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Environmental Quality Board
Pennsylvania Department of Environmental Protection
P.O. Box 8477
Harrisburg, PA 17105-8477
Email: RegComments@state.pa.us

INDEPENDENT REGULATORY
REVIEW COMMISSION

ENVIRONMENTAL QUALITY BOARD

RE: Pennsylvania Department of Environmental Protection's Environmental Quality Board (EQB) proposed amendment to the regulations on Wastewater Treatment Requirement: Section 95.10, Section 95.2, 40 CFR 437.34, & 40 CFR 437.36

Dear Members of the Environmental Quality Board:

I **agree** with the recommendation by the EQB to further protect Pennsylvania's drinking water and waterways by establishing new discharge standards for new sources of wastewaters that are high in total dissolved solids (TDS).

Additional Comments:

During the recent events that occurred in the Dunkard Creek in Greene County, Pennsylvania during the month of September of 2009, it is imperative and absolutely necessary that an amendment be made to wastewater regulations at this time. The total destruction of 43-miles of the stream and the on-going high levels of TDS will affect the Monongahela River, endangering the health of approximately 850,000 users. Also, there is great danger to all animals that depend on the water as well as all aquatic life. Studies have shown that 1) Disinfection By-Products (DBPs), and 2) the by-product from chemical reactions between disinfectants (which is being pumped into the ground), chlorine (pre-existent in the ground), and other organic materials, present health risks to humans. The worst of these chemical mixtures is brominated water, which has been shown to cause bladder cancer in humans. At present, the Monongahela River presents higher level of several of these contaminates.

I do agree with the amendments request. However, in 1997 research by J.A. Black.: Water pollution technology, states that TDS over 400mg/l has a direct negative affect on the diversity of fish populations. Also, research by Weber-Scannell, P.K. & Duffey, L. K. (2007) American Journal of Environmental Sciences, 3 1-6 reinforces that TDS directly and adversely affects aquatic organisms inhabiting a stream. I would recommend that the D.E.P.'s current TDS standard of 500mg/l be changed to 400mg/l.

The D.E.P. should expedite these amendments as soon as possible. Further, until the amendments take effect, there should be a moratorium on the dumping of untreated wastewaters into any stream in Pennsylvania that do not meet the new standards for TDS, salt or organic levels.

Our community is in the forefront of the Marcellus Drilling and coal bed methane drilling; Dunkard Creek has paid the price. At present, both the Monongahela River and Whitely Creek are in danger of the same fate of as Dunkard Creek.

Thank You,

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