



PO BOX 97062
PITTSBURGH, PA 15229
THREERIVERSWATERKEEPER.ORG

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

July 12, 2022

**Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A
Underground Injection Well**

Dear Mr. Hancharick,

Three Rivers Waterkeeper (3RWK) thanks you for the opportunity to submit comments on Underground Injection Control Permit Number PAS2D702BALL Authorization to Operate a Class II-D Injection Well. 3RWK was founded in 2009 and aims to improve and protect the water quality of the Allegheny, Monongahela, and Ohio Rivers. These waterways are critical to the health, vitality, and economic prosperity of our region and communities. We are both a scientific and legal advocate for the community, working to ensure that our three rivers are protected and that our waters are safe to drink, fish, swim, and enjoy. We are one of the 300 organizations that make up the global Waterkeeper Alliance and work together to connect local communities to global environmental and advocacy resources. 3RWK opposes this permit authorizing the Sedat 4A Injection Well due to the risk of both surface and groundwater contamination in Plum Borough.

The Commonwealth of Pennsylvania promises in its constitution “a right to clean air, pure water, and to the preservation of the natural, scenic, historic, and esthetic values of the environment” through its environmental rights amendment.¹ These natural resources are “the common property of all the people,”

¹ Pa. Const. art. I, § 27.

and it is the duty of the Commonwealth to “conserve and maintain them[.]”² The Sedat 4A Injection Well gambles with Plum residents’ right to pure water, disregarding their opposition to the project in favor of industrial convenience.

Plum residents and officials have worked for years to prevent Penneco from building wastewater injection wells in the borough.³ Since the older Sedat 3A Injection Well was proposed in 2016, residents have spoken out about the risks that injection wells pose both to the underground aquifers and to the streams and creeks that flow through the borough.⁴ Their concerns were unfortunately vindicated: the 3A Injection Well has already failed and violated environmental regulations, leading to persistent, ongoing water quality problems.⁵ Residents living near the Sedat 3A well have said that since the injection well began to operate, their well and spring water became discolored and cloudy, or took on strange tastes or odors.⁶ At the same time, residents’ attempts at challenging the permitting and construction of the Sedat 3A and now 4A Injection Wells have been ignored. When the Sedat 3A well was initially proposed, “at least 200 people opposed permit approval” at the July 2017 public hearing.⁷ The Borough updated its zoning ordinance to restrict oil and gas disposal wells to areas zoned for industrial use, but that too was ignored.⁸ When opponents of the injection well asked Governor Wolf to step in and protect the Borough, the governor’s response was to say that he lacked the authority to revoke the permit.⁹ In effect, the

² *Id.*

³ Joyce Hanz, *2nd Injection Well Project in Plum Faces Opposition from Residents, Borough Officials*, TribLIVE, Dec. 10, 2021, <https://triblive.com/local/valley-news-dispatch/second-injection-well-project-in-plum-faces-opposition-from-residents-borough-officials/>

⁴ Michael Divittorio, *Plum Ends Fight Against Injection Well Project*, TribLIVE, June 24, 2020, <https://triblive.com/local/valley-news-dispatch/plum-ends-fight-against-injection-well-project/>. See also Dillon Carr, *Plum Expresses Opposition to Injection Well*, TribLIVE, July 27, 2017, <https://archive.triblive.com/local/plum/plum-expresses-opposition-to-injection-well/>.

⁵ Joyce Hanz, *supra* note 3.

⁶ *Id.*

⁷ Michael Divittorio, *supra* note 4.

⁸ Joyce Hanz, *supra* note 3.

⁹ Dillon Carr, *Environmental Groups Call on Gov. Tom Wolf to Stop Plum Oil and Gas Disposal Well*, TribLIVE, Jan. 14, 2021, <https://triblive.com/local/plum/environmental-groups-call-on-gov-tom-wolf-to-stop-plum-oil-and-gas-disposal-well/>

permitting process used for the Sedat 3A Injection Well violated Plum residents' right to pure water as guaranteed by the Pennsylvania Constitution while also denying the state and local governments the ability to protect their residents. Despite the widespread, vocal opposition to oil and gas waste disposal in Plum Borough, the Sedat 3A well was permitted. This undemocratic process must not repeat with the Sedat 4A Injection well.

Not only would this permit jeopardize Plum residents' right to pure water as guaranteed by the Pennsylvania Constitution, but it also violates federal water quality laws. In particular, the risk posed to both ground and surface water quality raises concerns under both the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA). Broadly, the CWA requires the acquisition of a valid NPDES permit to discharge pollutants from a point source into the surface waters of the United States.¹⁰ The United States Supreme Court held in the 2020 case *City of Maui v. Hawai'i Wildlife Fund* that the CWA "requires a permit when there is a direct discharge from a point source into navigable waters or when there is a *functional equivalent of a direct discharge*."¹¹ In *Maui*, a wastewater reclamation facility in Hawaii pumped wastewater underground, where it flowed through the groundwater out into the ocean.¹² Even though the flow of that wastewater was disrupted by the need to travel underground, the Court held that this was still in effect a discharge of waste from a point source into coastal waters.¹³ The CWA's effluent limitations still applied when point source pollution (e.g. wastewater from an injection well) traveled in a nonpoint source manner (e.g. through groundwater) into navigable waters. The fact that contaminants must flow underground before reaching navigable surface waters should not exempt the Sedat 4A Injection Well from the CWA's requirements for other point sources.

¹⁰ 40 CFR § 122.1.

¹¹ *Cty. of Maui v. Haw. Wildlife Fund*, 140 S. Ct. 1462, 1476 (2020).

¹² *Id.* at 1469.

¹³ *Id.* at 1477.

The antidegradation policy established by the Clean Water Act requires that “the level of water quality necessary to protect [the stream’s] existing uses shall be maintained and protected.”¹⁴ The same antidegradation policy also requires that sufficient water quality must be maintained “to support the protection and propagation of fish, shellfish, and wildlife and recreation on and in the water.”¹⁵ Even if the State were to decide that the economic or social interests are weighty enough to justify allowing lower water quality, the State must still “assure that there shall be achieved the highest statutory and regulatory requirements for all new and existing point sources”¹⁶ Plum Creek and its tributaries are classified for recreational use and as a warm water fishery.¹⁷ Plum Creek itself is a tributary of the Allegheny River, which supports recreation and warm water fish, while also being widely used for navigation and as a source of drinking water.¹⁸ Although the risks to Plum residents’ surface water are most immediate, contamination from the Sedat 4A Injection Well most likely would negatively impact waters outside of the Borough’s limits. The EPA and DEP must not issue permits that carry the risk of destroying these existing uses.

Not only does the Sedat 4A Injection Well pose a serious risk to Plum Borough’s surface waters, it also risks contaminating drinking water. The SDWA requires that

[n]o owner or operator shall construct, operate, maintain, convert, plug, abandon, or conduct any other injection activity in a manner that allows the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR part 142 or may otherwise adversely affect the health of persons.¹⁹

Any drinking water contamination whatsoever would violate the SDWA, and Penneco has not shown that they can build a well in such a way that it would not contaminate the drinking water. Indeed, the history

¹⁴ 40 CFR § 131.12(a)(1).

¹⁵ 40 CFR § 131.12(a)(2).

¹⁶ *Id.*

¹⁷ 25 Pa. Code § 93.9u. *See also 2022 Pennsylvania Integrated Water Quality Report*, PA DEP, <https://storymaps.arcgis.com/stories/b9746eec807f48d99decd3a583eede12> (last visited July 11, 2022).

¹⁸ *Id.*

¹⁹ 40 CFR § 144.

of leaks from the Sedat 3A Injection Well serve as a case study for why the proposed Sedat 4A Injection Well creates a direct threat to the underground sources of drinking water that the SDWA is meant to protect.

The Sedat 3A Injection Well failed within months of its construction. Residents complained of contaminated wells and springs, and Penneco responded by providing bottled water to some residents after the initial complaints.²⁰ Beyond Plum, communities across the United States have raised alarms regarding the safety of injection wells for over a decade.²¹ More recently, in addition to the failures of the Sedat 3A well, reports of fracking wastewater contaminating surface waters in Ohio and West Virginia further support residents' concerns about the safety of injection wells.²² With the history of well failures in this region, residents might expect that this will in fact affect surface waters. Allegheny County is defined by its rivers, and contamination from another faulty injection well has the potential to spread far. This is particularly true given how infrequent integrity tests for Class II Injection Wells really are: with tests only every five years, leaks might continue for years before action is taken.

In addition to violating federal laws, the Sedat 4A Injection Well would also violate the Pennsylvania Clean Streams Law. Unlike the CWA, the Clean Streams Law explicitly includes “underground water” as a part of the “waters of the Commonwealth” to be protected under the law. Additionally, the Clean Streams Law contains specific provisions relating to pollution resulting from underground wastewater disposal. The DEP is obligated to “consider the disposal of wastes . . . into the

²⁰ Joyce Hanz, *supra* note 3.

²¹ Abrahm Lustgarten, *Injection Wells: The Poison Beneath Us*, ProPublica, June 21, 2012, <https://www.propublica.org/article/injection-wells-the-poison-beneath-us>.

²² Julie Grant, *In Ohio, Regulators Respond to Suspected Frack Waste Spewing from Unused Gas Well, Causing Fish Kill*, StateImpact Pennsylvania, February 5, 2021, <https://stateimpact.npr.org/pennsylvania/2021/02/05/in-ohio-regulators-respond-to-suspected-frack-waste-spewing-from-unused-gas-well-causing-fish-kill/>. See also *Study: Fracking Didn't Impact West Virginia Groundwater, But Wastewater Spills Pollute Streams*, StateImpact Pennsylvania, April 24, 2017, <https://stateimpact.npr.org/pennsylvania/2017/04/24/study-fracking-didnt-impact-west-virginia-groundwater-but-wastewater-spills-pollute-streams/>.

underground as potential pollution[.]”²³ In particular, three types of underground discharges are prohibited:

- (1) Discharge of inadequately treated wastes, except coal fines, into the underground workings of active or abandoned mines.
- (2) Discharge of wastes into abandoned wells.
- (3) Disposal of wastes into underground horizons unless the disposal is for an abatement of pollution and the applicant can show by the log of the strata penetrated and by the stratigraphic structure of the region that it is improbable that the disposal would be prejudicial to the public interest and is acceptable to the Department.²⁴

Southwest Pennsylvania has a centuries-long history of coal mining. Plum Borough itself is situated on land marked forever by mining and drilling operations.²⁵ The preponderance of abandoned mines in the area increases the risk that leaking wastewater could flow into mines or abandoned wells, functionally behaving as a discharge violating 25 Pa. Code § 91.51(b)(1)-(2). The channels created by these mines and wells only increase the permeability of the geologic features meant to trap the wastewater underground, and thereby increase the risk of contamination.²⁶ Furthermore, we believe that the Sedat 4A Injection Well would also violate 25 Pa. Code § 91.51(b)(3), because placing Plum Borough’s streams and drinking water at risk of contamination by toxic and radioactive fracking brine would indeed be prejudicial to the public interest.

In summary, we oppose this permit for the Sedat 4A Injection Well because it violates the rights of Plum residents under the Pennsylvania Constitution and under both state and federal laws. Penneco has clearly violated similar permits in the past and they have not shown that they are taking the interests of the community into consideration. The people of Plum oppose the creation of a new well, just as they opposed the creation of the Sedat 3A Injection Well back in 2017. The EPA must consider both the failure

²³ 25 Pa. Code § 91.51(a).

²⁴ 25 Pa. Code § 91.51(b).

²⁵ See Jake Flannick, *State Works to Extinguish Longtime Underground Mine Fire in Plum*, Pittsburgh Post-Gazette, Apr. 7, 2017, <https://www.post-gazette.com/local/east/2017/04/07/Plum-underground-mine-fire-being-extinguished/stories/201703310144>.

²⁶ Abrahm Lustgarten, *supra* note 21.



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of the Sedat 3A Injection Well and the scope of Penn Borough's mobilization against the creation of any more injection wells. We believe therefore that the EPA must deny Underground Injection Control Permit Number PAS2D702BALL authorizing the Sedat 4A Injection Well.

Thank you for your time and consideration.

Sincerely,

Heather Hulton VanTassel, PhD

Executive Director, Three Rivers Waterkeeper
PO Box 97062, Pittsburgh, PA 15229
Heather@ThreeRiversWaterkeeper.org
724-651-4367

U.S.EPA

R3-ULC-Mailbox@epa.gov

I am writing in response to the permit application being filed by Penneco Environmental Solutions. LLC (with corporate offices at 6608 Route 22 Delmont, PA 15626) This application is being filed for a "Residual Waste Transfer Facility" and expansion to its existing facility located at 1815 Old Leechburg Rd. New Kensington, Pa 15068

The current facility on this property has been receiving 2,268,000 gallons of oil and gas waste water also referred to as flowback per month beginning back in March of 2021. All seemed to be going okay at its initial startup other than new truck traffic and noises twenty-four hours a day, seven days a week. Then in May of 2021 the EPA approved doubling the amount of waste acceptance to 4,536,000 gallons per month. It was soon after was when this facility had it first of many failures.

The owner of this facility failed to report the packer failure the right agency in the time required. This is unacceptable for this industry, let alone people like myself who depend on these companies and their knowledge and word that they are doing everything legit. It shows me that the well operators own versions could be by far to benefit themselves so they can continue to operate uninterrupted.

DEP Don Hegburg told me it was mechanical packer failure. I believe he said somewhere at a depth around 700 feet. After learning this, I realized when this happened it resulted immediately in well contamination complaints. The contamination that our wells received in this direct area may very well may have been caused by this failed packer. I have the Smolinski family that lives on my road above me that had immediate discoloration coming from their well water with a pretty awful smell they were saying. Frank spoke at your hearing on 8/30. I believe they stopped using their well. I did get to see the orange tinted sample at a Plum Borough meeting. I also will include other testimonies from the Paddock family who live directly above me later in this letter. (And as an attached document) You have heard the Sheehan's testimony and many others at the past Plum meeting we had with your agency. I still feel there may be many more families in the immediate area that may not even realize that their water and or air is being compensated. Let alone all the health issues that may be brewing for their futures. Even though the DEP is trying its best to make everyone in Plum aware, I feel this needs to be the well owner's responsibility to notify or to at least absorb the cost for the man hours of the tax payer's dollars. Instead of just walking away and saying "it has to go somewhere". That's just another way to show me how one these officers that work for Penneco and their knowledge of this industry. I would expect and answer like this more from a child than a professional.

My issue occurred back in the middle of September 2021. I was awoken by a really awful acidic, chemical smell that somehow enter my home. My eyes, throat, nostrils and any exposed skin was burning, really bad and I also had a pretty bad headache. I had trouble breathing, almost like suffocating. I checked on my girlfriend and the dogs and got outside to see what was happening, also thinking that fresh air could help with the issue that was happening to us. I understand that there are numerous chemicals in this industry and had a pretty major concern that this is what directly affected us. This concern made me start to file my own complaints with all agencies and contacts listed.

- DEP, Don Hegburg
- Nick Cato (DEP Air Quality Control)
- EPA New Stanton office, spoke to Tom Morris.
- Pittsburgh Poison Center, referred me to Allegheny County Health Department.
- Allegheny County Health Department, Stephanie Hasanali, Division of Environmental Health Epidemiology.
- Pennsylvania Department of Health (DOH)
- Plum Police Department Officer Rupert
- Plum Borough Board

10/7/21 Plum Borough Police Department Officer Rupert was here and I filed a complaint against Penneco. The officer did come into my home and noticed the unusual smell in my basement. This is when my Geothermal Water Furnace was located at that time. I asked if he could email me a copy of the complaint which I am still waiting for. I realize the local police force have no training what so ever in the oil and gas industry and the severity of the issues these facilities are capable of causing, so I probably had the officer pretty confused.

10/18/21 I also contacted my primary care doctor Dr. Lawrence John for testing. He was very concerned on me living so close to this facility and told me that we need to move away from this Injection Well as soon as I am able. He explained they are not good for us to be around. I explained to him what happened to me. He then referred me to an ENT, Dr Golla.

Dr. Golla ran numerous tests [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] I am currently in the process of making additional appointments with several other specialists that are more familiar with the effects transient expose to chemicals in the fracking industry, and if they could prove this is what directly [REDACTED] I believe they have in the past.

I know it may not mean much to anyone. But the two things I enjoy the most in life is my work and cooking my food. I worked from home for the past 17 years roughly 14-16 hours a day. [REDACTED] then they wrecked my life. Until you actually live through what I live with everyday now, there is just no way to understand. I am still concerned of further health issues that may result from this.

If proven, I will then be filing criminal charges also against the several fracking companies and their negligence that could be contaminating the air or water that passes across or under my property. Pennsylvania's Attorney General has been a big help at correcting problems in this Industry. I am hoping I can turn to them for help if so.

NOTE: The primary component of natural gas is methane, which is odorless when it comes directly out of the gas well. In addition to methane, natural gas typically contains other hydrocarbons such as ethane, propane, butane, and pentanes. Raw natural gas may also contain water vapor, hydrogen sulfide (H₂S), carbon dioxide, helium, nitrogen, and other compounds. If the concentration of H₂S in the gas is high enough, there may also be a "rotten egg" odor associated with the gas. Penneco also has several of their own shallow wells on this same property that currently are still producing natural gas. I am concerned that one of these wells, from one or more of these fracking companies may have caused my Parosmia. Being I live in here in this rural zoned area, there is no other industry even close that could produce this type of vapors.

My main concern is to find out what caused this odor. On October 2nd I emailed a complaint to the DEP. The complaint went as follows: "My water well that provides water to my Geothermal Furnace seems to be emitting a strong acid-like odor into my home. It may have very well been the cause that was irritating to my eyes, skin and nostrils. I believe my water well may be contaminated with the chemicals they are pumping into the Penneco Sadat #3 injection well. If so, this is a real concern to me. They have been unloading into the well for the last few weeks all hours of the day and night to the Penneco Sadat #3 injection well about a quarter mile above my home. I have not been running my furnace for fear it is indeed contamination. The well water that passes through my Geothermal Furnace discharges into a creek in front of my home. Being I have worked in the gasoline and diesel business for the last 40 years I am familiar with a lot of the regulations for ground and water contamination also. Please email me or call me as soon as possible."

Don Hegburg from the DEP called and made an appointment to come to my home.

10/6/21 DEP came to my home with two other representatives and did the first samplings of many that they took over the next few months from my well. They noticed a strong, referring to it as a petroleum odor. This also confirms what my colleagues told me when he was in my basement right around the same time. In their early investigation they felt they needed to investigate where the unusually high amounts of methane can be coming from. Later they told me Penneco and EQT are two of the companies working in this area. Over the next 6 months and numerous visits by the DEP to my home, we have been documenting the methane readings they are taking have been ranging anywhere from 10% gas to as high as 42-46% gas it is "directly related to the gas and oil industry, not coal gas". (See photo of actual DEP readings)

I have been in the Gasoline, Diesel fuel business for nearly 40 years. We have strict regulations we are required to follow. From a description of the products (MSDS Sheets) we carry on the trucks to documenting and reporting any type of spills over 25 gallons. Yet these injection facilities are accepting some of the same chemicals we see on our MSDS Sheets. I don't understand how they are clearly allowed to dump them into the ground beneath our homes with no reporting, no BOL's required, or no such documentation of the exact amount of chemicals of what is being hauled in any of these bottle trucks. I realize they like to say they are diluted with million gallons of water but understand that there have already been trucks in this industry that carry loads with higher amounts of chemical concentrations than others. We know that there are numerous chemicals used in the fracking business. Some of the more serious ones in this fracking waste are what concern me. Benzene, Toluene, Xylene are just a few and are all used to make gasoline. We also see ones like Sulfuric Acid and Hydrogen Sulfide, Phenol. These are the ones that can permanently damage the neurological system if the vapors

come in contact with humans. I can't help to wonder if one or more of these very well may be of came in contact with me while sleeping at my home that night.

Being exposed to toxic chemicals used in the fracking industry [REDACTED] Also, these same chemicals that are used in this industry have also caused death. And now let's add the everyday stress from living near these facilities. And the permits that are granted by the EPA and the DEP. Agencies that I always assumed were here for the safety of the daily water I drink and the air I breath.

During some of the DEP's investigation, on one of his visits to the Penneco Injection Facility on or around 10/13/2021, Don Hegburg made me aware he was told by a Penneco employee that they were burning off some pretty harsh stuff at this Injection site a while back. Don asked me if I smelt what could be like rotten eggs back then. What now concerns me, maybe they could have been burning off Hydrogen Sulfide, or some other highly toxic chemical on their property? [REDACTED]

[REDACTED]

[REDACTED] The DEP has already made me aware that chemical vapors are heavier than air and tend to stay low to the ground. They also linger in our homes, cars, storage sheds and basically every nook and cranny air can find. Also, that nights tend to be worst when the air becomes still.

1/19/22 Plum Borough Zoning Board Hearing. I have a copy of the hearing transcripts containing some sworn testimonies from several people who live above me, one family directly above me, on my road that were also complaining about chemical and very bad acid odors in the air that made your eyes water and leaves a bad taste in their mouths. This also cause them to have to leave their home at times. (See attachment)

I assume that you already know that this Injection Well is the very first commercial Injection Well in the state of Pennsylvania. They receive numerous gallons of Residual Waste from numerous states. When these companies are required to govern themselves, I sometimes wonder how many companies report the exact truth of every violation they break. If any of them have a track record that this company appears to have, who knows what is being offloaded at this facility.

This is the main reason I do not want to see this permit approved for this Penneco Sadat facility. I see the damage that the current Injection Facility has caused to us and if it is because of their negligence, then they need to be shut down immediately until they are reviewed for this and the other existing outstanding issues are resolved. They already have a pretty bad track record of numerous past incidents and violations against them at numerous facilities they own and maintain. It is obvious to me that they are unqualified to be into this business, or just have trouble reporting their problems in a timely manner. At this Injection Facility, they have already failed to notify the EPA and the DEP in the timely matter when they did not report their WOS-AS1-X packer failure. I can't help but feel that they were starting to cover up their problems at this Injection facility. If not mistaken, they are responsible to monitor their actions and have already proven they are unable to report themselves. I can't help to feel

how incompetent this company and some of its officers are. I do not want to see anyone else around this facility become damaged like my health, my home and property already have.

I want to go back to the meeting on 8/30/22. Dr. John F. Stolz mentioned how my water well that is used to operate my geothermal furnace was compensated. I have had this furnace removed and replaced back in May of this year and is now running on propane. Just additional costs this facility is creating for me. I was deathly afraid to use the current Geothermal unit in fear of an explosion or possibly being poisoned again if this was the case.

I want to assure you that I am not against the Fracking Industry. This provides the energy for an important part of America's future. I am against the weak laws and loopholes and unsafe practices that continue to make this industry unsafe for the health of all Americans.

I also am concerned, that the DEP and EPA that we know are already severely understaffed to be able to follow up with all of the investigations required in this industry in a proper and timely manner. I now see this putting the health of the citizens at risk. The Attorney General has also mentioned how these officers, trained at our government expense, have been poached away to much higher-paying jobs in the oil and gas industry. This is mentioned back in the court of common pleas Allegheny County Investigating Grand Jury Report No. 1 Filed June 22, 2020 (see attached link below)

<https://www.attorneygeneral.gov/wp-content/uploads/2020/06/FINAL-fracking-report-w.responses-with-page-number-V2.pdf>

I now see my government is adding 87,000 IRS agents. I see no mention of DEP or EPA agents being added. I can't help feeling that money tops health, on their priority list.

Today's EPA and DEP challenges are unlike the steel industry cleanups back in the sixties and seventies. Back then you could see the smog in the air, the iron oxides that laid on the hoods of cars and the oil and chemical sheens on the three rivers. Today's challenges are gases and vapors that you can't see and as far as the really ugly looking fluids and numerous chemicals that vanish into Injection wells quicker than they can settle in ponds at fracking sites.

I can't stress enough how important that the EPA and DEP needs to continue to grow along with all these changes of today's fracking industry. With these added challenges these two agencies face and the uncertainties of what numerous chemicals they are actually looking for may be another reason to reevaluate this industry. The environmental challenges of this industry today are more out of sight so let's not make them more out of mind.

I do however notice a Superfund to protect people's health. The PFAS "Chemicals as Hazardous Substances" It's nice to know that they are going to hold the polluters accountable for their actions. I am hoping this will be a start to making this fracking industry safer for all of our health.

Please, if there is any other information you may require, I have kept a journal from the opening of this facility. The numerous hours I work from my home that overlooks [REDACTED] given me the opportunity to make people aware of what it is like to live in the day and life of an Injection Well.

Thank you for your time, and please can you acknowledge that you received this email.

Bob Teorsky [REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Russell Zerbo <rzerbo@cleanair.org>

Wed 7/13/2022 8:52 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear,

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API

#37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Thanks,
Russell Zerbo (he/him)
215.567.4004 x130
advocate
cleanair.org

September 5, 2022

Donald R. Ziegler

James Bennett

US EPA Region 3

Four Penn Center

1600 John F. Kennedy Blvd

Philadelphia, PA 19103-2029

Dear Mr. Bennett

Thank you for moderating the public hearing on August 30 at the Plum Borough Community Center regarding PENNECO's request to add an additional injection well, known as Sedat 4A. You were patient in hearing all the reasons why the request for this well should be denied. The citizens you represent offered evidence of the negative impact of the first injection well that PENNECO is operating. Now that we have tangible evidence of the negative impact of their first well, there is solid data and grounds to deny PENNECO moving forward with their request for Sedat 4A.

After reviewing your EPA website, it is encouraging to see your mission at the EPA is so clearly stated, which I reference below:

OUR MISSION

The mission of EPA is to protect human health and the environment.

EPA works to ensure that:

- **Americans have clean air, land and water;**

James, it is reassuring that you are involved to protect us as our representative at the EPA. From the evidence and public comment, it appears obvious the decision that you must make to protect our health and the environment so we can have clean air, land and water is to deny the permit for the Sedat 4A injection well.

Also, from your EPA website the document of "Transparency and Open Government" dated January 21, 2009 was posted. It states that the "*Government should be transparent. Transparency promotes accountability and provides information for citizens about what their government is doing.*"

James, as our representative of the EPA, I/we look forward to transparency from you in your decision/recommendation and accountability to us as the citizens you serve. We eagerly await your decision to reject this request from PENNECO for the Sedat 4A injection well.

Thank you in advance for looking after our welfare and helping provide clean air, land and water as stated by your EPA mission!

Sincerely,



CC: Adam Ortiz, Regional Administrator; Michael S. Regan, EPA Administrator

Opposition to draft permit PAS2D702BALL

Matt Kelso <kelso@fractracker.org>

Sat 7/2/2022 3:58 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

July 2, 2022

Attn: Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

According to your [website](#), “The mission of EPA is to protect human health and the environment.” The mission is clear and unambiguous, and further backed by seven key points of how EPA hopes to achieve this goal. And yet, when it came to approving the Sedat #3A Class II-D waste disposal well (PAS2D701 BALL), EPA Region 3 officials systematically worked against each and every one of these guiding principles, failing the neighbors of the site by turning their relatively clean environment into yet another contamination zone. And now, with the issuance of the draft approval for the Sedat 4A Class II-D well (PAS2D702BALL), your agency is on the precipice of doubling down on all of these mistakes.

In this letter, we will discuss these failures point by point. Each one begins, “EPA works to ensure that:”

- “Americans have clean air, land and water.”

In your 2017 public hearing about Sedat #3A, EPA made it clear that they were not going to consider harm to air or land, only water issues that might run afoul of the 1974 Safe Drinking Water Act. Therefore, residents who have complained of chemical odors from the tank battery on the site have no recourse with EPA. Residents who have complained of diesel pollution from the constant procession of waste haulers have no recourse with EPA. Residents who have complained of physical damage to their property from activities on site have no recourse with EPA.

But as it turns out, EPA has shown that they are uninterested in protecting water supplies as well. At least two different residences have complained about polluted water supplies after less than 18 months of operation. None of this should be surprising to the EPA. In the 2017 hearing, residents and scientists brought this to EPA’s attention, including evidence of industry assessments that the region just [isn’t suitable for underground injection](#). If we are being candid, nothing has changed with the friable sedimentary strata since that determination was made. The only thing that has changed is that the industry produces many times more waste fluid than ever before, which frankly seems to be more of a concern to EPA than residents impacted by Sedat 3A. EPA has ignored this situation and opted to issue Sedat 4A a draft permit anyway.

- National efforts to reduce environmental risks are based on the best available scientific information.

I have yet to see scientific information that suggests that the best way to dispose of flowback and produced water is to inject them into shallow wells directly beneath people’s homes. I do have some sympathy for the Agency, which is required to assess the safest manner of dealing with this waste stream when no safe manner exists. Wherever the site of injection occurs, there is the risk of [contamination](#), [induced seismicity](#), and [repressurizing abandoned wells](#), among many concerns. So why does EPA think that this is appropriate to pump beneath homes in Plum Borough?

- Federal laws protecting human health and the environment are administered and enforced fairly, effectively and as Congress intended.

According to [EPA's website](#), "UIC regulations mandate the consideration of a variety of measures to assure that injection activities will not endanger underground sources of drinking water." This is an unambiguous directive. Approving the injection of harmful oil and gas waste fluids into shallow wells beneath the homes of residents that rely on groundwater sources for domestic use is similarly an unambiguous failing of the law, as intended by Congress. Further, the region's long history of coal mining, conventional oil and gas drilling, and water well drilling through multiple layers of crumbling sedimentary rocks makes it clear that any insistence that the Murrysville Sand injection formation is sealed off from the drinking water aquifers is fictitious at best. Residents in the area know better, as should officials at EPA.

- Environmental stewardship is integral to U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade, and these factors are similarly considered in establishing environmental policy;

Merriam-Webster defines stewardship as, "the conducting, supervising, or managing of something, especially the careful and responsible management of something entrusted to one's care." EPA acknowledges that it is its job to provide environmental stewardship over a variety of industries, and this list includes the disposal of oil and gas waste fluids. Disposal at the adjacent Sedat 3A site has already caused numerous problems in a short period of time. Two different residences have complained of problems with their private water supplies following the beginning of operations at Sedat 3A. Another family is no longer able to enjoy time outdoors in their yard when noxious fumes from the tank battery are blown in their direction. Approving a decades-old two-casing borehole for high pressure injections proved to be as bad of an idea as it sounds, resulting in a failed mechanical integrity test after fewer than four months of operation. Fluids that are frequently high in radioactive elements including Radium-226 and its daughter isotope, Radon-222 are pumped underneath people's houses and drinking waters. To any reasonable observer, none of this sounds like environmental stewardship to protect natural resources and human health. At the very least, an alternative site away from human receptors is necessary for these injection operations.

