

February 26, 2011

Environmental Protection Agency
The Science Advisory Board Staff Office
Ronald Reagan Building
1300 Pennsylvania Avenue
Suite 31150
Washington, DC 20004

Attn: Mr. Edward Hanlon
Designated Federal Officer

RE: Comments on Draft EPA SAB Hydraulic Fracturing Study Plan

Dear Mr. Hanlon:

Below are my comments, which I am submitting as an individual citizen extremely concerned about the potential public health impacts, short term and long term, of hydraulic fracturing, particularly through contamination of drinking water. The importance of the credibility of the EPA's proposed research cannot be overemphasized.

1. The composition of the panel, and potential conflicts of interest, will have a powerful effect on both the meaningfulness of the study and its credibility with the public. Please have each member of the panel disclose, for the public record, any sources of funding to them personally and to their employer (including, for example, university research grants, chairs, donations) by any entity either in or connected to the natural gas drilling industry (including financial institutions), for the last 10 years.
2. Chapter 6. I think "five to eight" case study sites is an insufficient number.
3. Chapters 6 and 8. The issue of what chemicals are used and their toxicity (Section 6.2) is of the utmost importance. To me, from a public health perspective it is completely unacceptable that the industry is not required to identify ALL the chemicals used; if some are "proprietary," then a mechanism could be created to keep those confidential even though known to the EPA for its purposes of protecting public safety. Secondly, the draft plan's coverage of how toxicity is to be studied doesn't seem to give attention to the INTERACTION of chemicals* and how that can multiply their toxic effects to humans (particularly young, developing humans such as children and fetuses). I refer you to the work of scientists such as Dr. Theo Colborn of Colorado, who has published on this topic (see, e.g., www.endocrinedisruption.com).

* (and their cumulative body burden)

4. I think baseline testing of the water of ANY site should be a prerequisite for any hydraulic fracturing operation. I realize this may be beyond the scope of your plan, but I include it anyway!

Thank you,

Nicola Coddington
57 Hillside Terrace
Irvington, NY 10533