

3042

**Cooper, Kathy**

**From:** RegComments@pa.gov  
**Sent:** Thursday, January 23, 2014 3:55 PM  
**To:** Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;  
RegComments@pa.gov; erekop@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.**

### **Commentor Information:**

John Trallo  
(jtrallo@epix.net)  
47 Main St  
Sonestown, PA 17758 US

**Comments entered:**

My name is John Trallo.

I am a resident, home owner, small business owner in DavidsonTwp., Sullivan County, PA. First I want to thank the DEP/EQB for this opportunity to speak. I am also a teacher, father, and grandfather.

After carefully reading the DEP proposed amendments to the PA oil and gas regulations, it is clear that the primary intention of these regulations is to encourage the expansion of the oil and gas industry in Pennsylvania, and not to protect the environment, the unique ecology of PA, our valuable forests and state lands, or people who live in the communities in the shale regions.

I hear the usual code words such as "minimizing, acceptable practices, lessening the impact", etc., but nowhere in the rules and regulations do I see any measure for shutting down what are commonly referred to as "bad actors". The only consequence for any violations, caused either by negligence, intent, or by accident, are scandalously low and inadequate fines. There are also no mention of any measures that the state would impose upon any operator to justly compensate, or restore the quality of life of those who will be negatively impacted. On the contrary, the rules are clearly slanted in the industry's favor.

To date, more than 1600 residents of Pennsylvania have entered their names onto the List of the Harmed, avowing that after drilling operations began in their area, they became ill. 161 of those cases have been documented and confirmed by the DEP via a right-to-know request.

Research from the Colorado School of Public Health indicates that persons who live within ½ mile of fracking operations have an increased risk of disease-- both cancers and non-cancers due to exposure to toxic chemicals.

Dr. John Adgate, Colorado School of Public Health, found that the chronic health risks near drilled areas were highest for neurological disease, hematological disease, respiratory effects, and developmental effects.

A study recently released by Cornell University, found decreased birth weight for babies of mothers who experienced their pregnancy near unconventional gas drilling operations. The research on the effect to developing babies is horrifying. There has been shown to be a 25% increased prevalence of low birth weight if the mother lived within 1.5 miles of an unconventional gas well.

Dr. Currie of Princeton University looked at the Pennsylvania birth records from 2004 to 2011 of infants born within 1 mile of unconventional gas drilling sites, and found the likelihood of low birth weight increased by more than half.

Research out of Duke University found that water wells within 1 mile of unconventional gas wells had 17 times the thermogenic methane as compared to reference sites. Another Duke study found thermogenic methane 6 times higher and ethane 23 times higher if a home was within one quarter mile of a gas well.

Dr. Warner of Duke University expressed concerns about natural pathways that might allow gases from gas wells to put drinking water supplies at risk.

Kevin Schug of the University of Texas found elevated levels of arsenic and selenium in water closest to gas extraction sites.

Avner Vengosh of Duke University, found that brine from Marcellus shale contains bromide and radium which is radioactive.

The Texas Commission on Environmental Quality analyzed fracking fluids. Associated health problems included: 65% of the chemicals were associated with serious health effects, 94% with skin, eye, and respiratory harm, 93% with gastrointestinal problems, 87% with respiratory system damage, 83% with brain and neurological effects.

Many of the chemicals used in gas drilling operations are known carcinogens, neurotoxins, and endocrine disruptors. Many, such as the BTEX group, have long been known to be linked to chronic and fatal diseases.

Over 40% of the chemicals used in unconventional gas drilling have been found to be endocrine disruptors.

A recent University of Missouri study done by a team of researchers, including Susan Nagel, head of the Endocrine Disruptors Group found that water samples collected from sites in a drilling dense region of Colorado exhibited more estrogenic, anti-estrogenic, or anti-androgenic activity than reference sites. The risk of disrupting the endocrine systems of our born and unborn children is unconscionable with the potential to lead to a multitude of chronic diseases and developmental disruption. The state of Pennsylvania has yet to conduct comprehensive public health and environmental studies, yet in the state of Pennsylvania, we have well sites located within 2 miles of at least 190 day care facilities, 223 schools, and 5 hospitals.

"Regulation" by its very definition means: the adjusting, organizing, or controlling of something, or the state of being adjusted, organized, or controlled, or to regulate the flow.

In closing I must conclude that there is no such thing as regulations that will adequately and sufficiently protect the people, or ensure the safety and protect the health of our children. If there are, I would like to know what regulatory model the DEP and the EQB have been studying.

Therefore, all the regulations, and the amendments to current regulations you propose do nothing more than attempt to adjust the rate of damage to the environment, public health, and the safety and security of our communities, and our children.

Finally, I would like to echo the wise words of Supreme Court Chief Justice Ron Castille who wrote the Supreme Court's decision on the unconstitutionality of some of Act 13's provisions when he said:

"By any responsible account, the exploitation of the Marcellus Shale Formation will produce a detrimental effect on the environment, on the people, their children, and the future generations, and potentially on the public purse, perhaps rivaling the environmental effects of coal extraction." - PA Supreme Court Chief Justice Ronald Castille, December 19, 2013

Therefore, the only responsible and acceptable solution that will protect our constitutional rights, the public health and safety, and the environment of Pennsylvania is to initiate a ban on this dangerous and invasive practice of extreme fossil fuel extraction, and move towards developing a renewable and sustainable energy policy.

Sincerely,  
John A. Trallo, Sr.  
47 Main Street  
Sonestown, PA 17758  
570-482-3503  
[jtrallo@epix.net](mailto:jtrallo@epix.net)

Executive Committee,  
Shale Justice Coalition  
<http://shalejustice.org/>

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Hayley Book

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Director, Office of Policy  
PA Department of Environmental Protection  
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P.O. Box 2063  
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**Re: Proposed Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites**

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Commentor Information:

Paul Zazow  
(plz23@verizon.net)  
7 Goldeneye Ct  
doylestown, PA 18901 US

Comments entered:

I've been very disappointed to learn about situations like Dimick where DEP and federal regulators have done such a poor job of protecting our citizens from the devastating effects of poorly controlled resource extraction. As such I strongly feel that DEP should require industry to restore contaminated drinking water to federal clean water standards and bypass the obvious delaying/obfuscating tactics by industry when they argue for previously degraded standards. Also, when a local drinking water supply is compromised, the industry responsible SHOULD be required to pay for trucking in safe water, as had originally been approved for places such as Dimick.

As well, open pits for storage waste has to be prevented, as the risks of leakage are unacceptable.

Also, all industries should be held to federal regulation standards for handling of hazardous substances, such as those used in fracking operations.

Thank you for listening. I'd appreciate a response to know that my message has been read.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Hayley Book

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