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Comments Re: 25 PA. CODE CH. 95-Wastewater Treatment Requirements

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

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FEB 18 2010
INDEPENDENT REGULATORY
REVIEW COMMISSION

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FEB 12 2010

ENVIRONMENTAL QUALITY BOARD

Dear Environmental Quality Board:

As a Pennsylvania resident, I would like to make the following comments on the new proposed wastewater rules (Chapter 95):

We need safe drinking water! DEP's proposal of 500 mg/L for Total Dissolved Solids (TDS) and 250 mg/L each for Sulfates and Chlorides will go a long way towards ensuring that our drinking water supplies will not have unsafe levels of TDS and these other contaminants. **DEP should not weaken their proposed discharge standard for TDS.**

We need these regulations to be in place as soon as possible to protect our rivers and drinking water. DEP should stop giving out more drilling permits until wastewater rules are in place. DEP should also stop allowing existing or proposed wastewater plants to pollute our rivers unless they follow these new rules.

DEP should add discharge standards for those contaminants that are frequently found in Marcellus Shale gas drilling wastewater. These would include bromides, arsenic, benzene, radium, magnesium, and possibly others. Many of these contaminants are toxic to humans and very difficult for drinking water systems to remove. *I am particularly concerned about radioactive species, as one firm that specializes in wastewater treatment has stated the levels can be high enough to require disposal at special facilities.*
DEP needs to ensure that all aspects of the generation of Marcellus wastewater are regulated. Currently there are no requirements to track wastewater from drilling sites to treatment plants, and there is no oversight over the reuse of Marcellus wastewater. *Every day (or nearly), there is yet another report in the newspapers about operation violations committed by haulers servicing this natural gas industry. A "cradle to grave" tracking of wastewater hauling would help ensure that illegal dumping is not added to the long list of violations. And since reuse of Marcellus wastewater requires "re-formulating" and re-mixing with additional fresh water at surface sites, there needs to be adequate regulations, safeguards, and oversight in place to prevent spills that could potentially contaminate surface water (nearby streams, wetlands, & drinking water).*

Sincerely,

Shellie Northrop

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