- All parts of society--communities, individuals, businesses, and state, local and tribal governments--have access to accurate information sufficient to effectively participate in managing human health and environmental risks.

While arguably the easiest of the seven ways that EPA strives to achieve their mission, the Agency has repeatedly failed to make providing accurate information to the community to allow for effective participation in managing health and environmental risks a priority for residents near the Sedat 3A and Sedat 4A sites.

Matters of transparency are more than just EPA guidelines – they are the law. The National Archives explains the Freedom of Information Act ([FOIA](#)) as follows:

The Freedom of Information Act, or FOIA (5 U.S.C. 552, as amended), generally provides any person with the statutory right, enforceable in court, to obtain access to government information in executive branch agency records. This right to access is limited when such information is protected from disclosure by one of [FOIA's nine statutory exemptions](#).

FracTracker Alliance has submitted two FOIA requests to EPA regarding Class II-D waste disposal wells in Pennsylvania, as the wells are effectively co-regulated with Pennsylvania Department of Environmental Protection (DEP). The first was a basic inventory of these wells. In theory, this should have been easy to accomplish, as the region's geographic unsuitability has resulted in very few of these wells compared to states like Oklahoma, Texas, or even Ohio. EPA eventually returned a list of 23 such sites in Pennsylvania, but the results were [incredibly sloppy](#), to the point where it became clear that EPA had no idea what the current state of affairs were with this industry in the state. EPA was lacking five wells from DEP data, four additional wells where the API number and well name didn't match, three wells where DEP and EPA had different well types noted, two wells where EPA just couldn't find the API number, and one well that wasn't on the DEP inventory of 200,000+ wells at all. These are a lot of significant errors for an inventory of 23 wells, and points to EPA's detachment from realities on the ground

for the industry in a state where it retains [regulatory primacy](#). A full federal review of Pennsylvania's Class II injection operations program is clearly necessary to avoid the aquifer exemption permitting and subsequent contamination catastrophes that have occurred in other [states like California](#).

The second FOIA was specific to the Sedat 3A well. This is what was requested:

The Sedat 3A SWD well in Plum Borough, Allegheny County, PA (Region 3, UIC program, <https://www.epa.gov/uic/uic-permit-pas2d701ball>) had a related water supply complaint earlier this year, shortly after going into operation. Per the Pennsylvania DEP, the operator notified EPA instead of DEP. We request a copy of that correspondence, or related notes. We understand that third party names will need to be redacted.

This is not a complicated request, however EPA requested three different extensions before finally refusing the request. In the experience of our organization and others that we work closely with, EPA FOIAs are routinely denied, are of low quality, or redacted to the point of obfuscation. When the request is backed by legal representation, results are somewhat improved. However, this shows a fundamental problem with the way EPA approaches FOIAs, which are intended to give residents the opportunity to know what governmental agencies know, in this case with respect to industrial activity that could be causing harm to the environment and human health.

Lastly, we can look at the virtual public meeting regarding this draft permit issuance itself. Local stakeholders that have been in communication with EPA about these sites were not notified of the pending hearing, which allowed only 30 days' notice – an insufficient amount of time to respond to the complexity of the draft permit, including finding experts to read and assess the documents. Further, the meeting is scheduled to be held virtually only and without explanation, which conflicts with the Agency's [best practice guidance](#). If EPA won't follow its own best practices, it can't be a surprise when polluting industries also opt not to. Requests for more time and a public meeting were refused by the agency.

- Contaminated lands and toxic sites are cleaned up by potentially responsible parties and revitalized.

By permitting the Sedat 3A site, EPA has enabled the creation of a new toxic site right next to people's homes. When EPA secretly allowed the doubling of the injected waste volume to 108,000 barrels per month, the Agency doubled down on their decision to allow contamination. With the draft permit of the adjacent Sedat 4A site, EPA has tentatively tripled down on the original bad decision. Presumably, the operator will then try to double the volume of the new site as well after a month of operation.

Of course, this is an area that was already impacted with conventional oil and gas wells and extensive coal mining. But the oil and gas waste dump is an entirely new toxic presence in the neighborhood, and EPA's blessing is contrary to the Agency's stated mission.

- Chemicals in the marketplace are reviewed for safety.

Oil and gas waste fluids contain a variety of chemicals which are harmful to human health and the environment. Some of these occur in naturally high concentrations, like bromides. Bromides could be a concern for water well owners that use shock chlorination to sterilize or "shock" their drinking water supply, because they can react to form [carcinogenic trihalomethanes](#), byproducts of disinfection that have been known for decades. As fracking fluids are often reused at other well sites, contaminant loads become concentrated even beyond what is present in Devonian brines. In this context, technologically enhanced naturally occurring radioactive materials ([TENORMs](#)) are known to be a problem [associated with these waste streams](#), sometimes measuring in the tens of thousands of picocuries per liter. And then there are also the chemical additives in the fracking fluids. According to self-reported industry data from [FracFocus](#), approved substances for this fluid includes [petroleum distillates](#), per- and polyfluoroalkyl substances ([PFAS](#), or "forever chemicals"), [acetone](#), [benzene](#), [formaldehyde](#), [chlorine dioxide](#), to name a few of the hundreds of chemicals that are inappropriate to be injecting beneath people's

homes and sources of drinking water. And these are just the chemicals that are made publicly available, as non-disclosure of chemicals due to trade secrets is both permissible and widespread on the registry.

There are seven ways in which EPA strives to uphold its mission of protecting human health and the environment. In the case of the existing Sedat 3A well and the issuance of the draft permit for Sedat 4A in Plum Borough, Allegheny County, Pennsylvania, the Agency falls significantly short on each method. Whereas one or two shortcomings could point to a difference of perspective, failing all seven shows that the agency is failing at its mission and needs a fundamental reset in its procedures regarding how permits for these Class II-D waste disposal wells are considered.

We understand that there is enormous pressure put on the Agency to approve such wells. The oil and gas industry produces billions of gallons of liquid waste every year that ultimately needs to go somewhere. However, helping industry find a place to pollute is not the task at hand for EPA. The task is to protect human health and the environment. To achieve its mission, EPA must revoke the draft permit and deny the application for Sedat 4A, as well as re-evaluate the existing permit for Sedat 3A.

Thank you for your careful reconsideration,

Matthew Kelso
Manager of Data and Technology
FracTracker Alliance



BOROUGH OF OAKMONT

(412) 828-3232

767 FIFTH STREET

OAKMONT, PA 15139-1524

POLICE (412) 826-1578

FAX (412) 828-3479

www.oakmontborough.com

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via email: R3_UIC_Mailbox@epa.gov

August 17, 2022

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

**Re: Proposed Permit PAS2D702BALL, Sedat #4A
Oakmont Borough Council Official Response.**

Mr. Hancharick,

During a recent public meeting of Oakmont's Borough Council, a speaker presented information regarding a proposed injection well in Plum Borough, a municipality abutting Oakmont.

On behalf of Council, we request that proposed Permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial Disposal Injection Well, Sedat #4A, located in Plum Borough be **denied** due to our concerns that the Pennsylvania DEP may be understaffed to adequately monitor the conditions of existing wells in the region.

Permit me to elaborate on our concerns.

We understand, based on information provided to Oakmont that the Applicant, Penneco Environmental Solutions, LLC, (hereinafter, "Penneco") has several violations and an unresolved permit application at adjacent injection wells, directly related to the current permit application.

A condition of Permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection stipulates the following:

"...The permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons."

During the last known Pennsylvania Department of Environmental Protection (DEP) file review of the Sedat #3A injection well (July 22, 2021), inspectors indicated that the "*Well operator failed to notify the DEP within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.*"



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Since then, the DEP has not completed additional file reviews or site inspections of Sedat #3A. Unfortunately, it appears the opportunity to adequately monitor the conditions of disposal injection wells—even more than once per year—is a challenge to the DEP due to staffing. Anecdotally, Sedat 1A monitoring well has not been inspected since November, 2020.

Furthermore, Oakmont Borough Council obtained information that soon after Penneco received a Disposal Injection Well Permit from both the EPA and DEP, the DEP subsequently issued five (5) violations to Penneco for poor construction practices at the Sedat #3A well in August, 2020.

Based on DEP's necessary enforcement actions against Penneco as it has not met the conditions of its existing Disposal Injection Well Permit (Sedat #3A), Penneco should not be granted an additional permit for an additional Disposal Injection Well Permit (Sedat #4A).

An interesting condition of the permit for Sedat #4A reads as follows:

“...The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.”

DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It would appear to be premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

Finally, the Injection Disposal Well Permit for Sedat #3A identifies Sedat #1A as a necessary monitoring well to ensure that Sedat #3A was properly functioning. As stated before, Sedat #3A has not been inspected since November, 2020, which was the well's first inspection after it was plugged in May, 2020 and granted a transfer of use permit.

Given the outline of violations publicly available for review and DEP's infrequent and irregular inspection schedule, the Department unfortunately does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning.



Again, Oakmont Borough urges the EPA to **deny** this permit application. On behalf of Oakmont Borough Council and the Honorable Mayor of Oakmont,

Respectfully,



Scot E. Fodi,
Borough Manager
BOROUGH of OAKMONT

C: Borough Council
Sophia Facaros, Mayor

See Next Page for additional distributions



I certify that a true copy of the foregoing document was distributed to the following individuals or entities:

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Allegheny County Council Member Michelle Naccarati-Chapkis
Plum Borough Council
Harry Schlegel, Mayor, Plum Borough
Pennsylvania Department of Environmental Protection, Environmental Quality Board
PWSA
The Municipal Authority of Oakmont Borough

Dated this 17th day of August 2022



(412) 828-3232



Oakmont Borough is a Certified Silver Community by Sustainable Pennsylvania

June 28, 2022

Attn: Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A
Underground Injection Well

Dear Mr. Hancharick,

The Safe Drinking Water Act (SDWA) was established in 1974 (with amendments in 1986 and 1996) to ensure the U.S. Environmental Protection Agency (EPA) protects the health of our nation from contaminants in our drinking water. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is **a direct threat to public drinking water and therefore a false pretense of safety posed by the EPA**. In addition to Sedat 3A permit number PAS2D701BALL, which led to environmental contamination, Sedat 4A presents devastating risks to several downstream Allegheny River public drinking water systems. Affected systems include the Pittsburgh Water and Sewer Authority, which provides water to hundreds of thousands of City of Pittsburgh residents and businesses.

Five water wells and two streams were identified within the Area of Review for the injection well identified as “Sedat 3A”. Two of the wells were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone¹, **water contamination was identified in residents’ wells**. The Pennsylvania Department of Environmental Protection (DEP) conducted standard parameter testing of the resident’s well water but failed to test parameters that typically indicate injection fluid infiltration. For example, no total suspended solid test was conducted, which would inform sand contamination. In addition — while Penneco’s chosen brand of chemical tracer is not public knowledge — because most chemical tracers in fracking fluid are fluorinated benzoic acids, results of the omitted benzene test would have informed fluid infiltration.

Code of Federal Regulations 40 CFR 144, which prohibits substantial endangerment of human health through the SDWA, establishes the framework for the Underground Injection Control (UIC) system where the consideration of a number of measures is meant to ensure injection

¹ 13 April 2020 Maskol Technical Review of Penneco’s Control and Disposal Plan

activities will not endanger underground sources of drinking water (USDWs). Due to the lack of proper water testing, no evidence disproves the casing failure led to fracking fluid waste leakage into USDWs. Therefore, the permit approval of Sedat 4A is a direct violation of the EPA's adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure.

The mechanical integrity test (MIT) conducted on June 11, 2021, following the application of new cement bond logs to Sedat 3A displayed a 3% loss of pressure over 30 minutes; a 5% loss of pressure would have resulted in a failure of the MIT as per EPA methods. While Sedat 3A minimally passed its MIT, we are deeply concerned that the mitigation applied to Sedat 3A was still very near failure for the MIT. The same integrity methods applied to Sedat 3A are proposed for 4A; in our scientific opinion, it is statistically unlikely the same proposed casing mitigations from 3A will be sufficient to protect 4A from failure. Lack of regulatory oversight by the EPA and an engineering review that would have prevented such a failure calls into question EPA's ability to protect the region's drinking water.

A letter containing H-FRAC Consulting Services' Reservoir and Fracture Characterization of the Murrysville Formation sent to the EPA in December 2015² indicated a need to inject fracturing waste into the formation at a pressure "higher than normal" at 1,420 psi. Due to low injection formation permeability of the formation, this suggested pressure could easily lead to increased unnatural faults or a casing failure similar to that which occurred in Sedat 3A.

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator "shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142." The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

In addition to the integrity of the well casings, we also question the current saturation and ultimate receptivity of the Murrysville Formation. Post waste injection, geological knowledge suggests a porous rock matrix will reach an ultimate point of storage capacity at which it will no longer be able to hold injected fluid. No ultimate receptivity point was reported by Penneco during the geological reporting phases, nor was it provided to the public by the EPA. Because Penneco has requested a disposal of 1.5 million gallons of waste into the Sedat 4A well (far below average for waste injection wells), it is our suspicion the operators calculated and knew the ultimate receptivity of the Area of Review for the Murrysville Formation. Alternatively, we

² 7 December 2015 Jacot Sedat 3A Reservoir and Fracture Characterization for the Murrysville Formation

suspect the 1.5 million gallon proposal reflects an expectation of a casing failure, in which case a permit for fluid injection should never have been initially issued to Penneco.

Research suggests full saturation of a sandstone matrix in combination with high injection pressure may lead to unnatural fracturing and upward and/or downward travel of waste fluid. Travel of waste via natural or unnatural faults through the overlying shale layer threatens a violation of the **Code of Federal Regulations part 40 CFR 144.12**. Therefore, we again emphasize the issuing of permits for the Sedat 4A well is a failure by the EPA to adhere to the SDWA and is a violation of applicable laws and regulations.

Finally, our legal research has resulted in our knowledge that the EPA did not properly adhere to the **Code of Federal Regulations 40 CFR 25.5 or 124.10** regarding public hearings, public notice, and public comment periods. Consistent with the COVID-19 national emergency, the EPA released a statement that they are “supportive of holding public hearings and meetings virtually” but that applicable. States in which hearings are being held must preliminarily approve of the virtual hearing according to their state laws. Because the State of Pennsylvania does not allow fully virtual hearings outside of emergency orders, and the COVID-19 state of emergency was removed in 2021, the **EPA was in direct violation of 40 CFR 25.5** by eluding approval from the State of Pennsylvania for the fully virtual hearing regarding the Sedat 4A well. The **EPA then violated 40 CFR 124.10 sections b and c** by providing improper public notice for the hearing per all four required methods³. Briefly, public notification was not fulfilled in all four required methods (ex. Plum municipality and mailing lists featuring Protect PT contacts should have been notified of the scheduled hearing) and all persons and agencies affected by the Sedat 4A permit were not notified at least 30 days in advance of the hearing.

52 years ago, the EPA was tasked with the development of environmental baselines that **minimize adverse impacts of pollution activities**. Today, we encourage EPA’s adherence to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions. We also suggest the EPA remedy their violations of **40 CFR 25.5 and 124.10** to avoid future legal involvement.

Regards,



Jenna Rindy, M.S. & M.Sc.
Staff Environmental Scientist
Protect PT

³ See “b” for timing and “c” for methods:
<<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-124/subpart-A/section-124.10>>

August 22, 2022

Attn: Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A
Underground Injection Well

Dear Mr. Hancharick,

The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is **a direct threat the health of residents living near the wells and Allegheny County's drinking water; therefore the approval of the permit is a false pretense of safety posed by the U.S. Environmental Protection Agency (EPA).**

In 1970 the EPA agreed to abide by the **Clean Air Act** (42 U.S.C. 7401), taking on the responsibility of not only improving but also protecting the country's air quality. Section 7470 of the U.S.C. specifically tasks the EPA with the goal "to protect public health and welfare from any actual or potential adverse effect which in the Administrator's judgment may reasonably be anticipated to occur from air pollution"¹.

Since October of 2021 our organization has been continuously monitoring ambient volatile organic compounds (VOCs) at 1835 Old Leechburg Rd, New Kensington, PA, approximately 500 feet south of the Sedat 3A injection well. Our recent assessment of the data from the monitor shows the residents living at 1835 Old Leechburg Rd are at high risk of acute health effects from VOC exposure and could potentially experience long-term negative effects due to proximity to the injection well. The health of Pennsylvania residents is actively declining due to the Sedat injection wells, regularly leading to headaches, nausea, dizziness, and vision impairment. **In accordance with the Clean Air Act, we request the EPA as a protection agency denies further permitting for injection wells if they have any interest in avoiding further damage to the lives of more human beings.**

In relation to the direct assurance provided by the EPA to protect the health of our nation from contaminants in our drinking water, the **Safe Drinking Water Act** (SDWA) was established in 1974. The Sedat 4A well presents devastating risks to several downstream Allegheny River public drinking water systems as confirmed by the contamination caused by the approval of the

¹ <[U.S.C. Title 42 - THE PUBLIC HEALTH AND WELFARE \(govinfo.gov\)](https://www.govinfo.gov)>

Sedat 3A well (permit number PAS2D701BALL). Affected systems include the Pittsburgh Water and Sewer Authority, which provides water to hundreds of thousands of City of Pittsburgh residents and businesses.

Five water wells and two streams were identified within the Area of Review for the injection well identified as “Sedat 3A”. Two of the wells were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone², **water contamination was identified in residents’ wells**. The Pennsylvania Department of Environmental Protection (DEP) conducted standard parameter testing of the resident’s well water but failed to test parameters that typically indicate injection fluid infiltration. For example, no total suspended solid test was conducted, which would inform sand contamination. In addition — while Penneco’s chosen brand of chemical tracer is not public knowledge — because most chemical tracers in fracking fluid are fluorinated benzoic acids, results of the omitted benzene test would have informed fluid infiltration.

Code of Federal Regulations 40 CFR 144, which prohibits substantial endangerment of human health through the SDWA, establishes the framework for the Underground Injection Control (UIC) system where the consideration of a number of measures is meant to ensure injection activities will not endanger underground sources of drinking water (USDWs). Due to the lack of proper water testing, no evidence disproves the casing failure led to fracking fluid waste leakage into USDWs. Therefore, the permit approval of Sedat 4A is a direct violation of the EPA’s adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure.

The mechanical integrity test (MIT) conducted on June 11, 2021, following the application of new cement bond logs to Sedat 3A displayed a 3% loss of pressure over 30 minutes; a 5% loss of pressure would have resulted in a failure of the MIT as per EPA methods. While Sedat 3A minimally passed its MIT, we are deeply concerned that the mitigation applied to Sedat 3A was still very near failure for the MIT. The same integrity methods applied to Sedat 3A are proposed for 4A; in our scientific opinion, it is statistically unlikely the same proposed casing mitigations from 3A will be sufficient to protect 4A from failure. Lack of regulatory oversight by the EPA and an engineering review that would have prevented such a failure calls into question EPA’s ability to protect the region’s drinking water.

A letter containing H-FRAC Consulting Services’ Reservoir and Fracture Characterization of the Murrysville Formation sent to the EPA in December 2015³ indicated a need to inject fracturing waste into the formation at a pressure “higher than normal” at 1,420 psi. Due to low injection formation permeability of the formation, this suggested pressure could easily lead to increased unnatural faults or a casing failure similar to that which occurred in Sedat 3A.

² 13 April 2020 Maskol Technical Review of Penneco’s Control and Disposal Plan

³ 7 December 2015 Jacot Sedat 3A Reservoir and Fracture Characterization for the Murrysville Formation

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator “shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142.” The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

In addition to the integrity of the well casings, we also question the current saturation and ultimate receptivity of the Murrysville Formation. Post waste injection, geological knowledge suggests a porous rock matrix will reach an ultimate point of storage capacity at which it will no longer be able to hold injected fluid. No ultimate receptivity point was reported by Penneco during the geological reporting phases, nor was it provided to the public by the EPA. Because Penneco has requested a disposal of 1.5 million gallons of waste into the Sedat 4A well (far below average for waste injection wells), it is our suspicion the operators calculated and knew the ultimate receptivity of the Area of Review for the Murrysville Formation. Alternatively, we suspect the 1.5 million gallon proposal reflects an expectation of a casing failure, in which case a permit for fluid injection should never have been initially issued to Penneco.


Research suggests full saturation of a sandstone matrix in combination with high injection pressure may lead to unnatural fracturing and upward and/or downward travel of waste fluid. Travel of waste via natural or unnatural faults through the overlying shale layer threatens a violation of the **Code of Federal Regulations part 40 CFR 144.12**. Therefore, we again emphasize the issuing of permits for the Sedat 4A well is a failure by the EPA to adhere to the SDWA and is a violation of applicable laws and regulations.

52 years ago, the EPA was tasked with the development of environmental baselines that **minimize adverse impacts of pollution activities**. Today, we encourage EPA’s adherence to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions. It would be in the EPA’s best interest to avoid causing further harm to residents of Pennsylvania, whether by following the Clean Air Act and/or the Safe Drinking Water Act.

Regards,



Jenna Rindy, M.S. & M.Sc.
Staff Environmental Scientist
Protect PT



Gillian Graber
Executive Director
Protect PT

Ryan Hancharick,

Protect PT, in partnership with the Breathe Project and FracTracker Alliance, recognized the importance of reaching out to our community, spreading information, and gathering their opinions about the proposed Sedat 4A Injection Well permit. Part of this effort involved us circulating a petition. Below, you will find the language used in said petition and the individuals that signed their names to it.

We urge you to recognize these people and perform your basic duty of protecting them,

Protect PT

Tell EPA to DENY the Permit for the Sedat 4A Injection Well

Last Spring, Penneco Environmental Solutions obtained a permit to open a fracking waste injection well in Plum Borough near the Allegheny River – the source of drinking water for hundreds of thousands of people in Allegheny County. Experts warned the U.S. Environmental Protection Agency (EPA) and the PA Department of Environmental Protection (DEP) that the engineering was insufficient and the well casing would fail.

The well failed.

Neighbors testified they lost their well water and were harmed in other ways. Now EPA is considering another permit for a second fracking waste injection well on the same site – an old, abandoned gas well next to a coal mine that has been on fire for decades. We must **Tell EPA to DENY THIS PERMIT** and keep fracking waste from oil and gas operations out of our community.

Through an injection well, fracking waste is injected into rock formations nearly a mile below ground. Using this method, waste has the potential to enter our freshwater sources via multiple pathways, like drinking water wells, abandoned oil and gas wells, abandoned mine chambers, etc. However, the main pathways of contamination involve waste traveling up through rock formations, or through cracks in the casings used to contain injected waste fluids.

It is well documented that fracking waste across the U.S. has been shown to contain radioactive material and PFAS (nicknamed “forever chemicals”).

Scientific evidence shows there are health risks to people living near fracking waste injection well sites, linking the wells to water contamination, destroyed ecosystems, and earthquakes. Exposure to fracking waste has been shown to lead to a range of health effects including upper respiratory symptoms, skin rashes, and difficulty breathing. Long-term exposure can lead to liver and kidney toxicity, heart and lung disease, and cancers such as leukemia.

The oil and gas industry is pushing hard for more waste injection wells in Pennsylvania to cut costs of recycling and shipment of waste to Ohio and other sites. The industry is desperately running out of places to put the waste.

We urge you to lend your name to this petition to clearly state to the Environmental Protection Agency (EPA), Region 3:

"I am asking the EPA to deny the permit for Penneco Environmental Solutions to build and operate the Sedat 4A fracking waste injection well in Plum Borough, Allegheny County. This well poses a grave danger to our drinking water and would violate EPA's adherence to the Safe Drinking Water Act. You must deny this permit."

In the following Google Sheets file you will find all those that signed this petition:



EPA Request for Postponement and In-person Hearing

Mary Obringer <mary@protectpt.org>

Mon 6/20/2022 9:03 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: Gillian Graber <gillian@protectpt.org>

 1 attachments (290 KB)

EPA request for postponement and in person hearing.pdf;

June 17, 2022

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox@epa.gov

Re: EPA Request for Postponement and In-person Hearing

Dear Mr. Hancharick

We are writing in response to the issuance of a draft permit PAS2D702BALL to Penneco Environmental Solutions, LLC, of Delmont, PA. Specifically, we have objections regarding the tentative public hearing currently scheduled virtually for June 28, 2022.

Our first objection is based on the virtual format of the hearing. Allegheny County is a diverse community whose members are always ready to voice their opinions and stimulate healthy conversation; this, however, has traditionally been conducted via in-person hearings. The community impacted by Penneco's objectives is primarily rural, and therefore its constituents cannot be expected to have reliable, widespread access to online platforms such as MS teams. While a dial-in option has been presented, participants who have dialed in are easily overlooked and uncomfortable participating due to only being able to do so at a bare minimum level. As a result, a virtual hearing would discourage conversation from some members of the community and alienate others from attending altogether. Because the purpose of these hearings is to get comments from the entire community affected, a virtual hearing will not meet this purpose in Allegheny County.

that the oil and gas industry has versus what we (local officials who are charged with protecting ourselves and the public) have to review application documents, research scientific facts and prepare comments.

We request the EPA postpone the hearing and hold it in person for the reasons outlined above, to allow appropriate participation from the public that will be impacted by the issuance of this permit.

Sincere Regards,

Gillian Graber
Executive Director, Protect PT

Bob Teorsky
[Redacted] New Kensington, Allegheny

Debra Smit
[Redacted] Pittsburgh, Allegheny

Ann LeCuyer LeCuyer
[Redacted] Trafford

Lois Drumheller
[Redacted] Monroeville, Allegheny

Judith Colick aetna
[Redacted] Export

Matthew Mehalik Executive Director Breathe Project
mmehalik@breatheproject.org
Pittsburgh, Allegheny

Nicole Ruscitto Council member Jefferson Hills None
[Redacted] Jefferson Hills. Allegheny

Patricia Emich
[Redacted] Irwin, PA

Jordan Stancil
[Redacted] Pittsburgh, Allegheny

Emily Cumpston
[Redacted] Pittsburgh, Allegheny County

Edith Abeyta North Braddock Residents For Our Future
[Redacted] North Braddock, Allegheny

Ana Tshulares Hoffman
[Redacted] Pittsburgh, Allegheny

Calvin McCutcheon President McCutcheon Enterprises, Inc.
calvin@completewastemgmt.com Apollo, Westmoreland County

Ashley Funk Executive Director Mountain Watershed Association
ashley@mtwatershed.com Melcroft, PA

Patricia R. Wendell
[Redacted] Jeannette, Westmoreland

Jess Friss Three Rivers Waterkeeper and Protect PT
jessprotectpt@threeriverswaterkeeper.org
Pittsburgh

Edward Ketyer, M.D. President Physicians for Social Responsibility Pennsylvania
ned@psrpa.org Venetia, Washington

Barbara W Brandom, MD Steering Committee Member Concerned Health Professionals of Pennsylvania
[Redacted] Pittsburgh, Allegheny County

Tonyehn Verkitus
[Redacted] Blakely

Darlene Leslie Protect PT
[Redacted] Murrysville

Mandeep Sain
[Redacted] Monroeville

Heather Hulton VanTassel Executive Director Three Rivers Waterkeeper
heather@threeriverswaterkeeper.org
Pittsburgh

Lois Bower-Bjornson
[Redacted] SCENERY HILL

David Mintz
[Redacted] Monroeville, Allegheny

Matt Kelso Manager of Data and Technology FracTracker Alliance
kelso@fractracker.org Allegheny County, PA

--
Mary Obringer
Outreach Manager
Protect PT (Promote PT Inc.)
724-392-7023 (office)

[REDACTED] (google voice/cell)
Follow @ProtectPT on social media
[Facebook](#), [Twitter](#), [Instagram](#) and [YouTube](#)



Comment on Permit #PAS2D702BALL

Ralph Kisberg <[REDACTED]>

Mon 7/11/2022 3:39 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

RDA *Responsible Decarbonization Alliance***PO Box 502 // Williamsport PA 17703-0502 // www.rdaPA.org**

July 11, 2022

Attn: Ryan Hancharick Source Water & UIC Section U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Dear Mr. Hancharick,

As a 501(c) 3 education and advocacy coalition located in North Central Pennsylvania concerned with all aspects of shale gas development, the Responsible Decarbonization Alliance (RDA) is in concurrence with the comments submitted on June 28th by Jenna Rindy, Staff Environmental Scientist at Protect PT asking that permit PAS2D702BALL for Sedat 4A be denied and that the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions be withdrawn.

Living in a shale gas development region of our Commonwealth with a decades-long history of underground methane gas storage, we are very aware that we do not have geological formations suitable for injection wells that are not already in use for storage. We must therefore rely on other regions, primarily in other states, to receive extremely toxic liquid wastes from not just the gas and oil industry, but from all industries in our area with similar waste fluid disposal challenges.

For those communities targeted for injection well operations, we are grateful for EPA oversight on the permitting process. We have seen first-hand for 14 years now that state legislatures, state administrations of either party, and the state agencies they fund are not up to the challenge of putting the needs and rights of individuals and families above the desires of oil and gas industry corporations to conduct business, even when there is evidence of harm that has occurred. We expect a higher standard from the EPA especially now while there is a federal administration in place that believes in the mission of the agency and the rights of the public to safe drinking water.

RDA believes Ms. Rindy and Protect PT sum up their argument well in the following paragraph:

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator “shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142.” The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

Thank you for your consideration of these comments.

Sincerely,

RDA Board of Directors,

Robert Cross, President
Barbara Jarmoska
Mark Szybist
Harvey Katz
Dianne Peeling
Eliza Whyman

44TH DISTRICT
STATE SENATOR
KATIE MUTH
SENATE BOX 203044
THE STATE CAPITOL
HARRISBURG, PA 17120-3044
717-787-1398
FAX: 717-783-4587
338 MAIN STREET
ROYERSFORD, PA 19468
610-792-2137
FAX: 610-948-3037



COMMITTEES
SENATE DEMOCRATIC POLICY
COMMITTEE, CHAIR
VETERANS AFFAIRS & EMERGENCY
PREPAREDNESS, DEMOCRATIC CHAIR
ENVIRONMENTAL RESOURCES
& ENERGY
FINANCE
STATE GOVERNMENT
RULES
EMAIL: senatormuth@pasenate.com
WEBSITE: www.SenatorMuth.com
FACEBOOK: @SenatorMuth
TWITTER: @SenatorMuth
INSTAGRAM: @SenatorMuth

August 30, 2022

Mr. Ryan Hancharick
Water Division
US EPA Region 3
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Dear Mr. Hancharick,

I am writing in opposition to the draft permit (PAS2D702BALL) issued to Penneco Environmental Services authorizing the conversion and operation of an Underground Injection Control (UIC) Class IID commercial disposal injection well in Plum Borough, Allegheny County. It is my understanding that the permit would allow Penneco to inject drilling wastewater and other fluids from their oil and gas drilling operations into the Murrysville sandstone formation in the subsurface perforated interval between approximately 1,740 feet to 1,800 feet below ground surface over the next ten years.

