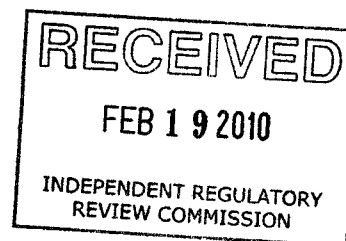


From: Bruce Saunders [wsaunder@brynmawr.edu]
Sent: Thursday, February 11, 2010 3:11 PM
To: EP, RegComments
Subject: Wastewater Treatment Requirements



TO: Members of the Environmental Quality Board

FROM: W. B. Saunders, Ph.D.
Emeritus Professor of Geology
Bryn Mawr College
Bryn Mawr PA 19010

RE: 25 Code Chapter 95, Wastewater Treatment Requirements

I have just finished reviewing information on the proposed new regulations and related issues on TDS discharges into Pennsylvania rivers, provided by Responsible Drilling Alliance (RAD). The gas drilling industry appears to have quickly moved to develop waste water management strategies that rely on recycling. This is particularly heartening, because the strategy used until now has relied either on dumping these high salinity and chemical laden wastes into rivers and streams, or trucking them to existing treatment facilities, which are unable to remove the pollutants before the 'treated' wastes are dumped into the streams and rivers. And the fact that EXXON recently bought out several of the major players in the Marcellus play shows that one of the largest energy companies, with one of the most sophisticated energy research facilities in the world believes it can make a profit in this area.

Please don't assume that I am simply objecting to the exploitation of Pennsylvania's Marcellus gas shale reserves; this resource, like the Barnett Shale of Texas, Fayetteville Shale of Arkansas, Chainman Shale of Utah, etc., all offer a terrific opportunity to utilize an energy source that is much cleaner than burning coal. I am not a petroleum geologist (though I have worked in that industry), but I have conducted investigations in all of these hydrocarbon-rich formations; the fact that technology offers us a new way to exploit these resources is terrific and should not be discouraged. At the same time, this exploitation must not be allowed to go uncontrolled or to run amuck without environmental oversight and appropriate taxation aimed at countering the unavoidable damage that all hydrocarbon exploitation necessarily entails. Now is the time to insist that procedures like recycling be developed. This may result in even more wear and tear on our highways (I see these gas-field tanker and equipment trucks streaming down highways like US 180 and PA 220 all day long, from my home in Pennsdale PA). This is serious enough, but nothing compared to the havoc that hypersaline and chemical laden waters will do to the (now-becoming pristine once again) riparian ecosystems, which has already been documented in Pennsylvania.

Recycling offers a number of benefits; it reduces the amount of fresh water removed from streams, and could conceivably reduce the amount of heavy tanker truck traffic on major highways. The new treatment plants on the drawing board often promise no discharge into our rivers.

The gas exploration industry is very well funded and technically based. They have the means, as they already have proven, to respond to the challenges of their own waste water. Put to the task, this industry is developing strategies that other industries can follow. These new technologies will translate into good, home grown jobs.

We must hold the line on the proposed new standards. they are not perfect but are a very good start. We must not accept ANY poisoning of our rivers when the means exist to avoid it. Everyone benefits when good regulation leads to a sustainable condition.

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