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**From:** CTinkham@clevelandbrothers.com  
**Sent:** Thursday, February 04, 2010 5:30 PM  
**To:** EP, RegComments  
**Subject:** Please consider tabling the proposed additional Code Chapter 95 Wastewater Treatment Requirements

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear members of the Environmental Quality Board,

My employer provides equipment and services to many of the companies that produce and consume coal in Pennsylvania. Our company has shed almost 500 jobs - over 33% of our work force - because of the recession's impact. The coal industry over the last two years helped us remain in business, allowing our remaining people to keep working proudly to take care of our families and our valued customers. If the coal industry in Pennsylvania is destroyed I cannot fathom how many tens of thousands of additional PA residents will be on the streets - including myself and friends.

I am especially concerned that this industry could be destroyed because of misinformation, misleading and incomplete data, especially concerning the proposed rulemaking regarding 25 PA Code Chapter 95 Wastewater Treatment Requirements.

My research easily identified severe flaws with the selective application of scientific and economic analyses used to draft these proposed requirements.

- the Monongahela River sampling in late 2008 was not conducted for a long enough time period to draw a statistically sound conclusion, especially considering the EPA's STORET data set contains 10 years of data indicating no concerning TDS trends, yet that seems to be disregarded for no scientifically sound reason
- EPA approved methods were not used in this short term survey
- the apparent lack of a holistic consideration, including socioeconomic impact, like the potential for losing 10's of thousands of jobs and negatively impacting all resident's consumer utility expenses

I am a taxpayer, energy consumer, friend of many that work in the coal industry, and an avid outdoorsman. It would be best for the people of Pennsylvania to focus right now on fulfilling the requirements of the Clean Streams Law, and continue to study this issue following EPA recommended guidelines, so that a statistically and scientifically sound conclusion can be reached. I am greatly concerned that these proposed requirements are "knee jerk", and the opportunity cost will have much more grave consequences on our society as a whole.

Thank you for your consideration,

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