

3042

Cooper, Kathy

From: RegComments@pa.gov
Sent: Friday, May 08, 2015 1:13 PM
To: Environment-Committee@pasenate.com; apankake@pasen.gov; IRRC;
 RegComments@pa.gov; eregop@pahousegop.com;
 environmentalcommittee@pahouse.net; gvitali@pahouse.net
Cc: ra-epmsdevelopment@pa.gov
Subject: Comment notice for - Advanced Notice of Final Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites (7-484)



Re: Advanced Notice of Final Rulemaking - Environmental Protection Performance Standards at Oil and Gas Well Sites (7-484)

The following comments have been received regarding the above-referenced advanced notice of final rulemaking.

Commentator Information:

Ed Oles
 (ejo123@yahoo.com)
 220 Mosshaven Way
 Ligonier, PA 15658 US

RECEIVED
 IRRC
 2015 MAY - 8 PM 2:46

Comments entered:

Ed Oles
 220 Mosshaven Way
 Ligonier, PA 15658

Re: Pennsylvania's Proposed Oil and Gas Regulations

A company must leave the air, the water, the environment, the health of the residents of a community as good as they found it. Since they do not do this voluntarily, regulations must ensure that they do. The end user of their products/gas/coal must pay the full price, now, of the "goods" and not leave the expense to future generations to heal or repair.

I am especially concerned that the Commonwealth take this opportunity to protect the health of our residents and the environment because I recently saw how our local township ignored the issues raised by citizens, even on the setback from schools. After reviewing information from areas with a history of drilling, I urge you to:

Prohibit open frack ponds that service one or multiple wells to curtail the many incidents of leaks and spills. Tanks used for the storage of waste must be completely enclosed.

New regulations should require that plans be submitted immediately to close existing waste impoundments with completion of closing required in 6 months.

There should be no legally allowed leakage or release of vapors, mists or liquids. Vapor capture devices should be required to prevent the escape of any fumes.

Air quality monitors that operate continuously must be installed to verify and report to the DEP that harmful gases are not escaping from the site.

Any limits for chemical emissions from tanks must be a total of all air pollution sources in the area. This information must be available to the public.

Prohibit the burial or land application of drill cuttings, which can contain polluting and radioactive substances.

Prohibit onsite burial of waste pits. Buried pits can leak and pollute groundwater over time freeing operators from any responsibility after completing operations.

Prohibit the land application of topsoil water, pit water, fill, or dredged material. These substances can contain chemicals and sediments bound with pollutants that pose risks to water, air and soil.

Radiation and radioactive waste should be specifically addressed in the new regulations.

All liquid and solid waste should be monitored for all relevant forms of radiation and readings must appear clearly on up-to-date labels.

- All temporary and permanent impoundments, storage tanks, pits, that collect discharges from wells must be tested at least quarterly.
- All liquid and solid materials transported to permanent sites such as landfills and injection wells, must be tested and clearly labeled, regardless of whether the destination state requires such labeling.
- The amounts of radioactivity and volumes must be publically disclosed on a quarterly basis.
- Residents within a 5-mile radius of the landfill must be informed annually of the radioactivity status
- The landfill must monitor radiation on landfill perimeters and in storm run-off and streams nearby on at least a quarterly basis.
- The landfill does not move the radioactivity to sites other than those designed for radioactivity.

Setbacks:

- The minimum setback from schools and sites that serve vulnerable populations such as hospitals and nursing homes should be not less than 1.5 to 2 miles since that is the average distance of recent evacuations.
- There should be a minimum of 750 foot buffer from all water ways: perennial streams and intermittent streams.

Water supplies

- The DEP's duty to investigate water pollution should extend to all oil and gas activities.
- All pre-drill water quality testing should be conducted by a certified third-party professional operator, and made available to the landowner.
- Companies should testing a minimum of 3 times for water quantity and quality during low, high and average hydrological conditions; the number required in a law suit and by the changes that naturally occur in the water table and chemistry.
- Any affected drinking water supplies must be restored either to Safe Drinking Water Act standards or, if pre-existing water quality was higher than SDWA standards, to the better pre-existing condition.

- All drillers make pre-drill data available to the public, while protecting individual homeowners' privacy.
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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Patrick McDonnell

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