

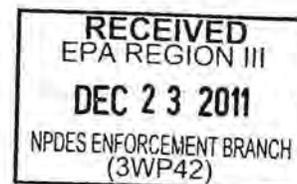
Pamela F. Faggert  
Vice President and Chief Environmental Officer

Dominion Resources Services, Inc.  
5000 Dominion Boulevard, Glen Allen, Virginia 23060  
Phone: 804-273-3467

December 22, 2011



**Dominion®**



**BY UPS OVERNIGHT MAIL AND EMAIL**

Mr. Peter Gold (Gold.Peter@epamail.epa.gov)  
U.S. Environmental Protection Agency, Region III  
NPDES Enforcement Branch  
Mail Code 3WP42  
1650 Arch Street  
Philadelphia, PA 19103-2029

**RE: Dominion Transmission, Inc.**  
**EPA Compliance Order - Docket No. CWA-03-2011-0267DN (Sept. 28, 2011)**  
**Additional Monitoring Data for Big Run WWTP, November 2011 (NPDES Permit**  
**PA0101656)**

Dear Mr. Gold:

Pursuant to Paragraph 36 of the above-referenced EPA Administrative Order for Compliance ("Order"), please find enclosed the analytical reports containing sampling results for Dominion Transmission, Inc.'s ("DTI") Big Run WWTP during the month of November 2011. The reports include data for the additional parameters required by the Order to be sampled bimonthly: Total Dissolved Solids (TDS); Chloride; Bromide; Sulfate; Uranium; Radium 226; Radium 228; and Gross Alpha. Please note that the reports also include analytical data for the other parameters sampled in compliance with Big Run's NPDES permit. That data will be reported on the monthly DMRs submitted to Pennsylvania Department of Environmental Protection via e-DMR.

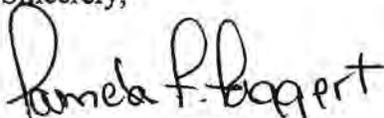
The facility obtained data for the additional parameters (along with the NPDES parameters) from 8-hour composite samples taken on November 2-3 and November 7. The November 2-3 samples were taken prior to commencing the discharge on November 4. The facility completed the discharge on November 10. The discharge totaled approximately 60,000 gallons of mostly non-process wastewater. Although the facility was not discharging when the first composite samples were taken on November 2-3, the samples were properly collected at Outfall 101 and no additional wastewater was added to the tank after those samples were taken. Thus, the samples are representative of the wastewater that was discharged.

Also, the Order and DTI's October 20, 2011 response indicated the additional sampling data would be submitted with the monthly DMRs. DTI uses e-DMR, however, and submission of the additional data is not compatible with the e-DMR program. Therefore, in accordance with our communications with you and with PADEP, DTI is submitting the additional data with this letter and will submit all future data collected pursuant to the Order in the same manner.

If you have any questions, please contact Sam Mathew at (330) 664-2531 or [sam.s.mathew@dom.com](mailto:sam.s.mathew@dom.com).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in black ink that reads "Pamela F. Faggert". The signature is written in a cursive style with a large initial "P".

Pamela F. Faggert

Enclosures

cc: Christina Nagy, PADEP Northwest Regional Office (via email)  
Sam Mathew

# Analytical Services, Inc.

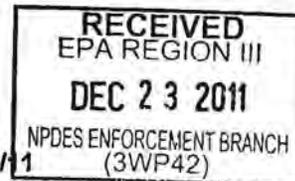
P.O. Box 237  
Brockway, PA 15824-0237

Laboratory (814) 265-8749  
FAX (814) 265-8749

## GENERAL ANALYSIS REPORT

CUSTOMER: Dominion Transmission  
654 Carson Hill Road  
Luthersburg, PA 15848  
Attn: Keith German

Page 1 of 1



SAMPLE RECEIVED: 11/03/11 at 8:35 am  
SAMPLE DATE: 11/02-11/03/11 (8 Hour Comp)

