Oral Comments on behalf of Food & Water Watch
Presented at SAB Hydraulic Fracturing Study Plan Review Meeting
3/07/2011

My name is Sarah Gingold. I am speaking on behalf of Food & Water Watch, a nonprofit consumer organization that advocates for common sense policies that will result in healthy, safe food and access to safe and affordable drinking water.

Thank you for giving us the opportunity to comment today on the Environmental Protection Agency's draft plan to study the potential impacts of hydraulic fracturing on drinking water resources.

First of all, we would like to commend the Science Advisory Board and Environmental Protection Agency for taking on this study. It is extremely important that the EPA use its authority to thoroughly and publicly document the dangers of this technology through on-site, hard data collection so that our public officials have the scientific justification for policies that protect the public. We are happy to see the EPA taking action in this regard.

However, we are concerned that the current study plan does not provide for a thorough analysis of human health risks from hydraulic fracturing related to wastewater treatment because it does not address the specific context in which this treatment is proposed to occur.

This issue is of particular concern to Food & Water Watch because it relates to the extensive work we have done advocating for public drinking and wastewater infrastructure. Today, wastewater systems around the country are aging and in need of repair, but lack the funding to perform needed maintenance. In fact it was our work on public infrastructure that first brought hydraulic fracturing to our attention, because everyone in New York who was talking about water was also talking about fracking.

In retrospect, it makes sense that we would learn about fracking through our infrastructure work in New York, because the wastewater treatment issue is specific to the Marcellus Shale region. In the west, drillers do not use treatment plants to dispose of produced waters. They inject the fluids underground. But when the industry moved east, they found that it was too expensive to ship the waste to sites that were suitable for injection. So they send the toxic liquid to treatment plants instead.

Unfortunately, this new method poses great risks to human health. If the toxic and radioactive chemicals, as well as salty dissolved solids, are not removed, they get dumped into waterways, where they could damage drinking water supplies. At present, the treatment facilities in this region are not adequately equipped to remove these substances. In 2009, Propublica reported that no wastewater treatment plant in Pennsylvania could remove Total Dissolved Solids from the water,

and it was unlikely that new plants would be able to do so by 2011. Just this past week, the Associated Press reported that Pennsylvania has a “few plants” that specialize in treating this type of waste, but they are unable to remove the dissolved solids and chlorides. Meanwhile, 14 percent of the wastewater in Pennsylvania is “being sent to municipal sewage plants that lack the ability to remove contaminants as efficiently.”

Given this context, if the study is going to ask, what are the possible impacts of inadequate treatment? It must also ask, what level of treatment is needed to ensure public safety? And, is this level of treatment possible given the current status of infrastructure in the specific locations where it is proposed?

Laboratory studies will not be sufficient to answer these questions. The EPA must ask questions such as, what is the volume of water that each well would ship to a treatment plant? Where exactly are these treatment plants? What is the current capacity of these plants? How well do they treat these substances? What will happen if the volume increases dramatically? What effect will running this waste through these plants this have on the treatment system? Who will pay for the additional wear and tear?

Already, treatment plants around the country are overburdened and underfunded. They are struggling to deal with new threats to the public from emerging contaminants in pharmaceuticals and personal care products that are increasingly making their way into our water systems and cannot be adequately removed with existing technology. Many of the potential health risks are still unknown, as is how their interactions with each other may multiply those potential risks. The situation nationally is already pretty scary. It becomes even scarier when hydraulic fracturing waters are added to the mix. We sincerely hope that the EPA will expand the scope of its current study to fully address these issues.

Thank you again for your consideration. We look forward to reading the results of your study.