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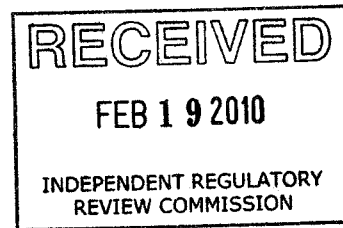
**From:** Coalition for Responsible Growth & Resource Conservation [crgrc11@verizon.net]  
**Sent:** Friday, February 12, 2010 12:19 AM  
**To:** EP, RegComments  
**Subject:** Comments to Environmental Quality Board - PROPOSED RULEMAKING [25 PA.?CODE CH. 95] Wastewater Treatment Requirements  
**Attachments:** Letter CRGRC (Katz signed) to EQB - TDS standards 2-11-10.pdf; ATT00002.htm

The Coalition for Responsible Growth & Resource Conservation submits the following letter in comment to the Environmental Quality Board regarding the proposed new wastewater treatment requirements. Attached is a pdf file of this letter with a signature on it.

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Anne Harris Katz, Secretary

Coalition for Responsible Growth  
& Resource Conservation  
(CRGRC)

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**COALITION for RESPONSIBLE GROWTH & RESOURCE CONSERVATION  
(C R G R C)**

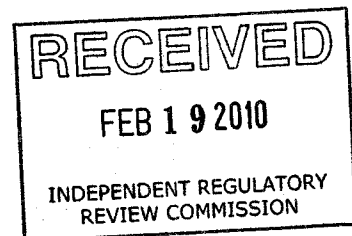
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February 11, 2010

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



I write on behalf of the Coalition for Responsible Growth & Resource Conservation (CRGRC) to comment on the proposed new Total Dissolved Solids (TDS) standards for wastewater under consideration by the Environmental Quality Board. CRGRC supports the need to strengthen the TDS standards to protect the state's waterways for all its uses.

CRGRC recognizes that high levels of TDS can be toxic to living organisms, damaging to public health and can interfere with operations of public water systems and water-intensive industrial processes. Furthermore, CRGRC recognizes that the expansion of Marcellus Shale drilling in the state has the potential to cause significant harm to water quality if the current standards are not strengthened. Wastewater from Marcellus Shale drilling contains a cocktail of chemicals including salts, metals, organics, radioactive materials and other pollutants. The production of this wastewater from quickly expanding exploration has already overwhelmed some wastewater treatment facilities and resulted in dumping that has harmed aquatic life, groundwater supplies and drinking water in Pennsylvania waterways.

CRGRC underscores the following points made by other organizations and individuals on this matter.

1. DEP's proposal will go a long way towards ensuring that our drinking water supplies will not have unsafe levels of total dissolved solids (TDS). DEP should not weaken their proposed discharge standard for TDS.
2. We need these standards in place as soon as possible to protect our waterways. DEP should stop permitting additional drilling until higher wastewater standards are in place. DEP should also stop allowing existing or proposed wastewater plants to pollute our rivers. They must be required to follow these new regulations.
3. DEP should add discharge standards for those contaminants that are frequently found in Marcellus Shale gas drilling wastewater, including but not limited to bromides, arsenic, benzene, radium and magnesium. Many of these contaminants are toxic and very difficult for drinking water systems to remove.
4. DEP needs to ensure that all aspects of the generation of Marcellus wastewater are regulated. Currently it is our understanding that there are no requirements to track wastewater from drilling sites to treatment plants, and that there is no oversight over the reuse of Marcellus wastewater.

5. To assure clean water for communities within Pennsylvania's Marcellus Shale formation and for those living downstream, DEP should include the following provisions in the proposed rule-making:

The proposed standard and concentration level should be expressed as a daily maximum instead of a monthly average to prevent impairments and protect aquatic life and drinking water.

Dilution of the wastewater stream to avoid exceeding the threshold should not be allowed.

Discharges of TDS should be limited to minimize the total background level. There should be a minimum requirement that all discharges not cause background in-stream concentrations of TDS to rise above 133% of background levels (Delaware River Basin Commission standard).

All new sources and new discharges at existing sources of TDS should be covered by the standard immediately. All other significant sources should be phased in to assure river and drinking water remain healthy.

(6) Testing, monitoring and reporting must be enhanced and integral to the wastewater standard to fully characterize the constituents of the wastewater.

(7) Oversight of wastewater re-use must be instituted to assure all re-use is environmentally benign and protects human health, the environment and community businesses.

(8) The standards must be implemented as quickly as possible and not after the proposed effective date of January 1, 2011, because the number of Marcellus permits is expected to triple in 2010. Pennsylvania's taxpayer-citizens cannot afford to wait until the gas industry has outpaced the regulations.

(9) DEP needs to ensure that all aspects of the generation of Marcellus wastewater are regulated and monitored via a chain of responsibility (cradle to grave) of signed paperwork documenting the origin, use, flowback, transportation, treatment and disposal of all fracking fluids, produced fluids, solid waste products and aerosols and other aerial volatiles. This documentation must be made part of the public record and be easily accessible to any member of the public.

The Coalition for Responsible Growth and Resource Conservation appreciates the opportunity to provide comments to the Environmental Quality Board. This is a matter of critical importance to Pennsylvania's environmental and economic viability.

Sincerely,



Anne Harris Katz  
Secretary CRGRC