REPORT DATE: 11/14/11  
ASI ID#: 107335

DESCRIPTION OF SAMPLE: Big Run WWTP - Wastewater

### TOTAL ANALYSIS RESULTS:

PARAMETER	RESULT	UNIT	QUANTITATION LIMIT	METHOD	BY	DATE
Oil/Grease (Grab) 11/02/11 @ 3:05 pm	< 5	mg/L	5	SM 5520B	AC	11/07/11 @ 4:00 pm
TSS	< 2	mg/L	2	SM 2540D	JT	11/03/11 @ 9:30 am
Iron	0.16	mg/L	0.10	200.8	BB	11/04/11 @ 10:59 am
Cadmium	<0.001	mg/L	0.001	200.8	BB	11/03/11 @ 3:00 pm
Barium	1.12	mg/L	0.005	200.8	BB	11/03/11 @ 3:00 pm
MBAS	0.11	mg/L	0.10	5540C	CH	11/04/11 @ 9:30 am
Zinc	0.256	mg/L	0.010	200.8	BB	11/03/11 @ 3:00 pm
Acrylamide	<0.01	mg/L	0.01	8270C	CC	11/11/11 @ 7:18 pm
Acidity	< 1	mg/L	1	2310B	CH	11/10/11 @ 8:40 am
Alkalinity	164	mg/L	1	2320B	CH	11/10/11 @ 8:40 am
Benzene	<0.002	mg/L	0.002	624	CC	11/08/11 @ 11:59 pm
Osmotic Pressure	98.5	mOsm/Kg	--	82650	GC	11/03/11
Field pH	8.83		--	--	RC	11/03/11 @ 7:20 am
TDS	2,412	mg/L	10	2540C	JT	11/03/11 @ 9:30 am
Chloride	1,399	mg/L	3.0	300.0	CH	11/08/11 @ 1:29 am
Sulfate	83.5	mg/L	5.0	300.0	CH	11/08/11 @ 1:46 am
Bromide	11.1	mg/L	0.10	300.0	CH	11/08/11 @ 1:29 am

We certify that the above reported values were obtained by use of procedures appropriate for the sample as submitted.

BY:

DATE: 11/14/11

FOR: William J. Sabatose, Chief Chemical Analyst

# Analytical Services, Inc.

P.O. Box 237  
Brockway, PA 15824-0237

Laboratory (814) 265-8749  
FAX (814) 265-8749

## GENERAL ANALYSIS REPORT

**CUSTOMER: Dominion Transmission**  
654 Carson Hill Road  
Luthersburg, PA 15848  
Attn: Keith German

Page 1 of 1

**SAMPLE RECEIVED: 11/03/11 at 8:35 am**  
**SAMPLE DATE: 11/02-11/03/11 (8 Hr. Comp)**

**REPORT DATE: 11/16/11**  
**ASI ID#: 107335**

**DESCRIPTION OF SAMPLE: Big Run WWTP - Wastewater**

### TOTAL ANALYSIS RESULTS:

TEST	RESULT	UNITS	METHOD	MATRIX	LOQ	BY	DATE
Uranium	ND	µg/L	200.8	L	1	CM	11/09/11
Gross Alpha	U +/- 303.78	pCi/L	900.0	L	3	MO	11/14/11
Radium-226	U +/- 0.15	pCi/L	903.0	L	1	MO	11/15/11
Radium-228	U +/- 0.42	pCi/L	904.0	L	1	MO	11/14/11

Analysis performed by Summit Environmental Technologies, Inc. NELAP Accreditation #: E87688.

ND = Not Detected

U = Undetected

**We certify that the above reported values were obtained by use of procedures appropriate for the sample as submitted.**

BY:



