmichael@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Mary Yunker](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 4:14:14 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Mrs. Mary Yunker  
422 S Logsdon Pkwy  
Radcliff, KY 40160-2416  
(270) 351-9492  
[mary\\_yunker@yahoo.com](mailto:mary_yunker@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Sharon Keller](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 4:44:17 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Sharon Keller  
2065 Glenview Dr  
Hebron, KY 41048-8308  
(513) 304-9897  
skeller506@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Debra Corbett](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 4:44:35 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Debra Corbett  
5189 Budd Rd  
New Albany, IN 47150-9108  
(812) 949-4828  
[debra.corbett@ahsrockets.org](mailto:debra.corbett@ahsrockets.org)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Summer Hughes](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 5:14:22 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Summer Hughes  
4721 Taylorsville Rd  
Huber Heights, OH 45424-2442  
(937) 239-9881  
[summer\\_hughes@hotmail.com](mailto:summer_hughes@hotmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Margaret Tyska](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 5:44:14 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Margaret Tyska  
421 Dorchester Ln  
Perkasie, PA 18944-1885  
(215) 453-0476  
met5656@comcast.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Roy Conard](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 6:14:13 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Roy Conard  
1219 S 11th St  
Philadelphia, PA 19147-5031  
(215) 755-3230  
rcnd268@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lisa Lester](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 6:44:07 PM

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Feb 22, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Ms. Lisa Lester  
317 Phillips St  
Johnstown, PA 15904-1225  
(814) 266-1122  
[lsunshine15904@atlanticbb.net](mailto:lsunshine15904@atlanticbb.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Thomas Hoover](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 7:44:19 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. Thomas Hoover  
12664 Chargers Ct  
Fishers, IN 46037-9582  
(317) 774-8990  
thoover@me.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Terri White](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:14:19 PM

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Feb 22, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Terri White  
3300 Waltham Ave  
Dayton, OH 45429-3530  
(937) 299-9601  
[sugar199215@gmail.com](mailto:sugar199215@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Thomas Kocoshis](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:44:21 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Dr. Thomas Kocoshis  
3544 W Johnson Cir  
Muncie, IN 47304-2522  
(765) 286-7242  
kocoshist@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Susan Jordan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:44:21 PM

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Feb 22, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Susan Jordan  
131 Carolyn Ln  
Nicholasville, KY 40356-9340  
(859) 885-9987  
[sumujo@windstream.net](mailto:sumujo@windstream.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Merin Roseman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 8:48:58 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Merin Roseman  
2708 Pea Ridge Rd  
Frankfort, KY 40601-9660  
(859) 325-9255  
[merin.roseman1@gmail.com](mailto:merin.roseman1@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Helene Rosen](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:14:55 PM

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Feb 22, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Helene Rosen  
92 Grandview Dr  
Ivyland, PA 18974-6127  
(215) 443-5516  
hrosen80@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [David Christman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:15:03 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. David Christman  
5273 Morning Sun Rd  
Oxford, OH 45056-8918  
(513) 523-2930  
dgxmn@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Josh Staquet](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:49:04 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mr. Josh Staquet  
4 Elliot Ct  
Royersford, PA 19468-1889  
(484) 369-1376  
[joshstaquet@gmail.com](mailto:joshstaquet@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jessica Gawlik](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 9:49:08 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. Jessica Gawlik  
2743 E North St  
Kendallville, IN 46755-3235  
(260) 000-0000  
jgawlik99@hotmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [E. Hinds](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 10:44:22 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. E. Hinds  
524 Sandy Ln  
Libertyville, IL 60048-3554  
(847) 816-1203  
ecathinds@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Amanda Fuller](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** KEEP Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 11:14:23 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Amanda Fuller  
800 Goullon Ct  
Louisville, KY 40204-2009  
(502) 742-9824  
[abfuller@gmail.com](mailto:abfuller@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Caylee Parker](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Thursday, February 22, 2018 11:44:34 PM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Miss Caylee Parker  
1942 Ursinus Ave  
Lancaster, PA 17603-4411  
(717) 224-5155  
[secretadmirer604ohyeah@gmail.com](mailto:secretadmirer604ohyeah@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Marjorie Chapman](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 12:14:34 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Marjorie Chapman  
3432 Ridge Rd  
Highland, IN 46322-2048  
(219) 743-8121  
[mghille@yahoo.com](mailto:mghille@yahoo.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Eleanor Bookwalter](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 12:14:39 AM

