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Sent: Friday, March 23, 2012 3:32 PM
To: mtammaro@rtenv.com
Subject: LESS WASTEWATER IS DISCHARGED TO TREATMENT PLANTS BY MARCELLUS SHALE GAS DRILLERS – WHERE IS THE WATER QUALITY IMPROVEMENT?

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LESS WASTEWATER IS DISCHARGED TO TREATMENT PLANTS BY MARCELLUS SHALE GAS DRILLERS - WHERE IS THE WATER QUALITY IMPROVEMENT?

Press Release

The PA Department of Environmental Protection has found that less of the wastewater produced from Marcellus Shale drilling is being sent to treatment plants than in the past. Non-Marcellus Shale wells (including shallow wells), however, still can use treatment plants. Shale drilling wastewaters have been considered a source of salty bromides, in PA rivers and streams, because treatment plants were not designed to treat the salty bromides.

The issue is considered important because there had been an expectation that concentrations of bromides in certain rivers and streams would fall when wastewater was diverted from wastewater treatment plants into deep wells or more advanced treatment plants. This has not happened.

In periods prior to the second half of 2011, shale drillers sent around 118 million gallons to numerous treatment plants that discharge into rivers and streams, but the vast majority of that wastewater is now managed differently, including via deep well injection in Ohio.

Although there are suspicions that use of industrial and domestic wastewater treatment plants continues for drilling wastewater (for the shallow well portion which is unregulated), no one appears to know what the real answer is to the question - Why are bromide levels in streams not falling? At the time that DEP acted to limit shale wastewater discharges to treatment plants, Marcellus Shale industry leaders objected to DEP imposition of wholesale limits on total dissolved solids (TDS) for wastewater. Recent data suggests that sources of TDS in rivers and streams in Pennsylvania are not well understood.

It should be said that regulatory effluent limits and wholesale changes in the management of large volumes of wastewater, should be based on sound decisionmaking, based on real "baseline" data, and not on perception of a problem that is not well understood. We think that funds should be freed up promptly to properly and fully evaluate TDS in PA's streams and rivers so that there is not a perception of overregulation with little demonstrable environmental benefit.

- Gary R. Brown, P.E., 610-265-1510 Ext. 234 or email gbrown@rtenv.com.

[Excerpts from Kevin Begos, Associated Press, South Jersey Sunday, 2/19/2012]



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