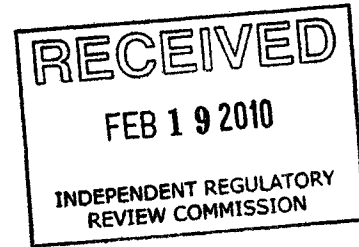


2806



DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY
P.O. Box 999 • Chester, PA 19016-0999

February 10, 2010



Environmental Quality Board
Rachel Carson State Office Building
16th Floor
400 Market Street
Harrisburg PA 17105-2301

Re: TDS Discharge Standards

Please consider the following comments concerning the proposed total dissolved solids (TDS) water quality standards.

DELCORA disagrees with the promulgation of a state-wide TDS standard that would apply to NPDES discharges, without regard to discharge location, current water quality, use of the receiving stream, or the economic impact on dischargers.

DELCORA discharges to zone four of the Delaware. The Delaware River Basin Commission's numeric standard is 1,000 mg/L. The proposed state-wide standard is 500 mg/L. DELCORA's 44 MGD municipal wastewater treatment plant will be impacted by the proposed regulations because of its size. While the DELCORA TDS effluent concentration does not exceed 2,000 mg/L, the TDS load can exceed 100,000 pounds per day because of its size. In 2009, DELCORA's monthly average TDS concentration exceeded 500 mg/L for several months.

While these regulations may have been targeted to regulate discharges from the Marcellus shale gas drilling, it will also affect municipal discharges at substantial cost. Sulfates and chlorides are components of the TDS measurement. These constituents are also present in municipal (household) and industrial wastewater/sewage. Municipal treatment plants are not designed to remove TDS. The proposed regulations will cause an economic burden to the residents of Delaware County, including the City of Chester, an economically distressed city. The City of Chester's sewage collection system is a combined system. In winter weather when salt is used for the deicing of roadways, TDS increases at the DELCORA wastewater treatment plant. Economic growth will be impacted.

Current and future discharges will be regulated through the NPDES permitting process. The water quality of the receiving stream should be protected through site specific permits that are based on the water quality of the receiving stream. DELCORA discharges to a tidal area of the Delaware River, yet the proposed standard sets forth criteria to protect potentially impaired water bodies like the Monongahela River, a drinking water source. The economic impact should be evaluated as to whether it is more economical for all discharges to meet a 500 mg/L TDS effluent standard or if drinking

ADMINISTRATION

610-876-5523
 FAX: 610-876-2728

CUSTOMER SERVICE/BILLING

610-876-5526
 FAX: 610-876-1460

PURCHASING & STORES

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PLANT & MAINTENANCE

610-876-5523
 FAX: 610-497-7950

water treatment plants treat source water to ensure the protection of the public's drinking water. Likewise if the receiving water is impaired due to TDS, then discharges should be subjected to an effluent TDS standard. Otherwise a state-wide TDS standard will cause economic hardship.

Please contact me at 610-876-5523 ext. 116 if you require additional information. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Christine Volkay-Hilditch".

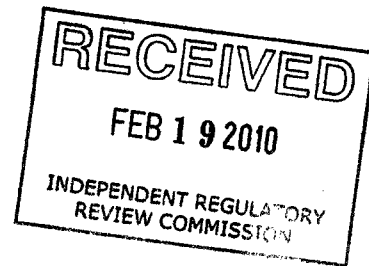
Christine Volkay-Hilditch, P.E.
Director of Engineering
DELCORA

cc: Joseph L. Salvucci
Robert Hindt
File

2806

From: Volkay-Hilditch, Christine [HilditchC@delcora.org]
Sent: Wednesday, February 10, 2010 8:56 PM
To: EP, RegComments
Cc: Salvucci, Joseph; Hindt, Robert; Foley, Sue
Subject: DELCORA TDS Comments
Attachments: DELCORA TDS Comments 02-10-2010.pdf

Importance: High



---Please find attached DELCORA's comments on the proposed TDS regulations.

Thank you for your attention.

Sincerely,

Chris Volkay-Hilditch, P.E.
Director of Engineering
DELCORA
PO Box 999
Chester, PA 19016-0999

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