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Feb 22, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Eleanor Bookwalter  
8560 Tree Top Dr  
Indianapolis, IN 46260-5314  
(317) 257-7095  
[edbookwalter@sbcglobal.net](mailto:edbookwalter@sbcglobal.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ryann Wickersham](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 2:14:43 AM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Ryann Wickersham  
1017 Ericsson Dr  
Coatesville, PA 19320-4804  
(484) 678-3370  
nocturna023@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Marla Humphreys](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 2:19:27 AM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Marla Humphreys  
8 Rex Ave Apt 2  
Philadelphia, PA 19118-3700  
(215) 248-3774  
[marlahumphreys@yahoo.com](mailto:marlahumphreys@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Charmaine White](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 7:45:03 AM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Charmaine White  
127 Kulp Rd  
Catawissa, PA 17820-7915  
(570) 875-3644  
[horselover930@yahoo.com](mailto:horselover930@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Elza Correll](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 9:15:12 AM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Elza Correll  
4558 Clearview Ave  
Cincinnati, OH 45205-1518  
(555) 555-5555  
correllis@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Patricia Schroder](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 9:20:16 AM

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Feb 23, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Patricia Schroder  
784 Sugartown Rd  
Malvern, PA 19355-3330  
(610) 647-1087  
[trishs@wallacecranes.com](mailto:trishs@wallacecranes.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Katherine Hope](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 10:45:33 AM

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Feb 23, 2018

ORSANCO ORSANCO

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ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Ms. Katherine Hope  
1004 Adams St  
Ottawa, IL 61350-4311  
(815) 431-9557  
kfhope1@mchsi.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Christine Stalter](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 11:15:25 AM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Ms. Christine Stalter  
6225 157th Pl  
Oak Forest, IL 60452-2711  
(708) 687-7309  
cancunchriss@aol.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Michelle Giordano](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 12:15:31 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Michelle Giordano  
4621 Harbor Blvd  
Columbus, OH 43232-6138  
(614) 829-6948  
[michellelg1972@yahoo.com](mailto:michellelg1972@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Sidne Baglini](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 12:15:37 PM

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Feb 23, 2018

ORSANCO ORSANCO

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Sincerely,

Mrs. Sidne Baglini  
203 Channing Ave  
Malvern, PA 19355-2710  
(484) 318-8081  
[sidbaglini@gmail.com](mailto:sidbaglini@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lynne Baird](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 12:50:32 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Lynne Baird  
1917 McCauslen Mnr  
Steubenville, OH 43952-1307  
(740) 282-0153  
[lynnelbaird@hotmail.com](mailto:lynnelbaird@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Sherry Elliott](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 1:15:38 PM

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Feb 23, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Sherry Elliott  
7661 S Old Palmyra Rd  
Pekin, IN 47165-8667  
(812) 967-4363  
[elliottsherry09@gmail.com](mailto:elliottsherry09@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Betsy Eppinger](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 1:15:50 PM

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Feb 23, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Betsy Eppinger  
822 N State St  
Litchfield, IL 62056-1402  
(217) 766-1738  
[betsy.eppinger@loop.colum.edu](mailto:betsy.eppinger@loop.colum.edu)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Olga Abella](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 2:50:46 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Olga Abella  
12129 N 675th St  
Robinson, IL 62454-4227  
(618) 544-5474  
[olgafox@hotmail.com](mailto:olgafox@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Carol Black](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 2:50:46 PM

---

Feb 23, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

I have visited the Ohio River - please do not let it deteriorate!

