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INDEPENDENT REGULATORY
REVIEW COMMISSION

From: Richard Brachman [rbrachman@earthlink.net]
Sent: Wednesday, February 10, 2010 8:27 AM
To: EP, RegComments
Subject: Fwd: Gas Drilling: PA DEP Wastewater Treatment Public Opinion deadline Friday

To: regcomments@state.pa.us

Cc: aejames@state.pa.us ; corneliusg@state.pa.us ; abiehler@state.pa.us ; redding@state.pa.us ; svito@state.pa.us ; dausten@state.pa.us ; croe@state.pa.us ; jhc@state.pa.us ; bfranco@state.pa.us ; doncooper@state.pa.us ; vchinchimail.net ; rjmanfredi@msn.com ; dstrong@clearnet.net ; mwhite@pasen.gov ; cgeorge@pahouse.net ; shutchin@pahousegop.com

Dear Members of the Environmental Quality Review Board:

RE: 25 Code Chapter 96, Wastewater Treatment Requirements

My home is in Wayne County, PA, just one mile from the Delaware River, and so I am very aware of the natural gas drilling permitting requests in my area. The potential for natural gas drilling in the Upper Delaware River Basin is a nightmare that terrifies 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.

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. "Recycling" is 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. I think of the huge Exxon underground oil spill in Greenpoint, Brooklyn, NY, spilled decades ago, and still causing health and behavioral problems in children. **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.

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 maximum daily 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 a few dollars of profit. Please enact stringent regulations to protect our water from the threats of natural gas drilling.

Thank you for considering my comments,

Sincerely,
Richard Brachman