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# **PARKWOOD RESOURCES, INC.**

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January 29, 2010

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Environmental Quality Board  
PO Box 8477  
Harrisburg, PA 17105-8477

ENVIRONMENTAL QUALITY BOARD

RE: 25 PA. CODE CH. 95  
Wastewater Treatment Requirements

I have been employed in the coal mining industry for many years and am deeply concerned with the proposed Chapter 95 Total Dissolved Solids regulation currently before the Environmental Quality Board. The regulations are not supported by adequate data and no consideration has been given to their economic consequences.

The data that the Department of Environmental Protection provided to the coal mining industry to support the regulation was collected in the Mon River Basin in 2008 during a 2 ½ month period of exceptionally low flow and cannot be considered representative of normal watershed conditions. Using this data to propagate a state wide regulation is not a reasonable approach.

There are no known cost effective means to reduce the total dissolved solids in a coal mine discharge to the proposed limits. The regulation would result in serious damage to the coal industry with a projected cost in the billions of dollars. The technologies necessary to meet these limits are untested on the scale necessary for the mining industry. Furthermore, there are critical questions as to the disposal facility capacity for the waste produced by the treatment process.

I support the testimony presented by the Pennsylvania Coal Association and others in opposition to the proposed regulation. I recommend that the Department of Environmental Protection withdraw the regulation at this time until the scope of the problem can be better defined and practical solutions can be developed.

Sincerely,



Stephen Reyba  
Vice President  
Parkwood Resources, Inc.

INDEPENDENT REGULATORY  
BOARD COMMISSION

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