



Stephen Hoffman

From: ecomment@pa.gov
Sent: Thursday, February 4, 2021 9:59 AM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; Troutman, Nick; timothy.collins@pasenate.com; gking@pahousegop.com; lversen, Sarah A.
Cc: c-jflanagan@pa.gov
Subject: Comment received - Proposed Rulemaking: Dam Safety and Waterway Management (#7-556)

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Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: Dam Safety and Waterway Management (#7-556).

Commenter Information:

Harry Gottlieb
(harrybgottlieb@verizon.net)
1734 Academy Ln
Havertown, PA 19083 US

Comments entered:

Dear DEP Regulatory Comments,

My water quality concern escalated when I worked for GAF Photo Services decades ago. Taking a water quality sample from the plant's ~seven-foot deep catch basin, my wristwatch fell in. The Plant Manager had the basin drained after the plant shut down that night. The bottom few feet of the basin, below the outflow pipe was a highly colored 1,1,1-trichloroethane (TCE) solution of dyes. TCE used as film lubricant; when containers of TCE on each machine got dirty, they were dumped into the effluent stream, leading to the basin. Beyond its carcinogenicity, its fumes overcame both the first maintenance worker who descended a ladder to retrieve my watch and the guy who went to save him. Heavier-than-water solvents routinely contaminate ground water.

I urge the Environmental Quality Board (EQB) to fully consider the following before finalizing its proposed revisions to Chapter 105.

I am concerned that the EQB consulted with industry groups early in the revision process, specifically by presenting proposed revisions and seeking additional input from the Pennsylvania Chamber of Business and Industry, without giving such an opportunity to public interest and

environmental groups. The EQB needs to equally consider feedback from public interest groups who speak up for the health and safety of the public and the environment. The EQB should now give comments from environmental and public interests groups significant consideration and their comments should be treated as an opportunity for further dialogue and contribution.

The EQB should revise these regulations to better protect Pennsylvania's wetlands and waterways and make it harder for various industries to negatively impact them. Certain proposed revisions could make it easier for project applicants to get permits or avoid the permitting process altogether by expanding the number of activities eligible for a waiver from the permitting process. The EQB cannot afford to loosen its regulations by allowing waivers and must protect the state's waterways regardless of their size. The EQB should reduce the number of waivers granted and should not allow any waivers for activities impacting Exceptional Value (EV), High Quality (HQ), Class A, Wild Trout, or already impaired streams.

The EQB should reconsider its revision that would require project applicants to only submit one application instead of applications in each county a proposed activity touches, as is currently required for large-scale projects like pipelines. By only requiring a project applicant to submit one application, EQB's proposed regulations could make it harder for counties and their residents to learn about proposed industrial activities that might affect their water bodies. This revision could make it more difficult for adequate review to take place at the local level and hinder the county's role in reviewing the county-specific impacts from projects like pipelines.

Thanks for considering these comments.
Sincerely,
Harry B. Gottlieb

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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