As oil and gas companies like Penneco continue to find more ways to extract our natural resources using dangerous chemicals, the management of their toxic byproducts is becoming increasingly dangerous. [According to Food & Water Watch](#), since the 1980s, oil and gas operators have injected more than 33 trillion gallons of wastewater underground – posing serious and significant threats to our communities, our families, our environment, and our groundwater.

A 2017 public comment submission drafted by Food & Water Watch regarding the permit for the first injection well on this same site indicated that Pennsylvania DEP records indicate at least 40 gas wells exist currently in Plum Borough, including the five identified by EPA as within 1,000 feet of the injection site. Their review of Pennsylvania DEP records found that Penneco committed over 50 violations in operating oil and gas wells in Pennsylvania. Some of these violations are significant and include failing to properly control and dispose of industrial and residual wastes resulting in water contamination. Just last year, [there was a violation at their Sadat 3A](#) well in Plum Borough for failing to notify the PA Department of Environmental Protection within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution. And in August 2020, that same well was [issued five violations](#) regarding environmental health and safety.

Additionally, [a 2014 study by the Government Accountability Office](#) indicated that while the EPA does implement safeguards in the process, the safeguards do not address emerging underground injection risks, such as seismic activity and overly high pressure in geologic formations leading to surface outbreaks of fluids. The report also cites that every day in the United States, at least 2 billion gallons of fluids are injected into over 172,000 wells to enhance oil and gas production, or to dispose of fluids brought to the surface during the extraction

of oil and gas resources. Injection wells raise serious concerns about the safety of the nation's drinking water – particularly in areas, like Plum Borough, with other drilling operations.

Under Pennsylvania's Act 13 of 2012, chemical compounds used in fracking operations have limited disclosure requirements. However, the full picture of the chemicals used is often hidden from view due to provisions that exempt access to chemical information deemed to be “confidential proprietary information” or “trade secrets.” Fracking companies have argued full disclosure would undermine their proprietary advantages and stifle the competitive nature of their operations. A [2018 report by Partnership for Policy Integrity \(PFPI\) entitled KeyStone Secrets](#), found that between 2013 and 2017, companies in Pennsylvania injected secret fracking chemicals 13,632 times into a total of 2,515 wells.

As we have seen in the years since fracking began in Pennsylvania, the use of hazardous chemicals has led to significant public health issues and the deterioration of drinking water quality in every community where these operations take place. If Penneco and other oil and gas companies are not required to disclose all of the chemicals used in their process, how then can they attest to the safety of injecting these hazardous and toxic chemicals back into the ground? A new geospatial analysis, the interactive [Oil and Gas Threat Map](#), which shows all active oil or gas wells nationwide, concludes that 1,482,810 Pennsylvanians, including 290,123 children, reside or attend schools or daycares within a half-mile “threat radius” of active oil and gas operations.

Everyone deserves clean water to drink. But across the country and across our Commonwealth, the drinking water of millions of Americans is being contaminated by the oil and gas industry. Plum Borough Council has been actively trying to prevent the second injection well from moving forward and filed an appeal earlier this year against its own zoning board, which approved the Penneco application in January. Residents who live near the current injection well said they do not want a second injection well near their homes because it will continue to increase concerns about possible impacts on drinking water, air quality, truck traffic and noise.

The oil and gas drilling industry in Pennsylvania has ruined the lives of so many Pennsylvania families and has caused irreparable damages to our environment. The toxic legacy of this industry will be felt for generations and by permitting another injection well in Allegheny County, we are exacerbating the issue. Both the Environmental Protection Agency and the Pennsylvania Department of Environmental Protection explicitly state ‘environmental protection’ in their names, but permitting dangerous wastewater disposal injection wells prioritizes industry over environment.

I am asking the US Environmental Protection Agency to be a part of the solution and to improve testing procedures, strengthen enforcement of rules and regulations, and require disclosure of all chemicals used in the cradle-to-grave process. I strongly encourage the EPA to listen to the impacted residents and the families of Plum Borough and to refuse this permit to Penneco for this dangerous commercial disposal injection well.

Thank you in advance for your attention to these important matters of public health.

In service,

A handwritten signature in black ink, appearing to read 'Katie Muth', with a long, sweeping flourish extending to the right.

Katie Muth
State Senator
44th Senatorial District

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Abbey Zimmerman [REDACTED]

Fri 8/12/2022 3:02 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

I am opposed to the Sedat 4A injection well. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is a direct threat to public drinking water.

Penneco is already operating an injection well on this site. In July 2021 two of the five water water wells near the site were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone, water contamination was identified in residents' wells.

Permitting the Sedat 4A injection well is in direct violation of U.S. Code of Federal Regulations 40 CFR 144, prohibits substantial endangerment of human health through the SDWA and establishes a framework for Underground Injection Control system. This framework requires consideration of a number of measures to ensure that injection will not endanger underground sources of drinking water. There is a lack of proper water testing and therefore no evidence disproving that the casing failure led to fracking fluid waste leakage into USDWs.

Given Penneco's existing well on this site has already failed and this proposed 4A well is the same as the 3A well a permit approval of Sedat 4A is a direct violation of the EPA's adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure

A leak, spill, casing failure, or another accident on the site of the proposed Sedat 4A well has the potential to contaminate drinking water for the 90 neighborhoods of the City of Pittsburgh as well as the other nearby communities who get their drinking water from the Allegheny River. EPA must adhere to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions.

As a resident of Allegheny County who gets my water from the Allegheny River I urge you to deny this permit and protect my water and the water of the more than 300,000 people who get their water from the Pittsburgh Water and Sewer Authority.

Abbey Zimmerman
[REDACTED]

Reject injection well in PLUM!

Alan Wells [REDACTED]

Wed 8/24/2022 1:42 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

The injection well is situated in a populated area and poses risks to groundwater, drinking water, and above ground risks. These are unacceptable.

The applicant, Penneco Environmental Solutions is a bad actor and has multiple violations of its existing injection wells. We cannot allow for further degradations and hazards.

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

Alan & Martina Wells
Allegheny County residents

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Amanda Amorn [REDACTED]

Sat 7/2/2022 4:11 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Reader.

I am opposed to the Sedat 4A injection well. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania will threaten the safety of public drinking water.

Penneco already has an injection well on this site. In July 2021 two water wells near the site were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate engineering review to detect a leak in the detection zone, water contamination was identified in residents' wells.

Permitting the Sedat 4A injection well is in direct violation of U.S. Code of Federal Regulations 40 CFR 144. Which prohibits substantial endangerment of human health through the SDWA and establishes a framework for Underground Injection Control system. This framework requires consideration of a number of measures to ensure that injection will not endanger underground sources of drinking water. Due to a lack of proper water testing and there is no evidence disproving that the casing failure led to fracking fluid waste leakage into USDWs.

A leak, spill, casing failure, or another accident on the site of the proposed Sedat 4A well has the potential to contaminate drinking water for the 90 neighborhoods of the City of Pittsburgh as well as the other nearby communities who get their drinking water from the Allegheny River. EPA must adhere to their own baselines by denying permit PAS2D702BALL for Sedat 4A.

Please deny this permit for the sake of the nearly 300,000 people who get their water from surrounding sources

[REDACTED]

The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is a direct threat to public drinking water. The request must be denied to prevent contamination at the proposed site and of downstream drinking water sources for residents of Pittsburgh.

The decision about the permit regarding the Sedat 4A injection well permit is a different situation from the decision made by EPA in 2018 to approve the Sedat 3A Injection Well. The impacts of an injection well in Plum Boro are no longer speculation but EPA must consider the impacts of the existing Sedat 3A well. In July 2021 two of the five water water wells near the site were contaminated in July 2021 when the 30-year-old injection well casing failed. Residents identified water contamination in their wells, following inadequate response from DEP, which would have included a detailed engineering review and suggesting a leak detection zone.

After the structural failure of the casing in the Sedat 3A well, the Pennsylvania Department of Environmental Protection (DEP) conducted standard parameter testing of the resident's well water but failed to test parameters that typically indicate injection fluid infiltration. Permitting the Sedat 4A injection well is in direct violation of U.S. Code of Federal Regulations 40 CFR 144¹, as it prohibits substantial endangerment of human health through the Safe Drinking Water Act (SDWA) and establishes a framework for Underground Injection Control system. This framework requires consideration of a number of measures to ensure that injection will not endanger underground sources of drinking water. As there was a lack of proper water testing after the Sedat 3A failure there is therefore no evidence disproving that the casing failure led to fracking fluid waste leakage into underground sources of drinking water (USDW).

The proposed 4A well includes the same designs and safety features as Penneco's existing well on this site, 3A which already failed. If EPA approves the permit for Sedat 4A, which has a design with proven failures, it would directly violate the EPA's adherence to the SDWA. The Sedat 4A well poses an endangerment to public health due to the high potential and probable casing failure that would lead to significant contaminants in drinking water that are hazardous to human health.

Additionally, the mechanical integrity test (MIT) conducted on the Sedat 3A well June 11, 2021 following the application of new cement bond logs found a 3% loss of pressure over 30 [minutes](#). This narrowly avoided the 5% loss which would have resulted in a failure per EPA methods. As the existing Sedat 3A well narrowly passed its MIT and the same integrity methods applied to Sedat 3A are proposed for 4A we are concerned about this near failure of the June 11 2021 MIT. Penneco has already demonstrated a failure to prevent accidents and contaminations from the Sedat 3A well and permitting the 4A well with the same insufficient engineering reviews places the region's drinking water at further risk.

¹[40 CFR § 144.1d4](#). 'Section 1431 of the Safe Drinking Water Act (SDWA) authorizes the Administrator to take action to protect the health of persons when a contaminant which is present in or may enter a public water system or underground source of drinking water may present an imminent and substantial endangerment to the health of persons.'

Earthworks reports from 2019 emphasize the risk transporting and injection of waste from oil and gas extraction poses to workers, frontline and fence-line residents, and communities nearby. While the exact toxins and chemicals in oil and gas waste remain undisclosed, research has found that fracking brings TENORM to the surface. Oil and gas waste from the Marcellus is of particular concern as it has been found to be more radioactive than other shale basins. According to a U.S. EPA analysis, the average concentration of radium-226 in 74 samples of Marcellus shale wastewater was 1,700 picocuries per liter. For comparison, the limit for drinking water is 5 picocuries per liter.

Earthworks supports the request by Protect PT who works with impacted residents of Plum Borough for EPA to withdraw the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions. We also urge EPA to deny permit PAS2D702BALL for Sedat 4A and protect the drinking water of the hundreds of thousands of people in Allegheny County, the communities of Plum, Oakmont, Verona, Fox Chapel, Harmar, Blawnox, Aspinwall, O'Hara, Penn Hills, Millvale, Wilkesburg, the 90 neighborhoods in the City of Pittsburgh and all those who live downstream.

The requested permit for the Sedat 4A well in Plum Borough of Pennsylvania has a high potential for design failure, would violate safe drinking water standards, threaten public health, and impact local businesses and their workers if their water is contaminated. Injection of waste from oil and gas extraction poses to workers, frontline and fence-line residents and for these reasons the Environmental Protection Agency should deny Permit Number PAS2D702BALL from Penneco Energy Solutions.

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Anaïs Peterson <apeterson@earthworksaction.org>

Wed 7/13/2022 8:41 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hi,

Attached are Earthworks comments re:Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well.

Thank you,

anaïs peterson

Fw: Penneco Sedat 4A

Hancharick, Ryan <Hancharick.Ryan@epa.gov>

Thu 9/1/2022 7:37 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

Water Division

U.S. EPA Region III

Four Penn Center

1600 John F. Kennedy Blvd.

Philadelphia, PA 19103

Phone: 215.814.3278

From: Anne Brendel [REDACTED]**Sent:** Thursday, September 1, 2022 3:30 PM**To:** Hancharick, Ryan <Hancharick.Ryan@epa.gov>**Subject:** Penneco Sedat 4A

Dear Ryan Hancharick,

As a retired civil engineer that did gas well permitting and well pad site design I am familiar with the concept of an injection well. In the case of this proposed well and the one already in service I am concerned that the existing conventional gas well, which was not designed or intended for this purpose is being "repurposed". While I understand in theory that the waste material's target location is below the aquifer used by local residential wells. I am very concerned about the integrity of well itself, it's lining and the possibility of leakage. This facility is too close to residential areas. I am not privy to the how many monitoring well were required or their locations as part of the permit, but research is starting to confirm that the current acceptable set backs are not nearly far enough from oil and gas facilities.

I object to the placement of a waste injection well in Plum Borough. I strongly encourage you to deny the permit.

Anne Brendel

Concerned Citizen
[REDACTED]

I am writing to you today regarding the Sedat 4A Injection Well

AnnMarie McCann [REDACTED]

Sat 7/30/2022 5:19 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am writing to request that you deny the permits for the Sedat 4A Injection Well. This well would put the public drinking water for the entire city of Pittsburgh and downstream communities at risk. The first injection well failed to contain the fluids. Adding a second injection well could further endanger clean drinking water. You must deny the permit for the Sedat 4A Injection Well to protect clean water.

Sincerely,

Mrs AnnMarie McCann
[REDACTED]

deny permit for Sedat #4A

Barbara Brandom 

Tue 6/28/2022 10:45 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Mr. Hancharick,

Attached is the text that I read at the public hearing tonight.

I agree with the many detailed comments delivered tonight.

Thank you for your service to the people of Pennsylvania.

Barbara Wendeborn Brandom, MD

Hancharick, Ryan

From: Barbara Brandom [REDACTED]
Sent: Wednesday, June 15, 2022 4:33 PM
To: R3 UIC Mailbox
Subject: Public Hearing June 28 on the next Injection well in Plum

I want to speak at the public meeting
"Underground Injection Control (UIC)
Program Notice of Draft Permit PENNECO Environmental solutions, PAS2D702BALL.
I want to discuss air and noise pollution from the trucks delivering material to the well site
and the water pollution resulting from spills and well containment failure. What monitoring is planned?
Sincerely,

Barbara Wendeborn Brandom, MD

Comments to PA EPA on Injection Wells in Plum Borough, PA, on June 28, 2022
Underground Injection Control (UIC)
Program Notice of Draft Permit PENNECO Environmental solutions, PAS2D702BALL

In 2018 citizens in Plum Borough spoke out against the first proposed fracking waste injection well in their suburb of Pittsburgh. We are still concerned that the toxic waste could escape into the Allegheny River and contaminate downstream public drinking water systems, including that of the Pittsburgh Water and Sewer Authority (PWSA). PWSA provides drinking water to hundreds of thousands of people. A 2016 Geological Survey found that oil and gas waste from an injection well in West Virginia had contaminated a nearby creek. In Texas, cracks in the casing of an injection well allowed contamination of an aquifer through which it ran.

The Plum well that was permitted to receive fracking waste in 2020 is drilled through an old coal mine. There are 16 abandoned gas wells within a half-mile of this well and 66 gas wells within one mile. Terry Engelder, Emeritus Professor of Geosciences at Penn State said that the presence of these old wells can facilitate the migration of injected wastewater. [alleghenyfront.org/groups-oppose-pittsburgh-area-fracking-waste-injection-well/] This water can migrate thousands of feet laterally.

Residents are complaining about the noise and air pollution produced by trucks bringing fracking waste water to the site of the injection well permitted in 2020. The formerly quiet neighborhood now experiences heavy truck traffic 24/7. Off loading fluid increases the odor of toxic organic compounds. Occupational exposure to benzene significantly increases the risk of leukemia. [ncbi.nlm.nih.gov/pmc/articles/PMC1568103/] The presence of benzene increases the risk of leukemia by 30% in people living within 3 miles of the site of pollution. [Environ Health 2020; 19:53 PMID:32430062] After the first injection well started function, the well water of a neighbor changed in color and taste.

The Chief Operating Officer for Penneco, Ben Wallace, said that a second injection well is needed to increase capacity and operate more efficiently. [wesa.fm/health-science-tech/2022-03-10/environmental-group-joins-plum] Where does this end? Penneco's need to dispose of fracking waste will increase until they stop fracking. Every injection well developed in Plum will increase the risk of downstream water pollution. It is easy to ignore this risk until disaster occurs. It may be easy to ignore the increased risk of leukemia in workers & residents, because years pass after exposure before this life threatening disease is recognized. But it is morally wrong to ignore the health risks that this industry imposes on Pennsylvanians.

I urge you to deny a permit for this injection well, Sedat #4A.

Sincerely,
Barbara W. Brandom, MD
Concerned Health Professionals of Pennsylvania

Testimony on the application of Penneco Environmental Solutions for an injection well in Plum Borough, PA

Barbara Brandom [REDACTED]

Sun 8/28/2022 10:01 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

There should be no more permits for injection wells (that are expected to hold fracking waste water at high pressure) in Plum Borough, PA.

I agree with the letter from Larry Irr that was published in the TribLIVE on July 12, 2022. The Sedat 4A well was not designed to withstand high cyclic pressures. Neither was the Sedat 3A well. Ben Wallace, the Chief Operating Officer of Penneco stated (as reported in TribLIVE Dec 10, 2021) that Penneco plans to rebuild Sedat 4A in the same manner they rebuilt Sedat 3A, to meet EPA and DEP regulations. But after Sedat 3A received toxic fracking waste water, nearby residents detected discoloration of water taken from wells and springs that had been used without this contamination for many years. EPA and DEP regulations appear to be inadequate to protect the drinking water of people with injection wells placed near their property.

Plum Borough instituted an ordinance to restrict the location of injection wells to areas zoned for heavy industry in December 2017. But these injection wells are on property owned by Penneco that is in a residential area, not zoned for heavy industry. Permits should be denied for wells in residential areas.

Furthermore, there is a lot of evidence that many injection wells have failed, in many parts of the USA. See,

<https://www.propublica.org/article/injection-wells-the-poison-beneath-us>

Clearly it is not safe for the inhabitants of Plum Borough to have injection wells placed in residential areas,

and there is no guarantee that toxic fluids from these injection wells will not find their way into more private wells and into the Allegheny River, the source of drinking water for many people.

The request by Penneco for a second Class II injection well in Plum Borough must be denied.

Barbara Wendeborn Brandom, MD (retired)

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Nigrosh, Benjamin I [REDACTED]

Thu 7/14/2022 1:11 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

I am opposed to the Sedat 4A injection well. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is a direct threat to public drinking water.

Penneco is already operating an injection well on this site. In July 2021 two of the five water water wells near the site were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone, water contamination was identified in residents' wells.

Permitting the Sedat 4A injection well is in direct violation of U.S. Code of Federal Regulations 40 CFR 144, prohibits substantial endangerment of human health through the SDWA and establishes a framework for Underground Injection Control system. This framework requires consideration of a number of measures to ensure that injection will not endanger underground sources of drinking water. There is a lack of proper water testing and therefore no evidence disproving that the casing failure led to fracking fluid waste leakage into USDWs.

Given Penneco's existing well on this site has already failed and this proposed 4A well is the same as the 3A well a permit approval of Sedat 4A is a direct violation of the EPA's adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure

A leak, spill, casing failure, or another accident on the site of the proposed Sedat 4A well has the potential to contaminate drinking water for the 90 neighborhoods of the City of Pittsburgh as well as the other nearby communities who get their drinking water from the Allegheny River. EPA must adhere to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions.

As a resident of Allegheny County who gets my water from the Allegheny River I urge you to deny this permit and protect my water and the water of the more than 300,000 people who get their water from the Pittsburgh Water and Sewer Authority.

Thank you,

B

[REDACTED]
Get [Outlook for iOS](#)

Please Reject Disposal Injection Well Permit PAS2D702BALL

Bethany Narajka [REDACTED]

Tue 8/2/2022 5:47 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Dear Mr. Hancharick,

As a lifelong PA resident and parent of a toddler, I ask that you consider the health of Pennsylvania's children and please deny the proposed permit.

I agree with the statement below from the Clean Air Council.

Sincerely,

Bethany Narajka

--

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,



Joseph Otis Minott, Esq.
Executive Director and Chief Counsel

Please Reject Disposal Injection Well Permit PAS2D702BALL

Bethany Narajka [REDACTED]

Fri 8/26/2022 1:43 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr. Hancharick

As the parent of a toddler and resident of Allegheny County, I ask you to seriously look at the effects this decision will have on the health of everyone in our community. My 2 year old son [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] I love Pittsburgh, but I don't know how much longer we can live here because of the health risks to our family.

I agree with the statement below from The Clean Air Council.

Sincerely,

Bethany Narajka

--

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

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Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

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from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

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Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,



Joseph Otis Minott, Esq.
Executive Director and Chief Counsel

Please Reject Disposal Injection Well Permit PAS2D702BALL

Bethany Narajka [REDACTED]

Thu 7/14/2022 1:50 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello,

As a registered voter and concerned parent, I ask you to read and seriously consider the statement below provided by the Clean Air Council. The health of our family, friends, and neighbors is at stake.

Sincerely,

Bethany Narajka

--

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

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The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Joseph Otis Minott, Esq.
Executive Director and Chief Counsel

Penneco Sedat 4A

Bill Cronin [REDACTED]

Sun 8/21/2022 12:38 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello,

My name is William Cronin. My address is [REDACTED]

I don't really give a damn what you drill for. Drill for oil, for all I care. I always find it comical when these get sent out. These are probably the same dumbasses that blindly inject themselves with Fauxvid19 Frankenshots. Laughable.

In closing, I don't give a damn what you drill for.

Bill Cronin

Sent from ProtonMail mobile

1 trucks come up and down that road 24 hours a day.

2 Thank you.

3 MS. CHAPKIS: Thank you.

4 The gentleman on this side with the red shirt,
5 please?

6 Could you please state your name and address?

7 MR. PATTOCK: My name is Jim Pattock, 2029 Old
8 Leechburg Road, P-A-T-T-O-C-K.

9 I am just here to tell you, since this has been
10 going on, I live at the bottom of the hill, the site is at
11 the top of the hill. It might be in the center of the
12 property, but it's at the very top of the hill. We live
13 down the bottom of the valley, so the odors go right down
14 the valley.

15 And we have had some very bad acid odors that will
16 make your eyes water, bad taste in your mouth. We actually
17 had to leave at times, because it is so bad. And it is
18 from their facility.

19 The noise, they got a pump that runs. It runs,
20 God, I don't know, all through the night, through the day.
21 It shuts down every once in a while.

22 But you are in your house, you've got to listen to
23 a fan, because you can't -- it's just a sound.

24 I heard that they were supposed to get an electric
25 motor, you know. I don't know when that is coming.



Penneco Injection Well follow up

Bob Teorsky [REDACTED]

Tue 9/6/2022 3:26 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: Bob Teorsky [REDACTED]

Hello

After speaking to a few of your agents they assure me that I can send a comment to this email address by 9/7/22 to be reviewed. Please let me know that you receive this along with the other attachments.

If there is any addition information I can send, please let me know.

Thank you,

Bob Teorsky
[REDACTED]

U.S.EPA

R3-ULC-Mailbox@epa.gov

I am writing in response to the permit application being filed by Penneco Environmental Solutions. LLC (with corporate offices at 6608 Route 22 Delmont, PA 15626) This application is being filed for a "Residual Waste Transfer Facility" and expansion to its existing facility located at 1815 Old Leechburg Rd. New Kensington, Pa 15068

The current facility on this property has been receiving 2,268,000 gallons of oil and gas waste water also referred to as flowback per month beginning back in March of 2021. All seemed to be going okay at its initial startup other than new truck traffic and noises twenty-four hours a day, seven days a week. Then in May of 2021 the EPA approved doubling the amount of waste acceptance to 4,536,000 gallons per month. It was soon after was when this facility had it first of many failures.

The owner of this facility failed to report the packer failure the right agency in the time required. This is unacceptable for this industry, let alone people like myself who depend on these companies and their knowledge and word that they are doing everything legit. It shows me that the well operators own versions could be by far to benefit themselves so they can continue to operate uninterrupted.

DEP Don Hegburg told me it was mechanical packer failure. I believe he said somewhere at a depth around 700 feet. After learning this, I realized when this happened it resulted immediately in well contamination complaints. The contamination that our wells received in this direct area may very well may have been caused by this failed packer. I have the Smolinski family that lives on my road above me that had immediate discoloration coming from their well water with a pretty awful smell they were saying. Frank spoke at your hearing on 8/30. I believe they stopped using their well. I did get to see the orange tinted sample at a Plum Borough meeting. I also will include other testimonies from the Paddock family who live directly above me later in this letter. (And as an attached document) You have heard the Sheehan's testimony and many others at the past Plum meeting we had with your agency. I still feel there may be many more families in the immediate area that may not even realize that their water and or air is being compensated. Let alone all the health issues that may be brewing for their futures. Even though the DEP is trying its best to make everyone in Plum aware, I feel this needs to be the well owner's responsibility to notify or to at least absorb the cost for the man hours of the tax payer's dollars. Instead of just walking away and saying "it has to go somewhere". That's just another way to show me how one these officers that work for Penneco and their knowledge of this industry. I would expect and answer like this more from a child than a professional.

My issue occurred back in the middle of September 2021. I was awoken by a really awful acidic, chemical smell that somehow enter my home. My eyes, throat, nostrils and any exposed skin was burning, really bad and I also had a pretty bad headache. I had trouble breathing, almost like suffocating. I checked on my girlfriend and the dogs and got outside to see what was happening, also thinking that fresh air could help with the issue that was happening to us. I understand that there are numerous chemicals in this industry and had a pretty major concern that this is what directly affected us. This concern made me start to file my own complaints with all agencies and contacts listed.

- DEP, Don Hegburg
- Nick Cato (DEP Air Quality Control)
- EPA New Stanton office, spoke to Tom Morris.
- Pittsburgh Poison Center, referred me to Allegheny County Health Department.
- Allegheny County Health Department, Stephanie Hasanali, Division of Environmental Health Epidemiology.
- Pennsylvania Department of Health (DOH)
- Plum Police Department Officer Rupert
- Plum Borough Board

10/7/21 Plum Borough Police Department Officer Rupert was here and I filed a complaint against Penneco. The officer did come into my home and noticed the unusual smell in my basement. This is when my Geothermal Water Furnace was located at that time. I asked if he could email me a copy of the complaint which I am still waiting for. I realize the local police force have no training what so ever in the oil and gas industry and the severity of the issues these facilities are capable of causing, so I probably had the officer pretty confused.

10/18/21 I also contacted my primary care doctor Dr. Lawrence John for testing. He was very concerned on me living so close to this facility and told me that we need to move away from this Injection Well as soon as I am able. He explained they are not good for us to be around. I explained to him what happened to me. He then referred me to an ENT, Dr Golla.

Dr. Golla ran numerous tests and [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED] I am currently in the process of making additional appointments with several other specialists that are more familiar with the effects transient expose to chemicals in the fracking industry, and if they could prove this is what directly [REDACTED] I believe they have in the past.

I know it may not mean much to anyone. But the two things I enjoy the most in life is my work and cooking my food. I worked from home for the past 17 years roughly 14-16 hours a day. [REDACTED] then they wrecked my life. Until you actually live through what I live with everyday now, there is just no way to understand. I am still concerned of further health issues that may result from this.

If proven, I will then be filing criminal charges also against the several fracking companies and their negligence that could be contaminating the air or water that passes across or under my property. Pennsylvania's Attorney General has been a big help at correcting problems in this Industry. I am hoping I can turn to them for help if so.

NOTE: The primary component of natural gas is methane, which is odorless when it comes directly out of the gas well. In addition to methane, natural gas typically contains other hydrocarbons such as ethane, propane, butane, and pentanes. Raw natural gas may also contain water vapor, hydrogen sulfide (H₂S), carbon dioxide, helium, nitrogen, and other compounds. If the concentration of H₂S in the gas is high enough, there may also be a "rotten egg" odor associated with the gas. Penneco also has several of their own shallow wells on this same property that currently are still producing natural gas. I am concerned that one of these wells, from one or more of these fracking companies may have caused my Parosmia. Being I live in here in this rural zoned area, there is no other industry even close that could produce this type of vapors.

My main concern is to find out what caused this odor. On October 2nd I emailed a complaint to the DEP. The complaint went as follows: "My water well that provides water to my Geothermal Furnace seems to be emitting a strong acid like odor into my home. It may have very well been the cause that was irritating to my eyes, skin and nostrils. I believe my water well may be contaminated with the chemicals they are pumping into the Penneco Sadat #3 injection well. If so, this is a real concern to me. They have been unloading into the well for the last few weeks all hours of the day and night to the Penneco Sadat #3 injection well about a quarter mile above my home. I have not been running my furnace for fear it is indeed contamination. The well water that passes through my Geothermal Furnace discharges into a creek in front of my home. Being I have worked in the gasoline and diesel business for the last 40 years I am familiar with a lot of the regulations for ground and water contamination also. Please email me or call me as soon as possible."

Don Hegburg from the DEP called and made an appointment to come to my home.

10/6/21 DEP came to my home with two other representatives and did the first samplings of many that they took over the next few months from my well. They noticed a strong, referring to it as a petroleum odor. This also confirms what my colleagues told me when he was in my basement right around the same time. In their early investigation they felt they needed to investigate where the unusually high amounts of methane can be coming from. Later they told me Penneco and EQT are two of the companies working in this area. Over the next 6 months and numerous visits by the DEP to my home, we have been documenting the methane readings they are taking have been ranging anywhere from 10% gas to as high as 42-46% gas it is "directly related to the gas and oil industry, not coal gas". (See photo of actual DEP readings)

I have been in the Gasoline, Diesel fuel business for nearly 40 years. We have strict regulations we are required to follow. From a description of the products (MSDS Sheets) we carry on the trucks to documenting and reporting any type of spills over 25 gallons. Yet these injection facilities are accepting some of the same chemicals we see on our MSDS Sheets. I don't understand how they are clearly allowed to dump them into the ground beneath our homes with no reporting, no BOL's required, or no such documentation of the exact amount of chemicals of what is being hauled in any of these bottle trucks. I realize they like to say they are diluted with million gallons of water but understand that there have already been trucks in this industry that carry loads with higher amounts of chemical concentrations than others. We know that there are numerous chemicals used in the fracking business. Some of the more serious ones in this fracking waste are what concern me. Benzene, Toluene, Xylene are just a few and are all used to make gasoline. We also see ones like Sulfuric Acid and Hydrogen Sulfide, Phenol. These are the ones that can permanently damage the neurological system if the vapors

come in contact with humans. I can't help to wonder if one or more of these very well may be of came in contact with me while sleeping at my home that night.

