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INDEPENDENT REGULATORY
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**Comments of
The League of Women Voters of Pennsylvania
Proposed Amendments to 25 Pa. Chapter 95 relating to Wastewater Treatment
Requirements**

The League of Women Voters of Pennsylvania views the proposed regulations that would limit new, large, high-TDS (Total Dissolved Solids) dischargers, total chlorides and total sulfates as an important step in improving the water quality in the Commonwealth. High concentrations of TDS have caused problems for both industrial users and public water suppliers who draw from our rivers and streams.

Given the increasing amount of wastewater created by the growth in Marcellus Shale drilling and other sources, the LWVPA opposes the weakening of the proposed regulations and any extension of the implementation timeline.

The LWVPA has three recommendations to strengthen DEP's proposed standards.

- First, the TDS effluent standard should be changed ideally to a **daily maximum** or, at the least, a **maximum daily average**. A monthly average will not adequately protect drinking water and aquatic life against spikes of highly concentrated discharges. The best available technology should be used to monitor TDS effluent on a frequent basis. Dilution has proven to be an unreliable remedy for these multiple sources of pollution.
- Second, all TDS dischargers, both large and small, should be covered by the standard, particularly those that discharge any TDS concentration greater than 500 mg/L.
- Third, existing dischargers need to be covered as soon as possible or, at the least, when their permits are renewed. New sources and new discharges at existing sources should be covered immediately.

The LWVPA believes that the assimilative capacity, of our waters and streams should not be considered an appropriate treatment for industrial wastes. Strong standards can promote the development and implementation of the technology to treat high TDS wastes safely and economically.

We request that the Environmental Quality Board review its regulations for toxic wastes and support the development of a comprehensive monitoring system to identify contaminants, insure their proper treatment, and track water used, re-used, and discharged. Pennsylvania's history shows that failure to regulate in the present will cost taxpayers exponentially more for future cleanup and remediation. Furthermore, weak standards will encourage importation of waste water from other states, increasing the amount of TDS emissions in our waters.

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From: Bonita Hoke [bchoke@palwv.org]
Sent: Tuesday, January 26, 2010 2:16 PM
To: Arthur Coccodrilli; Bedwick, George; David Fineman; nfrantz@irrc.state.pa.us; Mizner, John
Cc: IRRC
Subject: Comments to IRRC--Wastewater Treatment
Attachments: 1 page Summary Chapter 95 for EQB.doc

The League is appreciative of the opportunity to provide input on Wastewater Treatment and have attached a one-page summary Chapter 95 sent to the Environmental Quality Board today.

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