

ATTACHMENT 3



3344 Route 130, PO Box 137
Harrison City, PA 15636

August 30, 2022

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

My name is Gillian Graber and I am the executive director of the non-profit organization Protect PT. Our organization would like to emphasize that the permit requested by Penneco Energy Solutions 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 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 (henceforth referred to as EPA).**

In order to protect the health of our nation from contaminants in our drinking water, the **Safe Drinking Water Act (SDWA)** was established in 1974. This act prohibits substantial endangerment of human health through the SDWA which establishes the framework for the Underground Injection Control (UIC) system. This system is meant to ensure injection activities will not endanger underground sources of drinking water.

The Sedat 4A well presents devastating risks to several downstream public drinking water systems on the Allegheny River and the potential to contaminate underground sources of drinking water.. Following a casing failure at the existing Sedat 3A injection well, residents experienced contamination to their drinking water. Residents voiced that they never encountered this issue before the casing failure, but Penneco refused to take responsibility. If Sedat 4A fails, it could potentially affect the Pittsburgh Water and Sewer Authority, which provides water to hundreds of thousands of Pittsburgh residents and businesses.

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 already experienced by Sedat 3A.

We question EPA's ability to protect the region's drinking water and properly adhere to the SDWA. This is a concern of ours because the EPA has not asked Penneco to address how they plan to protect us from another casing failure. The EPA accepting Penneco's integrity test that just barely passed is reckless. We also tax the EPA with a failure to require Penneco to address their calculations of the geology under Plum, a community that has already experienced a history of extractive practices exploiting the resources and leaving the cleanup for future generations

Additionally, over 50 years ago the EPA agreed to abide by the **Clean Air Act**, taking on the responsibility of “protect(ing) public health and welfare from any actual or potential adverse effect which ... may reasonably be anticipated to occur from air pollution”.

Our organization has been continuously monitoring ambient volatile organic compounds (VOCs) on land owned by one local resident approximately 500 feet south of the Sedat 3A injection well. Our recent assessment of the data from the monitor shows that residents living on Old Leechburg Rd are at a high risk of acute health effects from VOC exposure and could potentially experience long-term negative effects due to proximity to the injection well. This research shows 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** deny further permitting for injection wells if they have any interest in avoiding further damage to the lives of more human beings.

Therefore, we again emphasize that the issuing of permits for the Sedat 4A well is a failure by the EPA to adhere to the SDWA and Clean Air Act and is a violation of applicable laws, regulations and our right to clean air and water that is unique to our commonwealth.

We demand EPA’s adherence to their own baseline of **minimizing adverse impacts of pollution activities in our water and air. This can be done** by denying the permit for the Sedat 4A and withdrawing the permit for the Sedat 3A. 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,
Gillian Graber
Executive Director
Protect PT