Being exposed to toxic chemicals used in the fracking industry can [REDACTED] Also, these same chemicals that are used in this industry have also caused death. And now let's add the everyday stress from living near these facilities. And the permits that are granted by the EPA and the DEP. Agencies that I always assumed were here for the safety of the daily water I drink and the air I breath.

During some of the DEP's investigation, on one of his visits to the Penneco Injection Facility on or around 10/13/2021, Don Hegburg made me aware he was told by a Penneco employee that they were burning off some pretty harsh stuff at this Injection site a while back. Don asked me if I smelt what could be like rotten eggs back then. What now concerns me, maybe they could have been burning off Hydrogen Sulfide, or some other highly toxic chemical on their property? [REDACTED]

[REDACTED]

[REDACTED]. The DEP has already made me aware that chemical vapors are heavier than air and tend to stay low to the ground. They also linger in our homes, cars, storage sheds and basically every nook and cranny air can find. Also, that nights tend to be worst when the air becomes still.

1/19/22 Plum Borough Zoning Board Hearing. I have a copy of the hearing transcripts containing some sworn testimonies from several people who live above me, one family directly above me, on my road that were also complaining about chemical and very bad acid odors in the air that made your eyes water and leaves a bad taste in their mouths. This also cause them to have to leave their home at times. (See attachment)

I assume that you already know that this Injection Well is the very first commercial Injection Well in the state of Pennsylvania. They receive numerous gallons of Residual Waste from numerous states. When these companies are required to govern themselves, I sometimes wonder how many companies report the exact truth of every violation they break. If any of them have a track record that this company appears to have, who knows what is being offloaded at this facility.

This is the main reason I do not want to see this permit approved for this Penneco Sadat facility. I see the damage that the current Injection Facility has caused to us and if it is because of their negligence, then they need to be shut down immediately until they are reviewed for this and the other existing outstanding issues are resolved. They already have a pretty bad track record of numerous past incidents and violations against them at numerous facilities they own and maintain. It is obvious to me that they are unqualified to be into this business, or just have trouble reporting their problems in a timely manner. At this Injection Facility, they have already failed to notify the EPA and the DEP in the timely matter when they did not report their WOS-AS1-X packer failure. I can't help but feel that they were starting to cover up their problems at this Injection facility. If not mistaken, they are responsible to monitor their actions and have already proven they are unable to report themselves. I can't help to feel

how incompetent this company and some of its officers are. I do not want to see anyone else around this facility become damaged like my health, my home and property already have.

I want to go back to the meeting on 8/30/22. Dr. John F. Stolz mentioned how my water well that is used to operate my geothermal furnace was compensated. I have had this furnace removed and replaced back in May of this year and is now running on propane. Just additional costs this facility is creating for me. I was deathly afraid to use the current Geothermal unit in fear of an explosion or possibly being poisoned again if this was the case.

I want to assure you that I am not against the Fracking Industry. This provides the energy for an important part of America's future. I am against the weak laws and loopholes and unsafe practices that continue to make this industry unsafe for the health of all Americans.

I also am concerned, that the DEP and EPA that we know are already severely understaffed to be able to follow up with all of the investigations required in this industry in a proper and timely manner. I now see this putting the health of the citizens at risk. The Attorney General has also mentioned how these officers, trained at our government expense, have been poached away to much higher-paying jobs in the oil and gas industry. This is mentioned back in the court of common pleas Allegheny County Investigating Grand Jury Report No. 1 Filed June 22, 2020 (see attached link below)

<https://www.attorneygeneral.gov/wp-content/uploads/2020/06/FINAL-fracking-report-w.responses-with-page-number-V2.pdf>

I now see my government is adding 87,000 IRS agents. I see no mention of DEP or EPA agents being added. I can't help feeling that money tops health, on their priority list.

Today's EPA and DEP challenges are unlike the steel industry cleanups back in the sixties and seventies. Back then you could see the smog in the air, the iron oxides that laid on the hoods of cars and the oil and chemical sheens on the three rivers. Today's challenges are gases and vapors that you can't see and as far as the really ugly looking fluids and numerous chemicals that vanish into Injection wells quicker than they can settle in ponds at fracking sites.

I can't stress enough how important that the EPA and DEP needs to continue to grow along with all these changes of today's fracking industry. With these added challenges these two agencies face and the uncertainties of what numerous chemicals they are actually looking for may be another reason to reevaluate this industry. The environmental challenges of this industry today are more out of sight so let's not make them more out of mind.

I do however notice a Superfund to protect people's health. The PFAS "Chemicals as Hazardous Substances" It's nice to know that they are going to hold the polluters accountable for their actions. I am hoping this will be a start to making this fracking industry safer for all of our health.

Please, if there is any other information you may require, I have kept a journal from the opening of this facility. The numerous hours I work from [REDACTED] has given me the opportunity to make people aware of what it is like to live in the day and life of an Injection Well.

Thank you for your time, and please can you acknowledge that you received this email.

Bob Teorsky [REDACTED]

I am writing to you today regarding the Sedat 4A Injection Well

Boomba Nishikawa [REDACTED]

Thu 7/14/2022 3:42 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Plum, and I am concerned about the proposed Sedat 4A Injection Well. I am concerned that this second well will further jeopardize my drinking water source and the Allegheny River, which my community and region relies on for clean drinking water. I demand that EPA keep our water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Boomba Nishikawa
[REDACTED]

I am writing to you today regarding the Sedat 4A Injection Well

Carlin Christy [REDACTED]

Wed 7/13/2022 11:07 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Allegheny County, and I am concerned about the proposed Sedat 4A Injection Well polluting our drinking water source, the Allegheny River. The existing Sedat 3A Injection Well already failed once after being in operation only a few months. How long do you think it will take for a second injection well to pollute our water? Adding a second injection well doubles the risk to our drinking water. I demand that EPA keep our drinking water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Carlin Christy
[REDACTED]

Re: Request to hold a public hearing on PAS2D702BALL

Cat Lodge [REDACTED]

Wed 6/22/2022 9:25 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Mr. Bennett,

With all due respect, cancelling a virtual meeting is much easier than cancelling an in-person hearing. This is the ease of virtual meetings. Perhaps you should have given the public more notice than you did.

Your decision to continue with the virtual meeting knowing that you will be leaving out a population of the community that is unable to electronically connect to the hearing is doing the community a disservice. But, alas, it seems that you are only concerned with those that can virtually participate.

It seems that EPA is not interested in voices from the public that will be impacted forever from a project which you seem prepared to permit.

Cathy Lodge

On Wed, Jun 22, 2022 at 9:22 AM R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov> wrote:

Thank you for your email. Given short time frame to postpone the public hearing and changing it to in person, the scheduled **virtual** hearing will be held. It would be unfair to those who already plan to attend the hearing to cancel the currently scheduled hearing. To ensure that everyone who wishes to express their views to EPA has time to do so, a call-in number was also provided, and, in addition, EPA will extend the public comment and additional two weeks, ending on July 13, 2022.

James Bennett
Source Water & UIC Section
U.S. EPA Region 3
Email: R3_UIC_Mailbox@epa.gov

From: Cat Lodge [REDACTED]
Sent: Saturday, June 18, 2022 9:20 PM
To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>
Subject: Request to hold a public hearing on PAS2D702BALL

Ryan Hancharick

Water Division (Mail Code: 3WD22)

U.S. Environmental Protection Agency Region 3

Four Penn Center

1600 John F. Kennedy Blvd.

Philadelphia, PA 19103

R3_UIC_Mailbox@epa.gov

215-814-3278

Dear Mr. Ryan Hancharick,

Please see my attached request for a proper public hearing and comments on :

EPA PUBLIC NOTICE Underground Injection Control (UIC) Program

Notice of Proposed Permit Issuance for: PAS2D702BALL:

Penneco Environmental Solutions, LLC

6608 Route 22 Delmont, PA 15626

Thank you,

Sincerely,

Cathy Lodge

Request to hold a public hearing on PAS2D702BALL

Cat Lodge 

Sun 6/19/2022 1:20 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Water Division (Mail Code: 3WD22)

U.S. Environmental Protection Agency Region 3

Four Penn Center

1600 John F. Kennedy Blvd.

Philadelphia, PA 19103

[R3 UIC Mailbox@epa.gov](mailto:R3_UIC_Mailbox@epa.gov)

215-814-3278

Dear Mr. Ryan Hancharick,

Please see my attached request for a proper public hearing and comments on :
EPA PUBLIC NOTICE Underground Injection Control (UIC) Program
Notice of Proposed Permit Issuance for: PAS2D702BALL:

Penneco Environmental Solutions, LLC
6608 Route 22 Delmont, PA 15626

Thank you,
Sincerely,
Cathy Lodge

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3
Email: R3_UIC_Mailbox@epa.gov

Re: EPA Request for Postponement and In-person Hearing

Dear Mr. Hancharick

I write in response to the issuance of a draft permit PAS2D702BALL to Penneco Environmental Solutions, LLC, of Delmont, PA. Specifically, I object to the tentative public hearing currently scheduled virtually for June 28, 2022.

My first objection is based on the virtual format of the hearing. Having grown up in Allegheny County I know that it is a diverse community whose members are always ready to voice their opinions and stimulate healthy conversation; this, however, has traditionally been conducted via in-person hearings. The community of Plum Borough, Allegheny County which will be impacted by Penneco's objectives is primarily rural. I currently reside in a rural community and know that like my neighbors, Plum Borough and its constituents cannot be expected to have reliable, widespread access to online platforms such as MS teams. While a dial-in option has been presented, participants who have dialed in are easily overlooked and uncomfortable participating due to only being able to do so at a bare minimum level. As a result, a virtual hearing would discourage conversation from some members of the community and alienate others from attending altogether. Because the purpose of these hearings is to get comments from the entire community affected, a virtual hearing will not meet this purpose in Allegheny County.

Furthermore, The Environmental Protection Agency's "best practices for conducting virtual public hearings and meetings include documenting the reasons for conducting the public hearing or meeting virtually." Memorandum: Virtual Public Hearings and Meetings, page 2 (April 16, 2020). In the EPA's notice of hearing regarding the Penneco draft permit, there are no documented reasons for conducting the hearing online. The lack of such documentation combined with the community's tendency to be excluded from hearings when virtual, as previously discussed, is sufficient to warrant an in-person hearing at a later date.

My second objection relates to the short amount of time that the public has had to review and comment on highly technical information. Given the information constantly coming out about the dangers of shale gas development including the evidence of radioactive material being found in the water and soil waste materials from the extraction process, EPA should proceed cautiously and with full disclosure to the public. This will allow the public time to review the application so that it can make intelligent comments about the proposal. While the EPA published this notice on their website on May 26th, 2022, the public did not know about this hearing until June 14th. Even if given a full 30 days to review, there is a huge disparity between the preparation time and resources that the oil and gas industry has versus what we (local officials who are charged with protecting ourselves and the public) have to review application documents, research scientific facts and prepare comments.

I request the EPA postpone the hearing and hold it in person for the reasons outlined above, to allow appropriate participation from the public that will be impacted by the issuance of this permit.

Sincerely,

Cathy Lodge

████████████████████

████████████████████

Fracking wastewater plum pa.

Cayle [REDACTED]

Mon 8/22/2022 6:43 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Good afternoon,

My name is Cayle Silvio and i live in the Plum community. I am currently aware a company wants to add a fracking waste well and i am totally against it. If you need anything further please let me know.

Best regards

Cayle Silvio

[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Wed 8/24/2022 1:16 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Wastewater injection Plum Borough

Tue 8/2/2022 8:22 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Cecelia,

Penneco Environmental Solutions is applying for its second gas drilling wastewater injection well in Plum Borough, Allegheny County, PA. The following is a suggested comment to the U.S. Environmental Protection Agency (EPA). The comment identifies several violations that Penneco has incurred at the proposed site as well as significant state permitting issues related to this proposal. The EPA has reopened this comment period and scheduled an in-person public hearing August 30, 2022 at the Plum Community Center, 499 Center New Texas Road, Pittsburgh, PA 15239 from 6:00 pm to 8:00 pm EST.

[Read more here.](#)

Please submit this suggested comment to the email below:

To: R3_UIC_Mailbox@epa.gov

Subject: Please Reject Disposal Injection Well Permit PAS2D702BALL

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is

clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

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Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

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Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Cecelia hard

I am writing to you today regarding the Sedat 4A Injection Well

David Gamble-Moore [REDACTED]

Wed 7/13/2022 10:43 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

As a health care provider and resident in Allegheny County, I've seen the direct results of the autoimmune disease and thyroid disease that's caused by the kind of pollution associated with the Sedat 4A Injection Well on our populace, who already suffer a higher rate of these sicknesses than the general populace. The molecular size of the associated pollution going into the river is too small to be filtered out effectively before drinking and thus is filtered out of the body by the thyroid and prostate of the people who drink the water, damaging the body in the process. The existing Sedat 3A Injection Well already failed after being in operation only a few months. Adding a second injection well doubles the risk to our drinking water and compounds the health, and therefore economical, problems of the region. Please keep our drinking water safe by denying the permits for the Sedat 4A Injection Well. Thank you.

Sincerely,

David Gamble-Moore
[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Dina Hanse [REDACTED]

Tue 8/2/2022 11:41 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

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https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ahs.dep.pa.gov%2FFACTSWeb%2FsearchResults_singleViol.aspx%3FInspecti%3D3067473&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7Cc58f61941c7c4b32e8d008da74e06fa9%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637950804670818503%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C2000%7C%7C%7C&sdata=TITuzOA%2BOZPAMnWDKpktOEEX%2BgzzfryBiCd7hUIWJQA%3D&reserved=0

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

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In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ahs.dep.pa.gov%2FFACTSWeb%2FsearchResults_singleSite.aspx%3FSiteID%3D5980&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C58f61941c7c4b32e8d008da74e06fa9%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637950804670818503%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ik1haWwiLCJXVCi6Mn0%3D%7C2000%7C%7C&sdata=thQtE8L1FKOT6uHuvdqP3wjD0oNcoX6izTgCWXjCoDo%3D&reserved=0

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely

Constantina Hanse



Please Reject Disposal Injection Well Permit PAS2D702BALL

Don [REDACTED]

Tue 8/2/2022 2:46 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Don Hawkins

Please Reject Disposal Injection Well Permit PAS2D702BALL

Don [REDACTED]

Wed 8/24/2022 5:00 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Thank you for your time,

Don Hawkins



Please Reject Disposal Injection Well Permit PAS2D702BALL

Don [REDACTED]

Thu 7/14/2022 4:48 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

ATTN:

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

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Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A. DEP clearly does not have the resources to ensure that Penneco’s injection

disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Don

September 5, 2022

Donald R. Ziegler

James Bennett

US EPA Region 3

Four Penn Center

1600 John F. Kennedy Blvd

Philadelphia, PA 19103-2029

Dear Mr. Bennett

Thank you for moderating the public hearing on August 30 at the Plum Borough Community Center regarding PENNECO's request to add an additional injection well, known as Sedat 4A. You were patient in hearing all the reasons why the request for this well should be denied. The citizens you represent offered evidence of the negative impact of the first injection well that PENNECO is operating. Now that we have tangible evidence of the negative impact of their first well, there is solid data and grounds to deny PENNECO moving forward with their request for Sedat 4A.

After reviewing your EPA website, it is encouraging to see your mission at the EPA is so clearly stated, which I reference below:

OUR MISSION

The mission of EPA is to protect human health and the environment.

EPA works to ensure that:

- **Americans have clean air, land and water;**

James, it is reassuring that you are involved to protect us as our representative at the EPA. From the evidence and public comment, it appears obvious the decision that you must make to protect our health and the environment so we can have clean air, land and water is to deny the permit for the Sedat 4A injection well.

Also, from your EPA website the document of "Transparency and Open Government" dated January 21, 2009 was posted. It states that the "Government should be transparent. Transparency promotes accountability and provides information for citizens about what their government is doing."

James, as our representative of the EPA, I/we look forward to transparency from you in your decision/recommendation and accountability to us as the citizens you serve. We eagerly await your decision to reject this request from PENNECO for the Sedat 4A injection well.

Thank you in advance for looking after our welfare and helping provide clean air, land and water as stated by your EPA mission!

Sincerely,



CC: Adam Ortiz, Regional Administrator; Michael S. Regan, EPA Administrator

September 5, 2022

Donald R. Ziegler

James Bennett

US EPA Region 3

Four Penn Center

1600 John F. Kennedy Blvd

Philadelphia, PA 19103-2029

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Thank you in advance for looking after our welfare and helping provide clean air, land and water as stated by your EPA mission!

Sincerely,



CC: Adam Ortiz, Regional Administrator; Michael S. Regan, EPA Administrator

Public Comment Letter to be Sent to Adam Ortiz

Don Ziegler [REDACTED]

Tue 9/6/2022 3:55 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan, please send a copy of the attached letter to Adam Ortiz, Regional Administrator. I do not have Adam's email address. Thank you and please let me know if you have questions.

--- Don Ziegler [REDACTED]

Letter for James Bennett Regarding PENNECO Sedat 4A Injection Well

Don Ziegler

Tue 9/6/2022 3:49 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan, please find my attached letter as a public comment on PENNECO's request for Sedat 4A injection well. Thank you.

---- Don Ziegler

Sedat #4A Plum Injection Well Comment

Dora Binion [REDACTED]

Wed 8/31/2022 2:53 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am demanding you to DENY the proposed Plum Injection Well, Sedat #4A. Injection Wells like this put drinking water at risk and coincide with a plethora of other impacts. When this injection well fails and contaminates Allegheny County's drinking water, residents could potentially be exposed to chemicals that will cause long-term health issues, including cancers, heart and lung disease, liver and kidney toxicity, etc. Allowing this Injection Well to operate will violate my right as a Pennsylvania citizen to pure water as stated in Article I, Section 27 of the Pennsylvania Constitution.

Sincerely,

Dora Binion
[REDACTED]

Protect **PT**

BREATHE PROJECT

The Air We Share



FRACTRACKER ALLIANCE

3344 ROUTE 130, SUITE D
PO BOX 137
HARRISON CITY, PA 15636

EDDM
ECRWSS
U.S. POSTAGE
PAID
GREENSBURG, PA
PERMIT 130

Local
Postal Customer

OUR DRINKING WATER IS AT RISK!

If you get your water from the Allegheny River –
You may be at risk from a fracking waste injection well.

Please tell the U.S. EPA to DENY the permit for a second fracking waste injection well in Plum Borough – the Penneco Sedat4A.

Fracking wastewater has been shown to contain Radioactive Material and PFAS – aka Forever Chemicals.

The Allegheny River is the source of drinking water for hundreds of thousands of people in Pittsburgh and Allegheny County, and many more downstream.



WE NEED YOUR HELP. PLEASE TAKE ACTION:

- **SIGN & SHARE THE PETITION**

Visit: protectpt.info/petition



- **ATTEND OR SPEAK AT THE EPA HEARING**

August 30th at 6 p.m.

Plum Community Center
499 Center New Texas Road, Pittsburgh, PA 15239

- **SUBMIT A WRITTEN COMMENT**

Contact:

Ryan Hancharik – R3_UIC_Mailbox@epa.gov

Include your name, address and permit name: Penneco Sedat 4A

If you have any questions or need help preparing comments, please contact:
Morgan Moran – morgan@protectpt.org

ProtectPT

**BREATHE
PROJECT**
The Air We Share

 **FRACTRACKER
ALLIANCE**

Our drinking water is at risk!

Dora Binion [REDACTED]

Tue 8/23/2022 12:58 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: [REDACTED]

I rent at [REDACTED] I've been using this contaminated water when I brush my teeth and shower. My whole apartment stinks. I have a pipe that is leaking in my laundry room. I have a bucket under the sink the sink where pipe is leaking.

I was wondering why ever morning my apartment was smelling and it's making me [REDACTED] [REDACTED] Thursday I received this notice down below. Now I'm concerned about my health. I am scheduling a doctor's appointment to see if I have been contaminated.

Please Reject Disposal Injection Well Permit PAS2D702BALL

Dunnefam [REDACTED]

Tue 8/2/2022 7:41 PM

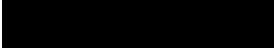
To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Public comment on Draft Permit Penneco Environmental Solutions, PAS2D702BALL

Fields, Edith G 

Tue 6/28/2022 10:50 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello Mr. Hancharick,

I am writing to you to ask that you do not issue the Penneco Environmental Solutions draft permit PAS2D702BALL. As someone who lives in Pittsburgh and works in the Plum Borough area, I am concerned that this injection well will threaten the quality of my drinking water. Additionally, I am concerned that a possible failure of the well's casings could expose the community around the well to environmental toxins, as this has happened with another Penneco injection well in the area. I believe people have a right to clean water and I hope that you will consider my position when making this decision.

Thank you,
Edith Fields

RE: Please Reject Disposal Injection Well Permit PAS2D702BALL

John Arnold <John.Arnold@oakmontborough.com>

Fri 7/15/2022 2:44 AM

To: Judy Ziegler [REDACTED] R3 UIC Mailbox
<R3_UIC_Mailbox@epa.gov>

Cc: [REDACTED]

Oakmont Council has passed a resolution opposing an injection well in PLUM and joining the city of Pittsburgh and its water authority in this opposition. I do not think another resolution would make any difference. Oakmont Water Authority has not taken a position on this matter. I thank you for your commendable interest in this most important issue (we all need water –see “Doctor Strangelove” -a movie--on the human need for H2O). I think this is an issue which can only be solved in Harrisburg .

Respectfully,
John Arnold

From: Judy Ziegler [REDACTED]

Sent: Thursday, July 14, 2022 9:53 PM

To: [REDACTED] R3_UIC_Mailbox@epa.gov

Cc: John Arnold <John.Arnold@oakmontborough.com>; [REDACTED]

Subject: RE: Please Reject Disposal Injection Well Permit PAS2D702BALL

I am writing in regards to the proposed new permit applied for by Penneco for a disposal injection well, Sedat #4A, located in Plum Borough described in the letter below. The purpose of the EPA is to protect and preserve the environment for the people living there, by not granting permits to irresponsible companies like Penneco with known violations and a poor public safety record. Why should the EPA approve another permit allowing Penneco to continue to dispose of millions of gallons of contaminated fracking waste water containing hazardous, disease-causing chemicals into our land? There is absolutely no guarantee that the injection wells holding this waste will not fail and leak their toxic contents into the surrounding ground water, ending up in wells, streams, and eventually the major water supply for the entire region, the Allegheny River. I have seen nothing in regards to a detailed regular testing plan for any well that Penneco has operated in the past or present, probably because no such plan even exists! The people in our communities who will be affected by these wells are counting on the EPA as their representative and advocate to stand up for their right under the law to healthy, clean, and safe air, water, and environment. It is the EPAs responsibility to stand up to companies like Penneco that carelessly generate and dump millions of tons of toxic waste with absolutely no regard to the harm they are doing to our local environment here which could potentially threaten all those living in the surrounding communities for years to come.

Thank-you for your attention in this important subject. I served as Water Quality Chemist at the Hulton Treatment Plant for Oakmont Water Authority, so I know the threat that chemicals can cause to the drinking water. I also worked at the UPMC Hillman Cancer Research and Treatment Center and saw first hand how exposure to chemicals like the ones found in fracking waste can result in types of cancer.

Sincerely yours,

Judy Ziegler
[REDACTED]

Sent from [Mail](#) for Windows

From: [REDACTED]
Sent: Thursday, July 14, 2022 10:28 AM
To: R3_UIC_Mailbox@epa.gov
Cc: john.arnold@oakmontborough.com; [REDACTED]
Subject: Please Reject Disposal Injection Well Permit PAS2D702BALL

Dear Sirs / Madam,

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

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https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the

Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco’s application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well’s first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

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Given the previously mentioned violations and DEP’s sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco’s injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Respectfully,

Ed Grystar

Citizens to Protect Oakmont

[REDACTED]

[REDACTED]

RE: Please Reject Disposal Injection Well Permit PAS2D702BALL

Judy Ziegler [REDACTED] >

Fri 7/15/2022 12:37 PM

To: John Arnold <John.Arnold@oakmontborough.com>; [REDACTED] R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: [REDACTED]

Thanks for the cute anecdote, John; it started my day off with a chuckle (yes, even vodka is made of water!). It does bring up an important point though and that is all life here on earth depends on water for its existence, and the lack of water on other planets makes them uninhabitable. Another concern I have but failed to mention is the close proximity of these injection wells to Plum Creek. Anyone who walks in Dark Hollow Woods knows how many children and dogs enjoy playing and swimming in this stream, almost every day in the summer. Think of how devastating it would be to have Plum Creek contaminated by fracking waste water! I grew up here in Oakmont and spent many hours in Dark Hollow, and remember how acid mine drainage from the Newfield mine caused that stream to run orange for years. There was no life there and no one would want to touch let alone play in that water; fortunately the mine closed and Plum Creek has now recovered. Are we going to allow fracking waste which is much more hazardous than acid mine drainage be the next threat of contamination for this stream and others in the area? This will only happen when the people in our communities do nothing to stop it.

Thanks for taking the time to read this,
Judy Ziegler

Sent from [Mail](#) for Windows

From: [John Arnold](#)**Sent:** Thursday, July 14, 2022 11:33 PM**To:** [REDACTED] R3_UIC_Mailbox@epa.gov**Cc:** [REDACTED]**Subject:** RE: Please Reject Disposal Injection Well Permit PAS2D702BALL

Please see [Dr. Strangelove \(4/8\) Movie CLIP - Water and Commies \(1964\) HD - YouTube](#) for the "essence" of pure water and our need for it. Just to lighten the subject a bit.

Respectfully,
John Arnold

Sedat #4A Plum Injection Well Comment

Ed Grystar [REDACTED] >

Mon 8/29/2022 2:17 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Oakmont, a contiguous community closely situated near this injection well. A few years ago, I was instrumental in organizing the Citizens to Protect Oakmont which worked to organize our Borough to strengthen the oil and gas ordinance to protect the health and safety of our citizenry. Our group, also worked to have the Borough pass a resolution against the first injection well and have worked with our Council to pass a second resolution against this proposed injection well. Since our community is contiguous to Plum and our oil and gas ordinance has a set back requirement to protect our community, we believe this gives Oakmont a standing to object to this well.

I am demanding you to DENY the proposed Plum Injection Well, Sedat #4A. Injection Wells like this put drinking water at risk and coincide with a plethora of other impacts. When this injection well fails and contaminates Allegheny County's drinking water, residents could potentially be exposed to chemicals that will cause long-term health issues, including cancers, heart and lung disease, liver and kidney toxicity, etc. Allowing this Injection Well to operate will violate my right as a Pennsylvania citizen to pure water as stated in Article I, Section 27 of the Pennsylvania Constitution.

Sincerely,

Ed Grystar
[REDACTED]

Reject Disposal Injection Well Permit PAS2D702BALL

EDWARD GRYPSTAR [REDACTED]

Thu 7/14/2022 2:18 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Edward Grystar
Citizens to Protect Oakmont



DENY PENNECO SEDAT 4A PERMIT PLEASEElle Scales 

Sun 8/28/2022 4:24 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello Mr. Hancharik,

I am asking the EPA to deny the permit for Penneco Environmental Solutions to build and operate the Sedat 4A fracking waste injection well in Plum Borough, Allegheny County. This well poses a grave danger to our drinking water and would violate EPA's adherence to the Safe Drinking Water Act. You must deny this permit.

This permit, if passed, will slowly destroy the health and wellness of the people of this borough. I want my children to grow up here and start their own families. I don't want to die of fracking waste related illnesses and cancers before I'm able to see that happen. The people of Plum are begging you to deny this permit and help ensure the safety and longevity of our families and community.

If you have any interest in protecting the children of Plum from childhood cancer, please deny this permit and read this article published by Yale:

<https://news.yale.edu/2022/08/17/proximity-fracking-sites-associated-risk-childhood-cancer>

If you're at all interested in the various harms that living near a fracking site can cause, and WILL cause, to the people of this town, please see more information here:

<https://www.ehn.org/fractured-harmful-chemicals-fracking-2650428324.html>

Please consider the harm that passing this permit can do to us. Please consider the human beings who live here and deny this permit.

Our families will thank you for generations!

Elizabeth and Andrew Brokenshire

Plum home owners and residents

Comment on Plum fracking injection well

Contact [REDACTED]

Wed 9/7/2022 2:23 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear EPA,

I would like to register my concerns and opposition to the second fracking waste injection well in Plum from Penneco. Given the problems with their first injection well in Plum, adding a second one seems like a terrible idea.

Sincerely,

Emily Winerock

[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

firehawk7773 [REDACTED] >

Fri 9/2/2022 2:04 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

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https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit

for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Signed,
Fayten El-Dehaibi

Please Reject Disposal Injection Well Permit PAS2D702BALL

firehawk7773 [REDACTED]

Wed 8/10/2022 3:39 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

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Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Fayten El-Dehaibi

Please Reject Disposal Injection Well Permit PAS2D702BALL

fern ritter [REDACTED]

Sun 9/4/2022 4:09 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

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Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

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Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use

permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

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The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

- Fern Ritter

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Gesina Peterman [REDACTED]

Fri 7/1/2022 9:07 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

I am opposed to the Sedat 4A injection well. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is a direct threat to public drinking water.

Penneco is already operating an injection well on this site. In July 2021 two of the five water water wells near the site were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone, water contamination was identified in residents' wells.

Permitting the Sedat 4A injection well is in direct violation of U.S. Code of Federal Regulations 40 CFR 144, prohibits substantial endangerment of human health through the SDWA and establishes a framework for Underground Injection Control system. This framework requires consideration of a number of measures to ensure that injection will not endanger underground sources of drinking water. There is a lack of proper water testing and therefore no evidence disproving that the casing failure led to fracking fluid waste leakage into USDWs.

Given Penneco's existing well on this site has already failed and this proposed 4A well is the same as the 3A well a permit approval of Sedat 4A is a direct violation of the EPA's adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure

A leak, spill, casing failure, or another accident on the site of the proposed Sedat 4A well has the potential to contaminate drinking water for the 90 neighborhoods of the City of Pittsburgh as well as the other nearby communities who get their drinking water from the Allegheny River. EPA must adhere to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions.

As a resident of Allegheny County who gets my water from the Allegheny River I urge you to deny this permit and protect my water and the water of the more than 300,000 people who get their water from the Pittsburgh Water and Sewer Authority.

Gesina Peterman (she/her)

[REDACTED]

[REDACTED]

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Gillian Graber <gillian@protectpt.org>

Wed 6/29/2022 2:50 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr. Hancharick,

Please see our attached comment for the Sedat 4A injection well Permit #PAS2D702BALL.