DATE: 11/16/11

FOR: William J. Sabatose, Chief Chemical Analyst

# Analytical Services, Inc.

P.O. Box 237  
Brockway, PA 15824-0237

Laboratory (814) 265-8749  
FAX (814) 265-8749

## GENERAL ANALYSIS REPORT

**CUSTOMER: Dominion Transmission**  
654 Carson Hill Road  
Luthersburg, PA 15848  
Attn: Keith German

Page 1 of 1

**SAMPLE RECEIVED: 11/08/11 at 8:20 am**  
**SAMPLE DATE: 11/07/11 (8 Hour Comp)**

**REPORT DATE: 11/22/11**  
**ASI ID#: 107431**

**DESCRIPTION OF SAMPLE: Big Run WWTP - Effluent Line**

### TOTAL ANALYSIS RESULTS:

PARAMETER	RESULT	UNITS	QUANTITATION LIMIT	METHOD	BY	DATE & TIME
Oil/Grease	5	mg/L	5	SM 5520B	AC	11/11/11 @ 2:30 pm
TSS	8	mg/L	2	SM 2540D	JT	11/08/11 @ 9:30 am
Total Iron	0.15	mg/L	0.10	200.8	BB	11/21/11 @ 10:04 am
Cadmium	< 0.001	mg/L	0.001	200.8	BB	11/17/11 @ 11:13 am
Barium	0.913	mg/L	0.005	200.8	BB	11/17/11 @ 11:13 am
MBAS	<0.10	mg/L	0.10	5540C	CH	11/08/11 @ 3:45 pm
Zinc	0.0142	mg/L	0.010	200.8	BB	11/17/11 @ 11:13 am
Field pH	7.97		--		RC	11/07/11
TDS	11,988	mg/L	10	SM 2540C	JT	11/09/11 @ 9:30 am
Chloride	7,030	mg/L	3.0	300.0	BB	11/15/11 @ 5:01 pm
Sulfate	357	mg/L	5.0	300.0	BB	11/15/11 @ 5:01 pm
Bromide	54.2	mg/L	0.10	300.0	BB	11/15/11 @ 5:01 pm

We certify that the above reported values were obtained by use of procedures appropriate for the sample as submitted.

BY: *Brianna Beauvair*

DATE: 11/22/11

FOR: William J. Sabatose, Chief Chemical Analyst

# Analytical Services, Inc.

P.O. Box 237  
Brockway, PA 15824-0237

Laboratory (814) 265-8749  
FAX (814) 265-8749

## GENERAL ANALYSIS REPORT

**CUSTOMER: Dominion Transmission**  
**654 Carson Hill Road**  
**Luthersburg, PA 15848**  
**Attn: Keith German**

Page 1 of 1

**SAMPLE RECEIVED: 11/08/11 at 8:20 am**  
**SAMPLE DATE: 11/07/11 (8 Hr. Comp)**

**REPORT DATE: 11/28/11**  
**ASI ID#: 107431**

**DESCRIPTION OF SAMPLE: Big Run WWTP - Effluent Line**

### TOTAL ANALYSIS RESULTS:

TEST	RESULT	UNITS	METHOD	MATRIX	LOQ	BY	DATE
Uranium	1.6	µg/L	200.8	L	1	CM	11/16/11
Gross Alpha	U +/- 52.3	pCi/L	900.0	L	3	MO	11/17/11
Radium-226	U +/- 0.21	pCi/L	903.0	L	1	MO	11/21/11
Radium-228	1.16 +/- 0.83	pCi/L	904.0	L	1	MO	11/18/11

Analysis performed by Summit Environmental Technologies, Inc. NELAP Accreditation #: E87688.

ND = Not Detected

U = Undetected

We certify that the above reported values were obtained by use of procedures appropriate for the sample as submitted.

BY: *Brianna Bourard*

DATE: 11/28/11

FOR: William J. Sabatose, Chief Chemical Analyst



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WATER STANDARDS AND FACILITY REGULATION

## SUPPLEMENTAL LABORATORY ACCREDITATION FORM<sup>1</sup>

Permittee Name: <u>Dominion Transmission, Inc. Big Run WWTP</u>							
Address: <u>473 Rt 410</u>							
<u>Punxsutawney, PA 15767</u>							
PERMIT NUMBER				MONITORING PERIOD Year/Month/Day			
PA0101656				11	11	01	TO 11 11 30
PARAMETER	ANALYSIS METHOD	LAB NAME	LAB ID NUMBER <sup>2</sup>				
Hexane Extractable PHC	SM 5520B	Analytical Services, Inc.	PA-DEP 33-411				
Metals	E200.8	Analytical Services, Inc.	PA-DEP 33-411				
Total Suspended Solids	SM 2540D	Analytical Services, Inc.	PA-DEP 33-411				
Benzene	624	Analytical Services, Inc.	PA-DEP 33-411				
pH	EPA 150.1	Analytical Services, Inc.	PA-DEP 33-411				
Osmotic Pressure	82550	Analytical Services, Inc.	PA-DEP 33-411				
Acidity	2310B	Analytical Services, Inc.	PA-DEP 33-411				
Alkalinity	2320B	Analytical Services, Inc.	PA-DEP 33-411				
MBAS	SM5540C	Analytical Services, Inc.	PA-DEP 33-411				
Acrylamide Monomer	8270C	Analytical Services, Inc.	PA-DEP 33-411				
pH	EPA 150.1	Accreditation by rule	68-03060				

