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Sabrina Kirby [sabrina.kirby@bucknell.edu] Thursday, February 11, 2010 12:32 PM

INDEPENDENT REGULATORY **REVIEW COMMISSION**

To:

EP, RegComments

Cc:

James, Everette; Cornelius, George; Biehler, Allen D.; Redding, Russell; Vito, Sandi; Austen, Douglas; Roe, Carl; Cawley, James H.; Franco, Barbara; Cooper, Donna; vchinchi@msn.com;

Walter Heine; rimanfredi@msn.com; dstrong@clearnet.net; mwhite@pasen.gov; rmusto@dem.pasen.gov; cgeorge@pahouse.net; shutchin@pahousegop.com

Subject:

Clarification in favor of 25 PA Code Ch. 95, Wastewater treatment requirements

Dear Environmental Quality Board Members,

I write to clarify my earlier email to you this week regarding proposed new wastewater treatment requirements in 25 PA Code Chapter 95.

I strongly support the three major effluent limitations in this regulation; limits of effluent "at the mouth of the pipe" to: 500 mg/L of TDS, 250 mg/L of total chlorides, and 250 mg/L of total sulfates as a monthly average.

I wish specifically to oppose an effort by gas drilling interests to apply the 500 mg/L limit on TDS to the body of water into which the effluent is being discharged, rather than the effluent itself. Depending on fluctuations in stream conditions, this change could allow TDS in effluent to reach into the thousands of mg/L, into streams that are already impaired by the past effects of coal mining and in some of which conditions are barely sufficient at present to support freshwater species.

All sources of information I'm aware of indicate that we don't have a large margin of error on this issue. For the long-term economic welfare of the commonwealth, drilling companies must be held accountable for the waste that they produce, and since they will reap the lion's share of the profits from their operations, it is their responsibility to meet treatment standards that you impose.

Thank you for your attention to this matter, and thank you in advance on standing firm to protect Pennsylvania's waterways.

Sabrina Kirby 175 Oxford Drive Lewisburg, PA 17837 (570) 524-4855

Sabrina Kirby Writing and Teaching Consultant **Bucknell University Writing Center** Lewisburg, PA 17837 (570) 577-3141 http://www.bucknell.edu/WritingCenter

Inspiration usually comes during work, rather than before it. --Madeleine L'Engle