Kind regards,

Gillian Graber

Executive Director



(724) 392-7023

www.protectpt.org

www.facebook.com/ProtectPT

Twitter: [@ProtectPT](https://twitter.com/ProtectPT)

June 28, 2022

Attn: Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A
Underground Injection Well

Dear Mr. Hancharick,

The Safe Drinking Water Act (SDWA) was established in 1974 (with amendments in 1986 and 1996) to ensure the U.S. Environmental Protection Agency (EPA) protects the health of our nation from contaminants in our drinking water. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is **a direct threat to public drinking water and therefore a false pretense of safety posed by the EPA**. In addition to Sedat 3A permit number PAS2D701BALL, which led to environmental contamination, Sedat 4A presents devastating risks to several downstream Allegheny River public drinking water systems. Affected systems include the Pittsburgh Water and Sewer Authority, which provides water to hundreds of thousands of City of Pittsburgh residents and businesses.

Five water wells and two streams were identified within the Area of Review for the injection well identified as “Sedat 3A”. Two of the wells were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone¹, **water contamination was identified in residents’ wells**. The Pennsylvania Department of Environmental Protection (DEP) conducted standard parameter testing of the resident’s well water but failed to test parameters that typically indicate injection fluid infiltration. For example, no total suspended solid test was conducted, which would inform sand contamination. In addition — while Penneco’s chosen brand of chemical tracer is not public knowledge — because most chemical tracers in fracking fluid are fluorinated benzoic acids, results of the omitted benzene test would have informed fluid infiltration.

Code of Federal Regulations 40 CFR 144, which prohibits substantial endangerment of human health through the SDWA, establishes the framework for the Underground Injection Control (UIC) system where the consideration of a number of measures is meant to ensure injection

¹ 13 April 2020 Maskol Technical Review of Penneco’s Control and Disposal Plan

activities will not endanger underground sources of drinking water (USDWs). Due to the lack of proper water testing, no evidence disproves the casing failure led to fracking fluid waste leakage into USDWs. Therefore, the permit approval of Sedat 4A is a direct violation of the EPA's adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure.

The mechanical integrity test (MIT) conducted on June 11, 2021, following the application of new cement bond logs to Sedat 3A displayed a 3% loss of pressure over 30 minutes; a 5% loss of pressure would have resulted in a failure of the MIT as per EPA methods. While Sedat 3A minimally passed its MIT, we are deeply concerned that the mitigation applied to Sedat 3A was still very near failure for the MIT. The same integrity methods applied to Sedat 3A are proposed for 4A; in our scientific opinion, it is statistically unlikely the same proposed casing mitigations from 3A will be sufficient to protect 4A from failure. Lack of regulatory oversight by the EPA and an engineering review that would have prevented such a failure calls into question EPA's ability to protect the region's drinking water.

A letter containing H-FRAC Consulting Services' Reservoir and Fracture Characterization of the Murrysville Formation sent to the EPA in December 2015² indicated a need to inject fracturing waste into the formation at a pressure "higher than normal" at 1,420 psi. Due to low injection formation permeability of the formation, this suggested pressure could easily lead to increased unnatural faults or a casing failure similar to that which occurred in Sedat 3A.

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator "shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142." The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

In addition to the integrity of the well casings, we also question the current saturation and ultimate receptivity of the Murrysville Formation. Post waste injection, geological knowledge suggests a porous rock matrix will reach an ultimate point of storage capacity at which it will no longer be able to hold injected fluid. No ultimate receptivity point was reported by Penneco during the geological reporting phases, nor was it provided to the public by the EPA. Because Penneco has requested a disposal of 1.5 million gallons of waste into the Sedat 4A well (far below average for waste injection wells), it is our suspicion the operators calculated and knew the ultimate receptivity of the Area of Review for the Murrysville Formation. Alternatively, we

² 7 December 2015 Jacot Sedat 3A Reservoir and Fracture Characterization for the Murrysville Formation

suspect the 1.5 million gallon proposal reflects an expectation of a casing failure, in which case a permit for fluid injection should never have been initially issued to Penneco.

Research suggests full saturation of a sandstone matrix in combination with high injection pressure may lead to unnatural fracturing and upward and/or downward travel of waste fluid. Travel of waste via natural or unnatural faults through the overlying shale layer threatens a violation of the **Code of Federal Regulations part 40 CFR 144.12**. Therefore, we again emphasize the issuing of permits for the Sedat 4A well is a failure by the EPA to adhere to the SDWA and is a violation of applicable laws and regulations.

Finally, our legal research has resulted in our knowledge that the EPA did not properly adhere to the **Code of Federal Regulations 40 CFR 25.5 or 124.10** regarding public hearings, public notice, and public comment periods. Consistent with the COVID-19 national emergency, the EPA released a statement that they are “supportive of holding public hearings and meetings virtually” but that applicable. States in which hearings are being held must preliminarily approve of the virtual hearing according to their state laws. Because the State of Pennsylvania does not allow fully virtual hearings outside of emergency orders, and the COVID-19 state of emergency was removed in 2021, the **EPA was in direct violation of 40 CFR 25.5** by eluding approval from the State of Pennsylvania for the fully virtual hearing regarding the Sedat 4A well. The **EPA then violated 40 CFR 124.10 sections b and c** by providing improper public notice for the hearing per all four required methods³. Briefly, public notification was not fulfilled in all four required methods (ex. Plum municipality and mailing lists featuring Protect PT contacts should have been notified of the scheduled hearing) and all persons and agencies affected by the Sedat 4A permit were not notified at least 30 days in advance of the hearing.

52 years ago, the EPA was tasked with the development of environmental baselines that **minimize adverse impacts of pollution activities**. Today, we encourage EPA’s adherence to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions. We also suggest the EPA remedy their violations of **40 CFR 25.5 and 124.10** to avoid future legal involvement.

Regards,



Jenna Rindy, M.S. & M.Sc.
Staff Environmental Scientist
Protect PT

³ See “b” for timing and “c” for methods:
<<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-124/subpart-A/section-124.10>>

written comment on Penneco Sedat 4A

Greg Mccullough [REDACTED]

Thu 9/1/2022 4:43 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

To Ryan Hancharik:

Please find attach my written comments urging the EPA to deny the permit for Penneco Sedat 4A.
Thank you, Janice McCullough, [REDACTED] My personal email is [REDACTED].

To: Ryan Hancharik:

From: Janice McCullough

[REDACTED]

[REDACTED]

Re: Penneco Sedat 4A

I attended the EPA meeting at Plum Community Center last night and was able to obtain papers explaining the permit that Penneco Environmental Solutions is seeking, a permit to open a second fracking waste injection well in Plum Borough along Leechberg Road after the first injection site failed. I find it confounding that their reason to pursue this avenue is to save their company money because of the cost of recycling and shipping the fracking waste. Their solution is to send it back into the ground into the rock formations where it can live for another generation's problem or maybe bubble up and secretly come out slowly seeping undetected into our water sources until a poisoned population finally alerts the medical community. In considering this new permit, it would seem that the EPA who is charged with protecting our country's citizens health is bowing for a company's profit, and ignoring the health alerts that have already surfaced in areas that have succumbed to these injection well sites.

It is time for towns and citizens to not be swayed by the promise of monetary gain from these companies. In life any process is known to have a waste component. It is obvious that the glitter of the "gold" that could be mined from this process blinded the creator and designer from planning ahead for the far future on how to get rid of the waste that would be created, or perhaps spend the extra time and their money to design a system that would not create the toxic waste.

I have five grandchildren that live in this potentially affected area should this permit be granted. I am asking the EPA to vehemently oppose this permit. It is time to demonstrate that human welfare is more honored than company profit!!!

Attention Mr. Hancharick | Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Heather Hulton VanTassel <heather@threeriverswaterkeeper.org>

Wed 7/13/2022 1:33 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr. Hancharick,

Three Rivers Waterkeeper (3RWK) thanks you for the opportunity to submit comments on Underground Injection Control Permit Number PAS2D702BALL Authorization to Operate a Class II-D Injection Well. You can find our comments attached. Please, do not hesitate to reach out to me for any clarifying questions. Thank you for your time,

--

Heather Hulton VanTassel, PhD
Executive Director, Three Rivers Waterkeeper
724-651-4367
<http://threeriverswaterkeeper.org/>



PO BOX 97062
PITTSBURGH, PA 15229
THREERIVERSWATERKEEPER.ORG

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

July 12, 2022

**Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A
Underground Injection Well**

Dear Mr. Hancharick,

Three Rivers Waterkeeper (3RWK) thanks you for the opportunity to submit comments on Underground Injection Control Permit Number PAS2D702BALL Authorization to Operate a Class II-D Injection Well. 3RWK was founded in 2009 and aims to improve and protect the water quality of the Allegheny, Monongahela, and Ohio Rivers. These waterways are critical to the health, vitality, and economic prosperity of our region and communities. We are both a scientific and legal advocate for the community, working to ensure that our three rivers are protected and that our waters are safe to drink, fish, swim, and enjoy. We are one of the 300 organizations that make up the global Waterkeeper Alliance and work together to connect local communities to global environmental and advocacy resources. 3RWK opposes this permit authorizing the Sedat 4A Injection Well due to the risk of both surface and groundwater contamination in Plum Borough.

The Commonwealth of Pennsylvania promises in its constitution “a right to clean air, pure water, and to the preservation of the natural, scenic, historic, and esthetic values of the environment” through its environmental rights amendment.¹ These natural resources are “the common property of all the people,”

¹ Pa. Const. art. I, § 27.

and it is the duty of the Commonwealth to “conserve and maintain them[.]”² The Sedat 4A Injection Well gambles with Plum residents’ right to pure water, disregarding their opposition to the project in favor of industrial convenience.

Plum residents and officials have worked for years to prevent Penneco from building wastewater injection wells in the borough.³ Since the older Sedat 3A Injection Well was proposed in 2016, residents have spoken out about the risks that injection wells pose both to the underground aquifers and to the streams and creeks that flow through the borough.⁴ Their concerns were unfortunately vindicated: the 3A Injection Well has already failed and violated environmental regulations, leading to persistent, ongoing water quality problems.⁵ Residents living near the Sedat 3A well have said that since the injection well began to operate, their well and spring water became discolored and cloudy, or took on strange tastes or odors.⁶ At the same time, residents’ attempts at challenging the permitting and construction of the Sedat 3A and now 4A Injection Wells have been ignored. When the Sedat 3A well was initially proposed, “at least 200 people opposed permit approval” at the July 2017 public hearing.⁷ The Borough updated its zoning ordinance to restrict oil and gas disposal wells to areas zoned for industrial use, but that too was ignored.⁸ When opponents of the injection well asked Governor Wolf to step in and protect the Borough, the governor’s response was to say that he lacked the authority to revoke the permit.⁹ In effect, the

² *Id.*

³ Joyce Hanz, *2nd Injection Well Project in Plum Faces Opposition from Residents, Borough Officials*, TribLIVE, Dec. 10, 2021, <https://triblive.com/local/valley-news-dispatch/second-injection-well-project-in-plum-faces-opposition-from-residents-borough-officials/>

⁴ Michael Divittorio, *Plum Ends Fight Against Injection Well Project*, TribLIVE, June 24, 2020, <https://triblive.com/local/valley-news-dispatch/plum-ends-fight-against-injection-well-project/>. *See also* Dillon Carr, *Plum Expresses Opposition to Injection Well*, TribLIVE, July 27, 2017, <https://archive.triblive.com/local/plum/plum-expresses-opposition-to-injection-well/>.

⁵ Joyce Hanz, *supra* note 3.

⁶ *Id.*

⁷ Michael Divittorio, *supra* note 4.

⁸ Joyce Hanz, *supra* note 3.

⁹ Dillon Carr, *Environmental Groups Call on Gov. Tom Wolf to Stop Plum Oil and Gas Disposal Well*, TribLIVE, Jan. 14, 2021, <https://triblive.com/local/plum/environmental-groups-call-on-gov-tom-wolf-to-stop-plum-oil-and-gas-disposal-well/>

permitting process used for the Sedat 3A Injection Well violated Plum residents' right to pure water as guaranteed by the Pennsylvania Constitution while also denying the state and local governments the ability to protect their residents. Despite the widespread, vocal opposition to oil and gas waste disposal in Plum Borough, the Sedat 3A well was permitted. This undemocratic process must not repeat with the Sedat 4A Injection well.

Not only would this permit jeopardize Plum residents' right to pure water as guaranteed by the Pennsylvania Constitution, but it also violates federal water quality laws. In particular, the risk posed to both ground and surface water quality raises concerns under both the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA). Broadly, the CWA requires the acquisition of a valid NPDES permit to discharge pollutants from a point source into the surface waters of the United States.¹⁰ The United States Supreme Court held in the 2020 case *City of Maui v. Hawai'i Wildlife Fund* that the CWA "requires a permit when there is a direct discharge from a point source into navigable waters or when there is a *functional equivalent of a direct discharge*."¹¹ In *Maui*, a wastewater reclamation facility in Hawaii pumped wastewater underground, where it flowed through the groundwater out into the ocean.¹² Even though the flow of that wastewater was disrupted by the need to travel underground, the Court held that this was still in effect a discharge of waste from a point source into coastal waters.¹³ The CWA's effluent limitations still applied when point source pollution (e.g. wastewater from an injection well) traveled in a nonpoint source manner (e.g. through groundwater) into navigable waters. The fact that contaminants must flow underground before reaching navigable surface waters should not exempt the Sedat 4A Injection Well from the CWA's requirements for other point sources.

¹⁰ 40 CFR § 122.1.

¹¹ *Cty. of Maui v. Haw. Wildlife Fund*, 140 S. Ct. 1462, 1476 (2020).

¹² *Id.* at 1469.

¹³ *Id.* at 1477.

The antidegradation policy established by the Clean Water Act requires that “the level of water quality necessary to protect [the stream’s] existing uses shall be maintained and protected.”¹⁴ The same antidegradation policy also requires that sufficient water quality must be maintained “to support the protection and propagation of fish, shellfish, and wildlife and recreation on and in the water.”¹⁵ Even if the State were to decide that the economic or social interests are weighty enough to justify allowing lower water quality, the State must still “assure that there shall be achieved the highest statutory and regulatory requirements for all new and existing point sources”¹⁶ Plum Creek and its tributaries are classified for recreational use and as a warm water fishery.¹⁷ Plum Creek itself is a tributary of the Allegheny River, which supports recreation and warm water fish, while also being widely used for navigation and as a source of drinking water.¹⁸ Although the risks to Plum residents’ surface water are most immediate, contamination from the Sedat 4A Injection Well most likely would negatively impact waters outside of the Borough’s limits. The EPA and DEP must not issue permits that carry the risk of destroying these existing uses.

Not only does the Sedat 4A Injection Well pose a serious risk to Plum Borough’s surface waters, it also risks contaminating drinking water. The SDWA requires that

[n]o owner or operator shall construct, operate, maintain, convert, plug, abandon, or conduct any other injection activity in a manner that allows the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR part 142 or may otherwise adversely affect the health of persons.¹⁹

Any drinking water contamination whatsoever would violate the SDWA, and Penneco has not shown that they can build a well in such a way that it would not contaminate the drinking water. Indeed, the history

¹⁴ 40 CFR § 131.12(a)(1).

¹⁵ 40 CFR § 131.12(a)(2).

¹⁶ *Id.*

¹⁷ 25 Pa. Code § 93.9u. *See also 2022 Pennsylvania Integrated Water Quality Report*, PA DEP, <https://storymaps.arcgis.com/stories/b9746eec807f48d99decd3a583eede12> (last visited July 11, 2022).

¹⁸ *Id.*

¹⁹ 40 CFR § 144.

of leaks from the Sedat 3A Injection Well serve as a case study for why the proposed Sedat 4A Injection Well creates a direct threat to the underground sources of drinking water that the SDWA is meant to protect.

The Sedat 3A Injection Well failed within months of its construction. Residents complained of contaminated wells and springs, and Penneco responded by providing bottled water to some residents after the initial complaints.²⁰ Beyond Plum, communities across the United States have raised alarms regarding the safety of injection wells for over a decade.²¹ More recently, in addition to the failures of the Sedat 3A well, reports of fracking wastewater contaminating surface waters in Ohio and West Virginia further support residents' concerns about the safety of injection wells.²² With the history of well failures in this region, residents might expect that this will in fact affect surface waters. Allegheny County is defined by its rivers, and contamination from another faulty injection well has the potential to spread far. This is particularly true given how infrequent integrity tests for Class II Injection Wells really are: with tests only every five years, leaks might continue for years before action is taken.

In addition to violating federal laws, the Sedat 4A Injection Well would also violate the Pennsylvania Clean Streams Law. Unlike the CWA, the Clean Streams Law explicitly includes “underground water” as a part of the “waters of the Commonwealth” to be protected under the law. Additionally, the Clean Streams Law contains specific provisions relating to pollution resulting from underground wastewater disposal. The DEP is obligated to “consider the disposal of wastes . . . into the

²⁰ Joyce Hanz, *supra* note 3.

²¹ Abrahm Lustgarten, *Injection Wells: The Poison Beneath Us*, ProPublica, June 21, 2012, <https://www.propublica.org/article/injection-wells-the-poison-beneath-us>.

²² Julie Grant, *In Ohio, Regulators Respond to Suspected Frack Waste Spewing from Unused Gas Well, Causing Fish Kill*, StateImpact Pennsylvania, February 5, 2021, <https://stateimpact.npr.org/pennsylvania/2021/02/05/in-ohio-regulators-respond-to-suspected-frack-waste-spewing-from-unused-gas-well-causing-fish-kill/>. See also *Study: Fracking Didn't Impact West Virginia Groundwater, But Wastewater Spills Pollute Streams*, StateImpact Pennsylvania, April 24, 2017, <https://stateimpact.npr.org/pennsylvania/2017/04/24/study-fracking-didnt-impact-west-virginia-groundwater-but-wastewater-spills-pollute-streams/>.

underground as potential pollution[.]”²³ In particular, three types of underground discharges are prohibited:

- (1) Discharge of inadequately treated wastes, except coal fines, into the underground workings of active or abandoned mines.
- (2) Discharge of wastes into abandoned wells.
- (3) Disposal of wastes into underground horizons unless the disposal is for an abatement of pollution and the applicant can show by the log of the strata penetrated and by the stratigraphic structure of the region that it is improbable that the disposal would be prejudicial to the public interest and is acceptable to the Department.²⁴

Southwest Pennsylvania has a centuries-long history of coal mining. Plum Borough itself is situated on land marked forever by mining and drilling operations.²⁵ The preponderance of abandoned mines in the area increases the risk that leaking wastewater could flow into mines or abandoned wells, functionally behaving as a discharge violating 25 Pa. Code § 91.51(b)(1)-(2). The channels created by these mines and wells only increase the permeability of the geologic features meant to trap the wastewater underground, and thereby increase the risk of contamination.²⁶ Furthermore, we believe that the Sedat 4A Injection Well would also violate 25 Pa. Code § 91.51(b)(3), because placing Plum Borough’s streams and drinking water at risk of contamination by toxic and radioactive fracking brine would indeed be prejudicial to the public interest.

In summary, we oppose this permit for the Sedat 4A Injection Well because it violates the rights of Plum residents under the Pennsylvania Constitution and under both state and federal laws. Penneco has clearly violated similar permits in the past and they have not shown that they are taking the interests of the community into consideration. The people of Plum oppose the creation of a new well, just as they opposed the creation of the Sedat 3A Injection Well back in 2017. The EPA must consider both the failure

²³ 25 Pa. Code § 91.51(a).

²⁴ 25 Pa. Code § 91.51(b).

²⁵ See Jake Flannick, *State Works to Extinguish Longtime Underground Mine Fire in Plum*, Pittsburgh Post-Gazette, Apr. 7, 2017, <https://www.post-gazette.com/local/east/2017/04/07/Plum-underground-mine-fire-being-extinguished/stories/201703310144>.

²⁶ Abrahm Lustgarten, *supra* note 21.



PO BOX 97062
PITTSBURGH, PA 15229
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of the Sedat 3A Injection Well and the scope of Penn Borough's mobilization against the creation of any more injection wells. We believe therefore that the EPA must deny Underground Injection Control Permit Number PAS2D702BALL authorizing the Sedat 4A Injection Well.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in green ink that reads "Heather Hulton VanTassel". The signature is written in a cursive style.

Heather Hulton VanTassel, PhD

Executive Director, Three Rivers Waterkeeper
PO Box 97062, Pittsburgh, PA 15229
Heather@ThreeRiversWaterkeeper.org
724-651-4367

Speaking at the Plum Injection Well Hearing

Jay Walker <jwalker@cleanair.org>

Thu 8/4/2022 10:26 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello. My name is Jay Ting Walker and I'm a community organizer with the Clean Air Council and I would like to speak at the Plum Injection Well hearing on August 30th.

Jay Ting Walker

Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Jayne Burke [REDACTED]

Sat 7/2/2022 3:41 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

I am opposed to the Sedat 4A injection well. The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is a direct threat to public drinking water.

Penneco is already operating an injection well on this site. In July 2021 two of the five water wells near the site were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone, water contamination was identified in residents' wells.

Permitting the Sedat 4A injection well is in direct violation of U.S. Code of Federal Regulations 40 CFR 144, prohibits substantial endangerment of human health through the SDWA and establishes a framework for Underground Injection Control system. This framework requires consideration of a number of measures to ensure that injection will not endanger underground sources of drinking water. There is a lack of proper water testing and therefore no evidence disproving that the casing failure led to fracking fluid waste leakage into USDWs.

Given Penneco's existing well on this site has already failed and this proposed 4A well is the same as the 3A well a permit approval of Sedat 4A is a direct violation of the EPA's adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure

A leak, spill, casing failure, or another accident on the site of the proposed Sedat 4A well has the potential to contaminate drinking water for the 90 neighborhoods of the City of Pittsburgh as well as the other nearby communities who get their drinking water from the Allegheny River. EPA must adhere to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions.

As a resident of Allegheny County who gets my water from the Allegheny River I urge you to deny this permit and protect my water and the water of the more than 300,000 people who get their water from the Pittsburgh Water and Sewer Authority.

Thank you

Jayne Burke
[REDACTED]

I am writing to you today regarding the Sedat 4A Injection Well

Jeffrey Sieber [REDACTED]

Wed 7/13/2022 11:08 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Allegheny County, and I am concerned about the proposed Sedat 4A Injection Well polluting our drinking water source, the Allegheny River. The existing Sedat 3A Injection Well already failed once after being in operation only a few months. How long do you think it will take for a second injection well to pollute our water? Adding a second injection well doubles the risk to our drinking water. I demand that EPA keep our drinking water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Jeffrey Sieber
[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Jennifer Valentine [REDACTED]

Thu 8/18/2022 7:37 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ahs.dep.pa.gov%2FefACTSWeb%2FsearchResults_singleViol.aspx%3FinspectionID%3D3224342&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C292f46c86f0d43d2454c08da81510954%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637964482288587820%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQljoiiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=evahPwtiHjSjXWTs0K2En%2FpjV8LPrykZ2D6gODilvug%3D&reserveid=0

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ahs.dep.pa.gov%2FefACTSWeb%2FsearchResults_singleViol.aspx%3FinspectionID%3D3067473&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C292f46c86f0d43d2454c08da81510954%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637964482288587820%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQljoiiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=rLqL5EgE4gEVE22Iiz5z%2FIE6J7pWC4IkSjC14tj9rK0%3D&reserved=0

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing

disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ahs.dep.pa.gov%2FFACTSWeb%2FsearchResults_singleAuth.aspx%3FAuthID%3D1399928&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C292f46c86f0d43d2454c08da81510954%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637964482288587820%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQljojV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=ha3MfOETILtaS%2Bsr%2BC%2BiYbkKah3YrNuQEJcYAXPgVW8%3D&reserved=0

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ahs.dep.pa.gov%2FFACTSWeb%2FsearchResults_singleSite.aspx%3FSitelD%3D5980&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C292f46c86f0d43d2454c08da81510954%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637964482288587820%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQljojV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=DTR8lsTc0K15h%2Bpt1bSewWbD3TvbRavMAndQVfe3pDo%3D&reserved=0

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

ty - j valentine

I am writing to you today regarding the Sedat 4A Injection Well

Jill Diskin [REDACTED]

Thu 7/14/2022 2:05 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Allegheny County, and I am concerned about the proposed Sedat 4A Injection Well polluting our drinking water source, the Allegheny River. The existing Sedat 3A Injection Well already failed once after being in operation only a few months. How long do you think it will take for a second injection well to pollute our water? Adding a second injection well doubles the risk to our drinking water. I demand that EPA keep our drinking water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Ms. Jill Diskin
[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL Ryan Hancharick Source Water & UIC Section U.S. EPA Region 3

Jill Diskin [REDACTED]

Thu 7/14/2022 2:00 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

--

Jill Diskin

Nothing is hopeless; we must hope for everything. Euripides

Beware of false knowledge; it is more dangerous than ignorance. George Bernard Shaw

Hopelessness is the enemy of justice. Bryan Stevenson

If you receive this communication in error, please do not copy or use the information contained within it or allow it to be read, copied or utilized in any manner, or by any other person(s).

If you receive this communication in error, please notify me immediately by response e-mail and permanently delete the original e-mail, attachment(s), and any copies. Thank you.

Sedat #4A Plum Injection Well Comment

Jo Resciniti [REDACTED]

Mon 8/29/2022 3:52 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I implore you to DENY the proposed Plum Injection Well, Sedat #4A. Injection Wells like this put drinking water at risk. Sedat #4A is close to the water supply intake for many Allegheny County residents like myself. I'm concerned that municipal water sources are not tested for contamination introduced by injection well facilities. If my public water becomes contaminated, I will likely be exposed and experience health impacts long before my drinking water is tested and procedures put in place to remediate contamination. Please do not put our drinking water at risk.

Sincerely,

Jo Resciniti

[REDACTED]
info@concernedresidents.org

Reject Disposal Injection Well Permit PAS2D702BALL

Joan Vondra [REDACTED]

Mon 8/29/2022 12:33 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person **that a water supply has been affected by pollution or diminution.**" Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, **DEP issued five violations to Penneco Environmental Solutions** for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, DEP's sporadic and infrequent inspection schedule indicates that DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Joan Vondra
[REDACTED]

Upcoming Comment regarding Plum Fracking permit

[REDACTED]
Sun 8/28/2022 6:56 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Ryan,

I am unable to attend the EPA hearing at The Plum Community Center on August 30th at 6pm regarding the opposition to the Plum fracking permit. But I will go on record to say that I, John M. Beres, from Baldwin Borough, PA 15227, am strongly opposed to this happening. As you and many others have pointed out: fracking consistently demonstrates that it has the real potential to foul and make our drinking water unsafe. We are tired of putting profits over public health and I/we strongly oppose any new permits in Plum to renew fracking. We want safe and palatable drinking water for us and our families in Allegheny County!!!

I appreciate your efforts to appear and make "our" voices heard at this hearing and I am hopeful that one more strong opinion may be helpful.

Thank You,

John M. Beres

John M. Beres

Reject Disposal Injection Well Permit PAS2D702BALL

Jon Wilson [REDACTED]

Mon 8/29/2022 8:40 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello,

I am asking that the EPA deny the permit for the proposed injection well (Penneco Sedat 4A) in Plum Boro. In short, fracking is an environmentally toxic method for resource extraction that is incompatible with our ability to move toward a sustainable future and protect the health of the residents in Allegheny County. My mother and sister's family with two young children live in Plum Boro and my wife and I live in Edgewood. Like hundreds of thousands of other residents, our drinking water source is the Allegheny river and this well would increase our collective exposure to toxic and cancer causing chemicals already abundant in the region. Scientific studies also continue to be published that expose that these types of facilities also spread the PFAS/PFOS forever chemicals that cannot be contained. The Pittsburgh region is already home to a unique hodgepodge of industrial pollution that routinely degrades our physical wellbeing, lifespan, and mental health. On behalf of my family, I implore you, please deny the expansion of this archaic and poisonous fracking well which only serves to harm the residents and our local environment.

Sincerely,
Jonathan Wilson

For more justification, please see the below:

The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the

Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Please Reject Disposal Injection Well Permit PAS2D702BALL

Jon Wilson [REDACTED]

Wed 7/13/2022 10:56 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Good evening,

As a nearby resident with several family members living in Plum Borough, I request that you deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Jon Wilson

Please Reject Disposal Injection Well Permit PAS2D702BALL

Judith Koch [REDACTED]

Tue 8/30/2022 5:08 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

To: Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Thank you!
Judith Koch,
Allegheny County resident

Please Reject Disposal Injection Well Permit PAS2D702BALL

Judy McAuley [REDACTED]

Tue 8/2/2022 2:42 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

As an Allegheny County resident I am asking you to please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:


https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Judy McAuley

EPA hearing, PENNECO Injection well #3A permit, Plum Borough

Judy Ziegler 

Tue 9/6/2022 5:05 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

September 6th, 2022

Dear Ryan Hancharick;

As a concerned resident of Oakmont, which gets its drinking water from the Allegheny River not far from PENNECO'S injection well #3A in Plum Borough and the proposed well #4A, I attended the public hearing on August 30th at the Plum Borough Community Center. Excellent testimony was presented regarding the safety violations and negative environmental impacts of PENNECO'S existing injection well #3A, in addition to expert testimony and complaints from residents affected by this well as to why the EPA should **deny** the permit for a second injection well, Sedat #4A, at the same site; no testimony in support of permitting the well was given at that time.

For five years I worked at the Oakmont Hulton Water Treatment Plant as water quality chemist in charge of the water treatment process, so I am well aware of the harm toxic chemicals like the ones found in fracking waste can have on the drinking water supply. There are no treatment processes available to remove these hazardous chemicals, enough to meet EPA drinking water standards, from the raw water source, in this case the Allegheny River from which thousands of people get their drinking water every day. If PENNECO'S injection wells holding millions of gallons of fracking waste ever fail (testimony revealed #3A already has leakage issues after only one year in operation) all these hazardous chemicals including radioactivity will contaminate surface water and ground water aquifers and could ruin our drinking water supply.

We must stop companies like PENNECO that are continuously generating huge quantities of hazardous waste from disposing of this waste unsafely and polluting our precious natural resources; the air we breathe, water we drink, and the land that grows our crops. If not, then we ourselves will be consuming toxic chemicals which will destroy our priceless health and well-being, thereby ruining our lives for years to come. It is the EPAs job as our representative to protect human health and our environment and as such will be held accountable.

Therefore, I am asking you to deny PENNECO'S permit for a second injection well, Sedat #4A.

Thank-you for your attention in this important matter,

Judy A. Ziegler



September 6th, 2022

Dear Ryan Hancharick;

As a concerned resident of Oakmont, which gets its drinking water from the Allegheny River not far from PENNECO'S injection well #3A in Plum Borough and the proposed well #4A, I attended the public hearing on August 30th at the Plum Borough Community Center. Excellent testimony was presented regarding the safety violations and negative environmental impacts of PENNECO'S existing injection well #3A, in addition to expert testimony and complaints from residents affected by this well as to why the EPA should **deny** the permit for a second injection well, Sedat #4A, at the same site; no testimony in support of permitting the well was given at that time.

