

**Summary of Comments by Clean Water Action to the
Environmental Quality Board (EQB) on the Triennial Review of
Water Quality Standards; Chloride Criteria
August 21, 2012**

Clean Water Action supports implementation of the proposed water quality standard for chlorides as contained in the Triennial Review of Water Quality Standards. There is a strong need for the chloride standard to be implemented due to existing discharges of chloride in several watersheds in the state. As recently as June, 2012, multiple wastewater treatment plants have reported to DEP discharges of chlorides exceeding 70,000 mg/L, several times saltier than seawater.

DEP's current draft proposal to utilize the chloride standard developed in Iowa in 2009 improves upon DEP's proposal in 2010 which was based on EPA's standard developed in 1988. The Iowa standard incorporates both more recent scientific knowledge, and in particular recognizes the relationship between chloride toxicity, the presence of sulfates, and hardness.

Clean Water Action recommends that EQB support the adoption of a safety factor for the chronic criteria prior to finalization of the standard in order to ensure that all uses will be protected. The safety factor is necessary due to lack of several factors not accounted for in the Iowa standard. Most notably, the Iowa standard is based solely on the toxicity of chlorides of sodium, while there is considerable evidence that chlorides of potassium, magnesium, and calcium have a greater toxic effect. In addition, a safety factor should encompass the current scientific uncertainty of the chronic effects of chloride on aquatic life.

Philadelphia

1315 Walnut Street
Suite 1650
Philadelphia PA 19107
Tel: 215.545.0250

Harrisburg

115 Pine Street
First Floor
Harrisburg, PA 17101
Tel: 717.233.1801

Pittsburgh

100 Fifth Avenue
Suite 1108
Pittsburgh, PA 15222
Tel: 412.765.3053

www.cleanwateraction.org/pa