## 2806

From: Sent: To: Cc: Subject: Cynthia Nash [nashionale@earthlink.net] Thursday, February 11, 2010 6:51 AM EP, RegComments Paul Sheehan; Alice Zinnes DEP Wastewater Treatment Public Opinion

Dear Members of the Environmental Quality Review Board:



RE: 25 Code Chapter 96, Wastewater Treatment Requirements

I own a home is in Wayne County, PA, which is steps from the Delaware River. Our well has been providing non toxic, clear and clean water since the late 1800's. I am all too aware of the natural gas drilling permitting requests in Damascus Township and elsewhere. The potential for natural gas drilling in the Upper Delaware River Basin horrifies me. From Dimock, PA, to Western PA, to Colorado, Wyoming and Texas, aquifers have been destroyed, animals have died, and people have become very sick. This has been well documented by environmental groups, private citizens, and local and national media, including, GASLAND, a documentary screened at this year's Sundance festival. If you haven't had an opportunity to see this film, I have no doubt the producers will be more than willing to arrange a private screening.

The proposed new regulations on TDS discharges into Pennsylvania rivers issued last April have already had a very positive result on drilling practices in that the gas drilling industry has quickly moved to develop wastewater management strategies that rely on recycling. However, recycling wastewater is not the answer to the many environmental threats of natural gas drilling. The PA DEP must develop new regulations to protect our rivers and drinking water, and the DEP should stop giving out more drilling permits until these new wastewater rules are in place. The DEP must also stop allowing existing or proposed wastewater plants to pollute our rivers unless they follow these new rules.

In actuality, currently there is NO way to treat this waste safely. The effects of "Recycling" are both very minimal and very dangerous because it actually concentrates poisons and also streams them across from drilling pad to drilling pad through miles of plastic pipe, increasing spills of toxic waste into wetlands. With recycling, the toxic waste left a mile underground is even more toxic than the original wastewater, and there are no regulations whatsoever in place to monitor, control or limit that this underground toxic waste site. Recycling actually allows the gas industry to save money while in the end making our environmental costs even more expensive. The DEP needs to create regulations and a monitoring system for recycling wastewater, and storing this water underground, before Pennsylvania sees similar disasters throughout the state. Does the state really want to become a 21st century SuperFund site?

Rather than allow drilling to proceed, we should enact an immediate moratorium on current discharges into **PA streams and rivers, and on all fracking and wastewater permits, until new regulations are in** effect. All arsenic, radium 226, benzene and other VOCs, pesticides, endocrine disruptors, and carcinogens must be completely removed from this toxic waste before it is discharged into PA streams and rivers, or buried underground. The 250 mg/liter limit on TDS, and sulfates and chlorides must be based on a <u>maximum daily</u> load rather than maximum monthly average, in order to avoid spikes of salinity and accompanying contaminants, which can be deadly to aquatic life as well as harmful to humans. And finally, 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.

Since the gas industry quickly moved to recycle wastewater, it clearly can continue to be profitable even as it is forced to protect our environment. Please do not forfeit our most valuable resource, water, just for short term profits. Please enact stringent regulations to protect our water from the threats of natural gas drilling.

Thank you for considering my comments,

Sincerely,

Cynthia Nash