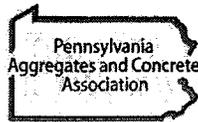


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August 20, 2012

Environmental Quality Board
Rachel Carson State Office Building
16th Floor
400 Market Street
Harrisburg, Pennsylvania 17101-2301

2012 SEP -5 PM 4: 34

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IRRC

RE: Triennial Review of Water Quality Standards [42 Pa.B. 4367]

Dear Members of the Board:

The Pennsylvania Aggregates and Concrete Association ("PACA") represents the interests of the concrete and aggregates (stone, sand and gravel) industries in the Commonwealth of Pennsylvania. We strongly object to the inclusion of sulfate, chloride and molybdenum as part of the proposed rulemaking proposal.

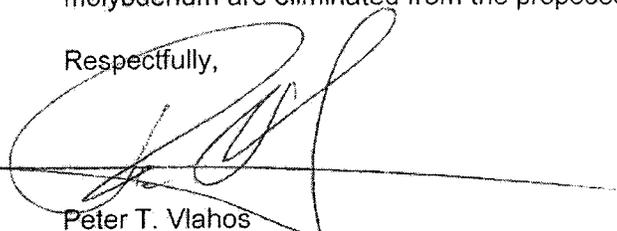
We believe that the Pennsylvania Department of Environmental Protection (DEP) should support its position with data from the Commonwealth by exercising good science rather than applying standards created by another state based on its own unique geology and geochemistry.

There is no national standard for sulfate. While the U.S. Environmental Protection Agency (EPA) may be studying such a standard the question that must be asked is the reasons for DEP's push for such a standard in the Commonwealth at this time.

The regulated community recognizes that the impetus for a chloride water quality standard is driven by the recent natural gas exploration boom in the Commonwealth. The promulgation of the Total Dissolved Solids (TDS) in 2011 coupled with the voluntary cessation of natural gas produced wastewater to municipal sewage treatment plants should have abated DEP's concerns. It would be prudent for DEP to analyze the impact of the TDS regulation before proceeding with yet another standard.

The implementation of the proposed standards will undoubtedly impact all industries in the Commonwealth at a time that our economy is teetering toward another recession and unemployment figures are on the rise in the Commonwealth. We respectfully request that sulfate, chloride and molybdenum are eliminated from the proposed rulemaking.

Respectfully,



Peter T. Vlahos
President