



PENNSYLVANIA MUNICIPAL AUTHORITIES ASSOCIATION

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Environmental Quality Board
PO Box 8477
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[Sent via electronic mail to RegComments@state.pa.us]

The Pennsylvania Municipal Authorities Association (PMAA) represents over 740 municipal authorities across the Commonwealth providing drinking water and sewage treatment management to more than six million Pennsylvania citizens.

The comments below are submitted in regard to the proposed revisions to 25 PA Code, Chapter 93 to establish an ambient water quality criterion for Chloride, that was published in the May 1, 2010 PA Bulletin.

Drinking Water Source Protection Concerns

Public water supply systems (PWS) with source water intakes on rivers and streams have always been vulnerable to source water quality changes (natural and man-made) beyond their control. Chloride is one water quality parameter that is particularly problematic in view of the required sophistication and cost of drinking water treatment (particularly if chloride levels fluctuate seasonally).

We believe that the proposed ambient water quality criterion for chloride will strengthen current water quality protection for PWS surface water sources.

Municipal Wastewater Treatment Concerns

There are 1,000 +/- Publicly-Owned Sewage Treatment Works (POTWs) in PA. Chloride is a common component of municipal wastewater from: (a) household sewage; (b) residential, commercial and industrial customers that use ion-exchange water softening; and (c) wastewater received from certain commercial and industrial establishments (such as food processors or landfills). Chloride levels in discharges from municipalities with combined (stormwater and sewage) sewer systems can be very high during winter months due to dissolved road salt in snowmelt runoff.

As stated in the preamble to this proposed rulemaking:

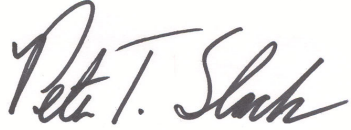
“The Criteria Continuous Concentration (CCC) and Criteria Maximum Concentration (CMC) values should not be exceeded more than once every 3 years on the average (EPA, 1988).

The 4-day average (CCC) criterion = 230 mg/l

The 1-hour average (CMC) criterion = 860 mg/l “

Translating such a criterion into a wastewater discharge limitation will require some sort of statistical modeling technique. Unfortunately, the Department has not provided any description of the technique that will be used, and it is therefore impossible to anticipate what sort of effluent limitations will result from such calculations. We suggest that the Department provide a few example calculations to assist in understanding the impact of the proposed criterion for various wastewater discharge scenarios.

Thank you for the opportunity to provide comments.

A handwritten signature in black ink that reads "Peter T. Slack". The signature is written in a cursive style with a large initial "P" and "S".

Peter T. Slack
Governmental Relations Associate