



Philadelphia Refinery

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December 6, 2013

Environmental Quality Board
PA Department of Environmental Protection
P.O. Box 8477
Harrisburg PA 17105-8477

Dear Environmental Quality Board:

As Vice Chairperson of the Storage Tank Advisory Committee (STAC), I am writing to communicate the STAC's position with regard to the proposed Land Recycling Program (Chapter 250) rulemaking.

A quorum was present at the December 3, 2013 STAC meeting, and following review and discussion of the proposed Chapter 250 regulations, STAC voted to unanimously approve the rulemaking as written for presentation to the EQB as proposed rulemaking, with the exception of the proposed MTBE value in Table 1, Appendix A. The sense of the STAC was that it did not support using DEP's interpretation of the MTBE drinking water advisory for odor, versus a more quantitative calculation in conjunction with EPA's methodology.

DEP staff did an excellent job in this very large, complicated, and complex process.

Please let me know if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads 'Judy S. Brackin'.

Judy S. Brackin
STAC Vice Chairperson