

From: Donald Hassig
Sent: Wednesday, November 20, 2013 4:46 PM
To: Hanlon, Edward
Subject: Cancer Action NY Comments for 11/20/13 Meeting of SAB Hydraulic Fracturing Research Advisory Panel

Cancer Action NY Comments for 11/20/13 Meeting of SAB Hydraulic Fracturing Research Advisory Panel

I am aware of many instances of damage to surface and ground water quality attributable to high volume hydraulic fracturing (HVHF). Numerous such instances of damage to water quality are described in the documentary film "Gasland". Additionally, I have read newspaper articles and encountered firsthand accounts of instances of damage.

It is not surprising that such instances of damage are being observed and reported. HVHF is a heavily polluting activity due to the use of vast quantities of toxic chemicals in the fracturing fluid and the release of toxic chemicals that were once isolated in shale formations. The toxic chemicals associated with HVHF are likely to find their way into ground and surface waters due to the presence of avenues whereby water can move between upper strata and lower strata. Fracturing of shale formations that lie deep within the Earth impacts water in upper strata and on the surface of the Earth because there are cracks and openings that communicate between the lower fractured strata and the upper strata and surface where water is present. Movement of chemicals and water through these cracks and openings allows mingling of chemicals and water. This is how water becomes contaminated with chemicals associated with HVHF.

Scientific research follows human observation. It is good that scientists would gather information on the damages to water that are caused by HVHF. This information will certainly serve to support the conclusion of many who are aware of the observed instances of water contamination their conclusion being that HVHF is a flawed technology, which should be banned throughout the world. It is the responsibility of the Science Advisory Board (SAB) Hydraulic Fracturing Research Advisory Panel (HFRAP) to take actions that will insure that the Environmental Protection Agency (EPA) develops policies for action on HVHF that utilize the best available science.

Based upon my past experiences with the EPA and the SAB Dioxin Review Panel (DRP), I have concluded that it is likely that the HFRAP will not take the actions that would insure science based action by EPA.

EPA is totally controlled by the petrochemical industry. The HFRAP was set up for the purpose of creating the illusion that scientific knowledge was being given a hard look by EPA. In fact, EPA answers to the petrochemical industry and will act to minimize public concerns about HVHF facilitating continued use of this energy extraction technology. EPA will help the petrochemical industry continue to utilize HVHF in the United States.

The DRP referred to above failed to take the actions necessary to insure that EPA developed science-based policies on dioxins. During the course of the finalization of the agency's dioxin reassessment the DRP repeatedly failed to question EPA actions that lacked a scientific basis. In 2006, EPA published a paper in which it set forth a much lower estimate of dioxin exposure. The lower exposure number was arrived at by changing the way that dioxin concentrations in foods were calculated. It is common practice to assign the quantity of half the limit of detection to samples in which no contamination is detected. EPA took food contamination data that had been used to assess dioxin exposure and assigned a value of zero to all samples that were no detects. Exposure went from 1 picogram dioxin TEQ per kilogram body weight per day to 0.6 picogram dioxin TEQ per kilogram body weight per day. This drop in exposure was not real. It came about only as a result of the change in value of the no detect samples. EPA used the lower exposure value to argue that dioxin exposure was continuing to decrease in the 2000s. The DRP did not question this artificial exposure reduction. EPA began using the new exposure number as if it were the best measure of exposure available.

In 2003, EPA published a draft of the dioxin reassessment that described a 1 in 1000 excess cancer risk associated with dioxin exposure at the 1 picogram dioxin TEQ per kilogram body weight per day value. This information caused much dissatisfaction among corporations in the chemicals and foods sectors of the economy. When EPA published the final draft of its dioxin reassessment in February 2012, it left out all information on dioxin exposure cancer risk. EPA has promised to publish a cancer part of the reassessment, but no action has been taken to do so. Ten years have passed since EPA first published information describing dioxin exposure cancer risk, which was higher than what is acceptable. EPA has made no further effort to warn the public of the dioxin exposure cancer hazard. The DRP has not expressed any concern about this failure on the part of EPA.

When EPA published the final draft of the non-carcinogenic effects part of the dioxin reassessment, it stated that the food supply was safe. This is not a science-based position. Experts in the science of dioxin exposure and health effects have concluded that current levels of dioxin exposure impose more than an acceptable quantity of cancer risk. The DRP has not questioned EPA on its statement that the food supply is safe.

The chairperson of the DRP was Dr. Timothy Buckley. Dr. Buckley was given a job in the EPA after the final non-carcinogenic effects part of the dioxin reassessment was published. I requested that Dr. Buckley answer questions about the lack of attention to science in the dioxin reassessment. Dr. Buckley declined to answer these questions. I have contacted all of the members of the DRP and not a single member has been willing to answer my questions.

The DRP is a group of people who will not challenge EPA actions that go against scientific knowledge and the best interests of the public. EPA selected these people because they had demonstrated their willingness to go along with actions by EPA that were counter to science but favorable to corporations. The DRP failed in its responsibility to insure that EPA follow science in all of its dioxin policy development actions. I suspect that the HFRAP will also fail in its responsibility to keep EPA on the science. This is because I know that EPA is controlled by the petrochemical industry and the other powerful corporate sectors. EPA is the corporations.

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