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From: Gail & Dan Brown [gdbrown@frontiernet.net]
Sent: Tuesday, January 12, 2010 7:26 PM
To: EP, RegComments
Subject: Fw: SCGF Fwd: Comments on 25 PA. CODE CH. 95-Wastewater Treatment Requirements

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INDEPENDENT REGULATORY
REVIEW COMMISSION

----- Original Message -----

From: Tate, Michele
To: 'Gail & Dan Brown'
Cc: SusquehannaCoGasForum
Sent: Tuesday, January 12, 2010 8:29 AM
Subject: RE: SCGF Fwd: Comments on 25 PA. CODE CH. 95-Wastewater Treatment Requirements

Ms. Brown:

Thank you for the comments you submitted to me concerning the Environmental Quality Board's (EQB) proposed Wastewater Treatment Requirements rulemaking. As you may know, the EQB is formally accepting public comments on the rulemaking until February 12, 2010. If you would like your comments considered by the EQB, including entered into the official public record and responded to by DEP in a Comment/Response document, please submit your comments directly to the EQB at RegComments@state.pa.us or by mail to: Environmental Quality Board, P.O. Box 8477, Harrisburg, PA 17105-8477.

Again, thank you for your interest in this rulemaking and for providing the attached comments. Please contact me if you have any questions concerning this proposed rulemaking or its status.

Thank you.

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-----Original Message-----

From: Gail & Dan Brown [mailto:gdbrown@frontiernet.net]
Sent: Monday, January 11, 2010 8:12 PM
To: Tate, Michele
Cc: SusquehannaCoGasForum
Subject: SCGF Fwd: Comments on 25 PA. CODE CH. 95-Wastewater Treatment Requirements

Please consider this as my formal testimony in support of stricter wastewater treatment requirements for wastewater treatment facilities related to natural gas drilling and its processes. While I vehemently argue that no gas well wastewater, treated or not, should be discharged into any waterway, if same cannot be accomplished in the eyes of our representatives, I argue that much stricter regulations should be an absolute requirement. Again, however, I must emphasize that I do not believe any gas drilling related wastewater, purportedly treated or not, should be allowed to enter our waterways. The risk of contamination to our drinking water supply is too high; that, along with the health and safety of our creeks and streams and all that inhabit or survive by it.

First, I contend that there are many unknowns regarding natural gas drilling wastewater. The Department's own Mr. Starosta admitted this at a recent public meetings along with the fact that there "could be surprises" regarding this wastewater. What is in fracturing water is at issue before it enters the ground. Once this frac water emerges

back from the earth, it carries with it heavy concentrations of earthen contaminants which, like many of the known chemical additives in frac water, can and do cause cancer and other harmful illnesses. The flow back water also contains extremely high total dissolved solids and can also be radioactive. I question what other harmful contaminants exist in this water that are not being tested for, or the lack of a test exists. The water that is proposed to be handled and discharged from this facility is a soup of uncertainty.

I respectfully submit the technology is not available to adequately remove or sufficiently treat the known contaminants contained in this wastewater, let alone the unknowns. Argument cannot be made that this wastewater is properly treated such that it is safe enough to discharge into any waterway based on any process, including chemical cleaning, which would only add further chemicals to the mix.

Ultimately, the treatment for total dissolved solids, amongst other contaminants, is dilution. With this, the fact remains that contaminants that can cause cancer or other serious illnesses, or cause serious aquatic changes, are still being discharged, just in smaller amounts. This is not safe in any situation.

It is also well documented that water between streams and groundwater transfers or, goes both ways. This interaction can change seasonally or during wet or dry periods. Therefore, ultimately, any discharge into waterways would be shared with groundwater possibly effecting public or private drinking supplies which surround point of discharges or beyond.

In furtherance, at a previous wastewater treatment facility public hearing for North Branch Processing, DEP indicated that it was not unusual in the area of immediate discharge for the discharge to affect fish - for them to move, or for other species to be affected. While this is disturbing enough, I'm certain this would affect more than aquatic and creek life.

I also argue that treatment facilities could possibly harbor open ponds containing this wastewater. Overflow possibilities could exist since it is not uncommon for heavy rain events to occur causing flash flooding. Contamination could also possible as a result of these ponds leaking especially if lined with pit liners since fifty percent are known to fail to some extent. If an overflow or breach were to occur, it could result in contamination of waterways and drinking water supplies.

Air quality is also a serious concern relative to these treatment facilities. Volatile chemicals and compounds such as benzene, toluene, and hydrogen sulfide, to name a few, can escape from open ponds due to natural evaporation. This is especially true if the ponds are aerated. The same holds true for the treatment process itself and its resultant emissions. This can irreparably harm nearby homes and neighborhoods. Benzene, along with many other compounds found in this wastewater are known carcinogens, cause blood and nervous system disorders, reproductive system failures, respiratory effects and other harmful and deadly ailments.

It should also be noted that surrounding residents of these proposed facilities will be exposed to all of the toxins and chemicals associated with gas drilling wastewater on a **permanent** basis. It is well documented that long term and repeated exposure carries with it greater risks.

Thank you for the opportunity to testify and for your consideration.

Gail Brown
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