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name/Title Principal Executive Officer

Phone: 304-627-3947

Kevin Miknis / Superintendent Gas  
Transmission Operations

Date: 12-19-2011

Signature of Principal Executive Officer or  
Authorized Agent

<sup>1</sup> Submit this form with each Discharge Monitoring Report (DMR), Annual Report or Recordkeeping and Reporting Form, where sample results are submitted to the Department for compliance purposes.

<sup>2</sup> For parameter(s) covered under accreditation-by-rule, submit the lab's registration number in lieu of an accreditation number.



COMMONWEALTH OF PENNSYLVANIA  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 BUREAU OF WATER STANDARDS AND FACILITY REGULATION

**SUPPLEMENTAL LABORATORY ACCREDITATION FORM<sup>1</sup>**

Permittee Name: Dominion Transmission, Inc. Blg Run WWTP

Address: 473 Rt 410  
Punxsutawney, PA 15767

PERMIT NUMBER	MONITORING PERIOD Year/Month/Day						
PA0101656	11	11	01	TO	11	11	30

**Administrative Order Analysis**

PARAMETER	ANALYSIS METHOD	LAB NAME	LAB ID NUMBER <sup>2</sup>
TDS	2540 C	Analytical Services, Inc.	PA-DEP 33-411
Chloride	300.0	Analytical Services, Inc.	PA-DEP 33-411
Sulfate	300.0	Analytical Services, Inc.	PA-DEP 33-411
Bromide	300.0	Analytical Services, Inc.	PA-DEP 33-411
Uranium	200.8	Analytical Services, Inc.	PA-DEP 33-411
Gross Alpha	900.0	Analytical Services, Inc.	PA-DEP 33-411
Radium 226	903.0	Analytical Services, Inc.	PA-DEP 33-411
Radium 228	904.0	Analytical Services, Inc.	PA-DEP 33-411

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name/Title Principal Executive Officer

Kevin Miknis / Superintendent Gas  
 Transmission Operations

Phone: 304-627-3947

Date: 12-19-2011

Signature of Principal Executive Officer or  
 Authorized Agent

Pamela F. Faggert  
Vice President and Chief Environmental Officer  
**Dominion Resources Services, Inc.**  
5000 Dominion Boulevard, Glen Allen, Virginia 23060  
Phone: 804-273-3467



October 7, 2011



**VIA EMAIL and OVERNIGHT MAIL**

Mr. Peter Gold  
Environmental Engineer  
NPDES Enforcement Branch  
Mail Code 3WP42  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**RE: EPA Docket No. CWA-03-2011-0267DN, Dominion Transmission, Inc.  
ADMINISTRATIVE ORDER FOR COMPLIANCE AND REQUEST FOR  
INFORMATION, September 28, 2011**

Dear Mr. Gold:

Dominion Transmission, Inc. ("DTI") received the above-referenced Administrative Order for Compliance and Request for Information (the "Order") on October 3, 2011. DTI is committed to full compliance with all environmental laws and regulations and will fully cooperate with EPA to resolve the violations alleged in the Order. As required by Paragraph No. 38 of the Order, we are writing to confirm that DTI intends to comply with the lawful, reasonable, and/or appropriate components of the Order, while reserving the right to appeal or seek other administrative/judicial relief regarding the Order, including on jurisdictional grounds, and does not waive any such rights. Also, please note that DTI intends to discuss proposed alternate submission dates and requirements with the Agency.

