

Having trouble viewing this email? [Click here](#)



**RT ENVIRONMENTAL SERVICES, INC.**  
*Your Solution-Oriented Environmental Services Firm*

## PADEP - PUBLIC OUTREACH ON TDS

PADEP and the Environmental Quality Board are undertaking a new form of public outreach on the TDS effluent limit proposed changes.

See the following pages for:

- [A Plain Language Summary](#)
- [A Sample Response Letter/Email](#)

For more information on the TDS standards tightening, call Gary Brown at 800-725-0593, ext 234

### Quick Links

[Our Website](#)  
[Newsletter](#)  
[Clients](#)

#### Corporate Office

215 W. Church Road  
King of Prussia, PA  
19406  
Tel: 610-265-1510  
Fax: 610-265-0687

#### NJ Office

Pureland Complex  
Suite 306  
510 Heron Dr., Box 521  
Bridgeport, NJ 08014  
Tel: 856-467-2276  
Fax: 856-467-3476

#### SW PA Office

591 E. Maiden Street  
Washington, PA 15301  
Tel: 724-206-0348  
Fax: 724-206-0380

[Join Our Mailing List!](#)

#### [Forward email](#)

✉ [SafeUnsubscribe®](#)

This email was sent to [rwilliams@rtenv.com](mailto:rwilliams@rtenv.com) by [rwilliams@rtenv.com](mailto:rwilliams@rtenv.com).  
[Update Profile/Email Address](#) | Instant removal with [SafeUnsubscribe™](#) | [Privacy Policy](#).

RT Environmental Services, Inc. | 215 W. Church Road | King of Prussia | PA | 19406

## Opportunity for Public Participation

### **Pennsylvania Environmental Quality Board Proposed Amendments to Regulations on Wastewater Treatment Requirements - Plain Language Summary**

The Pennsylvania Clean Streams Law preserves and improves the purity of our waters and allows for remedies to be developed by the Pennsylvania Department of Environmental Protection (PA DEP). It allows the adoption of rules and regulations, as necessary, to accomplish this protection.

The Pennsylvania Environmental Quality Board proposes to amend the Wastewater Treatment Requirements. The goal of this amendment is that by January 1, 2011, *new* sources of total dissolved solids (TDS) wastewaters will have discharge limits. This amendment is intended to protect Pennsylvanian's drinking water and aquatic life.

The PA DEP's permitting strategy for *High Total Dissolved Solids (TDS)* wastewater discharges' addresses the existing and potential pollution of the Commonwealth's waters from large sources of TDS, sulfates and chlorides. Some rivers and streams in Pennsylvania are almost unable to absorb additional TDS discharges without negative affects. These discharges must be managed through permit limitations that require a stricter approach to wastewater treatment and/or water quality standards.

**What is TDS?** Total Dissolved Solids (TDS) are dissolved materials or contaminants (toxic metals and organic pollutants) in the water. TDS that can be naturally present in water or it could be the result of runoff, mining or industrial or municipal treatment of water. The major concerns about high concentrations of TDS in water are the direct effects it may have on the health of aquatic and human life and water supplies. It could make the water saltier, harder and more toxic.

**How could TDS affect the health of the water supply, aquatic and human life?** In 2008 there were water quality issues in the Monongahela River basin. The River's water level was very low, and there were high concentrations of TDS and sulfates. These high levels were over the water quality standards from the border with West Virginia to Pittsburgh. Several environmental agencies studied the effects of TDS, sulfates and chlorides on the River, its tributaries and aquatic life. They observed a clear difference between water organisms in receiving streams living above the point of discharge and those living below it. All these studies concluded that the existing and potential contamination is found throughout the whole state.

The studies also found that a high percentage of the Disinfection By-Products (DBPs) being formed in the drinking water systems were brominated by-products. (Disinfection By-Products are formed by a chemical reaction between disinfectants such as chlorine, and organic matter in the water). Brominated DBPs present a higher health risk than chlorinated DBPs. There appears to be a strong relationship between the formation of certain DBPs and high water bromide concentrations in the river. As a result, water from the Monongahela River presents higher levels of the more toxic DBPs. This creates higher risks of bladder cancer to their consumers.

**What Are the Existing Regulations?** Right now, industries discharging wastewater with high concentrations of TDS are only required to treat and remove heavy metals, but there is no treatment for TDS, sulfates and chlorides, other than dilution (using the stream to mix with the discharge to lower the level of contamination). The higher levels of TDS in Pennsylvania's water show that dilution is no longer an adequate treatment.

**DEP is accepting written public comments to this amendment to the regulation on wastewater treatment requirement limits. Please send your comments, reaction, support, concern or testimony to the Environmental Quality Board as follows:**

**How and When to Submit Comments? (Please see the attached sample letter)**

All comments must be received by February 12, 2010.

- **By mail:** Environmental Quality Board, P.O. Box 8477, Harrisburg, PA 17105-8477
- **Express Mail:** Environmental Quality Board, Rachel Carson State Office Building, 16th Floor, 400 Market Street, Harrisburg, PA 17105-2301
- **Email:** RegComments@state.pa.us - If an acknowledgement of electronic comments is not received by the sender within 2 working days, the comments should be retransmitted to ensure receipt

**Have any questions or need some clarification about this amendment?** Please see the contact people below.

- Ronald C. Furlan, Chief, Division of Planning and Permits (717) 787-8184
- Richard Morrison, Assistant Counsel, Bureau of Regulatory Counsel (717) 787-7060.
- Persons with a disability may use the Pennsylvania AT&T Relay Service by calling (800) 654-5984 (TDD users) or (800) 654-5988 (voice users).

