

To: Mr. Benton Best, Emergency Management Coordinator (EMC)

Tioga County Department of Emergency Services

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June 20, 2017

From: Ms. Therése Aigner, CES, CEC; Chair - Regulatory Oversight Group (ROG)

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Subject: Public Comment - Tioga County 2017 Hazard Mitigation Plan "DRAFT" <<<<----/////

1.0 Section 4.4.2 [Ranking Results]

1.1 Table 49 - Risk Factor Assessment

1.1.1 Section 4.3.16 to 4.3.16.1 should be expanded to indicate Hazard as Industrial , Petroleum & FRAKING Well Site Incident: Hazwaste [Toxic, Radiation (TENORM/DU)]. Ref. File(s): FRAK 5.TA [PADEP list of (78) families of chemicals used i Hydraulic Fracturing in Pennsylvania] & FRAK 39.TA/P-8/P-13 to 30 [Actually represents the (750) chemicals and/or compounds used in FRAKING operations. There are (650) of these that contain chemicals and/or compounds that are known CARCINOGENS. This information is part of Act 13 legal documents filed in Pennsylvania.

1.1.2 Risk Factor should be increased to [3.2].

2.0 Section 4.2.2 [Summary of Hazards]

2.1 Should read; Industrial, Petroleum & FRAKING Well Site Incident(s).

2.1.1 Should read in a second paragraph: Placarding in transit of HAZMAT (including Class 1 Explosives) Hazwaste [Toxicity & Radiation (TENORM/DU)] per PA Title 75 [Chapter 83]; also U.S. DOT 49 CFR 171 to 178, 383, 385,397. This also includes HM-181 requirements.

2.2 Transportation Accidents & Transportation HAZMAT.

2.2.1 The following should be added to shed light with regard to the consequences of mismanagement of HAZWASTE [Toxicity & Radiation (TENORM/DU)].

2.2.2 Self Monitoring Report (SMR); [Ref. File: FRAK 10.TA]. This SMR was an investigation & review of a 26R Annual HAZWASTE Summary to the amount of 755,580 Gal. The Lab Analysis indicated (53) chemical HAZWASTES, along with (7) of them that were Radiologicals [Radium-226, Radium-228, Gross Alpha, Gross Beta, (2) Uranium, Thorium]. It should be noted that there was a proper Chain of Custody (COC) here.

2.2.3 Self Monitoring Report (SMR); [Ref. File: FRAK 11.TA]. This SMR investigated Radiation exposure in Roentgens per hour (R/Hr.). Sample dates were from 6/29/2012 to 11/24/2014 and indicated exposure at 12.3 R/Hr. Be mindful that Radiation exposure is Cumulative. Thus at 12.3 R/Hr. x 7.5 hours; the person would have 92.25 hours to evacuate. It should be noted that there was a proper Chain of Custody (COC) here.

2.2.4 Self Monitoring Report (SMR); [Ref. File; FRAK 15. TA]. This SMR investigated Radiation exposure in Roentgens per hour (R/Hr.) Sample date was 3/29/2013 (Well Site Pads at distances of 8 to 20 Ft.) and indicated exposure at 0.2 R/Hr. to 0.4 R.Hr. Be mindful that Radiation exposure is Cumulative. Thus at 0.4 R/Hr. x 12 hours x 6 day work week; the persons would have 28.8 days to evacuate. I should be noted that there was a proper Chain of Custody (COC) here.

2.2.5 On 4/23/2013 & 4/25/2013 the ROG received documentation [Ref. File: FRAK 16.TA]; that there had been HAZWASTE (TENORM/DU) rejected at a land fill. The Radioactive Waste in question was Radium-226; detected at 96 Microrem. It should be noted that any Radioactive Waste above 10 Microrem cannot be accepted. This HAZWASTE (TENORM/DU) came from FRAKING Well Sites.

3.0 PEOPLE (their Well Being, their Safety, their Property Rights; {The Most Important Part of The Equation}):

3.1 On 2/27/2013 the ROG issued a Self Monitoring Report (SMR); [Ref. File: FRAK 14.TA] with regard to Mr. Randy Moyer of Portage, PA. He is AT HARM. His condition is typical of what happens when persons are exposed to the HAZWASTE [Toxicity & (TENORM/DU)] that are generated during FRAKING operations. Do chat with Randy Moyer on facebook.com/Gas Vets/info; {this is quite Graphic}.

3.1.1 The "Diagnosis" here is: Melkersson-Rosenthal Syndrome (MRS); [Ref. File: FRAK 45.TA MRS].

3.1.2 As of this date there are 19,518 persons AT HARM.

3.1.3 As of this date there are 39 Deaths resulting from the exposure to HAZWASTE [Toxicity & (TENORM/DU)].

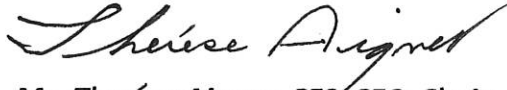
3.1.4 With regard to "Brown Fields"; 1,371 have been the result of "mismanagement" of the HAZWASTE [Toxic & (TENORM/DU)] that is generated at the FRAKING Well Sites.

3.1.5 The Negative Impact these continuing Placarding Violations and the continuing mismanagement of HAZWASTE [Toxic & (TENORM/DU)] have on people, homes, farms and businesses; represents the cost of "Not Doing".

4.0 Do keep in mind, that there "No Exemptions" to HAZMAT placarding requirements (as out lined in 2.1.1) or to the HAZWASTE regulations [Resource Conservation and Recovery Act of 1976 (RCRA)].

In closing; we (the ROG) thank you for the scheduled Public Meetings (2/2/2017 & 6/1/2017) and this opportunity to participate in the Public Comment Period via this submission.

Sincerely,



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File: FRAK 84.TA

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