

From: Gary Glass [gglass143@charter.net]  
Sent: Wednesday, April 30, 2008 1:31 PM  
To: Fenske, MaryJean  
Cc: Dave Zentner; Grant Merritt; Le Lind  
Subject: MPCA emergency goal for VHSV: zero viable organisms, virus carriers.

Dear MS Fenske:

Ref.: NPDES draft regulations for water used for ballast.

The Izaak Walton League of America adopted a resolution at the national convention: zero viable invasive organisms in water used for ballast in all vessels that use the Great Lakes.

MPCA must not continue the traditional strategy used for conventional pollutants that there is a lower limit of concentration where no effect is caused because this strategy is non-protective and therefore wrong.

Traditional pollutants can not reproduce themselves and increase in numbers of atoms or compounds, where as, live viable organisms can and do grow in numbers, to populations that cause adverse effects, including mortality of fish. VHS virus in one such organism, where one particle may grow into a killing population within a single fish and cause mortality to that infected fish.

For these reasons, the proposed water standards for the NPDES permits for ballast water when expressed as numbers of organisms per volume of water are unacceptable and should be replaced with a strategy which calls for zero viable organisms, achieved by physical and/or chemical treatment(s) to sterilize and disinfect all viable pathogenic and non-native species present in the water used for ballast, and made non-toxic before it is discharged to the receiving waters.

Sincerely,  
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