From: Sent:

To:

Subject: **Attachments:** Don &/or Mary [hrendarice@verizon.net]
Friday, February 12, 2010 3:52 PM
EP, RegComments
25 PA Code Ch. 95 Wastewater Treatment Requirements
Marcellus Shale DEC ltr2_12_10.doc

RECEIVED

FEB 1 9 2010

INDEPENDENT REGULATORY REVIEW COMMISSION

Please see the attached comment letter on 25 PA Code Ch. 95 Wastewater Treatment Requirements. Thank you.

Mary Hrenda

2806



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

(Express mail: Rachel Carson State Office Building, 16th Floor, 400 Market Street,

Harrisburg, PA 17105-2301)
RegComments@state.pa.us

Re: 25 PA Code Ch. 95 Wastewater Treatment Requirements

Dear Environmental Quality Board Members,

I support action by PADEP to protect our streams, rivers and water supply from high-TDS discharges, especially from the burgeoning flow of gas drilling wastewater. The proposed standards for TDS, sulfate and chloride are a first step that must not be weakened. However, these standards do not go far enough and additional protective measures need to be taken by PADEP now to prevent further degradation of the State's waterways and water resources. The following additional steps are needed:

- 1. The opening of vast tracts of public and private lands to gas drilling has the real potential to pollute much of Pennsylvania's surface and ground water resources, decimate wildlife habitat, destroy fisheries and destroy the treasured natural beauty of Pennsylvania's woodlands. This injury could last for generations. A moratorium on any further leasing of public land for gas drilling must be enacted until an environmental impact study of the effects of gas drilling on Pennsylvania's natural resources has been completed. The results of this study must be used to guide the Commonwealth in determining whether or not future gas drilling leases should be granted and for future regulation of the natural gas industry.
- 2. The chemicals that go into the makeup of frac water must be regulated, as well as constituents of flowback water from the gas-producing formations. Specifically, natural gas companies, drilling contractors, service companies, etc. must tell PADEP what the chemical constituents of frac water are. Provisions can be made to keep the actual formulas confidential, but the constituents must be disclosed to regulatory agencies. Only if these constituents are known can the regulatory agencies monitor for these constituents, determine what pollution events that occur are due to gas drilling, require appropriate restitution and fines and keep our ground- and surface water safe for drinking, maintenance of fisheries and other habitat and recreation.

3. Sewage treatment plants are not equipped to effectively treat synthetic organic chemicals, radioactive chemicals heavy metals such as arsenic and other constituents of frac water and flowback water. Therefore, the gas drilling industry should be required to pre-treat flowback water to remove all chemicals that conventional sewage treatment plants are not designed to treat before such water is released to such plants.

Thank you for your consideration.

Sincerely,

Mary Hrenda