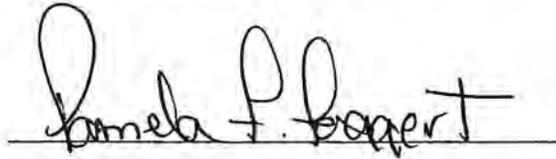
With respect to Paragraph No. 34 of the Order, DTI confirms that it intends to continue to accept "oil and gas exploration and/or production wastewater" in accordance with its duly issued NPDES permit (NPDES Permit No. PA0101656) for the Big Run WWTP. Please note that the Big Run facility receives "oil and gas exploration and/or production wastewater" from DTI-owned gas production and storage wells only, and not from any third parties.

DTI looks forward to resolving this matter and addressing EPA's concerns. Thank you for your attention to this matter.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or

Mr. Peter Gold  
October 7, 2011  
Page 2

persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A handwritten signature in black ink, reading "Pamela F. Faggert", written over a horizontal line.

Pamela F. Faggert  
Vice President and Chief Environmental Officer

cc: Jeffrey L. Barger  
Donald C. Bluedorn II

Pamela F. Faggert  
Vice President and Chief Environmental Officer  
Dominion Resources Services, Inc.  
5000 Dominion Boulevard, Glen Allen, Virginia 23060  
Phone: 804-273-3467



October 20, 2011

***VIA EMAIL and OVERNIGHT MAIL***

Mr. Peter Gold  
Environmental Engineer  
NPDES Enforcement Branch  
Mail Code 3WP42  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA. 19103-2029

**RE: EPA Docket No. CWA-03-2011-0267DN, Dominion Transmission, Inc.  
ADMINISTRATIVE ORDER FOR COMPLIANCE AND REQUEST  
FOR INFORMATION, September 28, 2011**

Dear Mr. Gold:

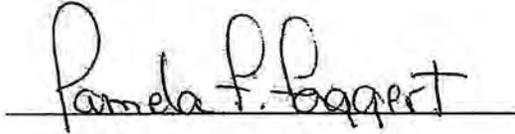
Dominion Transmission, Inc. ("DTI") received the above-referenced Administrative Order for Compliance and Request for Information on October 3, 2011 regarding DTI's Big Run wastewater treatment facility in Henderson Township, Jefferson County, Pennsylvania. The following responses, and associated documents provided on the enclosed CD, represent DTI's good faith efforts to provide available and responsive documentation and information in its possession. By submitting these responses, DTI does not waive its right to contest EPA's findings, allegations, violations, legal conclusions or any other statements in the Request in any future proceeding, and hereby preserves its rights and defenses with respect to this matter.

Should you have any questions regarding our responses, please contact Sam Mathew at (330) 664-2531 or [sam.s.mathew@dom.com](mailto:sam.s.mathew@dom.com).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and

Mr. Peter Gold  
U.S. EPA – Region III  
October 20, 2011  
Page 2

belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A handwritten signature in cursive script that reads "Pamela F. Faggert". The signature is written in black ink and is positioned above a solid horizontal line.

Pamela F. Faggert

Enclosures

cc: Jeffrey L. Barger  
Sam S. Mathew  
Donald C. Bluedorn II, Esq.

**DOMINION TRANSMISSION, INC.'S RESPONSES TO EPA  
ADMINISTRATIVE ORDER FOR COMPLIANCE AND REQUEST FOR  
INFORMATION ("Request"), EPA DOCKET NO. CWA-03-2011-0267DN**

**INTRODUCTION AND BACKGROUND ON BIG RUN FACILITY**

The Big Run Wastewater Treatment Plant (the "Facility") was first permitted in 1983 by CNG Transmission Corporation, which was a subsidiary of Consolidated Natural Gas Company ("CNG"). The Facility was built and permitted specifically as a non-commercial treatment plant dedicated to serving only CNG and its affiliates. In January 2000, Dominion Resources, Inc. ("DRP"), the parent corporation of Dominion Transmission, Inc. ("DTI"), acquired CNG and its affiliates (including CNG Transmission Corporation).

To the best of DTI's knowledge, the Facility never accepted for treatment any fluids that were not generated by CNG or its affiliates when it was owned by CNG. Likewise, the Facility has remained a captive, non-commercial treatment plant during DTI's ownership. Since 2000, it has only received fluids generated by DTI or its affiliates. Presently, because of the recent sale of two DTI affiliates (Dominion Exploration & Production, Inc. and Peoples Natural Gas Company), the Facility receives wastewater only from DTI-owned gas wells and related facilities. In addition, as a captive, non-commercial plant, the Facility operates only as necessary and does not operate continuously.