Sincerely,

Ms. Carol Black  
603 Jefferson St  
Valparaiso, IN 46383-4905  
(219) 462-4149  
[carol@tblawyers.com](mailto:carol@tblawyers.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Ellen Kinney](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 3:15:54 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. Ellen Kinney  
11533 Twin Mills Ln  
Chardon, OH 44024-9726  
(440) 286-8688  
[blueowl1990@gmail.com](mailto:blueowl1990@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Pamela Hamulak](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 3:15:54 PM

---

Feb 23, 2018

ORSANCO ORSANCO

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Sincerely,

Ms. Pamela Hamulak  
3000 Royalwood Rd  
North Royalton, OH 44133-4102  
(440) 237-2295  
[pamham423@yahoo.com](mailto:pamham423@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jeanne Schlatter](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 3:46:11 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Jeanne Schlatter  
1049 Cambridge Rd  
Coshocton, OH 43812-2704  
(740) 622-6180  
[siony@hotmail.com](mailto:siony@hotmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Margaret Tyska](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 6:47:58 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Mrs. Margaret Tyska  
421 Dorchester Ln  
Perkasie, PA 18944-1885  
(215) 453-0476  
met5656@comcast.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Britt Tinkle](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 7:13:13 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Miss Britt Tinkle  
816 N 150 W  
Franklin, IN 46131-8592  
(317) 474-9887  
[brittpsd@yahoo.com](mailto:brittpsd@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jennifer Hill](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 7:43:18 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Jennifer Hill  
127 Spring Valley Rd  
Westerville, OH 43081-2534  
(614) 523-2237  
[jennifer\\_ann\\_hill@yahoo.com](mailto:jennifer_ann_hill@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jennifer Charles](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Friday, February 23, 2018 8:43:30 PM

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Feb 23, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Jennifer Charles  
3758 Zebulon Hwy  
Pikeville, KY 41501-3443  
(606) 432-3222  
ladysmith103@yahoo.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Mary Bronson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 5:44:10 AM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Mary Bronson  
511 E 43rd 1/2 Dr Apt 3  
Terre Haute, IN 47802-4266  
(812) 238-9351  
[lupelula@yahoo.com](mailto:lupelula@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Carole DeSmedt](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 7:44:16 AM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mrs. Carole DeSmedt  
1057 Highland Rd  
Newtown, PA 18940-2803  
215551212  
[cadrfd@aol.com](mailto:cadrfd@aol.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Stephen Peterangelo](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 7:44:17 AM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Stephen Peterangelo  
440 Claranna Ave  
Oakwood, OH 45419-1823  
(937) 361-4640  
scpeterangelo@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Meredith Asher](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 8:44:27 AM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Meredith Asher  
2717 W Thomas St Apt 2  
Chicago, IL 60622-3683  
(630) 253-6687  
[metroediting@gmail.com](mailto:metroediting@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [David Meade](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 9:14:36 AM

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Feb 24, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mr. David Meade  
115 N Pennsylvania Ave  
Apollo, PA 15613-1353  
(412) 965-7692  
dvdmd7@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Deborah Lakowski](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 11:44:44 AM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Deborah Lakowski  
3406 S Kilkenny Dr  
Crystal Lake, IL 60014-4712  
(847) 639-4249  
[dlakows@yahoo.com](mailto:dlakows@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jason Elkins](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 12:15:00 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Jason Elkins  
4817 Clayton Rd  
Brookville, OH 45309-7305  
469-5357  
[jason\\_at\\_tower\\_green@yahoo.com](mailto:jason_at_tower_green@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Pamela Rossetti](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 12:19:52 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Pamela Rossetti  
827 Woodbrook Ln  
Plymouth Meeting, PA 19462-2555  
(610) 724-0715  
doobutt\_1@verizon.net

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Nicola Nicolai](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 12:44:57 PM

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Feb 24, 2018

ORSANCO ORSANCO

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As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Nicola Nicolai  
2400 Copper Creek Rd  
Chester Springs, PA 19425-3890  
(484) 356-6482  
[nicola.6@comcast.net](mailto:nicola.6@comcast.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Susan Tucker](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 2:45:11 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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Sincerely,

Ms. Susan Tucker  
4th Ave  
Warren, PA 16365  
(814) 688-1057  
[robbybob2@gmail.com](mailto:robbybob2@gmail.com)