For five years I worked at the Oakmont Hulton Water Treatment Plant as water quality chemist in charge of the water treatment process, so I am well aware of the harm toxic chemicals like the ones found in fracking waste can have on the drinking water supply. There are no treatment processes available to remove these hazardous chemicals, enough to meet EPA drinking water standards, from the raw water source, in this case the Allegheny River from which thousands of people get their drinking water every day. If PENNECO'S injection wells holding millions of gallons of fracking waste ever fail (testimony revealed #3A already has leakage issues after only one year in operation) all these hazardous chemicals including radioactivity will contaminate surface water and ground water aquifers and could ruin our drinking water supply.

We must stop companies like PENNECO that are continuously generating huge quantities of hazardous waste from disposing of this waste unsafely and polluting our precious natural resources; the air we breathe, water we drink, and the land that grows our crops. If not, then we ourselves will be consuming toxic chemicals which will destroy our priceless health and well-being, thereby ruining our lives for years to come. It is the EPA's job as our representative to protect human health and our environment and as such will be held accountable.

Therefore, I am asking you to deny PENNECO'S permit for a second injection well, Sedat #4A.

Thank-you for your attention in this important matter,

Judy A. Ziegler

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██████████ ██████████

██

Penneco Injection Comment

kara f [REDACTED] >

Tue 6/28/2022 11:35 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello,

My name is Kara Flaherty and I live at [REDACTED]

The Penneco injection threatens my access to clean water, since I get my water from the allegheny river. Please deny this permit.

Thank you,
Kara Flaherty

Please Reject Disposal Injection Well Permit PAS2D702BALL

kari pohl [REDACTED]

Fri 8/19/2022 6:00 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>; R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

As a resident of Aliquippa, PA, I am asking that you deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A. The carelessness of oil and gas industry bad actors is increasingly becoming a national security issue as the health and safety of millions of Americans continues to be threatened by negligence-induced accidents, leaks, and other failures.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

The Municipal Water Authority of Aliquippa obtains its drinking water from wells located under the Ohio River. As this proposed well could end up dumping radioactive and PFAS-laced frackwaste into the Allegheny River, which would then contaminate the Ohio River (which supplies drinking water to some 5 million people), it's imperative that this permit application gets denied.

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. Therefore, I urge the EPA to deny this permit application.

Sincerely,

Kari Pohl

[REDACTED]

[REDACTED]

44TH DISTRICT
STATE SENATOR
KATIE MUTH

SENATE BOX 203044
THE STATE CAPITOL
HARRISBURG, PA 17120-3044
717-787-1398
FAX: 717-783-4587

338 MAIN STREET
ROYERSFORD, PA 19468
610-792-2137
FAX: 610-948-3037



COMMITTEES

SENATE DEMOCRATIC POLICY
COMMITTEE, CHAIR
VETERANS AFFAIRS & EMERGENCY
PREPAREDNESS, DEMOCRATIC CHAIR
ENVIRONMENTAL RESOURCES
& ENERGY
FINANCE
STATE GOVERNMENT
RULES

EMAIL: senatormuth@pasenate.com
WEBSITE: www.SenatorMuth.com
FACEBOOK: @SenatorMuth
TWITTER: @SenatorMuth
INSTAGRAM: @SenatorMuth

August 30, 2022

Mr. Ryan Hancharick
Water Division
US EPA Region 3
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Dear Mr. Hancharick,

I am writing in opposition to the draft permit (PAS2D702BALL) issued to Penneco Environmental Services authorizing the conversion and operation of an Underground Injection Control (UIC) Class IID commercial disposal injection well in Plum Borough, Allegheny County. It is my understanding that the permit would allow Penneco to inject drilling wastewater and other fluids from their oil and gas drilling operations into the Murrysville sandstone formation in the subsurface perforated interval between approximately 1,740 feet to 1,800 feet below ground surface over the next ten years.

As oil and gas companies like Penneco continue to find more ways to extract our natural resources using dangerous chemicals, the management of their toxic byproducts is becoming increasingly dangerous. [According to Food & Water Watch](#), since the 1980s, oil and gas operators have injected more than 33 trillion gallons of wastewater underground – posing serious and significant threats to our communities, our families, our environment, and our groundwater.

A 2017 public comment submission drafted by Food & Water Watch regarding the permit for the first injection well on this same site indicated that Pennsylvania DEP records indicate at least 40 gas wells exist currently in Plum Borough, including the five identified by EPA as within 1,000 feet of the injection site. Their review of Pennsylvania DEP records found that Penneco committed over 50 violations in operating oil and gas wells in Pennsylvania. Some of these violations are significant and include failing to properly control and dispose of industrial and residual wastes resulting in water contamination. Just last year, [there was a violation at their Sadat 3A](#) well in Plum Borough for failing to notify the PA Department of Environmental Protection within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution. And in August 2020, that same well was [issued five violations](#) regarding environmental health and safety.

Additionally, [a 2014 study by the Government Accountability Office](#) indicated that while the EPA does implement safeguards in the process, the safeguards do not address emerging underground injection risks, such as seismic activity and overly high pressure in geologic formations leading to surface outbreaks of fluids. The report also cites that every day in the United States, at least 2 billion gallons of fluids are injected into over 172,000 wells to enhance oil and gas production, or to dispose of fluids brought to the surface during the extraction

of oil and gas resources. Injection wells raise serious concerns about the safety of the nation's drinking water – particularly in areas, like Plum Borough, with other drilling operations.

Under Pennsylvania's Act 13 of 2012, chemical compounds used in fracking operations have limited disclosure requirements. However, the full picture of the chemicals used is often hidden from view due to provisions that exempt access to chemical information deemed to be “confidential proprietary information” or “trade secrets.” Fracking companies have argued full disclosure would undermine their proprietary advantages and stifle the competitive nature of their operations. A [2018 report by Partnership for Policy Integrity \(PFPI\) entitled KeyStone Secrets](#), found that between 2013 and 2017, companies in Pennsylvania injected secret fracking chemicals 13,632 times into a total of 2,515 wells.

As we have seen in the years since fracking began in Pennsylvania, the use of hazardous chemicals has led to significant public health issues and the deterioration of drinking water quality in every community where these operations take place. If Penneco and other oil and gas companies are not required to disclose all of the chemicals used in their process, how then can they attest to the safety of injecting these hazardous and toxic chemicals back into the ground? A new geospatial analysis, the interactive [Oil and Gas Threat Map](#), which shows all active oil or gas wells nationwide, concludes that 1,482,810 Pennsylvanians, including 290,123 children, reside or attend schools or daycares within a half-mile “threat radius” of active oil and gas operations.

Everyone deserves clean water to drink. But across the country and across our Commonwealth, the drinking water of millions of Americans is being contaminated by the oil and gas industry. Plum Borough Council has been actively trying to prevent the second injection well from moving forward and filed an appeal earlier this year against its own zoning board, which approved the Penneco application in January. Residents who live near the current injection well said they do not want a second injection well near their homes because it will continue to increase concerns about possible impacts on drinking water, air quality, truck traffic and noise.

The oil and gas drilling industry in Pennsylvania has ruined the lives of so many Pennsylvania families and has caused irreparable damages to our environment. The toxic legacy of this industry will be felt for generations and by permitting another injection well in Allegheny County, we are exacerbating the issue. Both the Environmental Protection Agency and the Pennsylvania Department of Environmental Protection explicitly state ‘environmental protection’ in their names, but permitting dangerous wastewater disposal injection wells prioritizes industry over environment.

I am asking the US Environmental Protection Agency to be a part of the solution and to improve testing procedures, strengthen enforcement of rules and regulations, and require disclosure of all chemicals used in the cradle-to-grave process. I strongly encourage the EPA to listen to the impacted residents and the families of Plum Borough and to refuse this permit to Penneco for this dangerous commercial disposal injection well.

Thank you in advance for your attention to these important matters of public health.

In service,

A handwritten signature in black ink, appearing to read 'Katie Muth', with a long, sweeping flourish extending to the right.

Katie Muth
State Senator
44th Senatorial District

Senator Katie Muth Public Comment Submission

Cavanaugh, Jeffrey [REDACTED]

Wed 8/31/2022 3:09 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hi Ryan,

Please find the attached public comment submission from Pennsylvania State Senator Katie Muth in opposition to the draft permit (PAS2D702BALL) issued to Penneco Environmental Services authorizing the conversion and operation of an Underground Injection Control (UIC) Class IID commercial disposal injection well in Plum Borough, Allegheny County.

Please let me know if you have any questions.

Thanks in advance for your consideration

Jeff

Jeff Cavanaugh

Deputy Chief of Staff & Communications Director

State Senator Katie Muth

Democratic Executive Director

Senate Veterans Affairs & Emergency Preparedness Committee

[REDACTED] (cell)

www.SenatorMuth.com



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Hi, My name is Katie Sheehan and I live at [REDACTED] the Sedat 3A injection well. Myself and family are probably at the highest risk of health impacts both physical and mental from the current Sedat 3A and the proposed 4A injection wells. I have filed several complaints with the EPA, DEP, Health department, local and state police departments and Plum municipality as well as PennDot, concerning water contamination, air pollution and truck traffic leading to road degradation and emissions.

Congress passed the SDWA in 1974. In part, the SDWA requires EPA to develop minimum federal requirements for UIC programs and other safeguards to protect public health by preventing injection wells from contaminating underground sources of drinking water (USDWs). The mission of EPA is to protect human health and the environment. It states on the EPA website that the EPA works to ensure that:
Americans have clean air, land and water;
National efforts to reduce environmental risks are based on the best available scientific information.

However in June of 2021 the Sedat 3A injection well had a failed mechanical integrity test which corresponds with the water complaints that myself and neighbors have made to the EPA and DEP in early July of 2021. Our water and neighbors' water now tests for elevated levels of Total Coliform, Iron, Manganese, Sodium, E. Coli, Methane, and Hexachlorocyclopentadiene. Our water is not recommended safe to drink and contributes to stress, anxiety and depression. According to sun.org scientific research also suggests that a common drinking water pollutant—lead—impacts mental health.

We all rely on our natural water sources for drinking, bathing, cooking, washing and other residential uses. I have to pay for water to be hauled in and stored in a water Buffalo now, for fear of using my well water, which never had an issue prior to the first injection well. My Husband and I are now living in the home where my Grandparents lived and they never had these issues. My parents have a natural spring which also is the only water source for them and cattle my Dad raises. Again, they never had a problem with their spring prior to the first injection well. They've had to spend \$3500 for a water filtration system, but it may still not be enough for possible future contamination.

The EPA is aware and has documented on their webpage that water run-off from rainfall or snow-melt can contaminate private wells by washing microorganisms into the well system or seeping underground. Heavy metals can contaminate private wells through groundwater movement and surface water seepage and run-off. People that consume high levels of heavy metals risk acute and chronic toxicity, liver, kidney, and intestinal damage, anemia, and cancer. Radionuclides can contaminate private wells through groundwater flow, waste water seepage and flooding. Drinking water with radionuclides can cause toxic kidney effects and increase the risk of cancer. Again I would like to point out [REDACTED] the first injection well site and the proposed 2nd site will be a neighboring location.

The EPA is in charge of enforcing: the Clean Air Act The EPA agreed to abide by the Clean Air Act (42 U.S.C. 7401), taking on the responsibility of not only improving but also protecting the country's air quality. Section 7470 of the U.S.C. specifically tasks the EPA with the goal "to protect public health and welfare from any actual or potential adverse effect which in the Administrator's judgment may reasonably be anticipated to occur from air pollution".

On July 28th 2021 a chemical odor was in the air, again never having this issue prior to the first injection well. This led me to work with ProtectPT and have an air quality monitor on our property that records data 24/7 and has shown VOC (Volatile Organic Compound) spikes. ProtectPTs report shows data of air pollution occurring.

VOCs can come from natural sources - for example, trees produce some VOCs. However, no research has ever pointed to natural sources producing values above the 50-300 ppb range at a given moment in time. Only unnatural sources like oil and gas activity could produce the numbers the monitor has been recording such as almost 40,000 ppb spiked. Data collection from our monitor reveals VOC concentrations above 500 ppb approximately 18,500 times from October 2021 through July 2022. High level of concern values, reaching up to 37,333 ppb. As VOC concentrations in the tens of thousands range have been shown to indicate oil and gas well activity, these levels can be attributed to the nearby Sedat 3A injection well. Such exposure to these levels of VOCs are likely to lead to symptoms such as headaches, nausea, dizziness, and issues with vision.

Myself and neighbors have filed complaints with the DEP and Allegheny Health Department and EPA regarding concern for a chemical odor in the air and symptoms of headaches, nausea and skin burning and eye irritation.

Truck traffic is already a nuisance. On days truck traffic is heavy a truck passes on average every 40 min or less between 5am-2pm. On January 7th of 2022 I recorded 5 trucks going to and from the injection well site in less than an hour and this is the case on some days currently. I am concerned about the truck emissions and carcinogenic material they carry that affect myself and my family's health.

Road degradation has already occurred.

Several portions of the road were collapsing and caving in on the road to the sedat 3a injection well. This was reported to Penndot and temporary repairs have been made.

Further exposure of toxic chemical and radioactive contamination of drinking water, air quality, mine subsidence and the potential for earthquakes and road degradation from hundreds of trucks are all reasons for our opposition to the Sedat4A site. The EPA needs to deny the Sedat 4A site. We already have proof of concern from the first site. We do not need any more health impacts both mental and physical from a second site.

Ryan Hancharick Source Water & UIC Section U.S. EPA Region 3

Katie Sheehan [REDACTED]

Fri 6/17/2022 3:24 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hi, My name is Katie Sheehan and I live at [REDACTED] the Sedat 3A injection well. I am emailing my concerns and comments towards the Sedat #4A injection well.

I would never have imagined having to deal with all of these daily nauncenses and concerns, when my husband and I decided to move into my Grandmother's home. I always remember how quiet it was sitting outside with my Gram under the apple tree on a summer day, overlooking the pasture and hillside enjoying a glass of ice cold well water. Now you can hear trucks every hour and think to yourself, "there goes another load of carcinogenic material to be dumped", and I wouldn't dare drink our well water. It has been tested showing higher than the recommended levels of several elements and a higher pH.

Truck traffic has been excessive! There is one truck on average every 40 min or less between 5am-2pm. I was able to shoot a live video on Jan 7th showing 5 trucks going to and from the injection well site in less than an hour. Some trucks are even tailgating one another coming to and from the sites. Traffic picks back up around 9pm and does not stop all night long. I am concerned about the truck emissions, noise levels and concern for speeding and most of all concern for what they are carrying. The truck traffic will double stop now the Sedat 4A site is operational. There is already damage to the Rd from heavy traffic. I had filed a complaint with Penndot regarding portion of the road caving in and eroding away.

I am concerned for my and my family's health. We will always be concerned about the probability that our water may be contaminated. I had filed complaints with the DEP and EPA regarding changes to taste, odor, and coloration to mine and my family's water sources since the first site went active.

I have filed several complaints with the DEP and Allegheny Health Department regarding concern for a chemical odor in the air. On days the odor is strong it does cause headaches. I have an air quality monitoring device on my property that records data 24/7 and has shown VOC (Volatile Organic Compound) spikes.

When I learned that Penneco wanted to put a second injection well at the same site, I was devastated. We had attended the EPA public meeting prior to the approval of the first site and have attended Plum council and zoning board meetings to express our concerns and opposition to these sites. I can already assume the Sedat 4A site will be permitted and operational soon, this is just another "formality". I want my comments in record for my opposition to the Sedat 4A site. The risks of toxic chemical and radioactive contamination of air quality and drinking water, mine subsidence and the potential for earthquakes and road degradation from hundreds of trucks are all reasons for our opposition to the current and 2nd sites.

Sincerely,
Katie Sheehan

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Mrs Sheehan

EPA hearing 8/30/2022

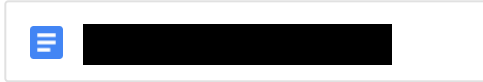
Katie Sheehan [REDACTED]

Tue 8/30/2022 10:16 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

This is my written and spoken statement during the EPA hearing in 8/30/2022.

Katie Sheehan



--

Mrs Sheehan

I am writing to you today regarding the Sedat 4A Injection Well

Katie Wolff [REDACTED]

Fri 7/15/2022 2:29 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I live in the adjacent neighborhood to Plum and I am concerned about the proposed Sedat 4A Injection Well. I am concerned that this second well will further jeopardize my drinking water source and the Allegheny River, which my community and region relies on for clean drinking water. I demand that EPA keep our water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Katie Wolff
[REDACTED]

Drinking water injection

Keith Fuller [REDACTED]

Wed 6/29/2022 5:58 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Ryan Hancharick,

My name is Keith Fuller. I am an Allegheny county resident. Our drinking water comes from the Allegheny river. The Sedat injection well threatens our clean water and the permit for the injection well should be denied.

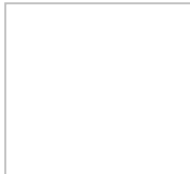
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Keith Fuller



Keith C Fuller

Executive Chef, Restaurant Associates at Google
Pittsburgh, Pennsylvania, USA



Need to spice up your at-home meals?
Elevate your plate - [become a Food Insider!](#)

Reject Penneco Injection Well Sedat #4A

Kelly Grau 

Tue 6/28/2022 3:54 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hi there,

My name is Kelly Grau and I live in the Friendship neighborhood of Pittsburgh. Pittsburgh water is already contaminated with enough lead as it is, and I am concerned that placing a fracking disposal site so close to the Allegheny river will further deteriorate the quality of drinking water coming from the Allegheny river. The EPA has a responsibility to protect water resources from corporations. If this permit goes through, I have no doubt that both the local environment and Pittsburgh residents will be negatively affected for years to come.

Thanks,
Kelly Grau

I am writing to you today regarding the Sedat 4A Injection Well

Kelly Riley [REDACTED]

Fri 7/29/2022 12:34 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am writing to request that you deny the permits for the Sedat 4A Injection Well. This well would put the public drinking water for the entire city of Pittsburgh and downstream communities at risk. The first injection well failed to contain the fluids. Adding a second injection well could further endanger clean drinking water. You must deny the permit for the Sedat 4A Injection Well to protect clean water.

Sincerely,

Ms. Kelly Riley
[REDACTED]

I am writing to you today regarding the Sedat 4A Injection Well

Kenneth Weir [REDACTED]

Wed 7/13/2022 8:19 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Plum, and I am concerned about the proposed Sedat 4A Injection Well. I am concerned that this second well will further jeopardize my drinking water source and the Allegheny River, which my community and region relies on for clean drinking water. I demand that EPA keep our water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Kenneth Weir
[REDACTED]

Fw: Proposed Plum Borough, Pa. Sedat 4A Injection Well Concerns

Hancharick, Ryan <Hancharick.Ryan@epa.gov>

Tue 7/5/2022 1:27 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

(Message originally sent directly to Hancharick.Ryan@epa.gov)

Ryan Hancharick

Source Water & UIC Section

Water Division

U.S. EPA Region III

Four Penn Center

1600 John F. Kennedy Blvd.

Philadelphia, PA 19103

Phone: 215.814.3278

From: Larry Irr [REDACTED]

Sent: Monday, July 4, 2022 10:34 AM

To: Hancharick, Ryan <Hancharick.Ryan@epa.gov>

Subject: Proposed Plum Borough, Pa. Sedat 4A Injection Well Concerns

Dear Mr. Hancharick,

I sent you the attached letter via the Link that I was provided. Here it is again in case the Link did not work.

Thanks for your consideration,

Dr. Larry Irr

Dear Mr. Hancharick:

I appreciate your virtual hearing for the Penneco Sedat 4A injection well in Plum Borough, Pa. Please deny it.

I do not believe believe that old gas well should be used for an injection well for which it was not originally designed. That is a poor engineering practice. The objectors are quite correct about the fact that an injection well will have high pressure cyclic stress (fatigue). Those pressure cycles could very well lead to leaks. My materials science class manual from circa 1990 states that " A metal subjected to repetitive or fluctuating stress (fatigue) will fail at a stress much lower than that required to cause fracture on a single application of load." Fatigue is a big concern with respect to metals failure such as the steel piping in this old well.

I also agree with the other concerns stated by the objectors. Already complaints from near-by residents about tainted well and spring water since the sister Sedat 3A injection well (former gas well) began operating in late spring 2021 were reported in the December 10, 2021 Tribune Review Article by Joyce Hanz titled "2nd Injection Well Project Faces Opposition From Residents, Borough Officials."

Leaking wells could end up contaminating the Allegheny River and harming the water supplies for thousands of people.

Thanks for your consideration,

Dr. Larry Irr



Please Reject Disposal Injection Well Permit PAS2D702BALL

Herndon, Laura [REDACTED]

Thu 8/18/2022 6:57 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Given the previously mentioned violations and DEP’s sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco’s injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Reject a Fracking Wastewater Injection Well in Plum Borough

Laura Horowitz <[REDACTED]>

Wed 8/24/2022 10:35 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application. Fracking does long lasting harm to the environment and everything living in it.

Sincerely,

Laura Horowitz

[REDACTED]

[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Laura Horowitz [REDACTED]

Tue 8/2/2022 8:27 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr Hancharik, Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application. Such a well would endanger the health and safety of the people who live and work in its vicinity.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

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https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Laura Horowitz

[REDACTED]

[REDACTED]

Attn: Ryan Hancharick. Comment regarding: Underground Injection Control (UIC) Program Notice of Draft Permit Penneco Environmental Solutions, PAS2D702BALL

Lauren Schricker [REDACTED]

Fri 6/24/2022 1:58 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

To: Ryan Hancharick Source Water & UIC Section U.S. EPA Region 3 Email:R3_UIC_Mailbox Phone: 215-814-3278

I am writing to express my vehement disgust that this permit is even being considered. I get my drinking water from the Allegheny River, and the risk of my drinking water being contaminated with radioactive fracking fluid is not worth this permit. Injection wells at this site have already previously failed and contaminated drinking water for locals. Please listen to the people of Pittsburgh and the surrounding areas: we do NOT want Penneco to inject their toxic waste anywhere near us. We do NOT support the fracking industry or anything that puts our right to clean water at risk.

Sincerely,

Lauren Schricker
[REDACTED]

Permit Number PAS2D702BALL.

Leigh-Anne from Airheads Balloon Art <laweiss@airheadsballoonart.com>

Tue 9/6/2022 9:21 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr. Hancharick and to whom it may concern,

I am a resident and parent in Plum Borough and am writing to you today as a public comment regarding Permit Number PAS2D702BALL. This permit authorizes the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. I oppose this permit for Penneco Environmental Solutions, LLC to inject waste water into this well as this poses a potential threat to the Plum community. I call on the EPA to deny the permit for the new well and revoke the permit for the existing well to protect my family from any harm that may impact the ground water. I urge you to deny this claim and others like it in neighboring communities as well.

Respectfully,

Leigh-Anne Weiss



Public Comment on Penneco Environmental Service Draft Permit #PAS2D702BALL

Leslie Coopriders [REDACTED] >

Wed 6/29/2022 4:13 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Good Morning

My name is Leslie Coopriders and I am a resident of Pittsburgh, Pennsylvania, zipcode 15224. I am submitting a public comment regarding the Penneco Environmental Services draft permit which authorizes the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania.

Currently, Sedat #3, also owned by Penneco is leaking frack waste, which is known to be radioactive, dangerously close to the Allegheny River, a major drinking water supply and recreation site for the City of Pittsburgh. The river flows directly to the city and connects to the Ohio River, which eventually empties into the Mississippi River.

As someone who spends a lot of their time around other boaters and participates in Crew Rowing, Standup Paddleboarding, and other water activities and knows others who enjoy the river, this permit is especially dangerous to grant to Penneco. Penneco demonstrated before that they don't care about drinking water and don't care to fix the problems they have caused.

Pittsburgh will be the next Flint, Michigan if this permit is granted. DO NOT grant them this permit and tell them that they need to fix the current leaking injection well. The people of Plum and surrounding areas are getting sick.

PWSA already has overflow problems with human waste into the Monongahela River. The problem is so severe that everytime it rains, PWSA issues a warning to stay out of the water for up to a week or more because of these overflows. Our water is already contaminated and unsafe.

Penneco's leaking fracking wells will be a death sentence for the people of Pittsburgh. DO NOT GRANT THIS PERMIT.

Please contact me at [REDACTED] for any follow up or here at this email address.

Thank you for your time and attention. Protect Pittsburgh water.

Regards,

Leslie Coopriders

Reject Disposal Injection Well Permit PAS2D702BALL

Lynn [REDACTED]

Wed 8/24/2022 2:14 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

You must deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. Due to the fact that the applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Lynn Benson

" In a time of universal deceit, to tell the truth is a revolutionary act" ~George Orwell

Reject Disposal Injection Well Permit PAS2D702BALL

Lynn [REDACTED]

Tue 8/2/2022 8:39 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco’s application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Lynn Dalton

" In a time of universal deceit, to tell the truth is a revolutionary act" ~George Orwell

I am writing to you today regarding the Sedat 4A Injection Well

Mackenzie Linderman [REDACTED]

Thu 7/14/2022 1:32 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Plum, and I am concerned about the proposed Sedat 4A Injection Well. I am concerned that this second well will further jeopardize my drinking water source and the Allegheny River, which my community and region relies on for clean drinking water. I demand that EPA keep our water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Mackenzie Linderman
[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Marcela Gonzalez Rivas [REDACTED]

Wed 8/3/2022 7:13 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Ryan Hancharick or whom this may concern,

I am writing to ask, as a resident in Pittsburgh, who sees this injection well as a threat to public health, to deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

It is unthinkable that the EPA is still considering giving a permit to this company, who has violated regulation multiple times. The EPA is charged with protecting the environment and yet it is allowing infractors to polluting away, causing devastating harm.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco’s application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well’s first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP’s sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco’s injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Please Reject PAS2D702BALL Disposal Injection Well Permit

Wed 8/24/2022 3:43 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Ryan Hancharick,

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Marianne Jew
Murrysville, PA

Please Reject Disposal Injection Well Permit PAS2D702BALL

Mark Fichman [REDACTED]

Tue 8/2/2022 2:43 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

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https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, “The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective

action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.” However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco’s application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well’s first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP’s sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco’s injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Mark Fichman

Sent from [Mail](#) for Windows

June 17, 2022

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3
Email: R3_UIC_Mailbox@epa.gov

Re: EPA Request for Postponement and In-person Hearing

Dear Mr. Hancharick

We are writing in response to the issuance of a draft permit PAS2D702BALL to Penneco Environmental Solutions, LLC, of Delmont, PA. Specifically, we have objections regarding the tentative public hearing currently scheduled virtually for June 28, 2022.

Our first objection is based on the virtual format of the hearing. Allegheny County is a diverse community whose members are always ready to voice their opinions and stimulate healthy conversation; this, however, has traditionally been conducted via in-person hearings. The community impacted by Penneco's objectives is primarily rural, and therefore its constituents cannot be expected to have reliable, widespread access to online platforms such as MS teams. While a dial-in option has been presented, participants who have dialed in are easily overlooked and uncomfortable participating due to only being able to do so at a bare minimum level. As a result, a virtual hearing would discourage conversation from some members of the community and alienate others from attending altogether. Because the purpose of these hearings is to get comments from the entire community affected, a virtual hearing will not meet this purpose in Allegheny County.

Furthermore, The Environmental Protection Agency's "best practices for conducting virtual public hearings and meetings include documenting the reasons for conducting the public hearing or meeting virtually." Memorandum: Virtual Public Hearings and Meetings, page 2 (April 16, 2020). In the EPA's notice of hearing regarding the Penneco draft permit, there are no documented reasons for conducting the hearing online. The lack of such documentation combined with the community's tendency to be excluded from hearings when virtual, as previously discussed, is sufficient to warrant an in-person hearing at a later date.

Our second objection relates to the short amount of time that the public has had to review and comment on highly technical information. While the EPA published this notice on their website on May 26th, 2022, the public did not know about this hearing until June 14th. Even if given a full 30 days to review, there is a huge disparity between the preparation time and resources

that the oil and gas industry has versus what we (local officials who are charged with protecting ourselves and the public) have to review application documents, research scientific facts and prepare comments.

We request the EPA postpone the hearing and hold it in person for the reasons outlined above, to allow appropriate participation from the public that will be impacted by the issuance of this permit.

Sincere Regards,

Gillian Graber
Executive Director, Protect PT

Bob Teorsky
[REDACTED] New
Kensington, Allegheny

Debra Smit
[REDACTED]
Pittsburgh, Allegheny

Ann LeCuyer LeCuyer
[REDACTED]
Trafford

Lois Drumheller
[REDACTED]
Monroeville, Allegheny

Judith Colick aetna
[REDACTED] Export

Matthew Mehalik Executive
Director Breathe Project
mmehalik@breatheproject.org
Pittsburgh, Allegheny

Nicole Ruscitto Council member
Jefferson Hills None
[REDACTED]
Jefferson Hills. Allegheny

Emily Cumpston
[REDACTED]
Pittsburgh, Allegheny County

Edith Abeyta North Braddock
Residents For Our Future
[REDACTED] North
Braddock, Allegheny

Ana Tshlares Hoffman
[REDACTED]
Pittsburgh, Allegheny

Calvin McCutcheon President
McCutcheon Enterprises, Inc.
calvin@completewastemgmt.co
m Apollo, Westmoreland
County

Ashley Funk Executive Director
Mountain Watershed
Association
ashley@mtwatershed.com
Melcroft, PA

Patricia R. Wendell
b [REDACTED]
Jeannette, Westmoreland

Jess Friss Three Rivers
Waterkeeper and Protect PT
jessprotectpt@threeriverswaterk
eeper.org Pittsburgh

Tonyehn Verkitus
[REDACTED] Blakely

Darlene Leslie Protect PT
[REDACTED]
Murrysville

Mandeep Saini
[REDACTED] Monroeville

Heather Hulton VanTassel
Executive Director Three Rivers
Waterkeeper
heather@threeriverswaterkeeper
.org Pittsburgh

Lois Bower-Bjornson
[REDACTED]
SCENERY HILL

David Mintz
[REDACTED]
Monroeville, Allegheny

Matt Kelso Manager of Data
and Technology FracTracker
Alliance kelso@fractracker.org
Allegheny County, PA

Patricia Emich
[REDACTED] Irwin, PA

Edward Ketyer, M.D. President
Physicians for Social
Responsibility Pennsylvania
ned@psrpa.org Venetia,
Washington

Jordan Stancil
[REDACTED]
Pittsburgh, Allegheny

Barbara W Brandom, MD
Steering Committee Member
Concerned Health Professionals
of Pennsylvania
[REDACTED]
Pittsburgh, Allegheny County

EPA Request for Postponement and In-person Hearing

Mary Obringer <mary@protectpt.org>

Mon 6/20/2022 9:03 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: Gillian Graber <gillian@protectpt.org>

 1 attachments (290 KB)

EPA request for postponement and in person hearing.pdf;

June 17, 2022

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox@epa.gov

Re: EPA Request for Postponement and In-person Hearing

Dear Mr. Hancharick

We are writing in response to the issuance of a draft permit PAS2D702BALL to Penneco Environmental Solutions, LLC, of Delmont, PA. Specifically, we have objections regarding the tentative public hearing currently scheduled virtually for June 28, 2022.