More important, the Facility is permitted to accept for treatment only the following wastewaters: gas well fluids, storage field production fluids, and miscellaneous compressor station wastewaters. To the best of DTI's knowledge, the Facility has always been permitted to accept only these wastewaters. **DTI emphasizes that, to the best of its knowledge, the Facility has never accepted any wastewater from drilling or hydraulic fracturing operations, Marcellus or other shale-gas operations, or coalbed methane operations.**

The Facility at first employed a flow-through treatment process using three lined impoundments. The treatment consisted of aeration, pH adjustment, and chemical treatment primarily to remove the iron, barium and suspended solids. Sand and carbon filters also were used to remove additional suspended solids and chemicals that contributed to the methylene blue active substances (MBAS) component of wastewater.

In July 2003, DTI temporarily closed the Facility in order to upgrade it by building and installing a batch treatment system. The new system employs two synthetic membrane-lined concrete tanks, a reactor vessel, and a settling vessel, in addition to pH adjustment, chemical treatment, sand filters, and carbon filters. This system began operation on or about February 19, 2008. The Facility received its NPDES permit from the Pennsylvania Department of Environmental Protection ("PADEP") in February 2007.

Documents responsive to the Request are Bates-numbered and included on the enclosed CD. For each DTI response to a request, please refer to the appropriate tab in

the Excel spreadsheet entitled "DTI Document Index." Each PDF file may have multiple pages.

### **SPECIFIC RESPONSES**

*No. 23: Respondent shall immediately take whatever action necessary to correct the deficiencies and eliminate and prevent recurrence of the violations cited above, and come into compliance with all of the applicable requirements of the Permit and the Act and its implementing regulations.*

**Response:** DTI has been in full compliance with the Permit, the Act, and its implementing regulations since at least January 2010.

*No. 24: Within fifteen (15) days from the date of this Order and Request, Respondent shall submit a written report detailing the specific actions taken to correct the violations cited herein and explaining why such actions are anticipated to be sufficient to prevent recurrence of these or similar violations. Respondent shall submit copies of all investigations conducted as a result of effluent limit exceedances listed in Attachment A and copies of documents related to such investigations or provide explanation why such investigations were not conducted.*

**Response:** DTI was successful in correcting the conditions that led to effluent limit exceedances in 2008 and 2009, and the Facility is in full compliance with the Permit, the Act, and its implementing regulations. As requested, DTI is providing the brief report below outlining the corrective actions it took regarding the exceedances as well as copies of the readily available responsive documents related to the corrective actions. Please note that readily available copies of the DMR cover letters were obtained from DTI's electronic files, and therefore do not include signatures. For these documents, please refer to Tab 24 of the DTI Document Index and the enclosed CD. Per email from Mr. Peter Gold (EPA) to Sam Mathew (for DTI) on October 12, 2011, EPA agreed to give DTI an extension to October 21, 2011 to submit its responses to the Request.

#### **Barium Exceedance: February 2008**

In February 2008, the monthly average level for barium exceeded the permit limit. DTI believes that the exceedance occurred as the Facility was fine-tuning its new batch treatment system, which was activated on February 19, 2008. DTI quickly responded to this problem by increasing the concentration of sodium sulfate treatment to precipitate the barium. Since that one-time exceedance, the barium level has consistently remained within the permit limits.

#### **TSS Exceedance: February-June 2008**

From February to June 2008, the instantaneous maximum and monthly average levels of TSS exceeded the permit limit. Prior to receiving analytical results for TSS, DTI had no reason to believe there was any problem as the discharge fluid had a clear appearance. In

