

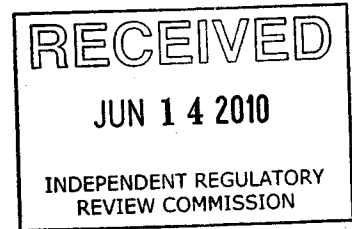
2806



The ARAMARK Tower
1101 Market Street
Philadelphia, Pennsylvania 19107-2994

BERNARD BRUNWASSER
Commissioner

June 8, 2010



Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Docket Number #2783 [EQB 7-440: Erosion and Sedimentation Control]
Docket Number #2806 [EQB 7-446: Wastewater]

Dear Sir/Ms.:

As a major Southeastern Pennsylvania drinking water supplier, the Philadelphia Water Department (PWD) supports the Pennsylvania Department of Environmental Protection proposed regulatory changes to Chapters 95 and 102. Managing point and non-point source pollution is a critical component of the proven multi-tiered approach to watershed protection. These changes align with the City's comprehensive Source Water Protection Program and our mission to protect and enhance the quality of our drinking water supply for future generations.

PWD strongly encourages the Independent Regulatory Review Commission to approve the Environmental Quality Board's proposed revisions for Chapter 95 and Chapter 102.

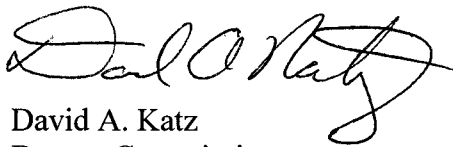
Specifically, the changes proposed to Title 25 Pa. Code Chapter 102 Erosion and Sediment Control and Stormwater Management regulations will improve stormwater management in Pennsylvania. Improved stormwater management upstream of Philadelphia will help reduce harmful pathogens (eg cryptosporidium), nutrients and sediment in our drinking water supply. New requirements to establish forested riparian buffers on Exceptional Value and High Quality streams that are not meeting designated uses are especially critical for drinking water supply protection.

The proposed changes to Title 25 Pa. Code Chapter 95 Wastewater Treatment Requirements (to address the discharge of wastewaters containing high Total Dissolved Solids (TDS)) will help protect ecology and our drinking water from potential harm that might occur due to natural gas extraction from the Marcellus Shale which underlay roughly half of our watershed. Adjusting the proposal to accommodate the Commonwealth's existing facilities makes good regulatory sense.

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PWD's core mission is to ensure safe, high quality drinking water to all of our customers and this effort begins with our pledge to be good stewards of our region's water resources. Indeed, the quality of our tap water is ultimately linked to the health, vitality, and quality of our watersheds and rivers.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Katz". The signature is fluid and cursive, with a large initial "D" and "K".

David A. Katz
Deputy Commissioner
Environmental Policy & Planning