Our first objection is based on the virtual format of the hearing. Allegheny County is a diverse community whose members are always ready to voice their opinions and stimulate healthy conversation; this, however, has traditionally been conducted via in-person hearings. The community impacted by Penneco's objectives is primarily rural, and therefore its constituents cannot be expected to have reliable, widespread access to online platforms such as MS teams. While a dial-in option has been presented, participants who have dialed in are easily overlooked and uncomfortable participating due to only being able to do so at a bare minimum level. As a result, a virtual hearing would discourage conversation from some members of the community and alienate others from attending altogether. Because the purpose of these hearings is to get comments from the entire community affected, a virtual hearing will not meet this purpose in Allegheny County.

that the oil and gas industry has versus what we (local officials who are charged with protecting ourselves and the public) have to review application documents, research scientific facts and prepare comments.

We request the EPA postpone the hearing and hold it in person for the reasons outlined above, to allow appropriate participation from the public that will be impacted by the issuance of this permit.

Sincere Regards,

Gillian Graber
Executive Director, Protect PT

Bob Teorsky
[Redacted] New Kensington, Allegheny

Debra Smit
[Redacted] Pittsburgh, Allegheny

Ann LeCuyer LeCuyer
[Redacted] Trafford

Lois Drumheller
[Redacted] Monroeville, Allegheny

Judith Colick aetna
[Redacted] Export

Matthew Mehalik Executive Director Breathe Project
mmehalik@breatheproject.org
Pittsburgh, Allegheny

Nicole Ruscitto Council member Jefferson Hills None
[Redacted] Jefferson Hills. Allegheny

Patricia Emich
[Redacted] Irwin, PA

Jordan Stancil
[Redacted] Pittsburgh, Allegheny

Emily Cumpston
[Redacted] Pittsburgh, Allegheny County

Edith Abeyta North Braddock Residents For Our Future
[Redacted] North Braddock, Allegheny

Ana Tshulares Hoffman
[Redacted] Pittsburgh, Allegheny

Calvin McCutcheon President McCutcheon Enterprises, Inc.
calvin@completewastemgmt.com Apollo, Westmoreland County

Ashley Funk Executive Director Mountain Watershed Association
ashley@mtwatershed.com Melcroft, PA

Patricia R. Wendell
[Redacted] Jeannette, Westmoreland

Jess Friss Three Rivers Waterkeeper and Protect PT
jessprotectpt@threeriverswaterkeeper.org
Pittsburgh

Edward Ketyer, M.D. President Physicians for Social Responsibility Pennsylvania
ned@psrpa.org Venetia, Washington

Barbara W Brandom, MD Steering Committee Member Concerned Health Professionals of Pennsylvania
[Redacted] Pittsburgh, Allegheny County

Tonyehn Verkitus
[Redacted] Blakely

Darlene Leslie Protect PT
[Redacted] Murrysville

Mandeep Saini
[Redacted] Monroeville

Heather Hulton VanTassel Executive Director Three Rivers Waterkeeper
heather@threeriverswaterkeeper.org
Pittsburgh

Lois Bower-Bjornson
[Redacted] SCENERY HILL

David Mintz
[Redacted] Monroeville, Allegheny

Matt Kelso Manager of Data and Technology FracTracker Alliance
kelso@fractracker.org Allegheny County, PA

--
Mary Obringer
Outreach Manager
Protect PT (Promote PT Inc.)
724-392-7023 (office)

[REDACTED] (google voice/cell)
Follow @ProtectPT on social media
[Facebook](#), [Twitter](#), [Instagram](#) and [YouTube](#)



RE: Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

Jason Muggli <jmuggli@plumboro.com>

Thu 6/23/2022 6:43 PM

To: Matt Kelso <kelso@fractracker.org>

Cc: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>; Michael Thomas <mthomas@plumboro.com>

Mr. Kelso,

I received communication from the Boro Manager, Mike Thomas, to configure our Council Chambers for this upcoming EPA MS Teams meeting.

I have our Council Chambers ready to broadcast and, if necessary, a microphone for attendees to ask questions during the hearing.

I will open our Council Chamber doors open at 5:45 PM on Tuesday June 28, 2022.

Here's a link to the post I made to our website:

[EPA Public Hearing on issuance of draft permit to Penneco Environmental Solutions | Plum PA \(plumboro.com\)](#)

Thank you,

JASON MUGGLI

Information Technology Coordinator

4575 New Texas Road, Pittsburgh, PA 15239

412-795-6800 x4206



[Facebook](#) | [SavvyCitizen](#)

From: Matt Kelso <kelso@fractracker.org>**Sent:** Wednesday, June 22, 2022 10:16 AM**To:** R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>; Michael Thomas <mthomas@plumboro.com>**Subject:** Re: Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

Mr. Bennett,

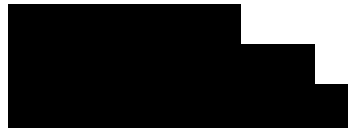
It's ironic, because the operator and EPA have as much time to prepare as they need, but it is the affected residents who have to scramble with insufficient notice. I do appreciate the extension of the written comment period, however.

At any rate, we have reached out to Plum Borough's Manager Michael Thomas (copied). The Borough has significant experience with MS Teams, and is willing to use this technology to make it easier for residents to be heard. For that to work, however, EPA will need to work with the Borough to allow for multiple speakers to be heard from the same connection. Obviously, that is not the same as an in-person meeting where residents can air their experiences and concerns to the

Agency face to face, but it would be significantly better than a phone call. Would this arrangement work for you?

Thanks,
Matt

Matt Kelso (he-him-his)
Manager of Data and Technology
FracTracker Alliance


www.fractracker.org
[Check out our mobile app](#)

On Wed, Jun 22, 2022 at 9:23 AM R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov> wrote:

Thank you for your email. Given short time frame to postpone the public hearing and changing it to in person, the scheduled **virtual** hearing will be held. It would be unfair to those who already plan to attend the hearing to cancel the currently scheduled hearing. To ensure that everyone who wishes to express their views to EPA has time to do so, a call-in number was also provided, and, in addition, EPA will extend the public comment and additional two weeks, ending on July 13, 2022.

James Bennett
Source Water & UIC Section
U.S. EPA Region 3
Email: R3_UIC_Mailbox@epa.gov

From: Matt Kelso <kelso@fractracker.org>
Sent: Thursday, June 16, 2022 3:48 PM
To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>
Subject: Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

To whom it may concern,

Residents in Plum Borough, Pennsylvania have recently learned of your "public" hearing for the Sedat 4A Class II-D wastewater disposal well.

<https://www.epa.gov/pa/underground-injection-control-uic-program-notice-draft-permit-penneco-environmental-solutions>

I think it is important that you realize that the virtual hearing is a significant obstacle for the residents who will be most affected by this proposed facility. Please reconsider the virtual-only nature of this hearing, and schedule an in-person hearing. Additionally, as residents have just found out about the hearing, there is insufficient time to react to the various issues in the draft UIC permit, including finding experts who are able to participate at the scheduled time. These people already have direct experience from the Sedat 3A well

(PAS2D701BALL), and you owe the community a fair chance to have their say, with the people making the decision on whether to approve the 10-year permit listening to them from across the room, rather than on a screen on an MS Teams link. Speaking of which, MS Teams is the least user-friendly of all of the various virtual meeting options, with technical glitches and poor documentation too frequently keeping participants from meetings. And this meeting is extremely important.

In summary, please postpone this meeting and have an in-person component for local residents.

Thanks,
Matt

Matt Kelso (he-him-his)
Manager of Data and Technology
FracTracker Alliance



www.fractracker.org

[Check out our mobile app](#)

Opposition to draft permit PAS2D702BALL

Matt Kelso <kelso@fractracker.org>

Sat 7/2/2022 3:58 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

July 2, 2022

Attn: Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

According to your [website](#), “The mission of EPA is to protect human health and the environment.” The mission is clear and unambiguous, and further backed by seven key points of how EPA hopes to achieve this goal. And yet, when it came to approving the Sedat #3A Class II-D waste disposal well (PAS2D701 BALL), EPA Region 3 officials systematically worked against each and every one of these guiding principles, failing the neighbors of the site by turning their relatively clean environment into yet another contamination zone. And now, with the issuance of the draft approval for the Sedat 4A Class II-D well (PAS2D702BALL), your agency is on the precipice of doubling down on all of these mistakes.

In this letter, we will discuss these failures point by point. Each one begins, “EPA works to ensure that:”

- “Americans have clean air, land and water.”

In your 2017 public hearing about Sedat #3A, EPA made it clear that they were not going to consider harm to air or land, only water issues that might run afoul of the 1974 Safe Drinking Water Act. Therefore, residents who have complained of chemical odors from the tank battery on the site have no recourse with EPA. Residents who have complained of diesel pollution from the constant procession of waste haulers have no recourse with EPA. Residents who have complained of physical damage to their property from activities on site have no recourse with EPA.

But as it turns out, EPA has shown that they are uninterested in protecting water supplies as well. At least two different residences have complained about polluted water supplies after less than 18 months of operation. None of this should be surprising to the EPA. In the 2017 hearing, residents and scientists brought this to EPA’s attention, including evidence of industry assessments that the region just [isn’t suitable for underground injection](#). If we are being candid, nothing has changed with the friable sedimentary strata since that determination was made. The only thing that has changed is that the industry produces many times more waste fluid than ever before, which frankly seems to be more of a concern to EPA than residents impacted by Sedat 3A. EPA has ignored this situation and opted to issue Sedat 4A a draft permit anyway.

- National efforts to reduce environmental risks are based on the best available scientific information.

I have yet to see scientific information that suggests that the best way to dispose of flowback and produced water is to inject them into shallow wells directly beneath people’s homes. I do have some sympathy for the Agency, which is required to assess the safest manner of dealing with this waste stream when no safe manner exists. Wherever the site of injection occurs, there is the risk of [contamination](#), [induced seismicity](#), and [repressurizing abandoned wells](#), among many concerns. So why does EPA think that this is appropriate to pump beneath homes in Plum Borough?

- Federal laws protecting human health and the environment are administered and enforced fairly, effectively and as Congress intended.

According to [EPA's website](#), "UIC regulations mandate the consideration of a variety of measures to assure that injection activities will not endanger underground sources of drinking water." This is an unambiguous directive. Approving the injection of harmful oil and gas waste fluids into shallow wells beneath the homes of residents that rely on groundwater sources for domestic use is similarly an unambiguous failing of the law, as intended by Congress. Further, the region's long history of coal mining, conventional oil and gas drilling, and water well drilling through multiple layers of crumbling sedimentary rocks makes it clear that any insistence that the Murrysville Sand injection formation is sealed off from the drinking water aquifers is fictitious at best. Residents in the area know better, as should officials at EPA.

- Environmental stewardship is integral to U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade, and these factors are similarly considered in establishing environmental policy;

Merriam-Webster defines stewardship as, "the conducting, supervising, or managing of something, especially the careful and responsible management of something entrusted to one's care." EPA acknowledges that it is its job to provide environmental stewardship over a variety of industries, and this list includes the disposal of oil and gas waste fluids. Disposal at the adjacent Sedat 3A site has already caused numerous problems in a short period of time. Two different residences have complained of problems with their private water supplies following the beginning of operations at Sedat 3A. Another family is no longer able to enjoy time outdoors in their yard when noxious fumes from the tank battery are blown in their direction. Approving a decades-old two-casing borehole for high pressure injections proved to be as bad of an idea as it sounds, resulting in a failed mechanical integrity test after fewer than four months of operation. Fluids that are frequently high in radioactive elements including Radium-226 and its daughter isotope, Radon-222 are pumped underneath people's houses and drinking waters. To any reasonable observer, none of this sounds like environmental stewardship to protect natural resources and human health. At the very least, an alternative site away from human receptors is necessary for these injection operations.

- All parts of society--communities, individuals, businesses, and state, local and tribal governments--have access to accurate information sufficient to effectively participate in managing human health and environmental risks.

While arguably the easiest of the seven ways that EPA strives to achieve their mission, the Agency has repeatedly failed to make providing accurate information to the community to allow for effective participation in managing health and environmental risks a priority for residents near the Sedat 3A and Sedat 4A sites.

Matters of transparency are more than just EPA guidelines – they are the law. The National Archives explains the Freedom of Information Act ([FOIA](#)) as follows:

The Freedom of Information Act, or FOIA (5 U.S.C. 552, as amended), generally provides any person with the statutory right, enforceable in court, to obtain access to government information in executive branch agency records. This right to access is limited when such information is protected from disclosure by one of [FOIA's nine statutory exemptions](#).

FracTracker Alliance has submitted two FOIA requests to EPA regarding Class II-D waste disposal wells in Pennsylvania, as the wells are effectively co-regulated with Pennsylvania Department of Environmental Protection (DEP). The first was a basic inventory of these wells. In theory, this should have been easy to accomplish, as the region's geographic unsuitability has resulted in very few of these wells compared to states like Oklahoma, Texas, or even Ohio. EPA eventually returned a list of 23 such sites in Pennsylvania, but the results were [incredibly sloppy](#), to the point where it became clear that EPA had no idea what the current state of affairs were with this industry in the state. EPA was lacking five wells from DEP data, four additional wells where the API number and well name didn't match, three wells where DEP and EPA had different well types noted, two wells where EPA just couldn't find the API number, and one well that wasn't on the DEP inventory of 200,000+ wells at all. These are a lot of significant errors for an inventory of 23 wells, and points to EPA's detachment from realities on the ground

for the industry in a state where it retains [regulatory primacy](#). A full federal review of Pennsylvania's Class II injection operations program is clearly necessary to avoid the aquifer exemption permitting and subsequent contamination catastrophes that have occurred in other [states like California](#).

The second FOIA was specific to the Sedat 3A well. This is what was requested:

The Sedat 3A SWD well in Plum Borough, Allegheny County, PA (Region 3, UIC program, <https://www.epa.gov/uic/uic-permit-pas2d701ball>) had a related water supply complaint earlier this year, shortly after going into operation. Per the Pennsylvania DEP, the operator notified EPA instead of DEP. We request a copy of that correspondence, or related notes. We understand that third party names will need to be redacted.

This is not a complicated request, however EPA requested three different extensions before finally refusing the request. In the experience of our organization and others that we work closely with, EPA FOIAs are routinely denied, are of low quality, or redacted to the point of obfuscation. When the request is backed by legal representation, results are somewhat improved. However, this shows a fundamental problem with the way EPA approaches FOIAs, which are intended to give residents the opportunity to know what governmental agencies know, in this case with respect to industrial activity that could be causing harm to the environment and human health.

Lastly, we can look at the virtual public meeting regarding this draft permit issuance itself. Local stakeholders that have been in communication with EPA about these sites were not notified of the pending hearing, which allowed only 30 days' notice – an insufficient amount of time to respond to the complexity of the draft permit, including finding experts to read and assess the documents. Further, the meeting is scheduled to be held virtually only and without explanation, which conflicts with the Agency's [best practice guidance](#). If EPA won't follow its own best practices, it can't be a surprise when polluting industries also opt not to. Requests for more time and a public meeting were refused by the agency.

- Contaminated lands and toxic sites are cleaned up by potentially responsible parties and revitalized.

By permitting the Sedat 3A site, EPA has enabled the creation of a new toxic site right next to people's homes. When EPA secretly allowed the doubling of the injected waste volume to 108,000 barrels per month, the Agency doubled down on their decision to allow contamination. With the draft permit of the adjacent Sedat 4A site, EPA has tentatively tripled down on the original bad decision. Presumably, the operator will then try to double the volume of the new site as well after a month of operation.

Of course, this is an area that was already impacted with conventional oil and gas wells and extensive coal mining. But the oil and gas waste dump is an entirely new toxic presence in the neighborhood, and EPA's blessing is contrary to the Agency's stated mission.

- Chemicals in the marketplace are reviewed for safety.

Oil and gas waste fluids contain a variety of chemicals which are harmful to human health and the environment. Some of these occur in naturally high concentrations, like bromides. Bromides could be a concern for water well owners that use shock chlorination to sterilize or "shock" their drinking water supply, because they can react to form [carcinogenic trihalomethanes](#), byproducts of disinfection that have been known for decades. As fracking fluids are often reused at other well sites, contaminant loads become concentrated even beyond what is present in Devonian brines. In this context, technologically enhanced naturally occurring radioactive materials ([TENORMs](#)) are known to be a problem [associated with these waste streams](#), sometimes measuring in the tens of thousands of picocuries per liter. And then there are also the chemical additives in the fracking fluids. According to self-reported industry data from [FracFocus](#), approved substances for this fluid includes [petroleum distillates](#), per- and polyfluoroalkyl substances ([PFAS](#), or "forever chemicals"), [acetone](#), [benzene](#), [formaldehyde](#), [chlorine dioxide](#), to name a few of the hundreds of chemicals that are inappropriate to be injecting beneath people's

homes and sources of drinking water. And these are just the chemicals that are made publicly available, as non-disclosure of chemicals due to trade secrets is both permissible and widespread on the registry.

There are seven ways in which EPA strives to uphold its mission of protecting human health and the environment. In the case of the existing Sedat 3A well and the issuance of the draft permit for Sedat 4A in Plum Borough, Allegheny County, Pennsylvania, the Agency falls significantly short on each method. Whereas one or two shortcomings could point to a difference of perspective, failing all seven shows that the agency is failing at its mission and needs a fundamental reset in its procedures regarding how permits for these Class II-D waste disposal wells are considered.

We understand that there is enormous pressure put on the Agency to approve such wells. The oil and gas industry produces billions of gallons of liquid waste every year that ultimately needs to go somewhere. However, helping industry find a place to pollute is not the task at hand for EPA. The task is to protect human health and the environment. To achieve its mission, EPA must revoke the draft permit and deny the application for Sedat 4A, as well as re-evaluate the existing permit for Sedat 3A.

Thank you for your careful reconsideration,

Matthew Kelso
Manager of Data and Technology
FracTracker Alliance

Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

Matt Kelso <kelso@fractracker.org>

Thu 6/16/2022 7:48 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

To whom it may concern,

Residents in Plum Borough, Pennsylvania have recently learned of your "public" hearing for the Sedat 4A Class II-D wastewater disposal well.

<https://www.epa.gov/pa/underground-injection-control-uic-program-notice-draft-permit-penneco-environmental-solutions>

I think it is important that you realize that the virtual hearing is a significant obstacle for the residents who will be most affected by this proposed facility. Please reconsider the virtual-only nature of this hearing, and schedule an in-person hearing. Additionally, as residents have just found out about the hearing, there is insufficient time to react to the various issues in the draft UIC permit, including finding experts who are able to participate at the scheduled time. These people already have direct experience from the Sedat 3A well (PAS2D701BALL), and you owe the community a fair chance to have their say, with the people making the decision on whether to approve the 10-year permit listening to them from across the room, rather than on a screen on an MS Teams link. Speaking of which, MS Teams is the least user-friendly of all of the various virtual meeting options, with technical glitches and poor documentation too frequently keeping participants from meetings. And this meeting is extremely important.

In summary, please postpone this meeting and have an in-person component for local residents.

Thanks,
Matt

Matt Kelso (he-him-his)
Manager of Data and Technology
FracTracker Alliance


www.fractracker.org
[Check out our mobile app](#)

Re: Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

Matt Kelso <kelso@fractracker.org>

Thu 6/23/2022 6:50 PM

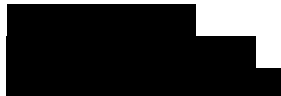
To: Jason Muggli <jmuggli@plumboro.com>

Cc: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>;Michael Thomas <mthomas@plumboro.com>

Great, thank you so much for setting this up, Jason and Mike.

Thanks,
Matt

Matt Kelso (he-him-his)
Manager of Data and Technology
FracTracker Alliance


www.fractracker.org
[Check out our mobile app](#)

On Thu, Jun 23, 2022 at 2:41 PM Jason Muggli <jmuggli@plumboro.com> wrote:

Mr. Kelso,

I received communication from the Boro Manager, Mike Thomas, to configure our Council Chambers for this upcoming EPA MS Teams meeting.

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Thank you,

JASON MUGGLI

Information Technology Coordinator

4575 New Texas Road, Pittsburgh, PA 15239

412-795-6800 x4206



[Facebook](#) | [SavvyCitizen](#)

From: Matt Kelso <kelso@fractracker.org>

Sent: Wednesday, June 22, 2022 10:16 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>; Michael Thomas <mthomas@plumboro.com>

Subject: Re: Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

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Matt

Matt Kelso (he-him-his)

Manager of Data and Technology

FracTracker Alliance

[REDACTED]

[REDACTED]

[REDACTED]

www.fractracker.org

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Source Water & UIC Section
U.S. EPA Region 3
Email: R3_UIC_Mailbox@epa.gov

From: Matt Kelso <kelso@fractracker.org>
Sent: Thursday, June 16, 2022 3:48 PM
To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>
Subject: Please hold an in-person public hearing for Sedat 4A PAS2D702BALL

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Thanks,

Matt

Matt Kelso (he-him-his)

Manager of Data and Technology

FracTracker Alliance

[REDACTED]

[REDACTED]

[REDACTED]

www.fractracker.org

[Check out our mobile app](#)

Plum Borough Fracking Injection Well - Penneco Sedat 4A

[REDACTED]
Wed 8/31/2022 5:00 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Good afternoon,

I am a homeowner and resident of Plum Borough, Allegheny County, PA. I was unable to attend the in-person hearing yesterday because, at age [REDACTED]

[REDACTED] is this proposed well.

The Environmental Protection Agency should be PROTECTING the environment, not allowing potentially radioactive waste and chemicals that can kill to be dumped into our river. This will impact not only residents of Plum, but everyone downstream of us – and that's a lot of people.

I do not want this well *anywhere* in the US. In fact, I don't even want fracking. We want a planet where our children can actually live safe and healthy lives, not one where they have to solve the problems that their grandparents exacerbated, and their parents failed to solve. To further add to the problems of future generations will already experience by poisoning freshwater supplies is criminal. I strongly oppose this well and request the EPA to do their job and actually protect the environment.

Respectfully,
Melanie Apollo

[REDACTED]
Re: Penneco Sedat 4A

Disposal Injection Well Permit PAS2D702BALL - please deny

Melissa McSwigan [REDACTED]

Sat 8/27/2022 1:32 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

To: Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

Thank you for your consideration and for this opportunity to make a public comment.

Regards,
Melissa McSwigan
Pittsburgh, PA 15213

Speaking at the EPA hearing

Michele Fetting [REDACTED]

Tue 8/9/2022 3:08 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello Ryan,

I'd like to sign up to speak at the hearing on the Plum injection well:

Public Hearing: EPA has scheduled an in-person public hearing for August 30, 2022 at the Plum Community Center, 499 Center New Texas Road, Pittsburgh, PA 15239 from 6:00 pm to 8:00 pm EST.

Do you know how many people have signed up?

Thank you!

Michele Fetting
[REDACTED]

Fw: My comments submitted

Hancharick, Ryan <Hancharick.Ryan@epa.gov>

Tue 6/28/2022 11:24 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

(Message originally sent to Hancharick.Ryan@epa.gov and forwarded to R3 UIC mailbox)

Ryan Hancharick

Source Water & UIC Section

Water Division

U.S. EPA Region III

Four Penn Center

1600 John F. Kennedy Blvd.

Philadelphia, PA 19103

Phone: 215.814.3278

From: Michele Fetting [REDACTED]

Sent: Tuesday, June 28, 2022 6:33 PM

To: Hancharick, Ryan <Hancharick.Ryan@epa.gov>

Subject: My comments submitted

Hi Ryan,

here are my comments for the sedat 4a injection well

Comments regarding Permit Application **Sedat #4A**

Michele Fetting



My name is Michele Fetting, I live in Pittsburgh P.A. and I get my drinking water from the Allegheny River.

Thank you to the EPA for holding this hearing

You heard from many of us in 2016 when you were here before – For Sedat3A.

We told you about the risks of injecting millions of gallons of radioactive and PFAS-laden waste into an unstable environment very near the source (and the intake pump) of drinking water for **hundreds of thousands of people**. And more.

We told you back then that approving the well would have tragic consequences.

That the casing could not handle the high pressure of these fluids.

We told you the well would fail.

But EPA approved the permit anyway.

And the casing failed. Almost immediately. And BOOM.

People lost their well water. The aquifer was likely contaminated. Downstream drinking water is in jeopardy.

The EPA is responsible for upholding our nations laws for clean and safe drinking water.

Our water is being destroyed by an often wreckless oil and gas industry. People are dying. Animals are dying.

The EPA is supposed to be a backstop for protection when our local and state governments fail.

They have failed – and we need your leadership more than ever.

The EPA must **not only deny this permit** – but you must engage in a full investigation of Fracking Waste which has been slipping through the regulatory cracks in our nation in a **truly spectacular way**.

Some waste samples show Radium-226 in excess of 18,000 picocuries per liter, or 3,600 times EPA's drinking water standard.

Radium is a "BONE SEEKER"

So when it gets into the human body it goes right for our bone marrow.

Our highly fracked region is seeing alarming rates of the rare, pediatric bone cancer – **Ewing's Sarcoma**.

You can connect the dots.

You can also put a stop to this.

This permit represents a direct violation of the Safe Drinking Water Act and endangers human health.

It is only a matter of time before this well *would* fail – like its twin brother next door.

And this **horrific** waste – that you can't see or smell or taste it – gets into our drinking water.

You the EPA have an important responsibility here.
Lives are truly at risk.

Today, as in 2018, I ask the United States Environmental Protection Agency to listen to residents, review the risks and evidence, and deny the PENNECO **Sedat 4A** permit application for this deep injection well.

Ryan Hancharick,

Protect PT, in partnership with the Breathe Project and FracTracker Alliance, recognized the importance of reaching out to our community, spreading information, and gathering their opinions about the proposed Sedat 4A Injection Well permit. Part of this effort involved us circulating a petition. Below, you will find the language used in said petition and the individuals that signed their names to it.

We urge you to recognize these people and perform your basic duty of protecting them,

Protect PT

Tell EPA to DENY the Permit for the Sedat 4A Injection Well

Last Spring, Penneco Environmental Solutions obtained a permit to open a fracking waste injection well in Plum Borough near the Allegheny River – the source of drinking water for hundreds of thousands of people in Allegheny County. Experts warned the U.S. Environmental Protection Agency (EPA) and the PA Department of Environmental Protection (DEP) that the engineering was insufficient and the well casing would fail.

The well failed.

Neighbors testified they lost their well water and were harmed in other ways. Now EPA is considering another permit for a second fracking waste injection well on the same site – an old, abandoned gas well next to a coal mine that has been on fire for decades. We must **Tell EPA to DENY THIS PERMIT** and keep fracking waste from oil and gas operations out of our community.

Through an injection well, fracking waste is injected into rock formations nearly a mile below ground. Using this method, waste has the potential to enter our freshwater sources via multiple pathways, like drinking water wells, abandoned oil and gas wells, abandoned mine chambers, etc. However, the main pathways of contamination involve waste traveling up through rock formations, or through cracks in the casings used to contain injected waste fluids.

It is well documented that fracking waste across the U.S. has been shown to contain radioactive material and PFAS (nicknamed “forever chemicals”).

Scientific evidence shows there are health risks to people living near fracking waste injection well sites, linking the wells to water contamination, destroyed ecosystems, and earthquakes. Exposure to fracking waste has been shown to lead to a range of health effects including upper respiratory symptoms, skin rashes, and difficulty breathing. Long-term exposure can lead to liver and kidney toxicity, heart and lung disease, and cancers such as leukemia.

The oil and gas industry is pushing hard for more waste injection wells in Pennsylvania to cut costs of recycling and shipment of waste to Ohio and other sites. The industry is desperately running out of places to put the waste.

We urge you to lend your name to this petition to clearly state to the Environmental Protection Agency (EPA), Region 3:

"I am asking the EPA to deny the permit for Penneco Environmental Solutions to build and operate the Sedat 4A fracking waste injection well in Plum Borough, Allegheny County. This well poses a grave danger to our drinking water and would violate EPA's adherence to the Safe Drinking Water Act. You must deny this permit."

In the following Google Sheets file you will find all those that signed this petition:



Protect PT Comment and Petition for PAS2D702BALL

Morgan Moran <morgan@protectpt.org>

Tue 9/6/2022 8:14 PM

To: Hancharick, Ryan <Hancharick.Ryan@epa.gov>; R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hi Ryan,

I am emailing you on behalf of Protect PT regarding Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well. Below, you will find two files: a petition that we circulated and our own comment we would like to submit.

On the petition file, I linked you to a Google Sheets document with all our collected signatures. Please let me know if you have trouble accessing this.

If you have any questions, or if something isn't appearing right on your end, please let me know. Also, please confirm with me that you are able to access both files.

Thank you,

Morgan Moran
Fossil Fuel Community Organizer
Protect PT
morgan@protectpt.org

Sedat #4A Plum Injection Well Comment

Morgan Moran [REDACTED]

Tue 8/16/2022 4:06 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am demanding you to DENY the proposed Plum Injection Well, Sedat #4A. Injection Wells like this put drinking water at risk and coincide with a plethora of other impacts. When this injection well fails and contaminates Allegheny County's drinking water, residents could potentially be exposed to chemicals that will cause long-term health issues, including cancers, heart and lung disease, liver and kidney toxicity, etc. Allowing this Injection Well to operate will violate my right as a Pennsylvania citizen to pure water as stated in Article I, Section 27 of the Pennsylvania Constitution.

Sincerely,

Morgan Moran
[REDACTED]

August 22, 2022

Attn: Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A
Underground Injection Well

Dear Mr. Hancharick,

The permit requested by Penneco Energy Solutions (Permit Number PAS2D702BALL) for the injection of hydraulic fracturing fluid waste into the Murrysville Formation in the Sedat 4A well in Plum Borough of Pennsylvania is **a direct threat the health of residents living near the wells and Allegheny County's drinking water; therefore the approval of the permit is a false pretense of safety posed by the U.S. Environmental Protection Agency (EPA).**

In 1970 the EPA agreed to abide by the **Clean Air Act** (42 U.S.C. 7401), taking on the responsibility of not only improving but also protecting the country's air quality. Section 7470 of the U.S.C. specifically tasks the EPA with the goal "to protect public health and welfare from any actual or potential adverse effect which in the Administrator's judgment may reasonably be anticipated to occur from air pollution"¹.