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Lynne Kramer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 2:45:11 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Ms. Lynne Kramer  
2605 Childers Dr  
Xenia, OH 45385-4790  
(937) 372-0990  
[figit1@juno.com](mailto:figit1@juno.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Linda Hollenbaugh](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 3:45:17 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Linda Hollenbaugh  
3960 Hilltop Dr  
Parma, OH 44134-4916  
(440) 845-7146  
lhollenbaugh@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Marc Howard](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 4:15:12 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mr. Marc Howard  
1 S Broad St  
# 7  
Philadelphia, PA 19107-3426  
(267) 321-7242  
[demibelg@gmail.com](mailto:demibelg@gmail.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Jo Thompson](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 4:50:25 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Jo Thompson  
PO Box 1635  
Marion, OH 43301-1635  
800888888  
dct434@aol.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Virginia Scheer](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 5:45:17 PM

---

Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Mrs. Virginia Scheer  
24 Arcadia Pl  
Cincinnati, OH 45208-2802  
(513) 321-5317  
vscheer@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Amanda Tomasik](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 5:45:23 PM

---

Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

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Sincerely,

Ms. Amanda Tomasik  
235 Casterton Ave  
Akron, OH 44303-1516  
(555) 555-5555  
mandy.tomasik@gmail.com

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Gretchen Sullivan](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 6:15:27 PM

---

Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Ms. Gretchen Sullivan  
8554 Private Road 336  
Millersburg, OH 44654-9703  
(330) 674-7441  
[gretvilard@yahoo.com](mailto:gretvilard@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Bill Kirchner](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 7:45:25 PM

---

Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

Members of ORSANCO-

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

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Sincerely,

Bill Kirchner  
1025 Dennison Avenue, Unit 505  
Columbus, OH 43201

Sincerely,

Mr. Bill Kirchner  
1025 Dennison Ave  
Apt 505  
Columbus, OH 43201-3868  
(617) 850-2374  
kirchner.bill@gmail.com



**From:** [National Wildlife Federation Action Fund](#) on behalf of [Joan Hansen](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 9:46:19 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

The Ohio River is at a critical juncture, again topping the list of most polluted rivers in the country. In the case of the Ohio River Basin it is beneficial-- and increasingly critical-- to advance a shared conservation agenda. Because strategies and decisions must be made across numerous states and across multiple levels of government, restoration and protection of the health and living resources of the Ohio River Basin clearly begs a collaborative approach.

The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Joan Hansen  
230 Cranberry Dr  
Beckley, WV 25801-9790  
(304) 237-9283  
[joan13056@yahoo.com](mailto:joan13056@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Dennis Kreiner](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 10:45:45 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Mr. Dennis Kreiner  
2307 Arrow St  
Carpentersville, IL 60110-1201  
(847) 426-0418  
[djkreiner2@comcast.net](mailto:djkreiner2@comcast.net)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Diane Diernbach](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 10:45:45 PM

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Feb 24, 2018

ORSANCO ORSANCO

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Diane Diernbach  
3462 Niles Carver Rd  
Mineral Ridge, OH 44440-9527  
(330) 299-0404  
[dianed@yahoo.com](mailto:dianed@yahoo.com)

**From:** [National Wildlife Federation Action Fund](#) on behalf of [Kathy Ross](#)  
**To:** [ORSANCO ORSANCO](#)  
**Subject:** Stop Proposed Elimination of Pollution Control Standards for the Ohio River  
**Date:** Saturday, February 24, 2018 10:45:51 PM

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Feb 24, 2018

ORSANCO ORSANCO

Dear ORSANCO,

As a constituent, I'm writing to express my concerns regarding the proposed changes to the Pollution Control Standards for discharges into the Ohio River.

ORSANCO's proposal to eliminate pollution control standards and withdraw from the process of maintaining and updating the standards moving forward is not acceptable. This approach jeopardizes the ongoing clean up and restoration of the Ohio River and is counter to the original 1948 compact that outlined the importance of watershed-wide cooperation through a joint or common agency.

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The Commission should continue to uphold its responsibility to protect our waterways, communities, and wildlife and to ensure all states work towards common goals and a cleaner Ohio River.

Sincerely,

Ms. Kathy Ross  
1111 N Crabtree Ln  
Mount Prospect, IL 60056-1319  
(847) 255-1071  
kar1961@yahoo.com