

From: Joann Morsch [joannmorsch@hughes.net]
Sent: Friday, February 12, 2010 3:51 PM
To: EP, RegComments
Subject: Wastewater treatment per DEP Chapter 95 regs



I support the following recommendations as outlined below by the environmental group RESCUE of Wayne and Susquehanna Counties:

1. There should be a mandated 1,000 foot buffer between a well site and a private drinking water source and a 1/2 mile buffer between a gas well and any public drinking water supply.
2. Marcellus "frackwater" should not be left in lined lagoons during any stage of the process.
3. No well site should be prepared or well drilled within 300 (instead of 100') feet from any stream, spring or body or within 300 feet of any wetlands" The qualifier "greater than one acre in size" should be eliminated.
4. Marcellus "frackwater" must be monitored via a chain of responsibility.
5. A TDS (Total Dissolved Solids) limit of 500 mg/L for TDS and 250 mg/L each for Sulfates and Chlorides is needed.
6. The standard for (TDS) should be stated as a daily maximum, not a monthly average.
7. DEP's proposed definition of large TDS sources is good.
8. All large TDS sources should be covered by the standard.
9. DEP should add discharge standards for bromides, arsenic, benzene, radium, magnesium and Volatile Organic Compounds.
10. Due to the highly varying toxicity of both TDS discharges and especially Marcellus wastewater, Whole Effluent Toxicity (WET) testing should be required.
11. DEP should stop issuing more drilling permits until Chapter 95 revisions are in place.
12. DEP needs to ensure that all aspects of the generation of Marcellus wastewater are regulated.
13. Any oil and gas development should be prohibited in Exceptional Value (EV) watersheds, Wilderness Trout Stream watersheds, EV wetlands or areas containing threatened or endangered species.
14. In High Quality-Coldwater Fishery (HQ-CWF) watersheds, PA DEP should, at minimum, require individual permits for gas development.

Thank you for your consideration in this important matter.

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15. Water withdrawal permitting by SRBC, DRBC and PA DEP must be closely monitored. Namely, flows from the permitted watershed need to be documented at the time of withdrawal to assure that the stream uses are protected.