Since October of 2021 our organization has been continuously monitoring ambient volatile organic compounds (VOCs) at 1835 Old Leechburg Rd, New Kensington, PA, approximately 500 feet south of the Sedat 3A injection well. Our recent assessment of the data from the monitor shows the residents living at 1835 Old Leechburg Rd are at high risk of acute health effects from VOC exposure and could potentially experience long-term negative effects due to proximity to the injection well. The health of Pennsylvania residents is actively declining due to the Sedat injection wells, regularly leading to headaches, nausea, dizziness, and vision impairment. **In accordance with the Clean Air Act, we request the EPA as a protection agency denies further permitting for injection wells if they have any interest in avoiding further damage to the lives of more human beings.**

In relation to the direct assurance provided by the EPA to protect the health of our nation from contaminants in our drinking water, the **Safe Drinking Water Act** (SDWA) was established in 1974. The Sedat 4A well presents devastating risks to several downstream Allegheny River public drinking water systems as confirmed by the contamination caused by the approval of the

¹ <[U.S.C. Title 42 - THE PUBLIC HEALTH AND WELFARE \(govinfo.gov\)](#)>

Sedat 3A well (permit number PAS2D701BALL). Affected systems include the Pittsburgh Water and Sewer Authority, which provides water to hundreds of thousands of City of Pittsburgh residents and businesses.

Five water wells and two streams were identified within the Area of Review for the injection well identified as “Sedat 3A”. Two of the wells were contaminated in July 2021 when the 30-year-old injection well casing failed. Due to the lack of appropriate and detailed engineering review suggesting a leak detection zone², **water contamination was identified in residents’ wells**. The Pennsylvania Department of Environmental Protection (DEP) conducted standard parameter testing of the resident’s well water but failed to test parameters that typically indicate injection fluid infiltration. For example, no total suspended solid test was conducted, which would inform sand contamination. In addition — while Penneco’s chosen brand of chemical tracer is not public knowledge — because most chemical tracers in fracking fluid are fluorinated benzoic acids, results of the omitted benzene test would have informed fluid infiltration.

Code of Federal Regulations 40 CFR 144, which prohibits substantial endangerment of human health through the SDWA, establishes the framework for the Underground Injection Control (UIC) system where the consideration of a number of measures is meant to ensure injection activities will not endanger underground sources of drinking water (USDWs). Due to the lack of proper water testing, no evidence disproves the casing failure led to fracking fluid waste leakage into USDWs. Therefore, the permit approval of Sedat 4A is a direct violation of the EPA’s adherence to the SDWA by leaving the endangerment of human health to chance because of potential and probable casing failure.

The mechanical integrity test (MIT) conducted on June 11, 2021, following the application of new cement bond logs to Sedat 3A displayed a 3% loss of pressure over 30 minutes; a 5% loss of pressure would have resulted in a failure of the MIT as per EPA methods. While Sedat 3A minimally passed its MIT, we are deeply concerned that the mitigation applied to Sedat 3A was still very near failure for the MIT. The same integrity methods applied to Sedat 3A are proposed for 4A; in our scientific opinion, it is statistically unlikely the same proposed casing mitigations from 3A will be sufficient to protect 4A from failure. Lack of regulatory oversight by the EPA and an engineering review that would have prevented such a failure calls into question EPA’s ability to protect the region’s drinking water.

A letter containing H-FRAC Consulting Services’ Reservoir and Fracture Characterization of the Murrysville Formation sent to the EPA in December 2015³ indicated a need to inject fracturing waste into the formation at a pressure “higher than normal” at 1,420 psi. Due to low injection formation permeability of the formation, this suggested pressure could easily lead to increased unnatural faults or a casing failure similar to that which occurred in Sedat 3A.

² 13 April 2020 Maskol Technical Review of Penneco’s Control and Disposal Plan

³ 7 December 2015 Jacot Sedat 3A Reservoir and Fracture Characterization for the Murrysville Formation

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator “shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142.” The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

In addition to the integrity of the well casings, we also question the current saturation and ultimate receptivity of the Murrysville Formation. Post waste injection, geological knowledge suggests a porous rock matrix will reach an ultimate point of storage capacity at which it will no longer be able to hold injected fluid. No ultimate receptivity point was reported by Penneco during the geological reporting phases, nor was it provided to the public by the EPA. Because Penneco has requested a disposal of 1.5 million gallons of waste into the Sedat 4A well (far below average for waste injection wells), it is our suspicion the operators calculated and knew the ultimate receptivity of the Area of Review for the Murrysville Formation. Alternatively, we suspect the 1.5 million gallon proposal reflects an expectation of a casing failure, in which case a permit for fluid injection should never have been initially issued to Penneco.


Research suggests full saturation of a sandstone matrix in combination with high injection pressure may lead to unnatural fracturing and upward and/or downward travel of waste fluid. Travel of waste via natural or unnatural faults through the overlying shale layer threatens a violation of the **Code of Federal Regulations part 40 CFR 144.12**. Therefore, we again emphasize the issuing of permits for the Sedat 4A well is a failure by the EPA to adhere to the SDWA and is a violation of applicable laws and regulations.

52 years ago, the EPA was tasked with the development of environmental baselines that **minimize adverse impacts of pollution activities**. Today, we encourage EPA’s adherence to their own baselines by denying permit PAS2D702BALL for Sedat 4A and withdrawing the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions. It would be in the EPA’s best interest to avoid causing further harm to residents of Pennsylvania, whether by following the Clean Air Act and/or the Safe Drinking Water Act.

Regards,



Jenna Rindy, M.S. & M.Sc.
Staff Environmental Scientist
Protect PT



Gillian Graber
Executive Director
Protect PT

Sedat #4A Plum Injection Well Comment

Nancy Atkinson [REDACTED]

Tue 8/30/2022 3:23 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am begging you to DENY the proposed Plum Injection Well, Sedat #4A! Injection Wells like this put drinking water at risk and coincide with a plethora of other impacts. When this injection well fails and contaminates Allegheny County's drinking water, as it inevitably will, residents will be exposed to chemicals that will cause long-term health issues, including cancers, heart and lung disease, liver and kidney toxicity, etc. Allowing this Injection Well to operate will violate my right as a Pennsylvania citizen to pure water as stated in Article I, Section 27 of the Pennsylvania Constitution.

History with Penneco demonstrates their lack of accountability or concern for the health and safety of residents. Failure occurred at the first injection well at this site, and it has not been corrected. Penneco knows they can stall and fail to pay penalties because the PA DEP is under resourced and will not enforce penalties or corrective actions.

PLEASE send the message to Penneco that they must DEMONSTRATE responsible behaviors before any expansion of their operations is contemplated and approved!!!

Sincerely,

Nancy Atkinson
[REDACTED]

Penneco Permit

Nicole Dawnee [REDACTED]

Tue 6/28/2022 12:50 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

To Whom it May Concern,

My name is Nicole Kupchella. I live at [REDACTED] I have become aware of the Penneco permit issuance that would effect my potential drinking water and that of others within the area. I am against the issuance of this permit. I believe we need to focus on the help and safety of our citizens above this project and come up with a better solution. Please put the helo of Pennsylvania citizens first. I intend on trying to make it to the Microsoft Team meeting tomorrow as well. Please so not allow this to happen to Pitttsburgh and/or the surround areas drinking water.

Kindly,
Nicole Kupchella

I am writing to you today regarding the Sedat 4A Injection Well

Norman Papernick [REDACTED]

Wed 7/13/2022 10:48 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Allegheny County, and I am concerned about the proposed Sedat 4A Injection Well polluting our drinking water source, the Allegheny River. The existing Sedat 3A Injection Well already failed once after being in operation only a few months. How long do you think it will take for a second injection well to pollute our water? Adding a second injection well doubles the risk to our drinking water. Our drinking purification systems are already taxed to the limit and currently aren't meeting the health needs of the community. Added more stress to these systems will hurt the most vulnerable of us. I demand that EPA keep our drinking water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Mr. Norman Papernick
[REDACTED]

Please Reject Disposal Injection Well Permit PAS2D702BALL

Olivia Perfetti <[REDACTED]>

Wed 8/3/2022 2:28 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API

#37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

reject injection well in Plum Boro

Paul Heckbert [REDACTED]

Thu 9/8/2022 3:54 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: Paul Heckbert [REDACTED]

I am strongly opposed to the construction of injection well Sedat 4A in Plum Boro because of the pollution risks.

I understand that Penneco is keeping open the option of disposing fracking wastewater in this well in the future. We know that fracking wastewater can contain not only radioactive elements but also carcinogenic chemicals such as PFAS (see <https://pubs.acs.org/doi/full/10.1021/cen-09926-polcon4>) that can last 1000 years.

This is unacceptable.

Although the depth of the well is supposed to put it below the level of the Allegheny River (where my drinking water comes from), this is not just the standard case of "out of sight, out of mind" — dumping things in the ground and forgetting about them. We know that many thousands of abandoned gas wells litter the state, most of them unmapped, and their probably-deteriorating casings can allow gases and liquids to propagate from deeper strata upward into groundwater. And Pennsylvania's DEP tragically suffers from regulatory capture by oil and gas lobbyists.

I don't want possible carcinogens in my drinking water.

Do not approve this new injection well in Plum Boro.

-Dr. Paul S. Heckbert

reject injection well in Plum Boro

Paul Heckbert [REDACTED]

Thu 9/8/2022 3:54 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Cc: Paul Heckbert [REDACTED]

I am strongly opposed to the construction of injection well Sedat 4A in Plum Boro because of the pollution risks.

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This is unacceptable.

Although the depth of the well is supposed to put it below the level of the Allegheny River (where my drinking water comes from), this is not just the standard case of "out of sight, out of mind" — dumping things in the ground and forgetting about them. We know that many thousands of abandoned gas wells litter the state, most of them unmapped, and their probably-deteriorating casings can allow gases and liquids to propagate from deeper strata upward into groundwater. And Pennsylvania's DEP tragically suffers from regulatory capture by oil and gas lobbyists.

I don't want possible carcinogens in my drinking water.

Do not approve this new injection well in Plum Boro.

-Dr. Paul S. Heckbert

PAS2D702BALL comment

Penn Hackney [REDACTED]

Sun 9/4/2022 9:12 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

No, no, no. I'm sure others have commented in the *danger* to the health of persons and water from fracking fluids - unintended perhaps, but inevitable nonetheless - so I will say only that at time when emissions need to be *reduced* (think of your grandchildren, or your neighbor's grandchildren, or the public good of the next several generations), to approve ANY new permit that encourages, creates, or benefits from extractive activity and fossil fuel emissions, is, to put it kindly, bad for the future.

Think about it; think about more than the immediate economic gain, PLEASE.

Thank you,

[REDACTED]

"Speak out for those who cannot speak, for the rights of all the destitute."

Proverbs 31:8 (New Revised Standard Version)

▪

Penneco Sedat 4A

Renzy Pezglobo [REDACTED]

Sun 8/21/2022 12:54 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr. Hancharik,

My name is Rachael Neffshade. I live at [REDACTED]
[REDACTED]

I am writing to you out of profound concern about the permit for the Penneco Sedat 4A that the Environmental Protection Agency (EPA) will be reviewing for approval or denial. As a homeowner in Plum Borough and a resident of Allegheny County, I urge you to deny the permit for the Penneco Sedat 4A.

There was once a waste injection well at the Penneco Sedat 4A site along Old Leechburg Road. Despite warnings from experts that the well casing would fail, the EPA and the Pennsylvania Department of Environmental Protection (PA DEP) allowed this first waste injection well to be created. Then, as both agencies were warned, the well casing failed.

My neighbors testified that they lost their well water and were harmed in other ways. There can be no doubt at this point that placing a waste injection well at the Penneco Sedat 4A site is dangerous and doomed to cause further harm to Plum Borough. Truly, attempting to yet again put a waste injection well on the same site would be an unwise venture.

In addition to the above concerns, the Sedat 4A site also contains an abandoned gas well which is next to a coal mine. The coal mine has been on fire for decades. Further disturbing the Sedat 4A site puts not just Plum Borough's water at risk, but also the lives of the residents at risk. It is unjustifiable. Surely, there are alternative sites that are far safer for this waste injection well than the Sedat 4A.

In summary, I urge you to deny this permit and use alternative location for the waste injection well. I have confidence that there are far more stable sites than the Sedat 4A for the well. Thank you for considering my comments.

Regards,

--R. Neffshade
[REDACTED]
[REDACTED]

Comment on Permit #PAS2D702BALL

Ralph Kisberg [REDACTED]

Mon 7/11/2022 3:39 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

RDA *Responsible Decarbonization Alliance***PO Box 502 // Williamsport PA 17703-0502 // www.rdaPA.org**

July 11, 2022

Attn: Ryan Hancharick Source Water & UIC Section U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Dear Mr. Hancharick,

As a 501(c) 3 education and advocacy coalition located in North Central Pennsylvania concerned with all aspects of shale gas development, the Responsible Decarbonization Alliance (RDA) is in concurrence with the comments submitted on June 28th by Jenna Rindy, Staff Environmental Scientist at Protect PT asking that permit PAS2D702BALL for Sedat 4A be denied and that the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions be withdrawn.

Living in a shale gas development region of our Commonwealth with a decades-long history of underground methane gas storage, we are very aware that we do not have geological formations suitable for injection wells that are not already in use for storage. We must therefore rely on other regions, primarily in other states, to receive extremely toxic liquid wastes from not just the gas and oil industry, but from all industries in our area with similar waste fluid disposal challenges.

For those communities targeted for injection well operations, we are grateful for EPA oversight on the permitting process. We have seen first-hand for 14 years now that state legislatures, state administrations of either party, and the state agencies they fund are not up to the challenge of putting the needs and rights of individuals and families above the desires of oil and gas industry corporations to conduct business, even when there is evidence of harm that has occurred. We expect a higher standard from the EPA especially now while there is a federal administration in place that believes in the mission of the agency and the rights of the public to safe drinking water.

RDA believes Ms. Rindy and Protect PT sum up their argument well in the following paragraph:

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator “shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142.” The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

Thank you for your consideration of these comments.

Sincerely,

RDA Board of Directors,

Robert Cross, President
Barbara Jarmoska
Mark Szybist
Harvey Katz
Dianne Peeling
Eliza Whyman

Please Reject Disposal Injection Well Permit PAS2D702BALL

Russell Zerbo <rzerbo@cleanair.org>

Wed 7/13/2022 8:52 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear,

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the DEP Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API

#37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Thanks,
Russell Zerbo (he/him)
215.567.4004 x130
advocate
cleanair.org

Please Reject Disposal Injection Well Permit PAS2D702BALL

S Orenstein [REDACTED]

Tue 8/2/2022 3:37 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Subject: Please Reject Disposal Injection Well Permit PAS2D702BALL

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: [215-814-3278](tel:215-814-3278)

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

S Orenstein, MD

UIC Draft Permit Penneco Environmental Solutions PAS2D702BALL

Sabrina Fedel [REDACTED]

Fri 9/2/2022 6:10 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Mr. Hancharick:

As someone who grew up in Plum Borough and still owns property there, I am deeply concerned and opposed to the proposed second fracking waste injection well. As a former environmental attorney for the federal government, I understand the implications of wastewater in heavily populated communities, despite EPA's assurances that these wells are "safe." Further, the noise and air pollution is a serious issue for the area, both from a human health standpoint and a real property value standpoint. Allegheny County already has very poor air quality from western air flow. We don't need to exacerbate our air quality issues further with this type of activity.

There is both serious evidence of problems with fracking activities and wastewater (see, for example:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.waterboards.ca.gov%2Fwater%2Fwater_issues%2Fprograms%2Fbay_delta%2Fcalifornia_waterfix%2Fexhibits%2Fdocs%2Fshr%2Fpart2%2Fshr-2-111.pdf&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C5da789b17933484d018c08da8d0e790f%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637977390550330933%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&reserved=0 and

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nrdc.org%2Fsites%2Fdefault%2Ffiles%2Ffracking-air-pollution-IB.pdf&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C5da789b17933484d018c08da8d0e790f%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637977390550330933%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&reserved=0) and

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fserc.carleton.edu%2FNAAGTWorkshops%2Fhealth%2Fcase_studies%2Fhydrofracking_w.html&data=05%7C01%7CR3_UIC_Mailbox%40epa.gov%7C5da789b17933484d018c08da8d0e790f%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637977390550330933%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&reserved=0) and <https://cfpub.epa.gov/ncea/hfstudy/recordisplay.cfm?deid=332990>). EPA's own data shows that there are genuine hazards to individual sites, which EPA sweeps under the rug by suggesting that overall the picture is rosy and fine. That won't help the residents of Plum when it happens.

Furthermore, it has been seen time and again that environmental justice issues such as race and poverty impact the decision of companies to locate operations. Plum is not a wealthy district within Allegheny County, and it does not have the resources to properly supervise or fight for appropriate regulatory oversight. It is unfair to attempt to saddle Plum with any injection wells, let alone multiple ones.

Simply put, these wastewater injection sites, and fracking activities in general, are seriously bad for everyone except those who make a profit on them. The rest of us are left to deal with the health

problems and degradation of our real property value that these companies leave behind. And taxpayers will eventually be saddled with the cost of clean up once these companies have extracted their profits. As a former federal CERCLA attorney, I know this story all too well.

I fully understand that the lobbying arm of oil and gas has firmly secured the PA legislature, but the Federal government, and EPA Region 3 should be above this. We need EPA to stop downplaying the dangers to our environment from the Fossil Fuel Industry. Our planet is literally imploding all around us, while our government is taking baby steps to fight those who, science has told us for decades if not a century, are responsible. The scientific evidence is irrefutable at this point. Climate catastrophe is happening at a faster rate than even experts predicted. And yet EPA wants to saddle Plum Borough with the harms. It's wrong and I oppose it.

Please consider this email my public comment.

Thank you,

Sabrina Fedel

Please Reject Disposal Injection Well Permit PAS2D702BALL

Sandy Edgecombe [REDACTED]

Wed 8/24/2022 8:33 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminants.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet inspected the Sedat #2A well after recently granting the transfer of use permit for the Sedat #2A well. It is premature for the EPA to permit the Sedat #4A well before Sedat #2A is inspected.

The inspection frequency of the Sedat #2A well can be seen here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5992

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

Alexandra Edgecombe

[REDACTED]

[REDACTED]

(No subject)

Sarah French [REDACTED] >

Fri 6/24/2022 3:25 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Hello, I am a resident of the Oakland neighborhood of Pittsburgh, 15213, and I am unable to attend the scheduled meeting on PAS2D702BALL. I am against this, and all commercial disposal injection Wells in Pennsylvania. I would like local and state governments to reject this permit.

Especially to a company already in violation for other injection wells.

Thank you
Sarah French



BOROUGH OF OAKMONT

(412) 828-3232

767 FIFTH STREET

OAKMONT, PA 15139-1524

POLICE (412) 826-1578

FAX (412) 828-3479

www.oakmontborough.com

MEMBERS OF COUNCIL
LINDSAY OSTERHOUT, PRESIDENT
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ASSISTANT BOROUGH MANAGER
PHYLLIS J. ANDERSON

SOLICITOR
KATE DIERSEN

MAYOR
SOPHIA FACAROS

CHIEF OF POLICE
MICHAEL J. FORD

via email: R3_UIC_Mailbox@epa.gov

August 17, 2022

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

**Re: Proposed Permit PAS2D702BALL, Sedat #4A
Oakmont Borough Council Official Response.**

Mr. Hancharick,

During a recent public meeting of Oakmont's Borough Council, a speaker presented information regarding a proposed injection well in Plum Borough, a municipality abutting Oakmont.

On behalf of Council, we request that proposed Permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial Disposal Injection Well, Sedat #4A, located in Plum Borough be **denied** due to our concerns that the Pennsylvania DEP may be understaffed to adequately monitor the conditions of existing wells in the region.

Permit me to elaborate on our concerns.

We understand, based on information provided to Oakmont that the Applicant, Penneco Environmental Solutions, LLC, (hereinafter, "Penneco") has several violations and an unresolved permit application at adjacent injection wells, directly related to the current permit application.

A condition of Permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection stipulates the following:

"...The permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons."

During the last known Pennsylvania Department of Environmental Protection (DEP) file review of the Sedat #3A injection well (July 22, 2021), inspectors indicated that the "*Well operator failed to notify the DEP within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.*"



Oakmont Borough is a Certified Silver Community by Sustainable Pennsylvania

Since then, the DEP has not completed additional file reviews or site inspections of Sedat #3A. Unfortunately, it appears the opportunity to adequately monitor the conditions of disposal injection wells—even more than once per year—is a challenge to the DEP due to staffing. Anecdotally, Sedat 1A monitoring well has not been inspected since November, 2020.

Furthermore, Oakmont Borough Council obtained information that soon after Penneco received a Disposal Injection Well Permit from both the EPA and DEP, the DEP subsequently issued five (5) violations to Penneco for poor construction practices at the Sedat #3A well in August, 2020.

Based on DEP's necessary enforcement actions against Penneco as it has not met the conditions of its existing Disposal Injection Well Permit (Sedat #3A), Penneco should not be granted an additional permit for an additional Disposal Injection Well Permit (Sedat #4A).

An interesting condition of the permit for Sedat #4A reads as follows:

“...The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solutions Sedat #2A well (API #37-003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit.”

DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It would appear to be premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

Finally, the Injection Disposal Well Permit for Sedat #3A identifies Sedat #1A as a necessary monitoring well to ensure that Sedat #3A was properly functioning. As stated before, Sedat #3A has not been inspected since November, 2020, which was the well's first inspection after it was plugged in May, 2020 and granted a transfer of use permit.

Given the outline of violations publicly available for review and DEP's infrequent and irregular inspection schedule, the Department unfortunately does not have the resources to ensure that Penneco's injection disposal wells and monitoring wells at this site are properly functioning.



Again, Oakmont Borough urges the EPA to **deny** this permit application. On behalf of Oakmont Borough Council and the Honorable Mayor of Oakmont,

Respectfully,



Scot E. Fodi,
Borough Manager
BOROUGH of OAKMONT

C: Borough Council
Sophia Facaros, Mayor

See Next Page for additional distributions



I certify that a true copy of the foregoing document was distributed to the following individuals or entities:

Governor Tom Wolf
Lieutenant Governor John Fetterman
United States Senator Bob Casey
United States Senator Pat Toomey
United States Representative Connor Lamb
Pennsylvania Senator Jay Costa
Pennsylvania Senator Jim Brewster
Pennsylvania Representative Carrie DelRosso
Pennsylvania Representative Tony DeLuca
Pennsylvania Representative Brandon Markosek
Allegheny County Executive Rich Fitzgerald
Allegheny County Council Member Bethany Hallum
Allegheny County Council Member Samuel DelMarco, III
Allegheny County Council Member Nicholas Futules
Allegheny County Council Member Michelle Naccarati-Chapkis
Plum Borough Council
Harry Schlegel, Mayor, Plum Borough
Pennsylvania Department of Environmental Protection, Environmental Quality Board
PWSA
The Municipal Authority of Oakmont Borough

Dated this 17th day of August 2022



(412) 828-3232



Oakmont Borough is a Certified Silver Community by Sustainable Pennsylvania

Penneco Environmental Solutions, LLC Sedat #4A Attention Ryan Hancharick

Scot Fodi <boroughmanager@oakmontborough.com>

Wed 8/17/2022 2:09 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Good morning, Mr. Hancharick,

The attached correspondence is an official letter from the Council for the Borough of Oakmont regarding Sedat #4A.

Oakmont Borough Council directed me to provide copies to several individuals and entities.

Page 4 lists those who are to receive this official position from Oakmont Borough Council.

Respectfully,

Scot E. Fodi, Manager

Borough of Oakmont

767 Fifth Street

Oakmont, PA 15139-1524

Office: (412) 828-3232

FAX: (412) 828-3479

Text "Oakmont" to 63975 to sign up for alerts from Oakmont Borough



I am writing to you today regarding the Sedat 4A Injection Well

Scott Sieber [REDACTED]

Wed 7/13/2022 11:13 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Oakmont, and I am concerned about the proposed Sedat 4A Injection Well. I am concerned that this second well will further jeopardize my drinking water source and the Allegheny River, which my community and region relies on for clean drinking water. I demand that EPA keep our water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Scott Sieber
[REDACTED]

I am writing to you today regarding the Sedat 4A Injection Well

Seth Bush [REDACTED]

Thu 7/14/2022 11:13 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Allegheny County, and I am concerned about the proposed Sedat 4A Injection Well polluting our drinking water source, the Allegheny River. The existing Sedat 3A Injection Well already failed once after being in operation only a few months. How long do you think it will take for a second injection well to pollute our water? Adding a second injection well doubles the risk to our drinking water. I demand that EPA keep our drinking water safe by denying the permits for the Sedat 4A Injection Well.

Sincerely,

Mr. Seth Bush
[REDACTED]

Reject Disposal Injection Well Permit PAS2D702BALL

Stephanie Ulmer [REDACTED]

Mon 8/29/2022 9:45 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

Although the PA DEP has issued multiple violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well, the DEP is clearly not able to inspect and monitor this injection well with enough frequency to fully protect our groundwater supplies. For example, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020. And, to make matters more worrisome, Penneco Environmental Solutions, LLC has already proved that it is not timely in reporting, as required, the damage it has done to water supplies.

In short, Penneco Environmental Solutions has clearly demonstrated that it has not met the conditions of its existing disposal injection well permit for Sedat #3A, it should not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A. In addition, the EPA should at least wait until DEP has inspected the Sedat #2A since before granting a permit, considering that DEP has only recently granted Penneco Environmental Solutions the transfer of use permit and given their poor record of violations.

The proposed permit PAS2D702BALL should be denied by both the EPA and the DEP.

Stephanie Ulmer

[REDACTED]

[REDACTED]

Public comment on fracking waste injection wells in Plum, PA

Steven Tuell [REDACTED]

Mon 9/5/2022 8:31 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

?To whom it may concern:

I am a resident in suburban Pittsburgh, in Wexford: not that far from Plum: so this is a matter of particular concern to me. However, even if the proposed injection well was in a residential community far removed from my home, the same human rights issues would be involved. Access to clean drinking water is a clear public health concern. The existing site in Plum has already had negative impacts on the drinking water of residents in Plum. Until those negative impacts have been assessed and properly addressed, there certainly should not be a second site approved so close to the first. The EPA should reject this permit.

God's peace,

Dr. Steven Tuell

James A. Kelso Professor Emeritus of Hebrew and Old Testament
Pittsburgh Theological Seminary

Re: Public hearing

Tammy Murphy <tammy@psrpa.org>

Wed 6/29/2022 12:01 AM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Good evening -

Did the meeting begin at 7 p.m.? Will there be another opportunity to speak on this issue? Are you accepting written comment? If you are accepting written comment, when is it due and to which address should it be sent?

Take action with the Concerned Health Professionals of Pennsylvania!

<<https://www.psrpa.org/concerned-health-professionals>>

Thank you.

Sincerely,

Tammy Murphy, M.A., LL.M.

(she/her)

Advocacy Director

Physicians for Social Responsibility - Pennsylvania

1501 Cherry Street, Philadelphia, PA 19102

www.psrphila.org 215.749.0960www.facebook.com/PhilaPSR/ @PSRPennsylvaniaOn Mon, Jun 27, 2022, 5:29 PM R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov> wrote:

Good afternoon, there's no need to register in advance to speak at the hearing. We'll give instructions tomorrow evening during the hearing.

You can go virtually using the following link: <https://msteams.link/HWTU>

You may also join via telephone using the following information:

Call-in Number: (484) 352-3221

Conference ID: 530 160 499#

We look forward to hearing from you.

Best regards,

Kevin Rowsey (he/him)

Source Water & UIC Section

Water Division

U.S. EPA Region 3

Four Penn Center

1600 John F. Kennedy Blvd.

Philadelphia, PA 19103

From: Tammy Murphy <tammy@psrpa.org>
Sent: Monday, June 27, 2022 3:13 PM
To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>
Subject: Public hearing

Good afternoon -

I want to speak at the public meeting

"Underground Injection Control (UIC)

Program Notice of Draft Permit PENNECO Environmental solutions, PAS2D702BALL. How do I register to do so and how can I join virtually?

Take action with the Concerned Health Professionals of Pennsylvania!
<<https://www.psrpa.org/concerned-health-professionals>>

Thank you.

Sincerely,

Tammy Murphy, M.A., LL.M.

(she/her)

Advocacy Director

Physicians for Social Responsibility - Pennsylvania

1501 Cherry Street, Philadelphia, PA 19102

www.psrphila.org 215.749.0960

www.facebook.com/PhilaPSR/ @PSRPennsylvania

Please Reject Disposal Injection Well Permit PAS2D702BALL

Pearce, Timothy [REDACTED]

Wed 8/10/2022 1:49 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Ryan Hancharick

Source Water & UIC Section

U.S. EPA Region 3

Email: R3_UIC_Mailbox

Phone: 215-814-3278

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is “the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (“USDW”), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons.” During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the “Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution.” Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020.

Thank you for your attention.

Timothy A. Pearce, Ph.D., Curator of Collections & Head, Section of Mollusks
Carnegie Museum of Natural History
4400 Forbes Ave, Pittsburgh, PA 15213-4080, USA

[REDACTED]
<https://carnegiemnh.org/research/mollusks-malacology/>

I tell snail jokes: www.tiktok.com/@carnegiemnh

Snail Jokes 2020 compilation (14 min) <https://www.youtube.com/watch?v=v9hByyJBIws>

10/5/22, 9:15 AM

Mail - R3 UIC Mailbox - Outlook

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I am writing to you today regarding the Sedat 4A Injection Well

VALERIE KLAUSCHER [REDACTED]

Wed 7/13/2022 9:19 PM

To: R3 UIC Mailbox <R3_UIC_Mailbox@epa.gov>

Dear Source Water & UIC Section Ryan Hancharick,

I am a resident of Allegheny County. You must deny the permits for the proposed Sedat 4A Injection Well, which will almost certainly pollute our drinking water source, the Allegheny River.

Residents have reported horrible smells and pollution, excessive noise and truck traffic, water contamination and health impacts from the Sedat 3A Injection Well in Plum. Several residents have expressed concerns about the proposed Sedat 4A Injection Well, which would be located at the same site as the existing well.

The existing Sedat 3A Injection Well already failed once after being in operation only a few months. How long do you think it will take for a second injection well to pollute our water? Adding a second injection well doubles the risk to our drinking water. I demand that EPA keep our drinking water safe by denying the permits for the Sedat 4A Injection Well.

Deny the permit.

Sincerely,

VALERIE KLAUSCHER
[REDACTED]