

3042

RECEIVED
IRRC

2015 MAY 25 AM 9:41

RECEIVED
APR 23 2015
DEP Policy Office

May 19, 2015

Attn: DEP Policy Office
400 Market St.
P.O. Box 2063
Harrisburg, PA 17105-2063

RegComments@pa.gov

To: DEP Policy Office
From: George Bach
Address: 65 East Greenwood Ave. ,Lansdowne,Pa. 19050

Re: Revisions to the Environmental Protection Performance Standards at Oil and Gas Well Sites
(Chapter 78 and 78a).

Thank you for the opportunity to comment to this proposed Advance Notice of Final Rulemaking of the Environmental Protection Performance Standards at Oil and Gas Well Sites (Chapter 78 and 78a). These draft regulations reflect a responsiveness to public comments. While I appreciate and support many of the changes proposed in this current version of the proposed rules, there are certain areas that I would like to see strengthened still, for the protection of my community. In addition, I would like to thank DEP for the public comment period. It is essential that we have these rules on the books and implemented, and avoid further delay of these protections leaving our communities at risk.

I would like to express my support for the proposed addition of a noise standard in the rule, and also seek to clarify that standard by adding a quantitative standard of 45dBA or lower. Noise complaints from drilling operations and production have been some of the most pervasive concerns among residents living near gas wells, and a quantitative standard is a good step toward addressing such concerns. In addition, I would like to offer the following: I support the proposed requirement that operators submit a permit application that identifies all active, inactive, abandoned and orphaned wells prior to drilling, and urge the Department to also require that all identified orphaned or abandoned wells be plugged or otherwise adequately addressed prior to drilling;

I agree that centralized open waste impoundments must be addressed, but I remain concerned that DEP's requirement that such impoundments be phased out or upgraded to meet residual waste regulations may not address pollution risks quickly enough. Under DEP's proposal, it may take more than 3 years before open storage of waste is eliminated.

Instead, I support a prohibition of open waste impoundments to take effect immediately after the rules are adopted, due to significant risk of air and water pollution, as well as risk of human exposure to hazardous substances;

I support DEP's proposed prohibition on the use of temporary on-site waste storage pits. Waste should be contained in closed systems to ensure that it does not leak into the environment. DEP has the duty to determine whether a drilling operation has affected a homeowner's water supply. Once that has been determined, I support the requirement that operator restore drinking water supplies to state Safe Drinking Water Act standards or better if the pre-drilling survey shows better quality. Thank you for this opportunity to advocate for regulations and enforcement that best protect our communities.

Sincerely,

George Bach
65 E. Greenwood
Lansdowne PA 19050