---

## **Outline of Proposed Regulatory Requirements Related to TDS**

The proposed changes to the existing regulations are mainly related to:

- The establishment of new discharge standards for new sources of wastewaters containing high concentrations of Total Dissolved Solids (TDS)

Section 95.10. Effluent standards for new sources of wastewaters containing high Total Dissolved Solids (TDS) concentrations

***What is a New Discharge?*** A discharge that did not exist on April 1, 2009, and includes a TDS concentration that exceeds 2,000 milligrams per liter or a TDS load that exceeds 100,000 pounds per day. It also includes an additional, expanded or larger discharge from a facility that existed before April 1, 2009.

- This new section establishes discharge limits for TDS, total chlorides and total sulfates, and explains some exceptions for industries that have established Federal criteria for TDS, sulfates and chlorides.
- Establishes criteria for new sources of wastewaters resulting from fracturing, production, field exploration, drilling or completion of oil and gas wells.
- Establishes that the discharge limitations in this section will not apply if a National Pollutant Discharge Elimination System (NPDES) permit has established more strict limitations than the ones in this section. (An NPDES permit is a Federal permit that regulates the levels and amounts of contaminants that go into the water).

- All new discharges of wastewater with High TDS must comply with the following: (except for those with an exception)
  1. Section 95.2 of the Pennsylvania Code (Title 25). (Click here to see the PA Code: [http://www.pacode.com/secure/data/025/chapter95/025\\_0095.pdf](http://www.pacode.com/secure/data/025/chapter95/025_0095.pdf))
  2. The discharge may not contain more than 500 mg/L of TDS as a monthly average (this means that not more than .05% of a liter may be TDS).
  3. The discharge may not contain more than 250 mg/L of total chlorides as a monthly average (this means that not more than .025% of a liter may be total chlorides).
  4. The discharge may not contain more than 250 mg/L of total sulfates as a monthly average (this means that not more than .025% of a liter may be total sulfates).
  5. In addition to paragraphs 1 - 4, discharges to groundwater, including land application and discharges to existing mine pools, must comply with 91.51 and 91.52 (Click here to see the General Provisions Chapter 91: [http://www.pacode.com/secure/data/025/chapter91/025\\_0091.pdf](http://www.pacode.com/secure/data/025/chapter91/025_0091.pdf))
  
- New discharges of wastewaters used for fracturing, production, field exploration, drilling or completion of oil and gas wells must also obey the following provisions (in addition to those already mentioned):
  1. No discharges of wastewater are allowed into waters of Pennsylvania from any direct source or site of fracturing, production, field exploration, drilling, or well completion (this refers to produced water, drilling muds, drill cuttings, and produced sand).
  2. Treated discharges of wastewater generated from fracturing, production field exploration, drilling, or well completion may be authorized by DEP. The discharges may only be from centralized waste treatment facilities and approved Publicly Owned Treatment Works.
  3. The discharge may not contain more than 10 mg/L of total barium as a monthly average (this means that not more than .001% of a liter may be total barium).
  4. The discharge may not contain more than 10 mg/L of total strontium as a monthly average (this means that not more than .001% of a liter may be total strontium).
  5. Any proposed discharges from a Centralized Water Treatment Facility must obey the performance standards in 40 CFR 437.34 (in addition to complying with requirements 2-4). Click here to see the performance standards: [http://edocket.access.gpo.gov/cfr\\_2007/julqtr/pdf/40cfr437.34.pdf](http://edocket.access.gpo.gov/cfr_2007/julqtr/pdf/40cfr437.34.pdf)
  6. Any proposed discharges from a Publicly Owned Treatment Works must obey the following: (in addition to complying with requirements 2-4)
    - Discharges must be pretreated and comply with the performance standards found in 40 CFR 437.36. Click here to see the performance standards: [http://edocket.access.gpo.gov/cfr\\_2007/julqtr/pdf/40cfr437.34.pdf](http://edocket.access.gpo.gov/cfr_2007/julqtr/pdf/40cfr437.34.pdf)
    - The Publicly Owned Treatment Works facility must develop and follow a Federal pretreatment program that meets the applicable standards found in 40 CFR 403. Click here to see the standards: [http://www.access.gpo.gov/nara/cfr/waisidx\\_09/40cfr403\\_09.html](http://www.access.gpo.gov/nara/cfr/waisidx_09/40cfr403_09.html)
    - Any wastewater treatment requirement established under this chapter does not apply if an NPDES permit limitation established under Chapter 92 provides a stricter discharge limitation requirement than would be provided by application of this chapter.

**To read the full proposed amendment, please visit DEP's Website to download the Proposed Rulemaking Document and the Proposed Regulations.**

Proposed Regulations: <http://www.pabulletin.com/secure/data/vol39/39-45/2065.html>

Notice of Correction: <http://www.pabulletin.com/secure/data/vol39/39-46/2065.html>

**Sample Letter or Email**

Date

Environmental Quality Board  
Pennsylvania Department of Environmental Protection  
P.O. Box 8477  
Harrisburg, PA 17105-8477

RE: Pennsylvania Department of Environmental Protection's Environmental Quality Board (EQB) proposed amendment to the regulations on Wastewater Treatment Requirements.

Dear Members of the Environmental Quality Board:

I ( **agree or disagree** ) with the recommendation by the EQB to further protect Pennsylvania's drinking water and waterways by establishing new discharge standards for new sources of wastewaters that are high in total dissolved solids (TDS).

Additional Comments (optional, but we highly encourage you to include)

Second paragraph: (Explain why do you agree or disagree)

Third paragraph: (What do you think DEP could do to improve this proposed regulation?)

Fourth paragraph: (How does this issue affects your community? Do you have anything else to add?)

Sincerely,

Your Name and Signature

Your Address