

**Historic Bellefonte**

Home of five Pennsylvania  
Governors

**Population, 7,000**

1769—Big Spring Discovered  
1795—Bellefonte Laid Out  
1800—Centre County Seat  
1808—Borough Incorporated



**"Beautiful Fountain"**

Named by the French Statesman, Talleyrand, the Big Spring is Pennsylvania's third largest. More than 11 million gallons flow from it daily. Less than one-half is utilized by area residents.

**2819**

**Borough of Bellefonte**

MUNICIPAL BUILDING — 236 W. LAMB ST.

**Bellefonte, Pennsylvania 16823**

March 12, 2010

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

(814) 355-1501  
Fax (814) 353-2315

**RECEIVED**

**MAR 12 2010**

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re: Regulation Comments, Proposed Rulemaking 25 PA. Code Chapters 92.92a

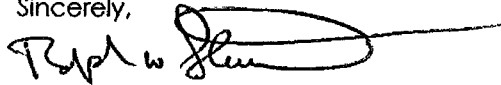
The following comments relate to the Bellefonte's wastewater facility that discharges to a high quality rated stream (Spring Creek). It appears that your permit may have the following limits modified by the new regulation changes.

1. The average monthly 8mg/l Total Nitrogen limit will require the plant to denitrify year round.
  - a. The existing permit has an annual limit which permits more flexibility to meet the existing requirement.
  - b. If the plant experienced some issue with the system during a month, it could put them out of compliance.
  - c. In addition, the annual limit enables the plant to evaluate a process change (such as alternate carbon source) during a month that it may not be denitrifying for the permit.
  - d. This regulation may reduce the opportunity for facilities to evaluate other options to improve the performance of their systems.
  
2. The average monthly 10 mg/l TSS change is a major reduction from the existing permit of 30 mg/l TSS.
  - a. It does not seem reasonable to make such a drastic change in this parameter without providing some time for operators to adapt to the new equipment associated with the new nutrient limits.
  - b. Is there a qualified impact to the stream that is quantifiable and warrants this change?
  - c. Currently, Bellefonte is running a denitrification filter that does experience some higher TSS, but within the existing permit requirements.
  - d. This new limit would likely put the facility out of compliance.
  - e. Without providing some reasonable time to work with the prior nutrient requirements/facility changes, the authority may have to add additional equipment/cost that may not be necessary.

3. The scum and other similar effluent restrictions do not appear to have distinct parameters in how those limits would be applied, or why they are necessary.
  - a. It seems that these parameters should have some specific criteria.
  - b. What is the direct impact to stream quality if the existing stream may have the same parameters?
  - c. Should the permits be more site specific to identify these concerns, rather than a blanket approach?
  
4. The proposed fee increases can have a detrimental effect on customers who are already seeing rate increases due to mandated improvements in the treatment process. It is imperative to reduce costs in times like this with many business and residential customers struggling to pay their utility bills.

Thank you in advance for taking my comments on behalf of Bellefonte Borough. If you have any questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph W. Stewart", with a long horizontal flourish extending to the right.

Ralph W. Stewart, Manager  
Bellefonte Borough  
236 West Lamb Street  
Bellefonte, PA 16823  
(814) 355-1501

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**From:** Ralph Stewart [rstewart@bellefonte.net]  
**Sent:** Friday, March 12, 2010 12:43 PM  
**To:** EP, RegComments  
**Subject:** Comments - Proposed Rulemaking 25 PA CODE CHS. 92 and 92a, Ralph Stewart, Manager, Bellefonte Borough, 236 West Lamb Street, Bellefonte, PA 16823  
**Attachments:** Comments Proposed Rulemaking Ch 92.pdf  
**Importance:** High

Hello,  
Please see the attached letter for comments on the proposed rulemaking – 25 PA CODE CHS. 92 and 92a.

Thank you,  
Ralph Stewart, Manager  
Bellefonte Borough  
236 West Lamb Street  
Bellefonte, PA 16823  
(814) 355-1501

