



## EPA ISSUES TECHNICAL DEVELOPMENT DOCUMENT FOR PROPOSED EFFLUENT LIMITATIONS, GUIDELINES AND STANDARDS FOR OIL AND GAS EXTRACTION

In March, EPA issued the above-referenced document which is expected to heavily influence the regulation of discharges from oil and gas extraction activities throughout the United States.

EPA is proposing pretreatment standards for the Oil and Gas Extraction Category (40 CFR Part 435). The regulations would address discharges of wastewater pollutants from onshore unconventional oil and gas (UOG) extraction facilities to publicly-owned treatment works (POTWs). EPA is requesting comments on this proposal and is requesting them by July 17, 2015.

UOG extraction wastewater can be generated in large quantities and contain constituents that are potentially harmful to human health and the environment. Wastewater from UOG wells often contains high concentrations of salt content, also called total dissolved solids or TDS. The wastewater can also contain various organic chemicals, inorganic chemicals, metals, and naturally-occurring radioactive materials (also referred to as technologically enhanced naturally occurring radioactive material or TENORM). EPA indicates that this potentially harmful wastewater creates a need for appropriate wastewater management infrastructure and practices.

Historically, operators primarily managed their wastewater via underground injection in disposal wells (where available). Where UOG wells were drilled in areas with limited underground injection wells, and/or there was a lack of wastewater management alternatives, it became more common for operators to look to public and private wastewater treatment facilities to manage their wastewater. Because they are not typical of POTW influent wastewater, some UOG extraction wastewater constituents:

- Can be discharged, untreated, from the POTW to the receiving stream
- Can disrupt the operation of the POTW (for example, by inhibiting biological treatment)
- Can accumulate in biosolids (also called sewage sludge), limiting their use, and
- Can facilitate the formation of harmful disinfection by-products.

EPA indicates that the proposed rule would better protect public health, the environment, and the operational integrity of POTWs by establishing pretreatment standards that would prevent the discharge of pollutants in wastewater from onshore UOG extraction facilities to POTWs. They state that this proposed rule would fill a gap in existing federal wastewater regulations to ensure that the current practice of not sending wastewater discharges from this sector to POTWs continues into the future.

EPA indicates that this proposed prohibition of discharges to POTWs reflects current industry practice. Because onshore unconventional oil and gas extraction facilities have discharged to POTWs in the past, and because the potential remains that some facilities can consider discharging to POTWs in the future, EPA is proposing this rule.

RT feels that this rule will not have a large impact on the existing UOG extraction/disposal activities. It is RT's experience that states, municipalities, and local POTWs are not currently approving these wastewaters for discharge at POTWs. However, EPA indicates that some POTWs still currently receive requests to discharge UOG wastewater. This rule would eliminate the burden on local POTWs to consider such requests and establish regulatory certainty regarding what can and cannot be acceptable at local POTWs. However, It is RT's opinion that the standards will be so stringent that it will be nearly impossible for them to be met, further ensuring that discharge of UOG wastewaters does not occur at local POTWs. EPA suggests that this may provide opportunities for the Oil and Gas Industry to manage their wastewater in this manner if the pre-treatment standards are met, however RT believes that it will rather ensure that UOG wastewater is not discharged to local POTWs.

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Click here for a link to this document:

<http://water.epa.gov/scitech/wastetech/guide/oilandgas/upload/UOG-Proposal-TDD-2015.pdf>  
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