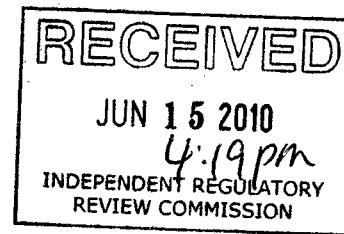


2841



June 14, 2010

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: AMBIENT WATER QUALITY CRITERION; CHLORIDE (CH)

Dear Board Members:

Veolia ES Greentree Landfill, LLC has reviewed the proposed chloride water quality criterion and is providing comments. Greentree Landfill has been in operation since 1986 and provides significant waste disposal service to residents and industries in Pennsylvania as well as nearby states.

Since we are an environmental business, we certainly understand that the total dissolved solids issue can be serious and should be evaluated and possibly regulated. However, it is our belief that the proposed regulation as written could cause significant harm to Pennsylvania industries to which we provide service and possibly to the waste business as well. Adoption of this regulation will be detrimental from an economic and employment viewpoint to both the public and industry in Pennsylvania. Estimated costs to achieve compliance as stated in the document are grossly underestimated and the approach is truly not fully viable.

After our review of the proposed rule, we are offering the following comments:

1. Treatment processes used to remove chlorides utilize methods that remove other Total Dissolved Solid components including beneficial constituents such as calcium and carbonate. Removal of these metals would not be helpful to any stream environment and, in fact, may actually be harmful to the stream.
2. This rule would affect all Pennsylvania landfills because landfill leachate has elevated levels of chlorides. Treatment processes at the landfills would need to be changed to accommodate this proposed rule. This could prove to be more expensive than the document's estimates.
3. The estimated cost for Reverse Osmosis of one cent (\$0.01/gallon) as given in the document is too low. Reverse osmosis treatment processes are much more costly. A more in-depth economic study should be done to determine the actual costs and the ultimate affect on the industries and the public...
4. The reject concentrate generated from a Reverse Osmosis must be considered. The reject waste stream from the process would probably be disposed in a landfill. When disposed in the landfill, it would ultimately increase the chlorides, dissolved solids and other constituents of the leachate. This would make the leachate even more difficult to treat and thereby increase treatment costs even further beyond the estimates given.

Veolia ES Greentree Landfill, LLC
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5. Evaporation of the brine water is an energy intensive process. Increasing energy use in Pennsylvania to do this does not enhance any program's to provide clean energy to the citizens and industries in the state. Production of salt to be used on Pennsylvania highways during the winter by using evaporation and/or crystallization will prove to be quite expensive. These salts produced may be radioactive and would further affect the environment when spread on roads across the Commonwealth. Also, when spread on the roadways, the salts would be carried to streams and would increase the chlorides and total dissolved solids in the water. The affect of the road salt on the streams and environment should be taken into full consideration. This can easily negatively affect the environment.
6. Other methods should be considered prior to finalizing this proposed rule. Mixing zones could be provided for in the proposed regulation and live stream flow monitoring could also be specified. Using these methods would allow higher levels of discharge without consequences to the stream.

Based on our review of the document, we are requesting that you reconsider this approach. Other available methods of managing the high chloride brines should be considered prior to issuing any new standards.

Sincerely

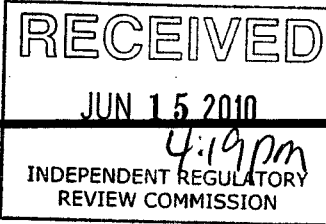
Veolia ES Greentree Landfill, LLC



William D. Binnie, P.E.
Area Engineer

Cc: Don Henrichs (Veolia ES Greentree Landfill)
Thad Sorg (Veolia ES Greentree Landfill)
Mary T. Webber (Webber Associates)

2841



From: William.Binnie@veoliaes.com
Sent: Tuesday, June 15, 2010 11:49 AM
To: EP, RegComments
Cc: Donald.Henrichs@veoliaes.com; Thad.Sorg@veoliaes.com; mary.webber@comcast.net
Subject: Veolia ES Greentree Comments on Proposed Rulemaking - 25 PA Code Chapter 93, Ambient Water Quality Criterion; Chloride (Ch)
Attachments: Veolia ES Greentree - Comments on Proposed Rulemaking - Chapter 93 - Chlorides.PDF

EQB Board members,
Please find attached a letter containing comments on the proposed rulemaking regarding chlorides. In reviewing the proposed rule, we feel that all the costs have not been taken into account or confirmed and that other treatment or management methods should be thoroughly reviewed prior to applying such a rule to the industries of Pennsylvania.
We appreciate your taking our comments into account regarding the rule.
Thank you,

Bill Binnie
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