fact, after considerable evaluation it was determined that the problem was due to the analytical methodology. After the first high TSS results were received, DTI responded swiftly and diligently to fix the problem. First, DTI hired several laboratories to test the fluids, but received conflicting results. It then began to evaluate how the analytical test method (ASTM 2540D), which employs a filter, was being performed. DTI tested and analyzed the filter paper, which showed residues of sodium chlorides, which is not a suspended solid. Recognizing that the issue involved dissolved solids, DTI contracted a water treatment specialist with expertise on highly dissolved solids fluids, who demonstrated that the high TSS levels did in fact originate from the residual dissolved solids retained on the filter paper. DTI thus concluded that the issue was with implementation of the analytical method rather than the treatment. DTI determined that the filter was not being adequately rinsed as the method prescribes, and that the problem could be addressed by additional rinsing of the filter to remove the dissolved solids. The additional rinsing procedure was submitted to PADEP as an attachment to the May 2008 DMR. Since the additional rinsing procedure has been applied, the Facility has been in compliance with the TSS limit. Additional details are provided in DTI's DMR cover letters to PADEP and in other related documents, which are provided on the enclosed CD.

*Oil and Grease Exceedance: March 2008*

In March 2008, the instantaneous maximum and the monthly average levels for oil and grease exceeded the permit limit. Despite DTI's examination, it was unable to determine any precise cause of this issue. DTI believes that this one-time exceedance occurred as Facility personnel were fine-tuning the new batch system. Since March 2008, the oil and grease level has been in compliance.

*MBAS Exceedance: November and December 2009*

In November and December of 2009, the instantaneous maximum and the monthly average levels for the MBAS exceeded the permit limits. Historically, DTI had been treating for the MBAS in the fluids through the activated carbon in the carbon filter. Once DTI detected the exceedance, DTI responded promptly by replacing the activated carbon in the carbon filter. This initially stopped the exceedance, but the MBAS level subsequently was exceeded again. DTI later discovered that the activated carbon failed because the vendor had changed the treatment chemical that was being used in DTI's wells, and thus affecting the wastewater coming to the Facility. DTI realized that this new product was leading to the treatment capacity of the activated carbon being quickly depleted. Once DTI learned of this problem, it immediately stopped using the vendor's new product and began removing the high-MBAS fluids and sending them to commercial facilities for treatment. The MBAS level has been in compliance since these actions were taken. Additional details are provided in DTI's DMR cover letters to PADEP and other related documents, which are provided on the enclosed CD.

*No. 25: The report referenced in Paragraph 24 shall specify whether the acceptance of oil and gas exploration and/or production wastewater caused or contributed to the effluent limit exceedances listed in Attachment A.*

Response: The Facility is a non-commercial, captive facility dedicated to and permitted for treating only certain natural gas fluids and other miscellaneous wastewaters from DTI and its affiliates' natural gas production and storage wells and related facilities. The Facility currently operates under duly-issued NPDES and WQM permits from PADEP. The causes of the exceedances are described above, and relate to operational issues at the treatment facility and not the sources of the wastewater.

*No. 26: Respondent shall provide EPA with an electronic spreadsheet that summarizes the information recorded in the facility monthly DMRs for the years 2006-2011.*

Response: Please refer to Tab 26 of the DTI Document Index and the enclosed CD.

*No. 27: Respondent shall provide EPA with the day, month, and year when oil and gas exploration and/or production wastewater was first accepted at the Facility.*

Response: The Facility's initial NPDES permit became effective June 21, 1983, and DTI presumes the Facility began operation on or after that date.

*No. 28: Respondent shall provide EPA with the notification the Facility gave to PADEP regarding the Facility's acceptance of oil and gas exploration and/or production wastewater referenced in Paragraph 27.*

Response: As noted above, the Facility was originally permitted, and remains permitted, to receive wastewater from natural gas storage and production wells, and not from drilling or hydraulic fracturing activities. Further, the Facility accepts such wastewater only from company- or affiliate-owned wells, and not from third parties. Please refer to Tab 28 of the DTI Document Index and the enclosed CD for relevant permitting information since 2006, as agreed to by Mr. Peter Gold, and confirmed by email from Sam Mathew on October 11, 2011.

*No. 29: Respondent shall provide EPA with documentation of PADEP's authorization for the acceptance of oil and gas exploration and/or production wastewater referenced in Paragraph 27.*

Response: Please see Response to No. 28.

