

#2806

From: American Rivers [outreach@americanrivers.org] on behalf of Edward Dery [hawkinnv@yahoo.com]
Sent: Wednesday, February 10, 2010 11:38 AM
To: EP, RegComments
Subject: Re: 25 PA Code Ch. 95 Wastewater Treatment Requirements

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INDEPENDENT REGULATORY
COMMISSION
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Feb 10, 2010

Pennsylvania State EQB Members
PA

Dear Members,

The water resources of Pennsylvania must be protected to assure the health of our environment and well-being of our communities. The rate of exploration of the Marcellus Shale formation has been outpacing guidance and regulation to protect the Commonwealth's waters. Proposed

revisions to Chapter 95, Wastewater Treatment Requirements will provide much needed protection but must be more robust to adequately protect aquatic life and drinking water. Please pass the Total Dissolved Solids (TDS) standard revision for implementation by January 1, 2011 with the following improvements:

- * Express the standard and concentration level as a daily maximum, not a monthly average, to prevent impairments and protect aquatic life and drinking water.
- * Prohibit avoidance of the threshold by dilution of the wastewater stream.
- * Adopt Delaware River Basin Commission policy across the state to regulate background levels.
- * Implement the TDS standard for all new sources and new discharges at

existing sources immediately. Phase in all other significant sources to assure river and drinking water remain healthy.

Additionally, include these provisions:

- * Establish discharge standards for other pollutants associated with exploration of the Marcellus Shale formation including bromides, arsenic, benzene and radium.
- * Enhance testing, monitoring and reporting through the wastewater standard to fully characterize the waste.
- * Institute oversight of wastewater re-uses to assure the re-use is environmentally beneficially and protects communities and the environment.

Wastewater from Marcellus Shale drilling contains a cocktail of chemicals including toxins, metals and other pollutants. The production of this wastewater from quickly expanding exploration has overwhelmed wastewater treatment facilities and resulted in dumping that has harmed aquatic life, groundwater supplies and drinking water.

Please adopt the revised standard with the modifications listed in this letter to insure clean water remains available so Pennsylvania's communities may thrive. Thank you for considering my comments.

Sincerely,

Mr. Edward Dery
1715 Maple St
Bethlehem, PA 18017-5128