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February 4, 2010

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

ENVIRONMENTAL QUALITY BOARD

RE: 25 PA. CODE CH. 95
Wastewater Treatment Requirements

Dear Environmental Quality Board:

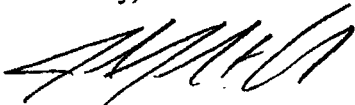
I am commenting on the proposed rulemaking to make changes to Chapter 95 regarding total dissolved solids (TDS). The proposed changes presented by DEP will not only have a devastating effect on industry, but will also have a profound adverse effect on local municipalities and the average resident of Pennsylvania; will providing only a slight, if any, net benefit to the environment.

The rush to regulate TDS is based on incomplete and inadequate data collected over a very short time period. Given the constant changing nature of water chemistry and Pennsylvania's complex network of stream systems; an in depth study covering a large number of streams over a longer period of time (current data used in rulemaking only covered a two and half month period) would be necessary to truly understand the sources and effects of TDS on Pennsylvania streams. DEP currents justification is just plain old bad science. By using DEP's methodology, one could draw the conclusion that the entire northern hemisphere will experience perpetual night based on measurements of daylight hours starting on June 22 and ending in August.

DEP has also not taken into account the economic impact of regulating TDS. The cost of meeting the proposed standards would mean loss of good paying Pennsylvania jobs in many industries and sectors of the economy. Additionally, every Pennsylvania would see and increase in the cost of living given that municipalities would be affected by increased sewage disposal costs, electricity bills, garbage bills, etc.

I believe DEP has not taken the necessary scientific steps to fully understand the effects of TDS on Pennsylvania's streams and weight the economic damage that arbitrary standards will have on not only industries, but every citizen of Pennsylvania. DEP should withdraw the proposed regulations and continue studying the issue and identify practical and sound solutions.

Sincerely,



John St. Clair
Pennsylvania Resident

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617 Hinter Road
Homer City, PA 15748

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INDEPENDENT REGULATION
REVIEW COMMISSION