*No. 30: Respondent shall provide to EPA all characterization evaluations of incoming wastes with source identification since the date referenced in Paragraph 27.*

Response: As agreed to by Mr. Peter Gold, and confirmed by email from Sam Mathew on October 11, 2011, DTI is providing copies of available data reports

for representative samples that DTI has collected of incoming wastewaters from 2006-2011. Please refer to Tab 30 of the DTI Document Index and the enclosed CD.

*No. 31: Respondent shall provide EPA with copies of all permit amendment applications including, but not limited to, applications submitted to notify the permitting authority of a proposed change in the type of wastes received at the Facility since the date referenced in Paragraph 27.*

Response: Please see response to No. 28.

*No. 32: Respondent shall provide EPA with the Facility's standard operating procedures for sampling the hauled wastewater at the truck unloading zone.*

Response: Given that the Facility is a captive, non-commercial facility treating only a known type of wastewater from company-owned natural gas storage and production wells and related facilities, it was unnecessary, and the Facility was not required, to develop a sampling procedure at the truck unloading zone. DTI does, however, make visual inspections for excessive oil content as part of its best practices and has analyzed representative samples of incoming wastewaters. See also Response to No. 30. Please refer to Tab 32 of the DTI Document Index and the enclosed CD.

*No. 33: Respondent shall provide EPA with the Facility's method for determining whether or not to accept hauled wastewater at the truck unloading zone based on the sampling procedure referenced in Paragraph 32.*

Response: Please see Response to No. 32.

*No. 34: Respondent shall inform EPA within five (5) business days of receipt of this Order and Request if it is continuing or planning to accept oil and gas exploration and/or production wastewater in and/or change current process operations.*

Response: Please see October 7, 2011 letter from Ms. Pamela F. Faggert to Mr. Peter Gold.

*No. 35: Respondent shall inform EPA if a permit renewal application was submitted to PADEP and if they plan to renew their NPDES permit.*

Response: DTI submitted its NPDES permit renewal application to PADEP on August 5, 2011.

*No. 36: Respondent shall begin composite sampling, of a minimum of 8-hour duration, of its effluent for the analysis of TDS, chloride, bromide, sulfate, Gross Alpha, Radium 226 and 228 and Uranium, upon receipt of this Order and Request and biweekly thereafter. Samples should be analyzed by an accredited laboratory using EPA-approved methods. Respondent shall submit to EPA and PADEP the additional monitoring data of their effluent with its monthly DMRs to characterize its water quality.*

Response: As agreed to by Mr. Peter Gold, and confirmed by email from Sam Mathew on October 11, 2011, commencing in early November, DTI will begin sampling for the above-listed parameters on a "2/month" basis, concurrent with 2/month sampling requirements for other parameters in the Facility's NPDES permit. Please note that because the Facility discharges intermittently and can forecast future discharge events, it sometimes must perform 2/month sampling events several days apart rather than on a strict "biweekly" schedule. With respect to the radiological sampling, DTI may not be able to receive the data in time to submit with its monthly DMR. Should that be the case, DTI will plan to submit that radiological sampling data with its subsequent DMR, unless EPA indicates to the contrary.

*No. 37: Respondent will not be required to perform the sampling and analysis prescribed in paragraph 36 above, if within 5 days of receipt of this Order and Request, Respondent certifies that it will not accept any oil and gas exploration and/or production wastewater. To meet the requirements of this paragraph, Respondent must sign and return to EPA the attached certification (Attachment B).*

Response: Please see Responses to No. 34 and No. 36.

*No. 38: Within five (5) days from the date of this Order and Request, Respondent shall submit to EPA a certification signed by a responsible official, of Respondent's intent to comply with this Order and Request.*

Response: Please see October 7, 2011 letter from Ms. Pamela F. Faggert to Mr. Peter Gold.

*No. 39: Unless otherwise stated, Respondent shall provide EPA all submissions pursuant to this Order and Request within fifteen (15) calendar days of receipt of this Order and Request. All submissions pursuant to this Order and Request shall be signed and dated by a responsible official of the Respondent and include the following certification....*

Response: Per email from Mr. Peter Gold to Sam Mathew on October 12, 2011, EPA agreed to give DTI an extension to October 21, 2011 to submit its responses to the Request. Also, DTI is using the certification language at 40 C.F.R. § 122.22(d), which is provided in the cover letter transmitting these responses.