



## Tompkins County Water Resources Council

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[www.tompkins-co.org/planning/committees.html](http://www.tompkins-co.org/planning/committees.html)

April 15, 2010

Mr. Edward Hanlon, Designated Federal Officer  
EPA Science Advisory Board (1400F)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington DC 20420

Re: EPA Hydraulic Fracturing Research Study

Dear Mr. Hanlon:

It has come to our attention that EPA is soliciting public input on the scope of EPA's review of hydraulic fracturing in relation to risks to groundwater. We commend the United States Environment Protection Agency for initiating this crucial investigation. On behalf of the Tompkins County Water Resources Council, I would like to submit the following comments for consideration of the Scientific Advisory Council (SAC) in their review of the scope of the hydraulic fracturing study.

We would like to urge EPA to study risks to surface water as well as groundwater from the shale gas industry. There are many opportunities for accidental spills of hydraulic fracturing fluids and flowback from pipes, hoses, valves, overflowing pits and trucks. Indeed, while we are not aware of any formal risk assessments, it seems possible that risks to surface water from accidental spills may be as great as or greater than risks to groundwater from hydraulic fracturing. Further, surface water is ultimately impacted by contaminated groundwater feeding streams and lakes.

Surface water is also impacted by the disposal of gas well waste fluids by POTWs. The screens in place for detecting and pre-treating toxic chemicals are based on the PPL of 126 chemicals and are inadequate to the task of screening for the 250 to 400 chemicals that might be found in hydraulic fracturing fluid, according to the draft Supplemental Generic Environmental Impact Statement prepared by the NYSDEC. This means that disposal of flowback by POTWs creates a substantial risk of contaminating surface waters with toxic chemicals that go undetected by the screening process. Even if contaminants are diluted to levels that are currently considered acceptable with respect to human health, there is a risk of ecosystem impacts due to bioaccumulation and biomagnification through the aquatic food web over the long term. The NYSDEC's draft Supplemental Generic Environmental Impact Statement proposes using toxicity bioassays as an additional screen for hazardous chemicals, however, the implementation of the bioassay screen is inadequate as proposed.

We would like to urge EPA to also consider air pollution, which is an inevitable consequence of shale gas extraction as currently practiced.

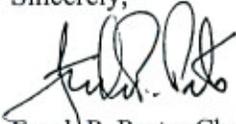
In addition, we would like to urge the EPA to investigate the feasibility of using alternative fluids for hydraulic fracturing, such as gases.

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We have attached comments submitted to the NYSDEC concerning the draft SGEIS as well as additional comments submitted to Governor Paterson concerning issues outside of the scope of the draft SGEIS.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank P. Proto". The signature is stylized and cursive.

Frank P. Proto, Chairman  
Tompkins County Water Resources Council

Encls.