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RE: Chapter 78 Public Comments

To Whom It May Concern:

Air Coalition of Tunkhannock is a nonpartisan grassroots group of Wyoming County Citizens whose mission is to address air quality issues in Wyoming County and Northeastern PA, determine impacts and work together to find solutions. We commend you for recognizing the need to strengthen regulations and appreciate the opportunity to comment on the Chapter 78 regulations. Peer reviewed studies and past incidents and violations have provided evidence that oil and gas production sites have polluted our air and water. Article 1, Section 27 of the Pennsylvania Constitution gives us the right to clean air, pure water . . . and it is your duty to protect and ensure that right.

We recommend that DEP ban open-air pits and tanks for storage and treatment of regulated substances and require all waste storage tanks to be completely enclosed as soon as possible. While we are glad that DEP is addressing this issue we feel it could be safely done within a year and doesn't go far enough. Allowing additional time risks additional pollution to our water and soil from leaks and to our air from aeration. DEP must require all waste impoundments to be disclosed in order for DEP to track or hold drillers accountable for pollution from these sites. Additionally, DEP must require all oil and gas industry operators to develop water management plans and ban the use of brine on our roads to further protect our water and soil as well as animal and agricultural food sources.

While we are glad that DEP has added schools to the list of public resources that require additional consideration when permitting oil and gas wells, this notification requirement alone is completely inadequate. To improve protection from pollution, noise, and light and safety from traffic, accidents, and explosions, DEP should require, at minimum, a one-mile setback of oil and gas wells, waste storage facilities, and any other infrastructure from the boundary of any school property. This setback should also be applied to locations where other vulnerable populations reside, including nursing homes, hospitals, day care centers, and environmental justice communities. Ohio had a one and a half mile evacuation zone during a well incident and studies have shown that the closer to wells the more negative impacts to health and quality of life. |

We were told at the onset of drilling that well sites would not need to be closer than one mile apart due to horizontal drilling but have seen that has not been the case. We see several well pads along with other infrastructure within a mile, compounding the negative effects of those who live, work or play in those areas.

While DEP goes through the process of the revision of the Chapter 78 regulations we urge you not to ignore air quality and the impacts from compressor stations and infrastructure and methane as it relates to climate. Although we commend DEP for raising air quality awareness by recently proclaiming Air Quality Awareness Week and the importance of the Air Quality Index, many counties in the shale fields do not have any air monitoring to obtain their county specific data to protect themselves from bad air days. In fact, the American Lung Association in their most recent State of the Air Report indicated that 82% of Wyoming County residents fall in the sensitive population!

We are aware that many call for balance of the needs of industry with that of citizens, but there is no other industry operating in so many residents' backyards and in residentially zoned areas. As rural and residential areas are now becoming industrialized, we hold you to the task of protecting the public health and safety and environment of all Pennsylvania residents and future generations by adopting the strongest possible regulations for the oil and gas industry.

Respectfully,

Audrey Gozdiskowski, Volunteer
Air Coalition of Tunkhannock