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Maiden Creek Watershed Association P. O. Box 68 Kutztown, PA 19530

FEB 1 8 2010

INDEPENDENT REGULATORY REVIEW COMMISSION

RECEIVED

FEB 1 2 2010

ENVIRONMENTAL QUALITY BOARD

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

Re: 25 PA Code Ch. 95 Wastewater Treatment Requirements

Dear Environmental Quality Board Members,

Maiden Creek Watershed Association (MCWA) supports action by PADEP to protect our streams, rivers and water supply from high-TDS discharges, especially from the growing flow of gas drilling wastewater.

In Pennsylvania wastewater from gas drilling companies is currently discarded in municipal sewage plants and industrial treatment plants. These plants then release the water into nearby rivers and streams. This discharged water contains TDS because no Pennsylvania sewage/industrial plants currently have the capability of removing TDS from the wastewater, and it is unlikely that they will be able to do so by 2011.

TDS causes changes in conductivity of the water; these changes can be very stressful for macroinvertebrates and other aquatic organisms. In an attempt to regulate ionic content, fish may experience dehydration and fluid loss through their gills. This constant regulation of ionic concentration may be more harmful to aquatic organisms than TDS alone.

The proposed standards for Total Dissolved Solids (TDS), sulfate and chloride are a first step that must not be weakened. However, these standards do not go far enough and additional protective measures need to be taken by PADEP now to prevent further degradation of the State's waterways and water resources.

Sincerely,

Marion Zuefle
Vice president MCWA