From: Sent: David M. Crossman [dmc@pitt.edu] Wednesday, January 13, 2010 9:11 PM

To:

EP, RegComments

Subject:

DEP proposed New Chap. 95 regs

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The dangerous tampering with water resources in PA should have every agency's utmost concern. Some feel that gas fracture zones are so deep that ground water disruption is unlikely. But the results of pumping huge amounts from our lakes and streams can wreak havoc with all the rest of the state's water needs that are fully understood.

Then the huge amount of shockingly polluted frack-water would have to be handled to prevent it from contaminating what is still useful. Technologies to manage all this are costly and not yet proven. The decisions made now have to take all the results into consideration.

I urge those who are responsible for the decisions to proceed with every caution. We may hope for the boon of gas extraction here, but the price may be too great.

- Marcellus "frackwater" must be monitored via a chain of responsibility (cradle to grave) of signed paperwork documenting the origin, use, flowback, transportation, treatment and disposal of all frackwater fluids. This monitoring must include all fluids (aqueous and air) and solids origination in the frackwater
- Our streams cannot be dumping grounds for frackwater. We must have a standard for Dissolved Solids allowed in our water. A TDS (Total Dissolved Solids) limit of 500 mg/L for TDS and 250 mg/L each for Sulfates and Chlorides is needed to meet Federal drinking water standard. DEP should not weaken their proposed discharge standard for TDS.
- The standard for Total Dissolved Solids (TDS) should be stated <u>as a daily maximum</u>, not a monthly average. In addition, there should be a minimum requirement that all discharges not cause background in-stream concentrations of TDS to rise above 133% of background levels (the Delaware River Basin Commission standard).
- DEP's proposed definition of large TDS sources is good. Do not change it. That proposed
  regulation is a good means to <u>prevent</u> impairment and regulation of TDS prior to having to
  utilize a TMDL process. The only suggestion would be to clearly state the 2,000 mg/L
  concentration threshold as a <u>daily maximum</u>. That daily maximum should not be allowed to
  be circumvented by dilution.

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