

Joseph Turner MD

I am Dr. Joseph Turner, a family practice physician in Riverton, WY. When I first read this proposal, my gut emotional response was that this was insane, how can DEQ even consider this? But then I stepped back and thought: I am a biochemistry major as well as having a medical degree, so I should approach this scientifically. I went online and read the DEQ statement of basis as well as the modeling report. I wanted to know more about the past history of the Moneta Divide permits, but on the DEQ web site I could only find the current draft version of permit WY0002062 but no previous versions. Thus, I had to rely on past news articles as well as the draft permit itself where DEQ admits previous versions of this permit allowed differing levels of chlorine release including some that allowed unlimited amounts. When was this and for how long? There was a news article that stated the EPA had previously vetoed this permit but then apparently tentatively approved it very recently, perhaps just this past month. This does not surprise me because it is well-known that the current administration in Washington D.C. is anti-science (not to mention not believing in History, Civics or even English literacy). Formerly known as the Environmental Protection Agency, with appointees like Scott Pruitt and Andrew Wheeler, it should now be renamed the Environmental Destruction Agency. So, I would take anything coming from them with a grain of sodium chloride, as it were.

Of note, any scientific study can be spun to prove a point because the study conclusions are only as good as the initial presumptions, definitions and endpoint goals.

The first problem I have is with the actual DEQ rules and regulations requiring consideration of existing water conditions (already loaded with toxins that should not be there in the first place because for the last 50 years dumping has been allowed and sometimes unregulated as just mentioned). They then allow up to an additional standard deviation of worsening toxin levels. It sure would be fascinating to have data on water quality when Boysen Dam was completed in 1952. Based on these rules, for the modeling study of the Class 1 water of the Wind River downstream from the dam, Aethon used average toxin data from 2010 - 2016 and the model showed that chlorine came very close to that 1 standard deviation increase. What we SHOULD be doing in this country is trying to IMPROVE water quality, not just accepting current conditions and allowing slight worsening with each subsequent permit issued.

Next let us look at the mixing zone portion of the model. What is important here is what they actually set out to prove. All they set out to do was to show that a particular toxin would be less than the "acute aquatic criteria". This term stands for the concentration of a toxin that, if remains for a specified length of time, will cause 50% of the aquatic life to die. Do you think it is like an electrical switch where at a level of 860, 50% of aquatic life dies, but at a level of 859 everything is fine? Of course not.

The final area I want to mention is the anti-degradation paragraphs on Alkali and Badwater Creeks. Here DEQ is basically saying that these are already poor quality water, so who cares if we make it worse. They also seem to rationalize the situation by stating this facility began functioning prior to the 1975 Clean Water Act.

The bottom line is all of these waters are used by wildlife and livestock. The reservoir is also used for crop irrigation and human consumption, both drinking water and fishing. Thus, after studying all of the data, my initial gut reaction was confirmed. This is insanity.

I will not even discuss whether we should be investing at all in fossil fuels (spoiler alert, the answer is NO). However, Wyoming and especially Fremont County are in desperate need of good jobs. If I only think in terms of job creation, then Aethon should hire many skilled workers for COMPLETING construction of the water treatment plant BEFORE any increase in effluent begins.

As an addendum, I find it peculiar, to say the least, that the letters of support from the mayors of Lander and Dubois are, word for word, identical (even including the typographical error in the last sentence). In fact, they look like they could have been written by Aethon itself. Don't you just love the "copy & paste" function?

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