

Issues for which Additional Comments are Sought

In addition to proposing revisions to its Pollution Control Standards, the Commission is seeking additional comments on certain issues. These issues emerged from the consideration of comments received in the initial comment period; the Commission believes that additional information is needed to determine the proper course of action, and would like to hear additional viewpoints on these issues.

Selenium

The Commission Standards currently include acute and chronic criteria for Selenium. Questions have been raised concerning the scientific validity of those criteria. The U.S. Environmental Protection Agency is in the process of developing new criteria for Selenium; when the new criteria are issued, ORSANCO will consider adopting them. In the interim, should the Commission retain its current criteria, or should it consider deleting those criteria?

Mercury

The Commission currently include ambient criteria for dissolved mercury for acute and chronic aquatic life protection, an ambient criterion for total recoverable mercury to protect human health, and a fish tissue criterion for methyl mercury to protect consumers of Ohio River fish. Questions have been raised as to the need for the human health criterion because it was originally adopted to protect fish consumption. Recent data indicate that the ambient criterion is exceeded in the Ohio River, but that fish from the river do not contain methyl mercury in excess of the fish tissue criterion. Should the Commission consider deleting the ambient criterion for total recoverable mercury for human health protection and rely instead on the fish tissue criterion?

Rate of Fish Consumption

Fish consumption is a significant factor in the development of ambient criteria for human health protection. Both current and proposed criteria have been developed based on an assumed rate of fish consumption. Questions have been raised as to whether or not the rate used in developing national criteria is appropriate for the Ohio River. The Commission seeks to identify any available information on the rates of fish consumption in the Ohio River Valley.

Relative Source Contribution

Development of human health criteria utilizes assumptions regarding human exposure to the pollutant under consideration from various sources –i.e., air- as well as water- borne. Questions have been raised as to whether or not the rates used in developing national criteria are appropriate for the Ohio River. The Commission seeks input on this question, including sources of information to be considered.

Blending

Blending refers to the practice of combining effluents from a wastewater treatment facility that have received different levels of treatment. Most secondary treatment facilities are capable of providing primary treatment to significantly greater quantities of wastewater than can be given secondary treatment. When the volume of flow exceeds that which can be given secondary treatment, the facility could provide primary treatment to all flows but provide secondary treatment to only a portion of the flow. The Commission Standards currently allow blending at facilities serving combined sewer systems if the practice is part of an approved long term control plan. Treatment facilities serving separate sewer systems may experience similar capacity problems under wet weather conditions. Should the Commission Standards address the use of blending at treatment facilities serving separate sewer systems? If so, what provisions might be considered for inclusion?