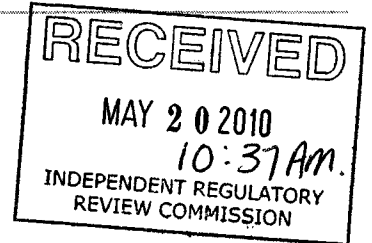


2806

From: Miller, Sarah E.
Sent: Thursday, May 20, 2010 10:31 AM
To: Jewett, John H.; Gelnett, Wanda B.; Wilmarth, Fiona E.; Cooper, Kathy
Cc: Kaufman, Kim
Subject: FW: IRRC Website - New Message

Comment

From: Independent Regulatory Review Commission [mailto:No-Reply@irrc.state.pa.us]
Sent: Thursday, May 20, 2010 10:29 AM
To: Help
Subject: IRRC Website - New Message



IRRC

Independent Regulatory Review Commission

A new message has arrived from the IRRC Website

First Name: Al

Last Name: Sever

Company: Sever Engineering LLC

Email: alsever@verizon.net

Subject: EQB proposal on TDS effluent Limits

Message:

Dear Commission Members, Please consider my concerns during your review of the Proposed EQB changes to Chap 95 as it relates to Total Dissolved Solids. 1) The proposal implies that Total Dissolved Solids (TDS) is a problem in our waterways but then proposes to only place limits on future Discharges while grandfathering those discharges who created the problem. 2) If TDS is a problem then ALL industries should receive the same TDS effluent Limit. It is unfair to require more stringent limits of only one industry--Marcellus Shale drilling activities. 3) The proposed cost of treatment is extremely expensive. Try telling citizens that they will ONLY have to pay 50 cents per gallon for sewage treatment. 4) PA DEP failed to provide any rationale for setting such expensive standards, other than implying that the industry can afford to pay for the treatment that consists whatever DEP chooses to require. 5) PA DEP exempts its own discharges from meeting these stringent limits, i.e., Abandoned Mine drainage systems. The largest quantity of TDS that will be discharged at any one point will be the proposed AMD system that PA DEP will construct to treat water from the old Barnes & Tucher mine complex in Cambria County. Not only will this extremely large discharge not be assigned effluent limits, it will not even be required to obtain a NPDES Permit. 6) The proposal to assign stringent effluent limits to pretreatment plants makes no sense. Why would anyone pretreat and pay money to a municipal POTW for additional treatment, if the effluent limits are the same for both. It would only make sense to not pretreat and obtain your own permit. Pretreatment standards should be made more lenient so that there is an incentive to send pretreated water to a POTW. These POTWs can receive revenue for providing necessary final treatment.

This is a chance for Municipalities to receive some revenue to pay for other mandates such as the Chesapeake Bay strategy. 6) The EQB proposal assigns these Water Quality limits to small streams in our mountains and to the brackish/tidal waters of the Delaware. Surely TDS will not affect the Delaware to the degree it might affect a small mountain stream. In Conclusion, as a retired employee of the Pa DEP (30+ years) who actually wrote NPDES permis assigning effluent limits, I am unaware of any situation where one industry has been picked to be the ONLY industry reciving extremely stringent Water Quality based effluent limits while all other industries will be exempt from the stringent limits. If these effluent standards are being proposed to protect the water quality of our waterways, then there should not be any "Grandfathering for existing dischargers and ALL proposed future dischargers should receive the WQ based limits. Sincerely, Al Sever, P.E. 516 Sand Hill Road Montoursvile, Pa 17754 570-368-8337 alsever@verizon.net