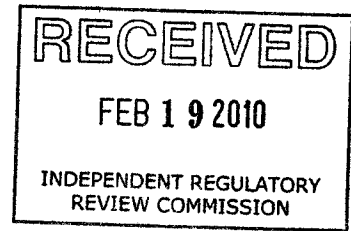


Robert B. Stanfield, ScD

29 Ledge Lane
Pipersville, PA 18947
Tel 610-294-9884
FAX 610-294-8119
e-mail stanassc@eclipse.net

February 9, 2010



Comments related to updating
Wastewater Management for High-TDS Wastewaters in Pennsylvania Total Dissolved
Solids (TDS)

Pa.B. Doc. No. 09-2065

Incidents along the Monongahela River have sparked action to reduce/capture/eliminate further stream pollution particularly from gas drilling operations. To further regulate barium, strontium, sulfates and chlorides is admirable.

However, these regulations however address only the macro pollutants. There are many, many other pollutants such as

- Surfactants,
- Organic halogens and phosphides,
- Soluble organics, (antifreeze, MTBE, THF, etc)
- Insecticides, herbicides, fungicides, biocides in general,

that need to be monitored. Many of these are covered in the CERCLA, SARA and National Priority List. Appropriate references and triggers for these pollutants need to be addressed.

These changes to Chapter 93 also do not address **the detection of a pollutant incident**. We have, in the Tincum Creek Watershed, have had to address this issue. The Hanson Quarry pumped out the accumulated water from its sump periodically into an Exception Value Rapp Creek. When they did, they violates the turbidity limits. The pumping occurred for only a limited time. Documenting the violation required a human to observe, a rapid response and thus difficult to capture.

Many violations are random events, some unknown to the violator, others are deliberate discharges occurring when no one is looking. This has caused significant damage to streams before action could be taken.

In the case of TDS, turbidity and pH there is off the shelf instrumentation that can measure, record and transmit data to appropriate authorities in the minute sampling intervals for a commercially reasonable cost. At potentially more extreme hazardous sites, there is more expensive but near real time and automated equipment available.

My observation is that the issue of detection and reporting in real time should be **institutionalized**.

The process of detecting and responding to incidents should be addressed in detail. Vulnerable operations and dumping sites should be monitored by the DEP **and** the public through operator funded equipment. Key "canary in the coal mine" surrogate pollutants should trigger rapid response and more detailed laboratory analyses depending on pre-determined pollutant lists based on the site's hazardous materials list. Reporting of analyses should be readily searchable and available on the Internet.

Bob Stanfield

2806

From: Robert Stanfield [stanassc@eclipse.net]
Sent: Tuesday, February 09, 2010 12:28 PM
To: EP, RegComments
Subject: EQB Doc 09-2065
Attachments: PAEQB_Doc_Wastewater_09-2065.pdf

See attached

