

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Thursday, January 09, 2014 10:17 AM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IIRC; RegComments@pa.gov; eregop@pahousegop.com; environmentalcommittee@pahouse.net
Cc: ra-epmsdevelopment@pa.gov
Subject: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites



Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites

The Environmental Quality Board (EQB) has received the following comments regarding the above-referenced proposed rulemaking.

2014 JAN -9 AM 10:23

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IIRC

Commentor Information:

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 Anonymous
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Comments entered:

Sirs; A topic not discussed that requires DEP involvement is "Pipeline Stream Crossing". The gas pipe line crossing arguments in Chester County at the Brandywine Creek were totally wrong, really wrong.

The gas pipeline company wanted to dig a trench across the creek, however the uninformed environmentalist insisted the trench would affect the environment and the quality of water entering Downingtown Water Treatment Plant. And finally affecting the Brewery from making quality beer. The Gas Company gave in and agreed to drill under the Creek at a cost at about \$1,000,000.00 additional. We as consumers pay extra for this.

No one analyzed what happens when we get a long ,several days of heavy rain. All the small streams are cleaned and the creek becomes loaded with suspended solids and related high turbidity. I have treated clarifiers with 10 NTUS to as high as 400 NTUS , while meeting drinking water standards. This type of rainy weather took place several months ago, and the Brandywine Creek was dark brown in color. The turbidity should have been in the 300 NTUS -400 NTUS range. No complaints from the Water Plant or the Brewery.

Digging a ditch across the Brandywine Creek, say ¼ to ½ way across the creek, per day, would definitely not upset the water quality. I would estimate the clarity would be less than 100 NTUS-200 NTUS about 200 FT from the ditch. This a far, far, less than found during heavy rains.

Why did no one explain the facts about this waste of money to appease some people totally

unfamiliar with the Creek Crossing Process?

I am an environmentalist with 50 years plus water treatment experience . I have contacted the DER and DEP 3 times regarding illegal dumping which resulted in clean up and fines.

I am concerned about the Oil and Gas Industries adopting latest technology methods and using the best Standards. We have to define them and inspect to ensure regulations, 100%. Most companies will comply with rules and laws, as long, as they are not constantly changing. Any shortcuts can and do cause pollution issues and accidents.

The consideration of well brine to deice roads can be dangerous unless constant monitoring is in place. Trace cancer elements, along with various organics are of concern.

Many people are concerned about wells burning off gas. The flair stacks are made to serve as safety valves to prevent pressure build up and potential explosions. Flaring should be controlled to avoid long periods of potential atmosphere problems and waste of well products.

Who is responsible for proving the source and or cause of domestic well and stream contamination?

A mandate that all well drillers include a nontoxic fluoresce type dye in their millions of gallons of water used to drill a well would help pin down the source. A bright reddish colored water in my sink would be easily traced to the specific well as the source. This would be a fast and less costly way to identify the source.

I have worked in Philadelphia Refineries for 25 years and I am aware of safety concerns at all times. Proper designed systems with ongoing inspections will definitely improve well and gas line safety. Taking risks to control costs is probably the single most cause of accidents and pollution issues.

a.baroni p.e.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

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