

From: RegComments@pa.gov
Sent: Wednesday, February 12, 2014 10:04 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;
 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 FEB 14 AM 9:05

RECEIVED
IRRC

Commentor Information:

Glenn Giles
 (glenn127@yahoo.com)
 127 fernwood Dr
 Portage, PA 15946 US

Comments entered:

Will PA. become the next WV chemical spill in water supply?

We should make sure what happened in West Virginia does not happen to our water supply. I feel it not worth the risk if it is not 100% foolproof for protecting our water supplies. I feel we should do everything possible to protect our water and not look for quick and cheap ways to get rid of the chemicals and brine waste.

Plans must be made to protect our ground water under all conditions, including high water and flooding. Planning for average conditions are not good enough.

To ensure the best protection of our water, the DEP's investigation should extend to all oil and gas activities.

The prohibition on construction of fluid storage areas within 100 feet of certain water bodies should be extended to all streams and water bodies.

Collection and analysis of chemical waste samples that are intended to be disposed of onsite needs to be a mandatory requirement. The draft regulations leave this to the discretion of the operator, which should not be allowed. This is especially important where a disposal site does not need to be inspected by the agency before closure, and there is no provision for long term monitoring of ground water.

The DEP's proposed regulations for the road-spreading of brine pose unacceptable threats to our water.

Any use of brine, is subject to regulation under the DEP's SWMA regulations at 25 Pa. Code Chapter 287. These regulations do not currently allow permits-by-rule for road-spreading, so the permit-by-rule scheme proposed in sections 78.70 and 78.70a is illegal.

It is DEP's responsibility to put what is right for the environment, first. I only hope we will not have to go through what the people of West Virginia are going thru.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

Hayley Book
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
RegComments@pa.gov

3042
Cooper, Kathy

From: RegComments@pa.gov
Sent: Wednesday, February 12, 2014 9:27 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;
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.

Commentor Information:

Karen Giles
(fernwoods@aol.com)
127 Fernwood Dr
Portage, PA 15946 US

2014 FEB 14 AM 9:05

RECEIVED
IRRC

Comments entered:

The DEP's purpose is to protect the public's right to a clean environment. This is your constitutional obligation! The DEP should be required to take whatever actions are needed to condition permits in a way that protects public resources.

Pennsylvania should not allow fluids used for oil and gas operations to be put in "natural depressions." Anything used to hold fluids that may contain water pollutants should be specifically engineered to hold hazardous waste and designed so they will NEVER leak and contaminate our water.

Plans must be made to protect our ground water under all conditions, including high water and flooding. Planning for average conditions is not good enough.

It serves little purpose to accept comments, if they are not read, evaluated and answered. Regulations should require the DEP to respond to comments submitted by public resource agencies.

To ensure the best protection of our water, the DEP's investigation should extend to ALL oil and gas activities.

The prohibition on construction of fluid storage areas within 100 feet of certain water bodies should be extended to all streams and water bodies.

The planned regulations would allow well operators to dispose of waste in pits on well sites if they follow minimal requirements. Since waste from oil and gas sites is exempt from the hazardous waste regulations, hazardous waste can be disposed at well sites with a single synthetic liner and no long-term groundwater monitoring. This is far from being good enough. Everything corrodes or deteriorates eventually. Please think about what will happen to our water and our health when these facilities leak.

A local engineer, that works on gas drilling, told me that eventually, probably in 20 years, all our water would be contaminated. Isn't our water, our health, and our lives more important than someone's profit? Don't you care about doing your job, and protecting our water?

Can't you see that our health and our environment is much more important than money in someone's pocket? Our water must be protected forever!

Many disposal pits have leaked, contaminating water. Due to the high risks of these mini-landfills, the DEP should prohibit well site disposal of residual waste. If it continues there should be long-term groundwater monitoring and public notice of the locations of these disposal sites.

The DEP should strengthen its regulatory mechanisms for ensuring that pits and impoundments are constructed in a structurally sound manner and according to regulation. Any falsification must be prosecuted criminally.

Collection and analysis of chemical waste samples that are intended to be disposed of onsite needs to be a mandatory requirement. The draft regulations leave this to the discretion of the operator, which should not be allowed. This is especially important where a disposal site does not need to be inspected by the agency before closure, and there is no provision for long term monitoring of ground water.

The DEP's proposed regulations for the road-spreading of brine pose unacceptable threats to our water, our health and even our homes. Isn't it obvious that when it rains, this will wash off the roads and into our streams?

My neighbor was biking along our road with his dog. After he got home, he noticed a strange substance all over the dog's feet and the carpet. It injured the dog and damaged the carpet, and after researching what the substance was, we felt it fracking brine.

Haven't you considered that people, pets and wildlife walk on roads, and then walk in our homes, where children play on the floor and then put their hands in their mouths, and the dogs lick their feet.

Please do not allow this to be put on our roads, or it will be unsafe for people and animals to walk there. The risks of spreading brine on roads outweigh the benefits.

Your purpose is to protect the environment, not to enable very rich companies to save money by putting their hazardous waste on our roads.

Any use of brine, is subject to regulation under the DEP's SWMA regulations at 25 Pa. Code Chapter 287. These regulations do not currently allow permits-by-rule for road-spreading, so the

permit-by-rule scheme proposed in sections 78.70 and 78.70a is illegal.

If our water is damaged I don't think there should ever be a release from liability. If there is a release from liability, it should certainly be conditioned on the adequate final restoration of the well site after the last well on the site has been plugged.

Please put what is right for the environment, above all else. Please consider what will happen when liners and containers start leaking. That is what you were hired to do. Our lives depend on you.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Hayley Book

Hayley Book
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
RegComments@pa.gov