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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**From:** rjampol@aol.com  
**Sent:** Friday, February 05, 2010 7:50 AM  
**To:** EP, RegComments  
**Subject:** RE: 25 PA Code Ch. 95 Wastewater Treatment Requirements

I am a resident of Pennsylvania and I am very concerned about the effects gas drilling will have on the environment, on drinking water, and on our public health. PADEP's proposed regulations are a good first step toward protected the people and environment of Pennsylvania, but they do not go far enough. Specifically, here are some additions I feel are essential to maintaining the safety of people, wildlife, and the ecosystem.

PADEP should *immediately* stop issuing gas drilling permits and not allow any further drilling until protective standards are in place. Similarly, no new wastewater plants should be permitted until protective standards are implemented, and existing wastewater plants should be required to upgrade their treatment systems to the new standards.

Standards should *not* be set based on monthly averages. Rather, they should be based on instantaneous measurements and should never be allowed to be exceeded.

The gas drilling industry should be required to provide an accurate accounting of all fresh water, re-used or recycled water used during the development of wells and the fracturing process, as well as discharged wastewater.

Standards for Total Dissolved Solids, Sulfates, and Chlorides allowed to be discharged should be adjusted to account for existing levels of these pollutants in the body of water receiving them. Otherwise, the water could obviously exceed the so-called "safe" amounts of these contaminants.

There are many other contaminants found in Marcellus Shale gas drilling wastewater that are not covered in the proposed regulations and *must* be regulated to ensure the health and safety of our people and environment. These include bromides, arsenic, benzene and its derivatives, formaldehyde, methanol, glutaraldehyde, ethylene oxide, and radium. Many of these contaminants are toxic to humans and very difficult for drinking water systems to remove.

Standards should be added to ensure that all aspects of Marcellus wastewater are regulated, including tracking wastewater from drilling sites to treatment plants and oversight of the reuse of Marcellus wastewater.

Thank you for your attention to these concerns.

Sincerely,  
Ruth Jampol  
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Newtown, PA 18940