

**Brockway Area Sewage Authority
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March 31, 2011

Mr. Ronald C. Furlan, PE
Pennsylvania Department of Environmental Protection
Bureau of Water Standards and Facility Regulation
Rachel Carson State Office Building, PO Box 8774
Harrisburg, PA 17105-8774

RE: Request for Information - Permit ID: PA0028428
Brockway Area Sewerage Authority, Jefferson and Elk County

Dear Mr. Furlan,

We are in receipt of your request letter dated March 18, 2011. Please be advised as follows concerning this letter.

First, it is our understanding that our facility is not receiving any wastewater related to Marcellus shale gas drilling operations. The brine wastewaters treated and discharged by our facility under contract to Dannic Energy are reported to be from standard gas production wells only.

You should also note that our NPDES permit is currently in the process of renewal and that we have objected to some of the monitoring and effluent requirements proposed by the Department.

Going to your specific requests, we currently check our effluent for pH and conductivity (as a stand-in for total dissolved solids). We have no problem accepting the additional sampling for total alkalinity, chloride, sulfate, and bromide, and having a certified laboratory start running total dissolved solids, as our contract with Dannic Energy provides that they must pay for all additional testing resulting from our acceptance of their wastewater. This additional monitoring will be undertaken if it is made a permit condition on our pending NPDES permit.

We strongly object to any requirements for radiation monitoring as to date there has been no study showing that such pollutants are present in brine wastewaters. In fact, the only definite study we have seen to date, presented by Bucknell University at the "Science of Marcellus Shale", Lycoming College, Williamsport, January 29, 2010, found no radiation problems with Marcellus shale wastewaters.

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Burt Waite, PG, of Moody and Associates, Inc., has informed us that his review and study of Marcellus brine wastewaters shows no problem with the levels of naturally occurring radioactives present in these wastewaters. This study included concentration of such materials in wastewater treatment processes, where he found that even when concentrated in sludges, there have been no reported cases where relevant standards for solid waste disposal were exceeded. This was a personal communication following the March 29, 2011, Toby Creek Watershed Association sponsored public meeting on Marcellus activities in the Little Toby Creek watershed.

Does the Department have any information which shows that such pollutants may be a problem in brine wastewaters?

We appreciate your consideration of our position on what to date appears to be costly additional monitoring that cannot be justified on the facts.

Sincerely,

Timothy Keister

Timothy Keister, CWT
Board Chairman
Brockway Area Sewerage Authority

cc: D. Sinclair, Dannic Energy