MPN
Maryland Pesticide Network

Environmental Health Bureau, Marcellus Shale Comments
Maryland Department of Health and Mental Hygiene
201 W. Preston Street, Room 327
Baltimore, MD 21201
Email: dhmh.envhealth@maryland.gov

October 3, 2014

Re: Comments on the Maryland Marcellus Shale Public Health Study FINAL Report

POSITION:
While the Maryland Pesticide Network, strongly supports the 52 recommendations outlined in the study, we submit the following comments for consideration by the Governor in making his decision.

COMMENTS:
We understand that Under Governor O'Malley's executive order, the state is studying the effects of hydraulic fracturing and developing best management practices (BMPs) for this process to minimize the effects. In these practices, we need to know what chemicals that include pesticides are being used in the hydraulic fracturing practices.

We know that a typical fracking gas well can shoot up to 100,000 gallons of chemical additives - **including pesticides** - into the ground. Some of these additives are known or suspected carcinogens. For example, a biocide pesticide used in fracking, is lethal to Bay oysters. In people, this chemical can be corrosive to the eyes, can kill skin tissue when exposed at high levels and is a developmental toxicant in rabbits from which scientists extrapolate possible public health impacts.

Scientists need to be able to assess potential links to public health impacts to a number of these fracking chemicals, but companies are not required to disclose what they use. The public has a right to know when and what toxic chemicals are being injected into our lands. When it comes to fracking, we're left in the dark**.**

In alignment with the Governor's commitment to protecting public health, we expect that Maryland will take a commonsense approach to protect the health of Maryland families by bringing transparency to the oil and gas industry. We ask our government to support and ensure our right to know about pesticides and other chemicals used in fracking. We urge this commission to recommend the O'Malley Administration ensure full disclosure of the potentially dangerous chemicals fracking wells could inject into Maryland lands.

While we don't know everything about its environmental impacts yet, any process where you're going to be shooting a huge amount of water, sand, and chemicals including pesticides- into our lands -- and where there are many reports of damaging health effects and animals dying -- should be a top priority for government oversight**..**

The risks posed by these chemicals are of great concern. A hydraulically fractured gas well typically requires between 60,000 and 100,000 gallons of chemical additives to be injected n to the ground. Some of the other chemicals are also known or suspected carcinogens, endocrine disrupters, neurotoxins, or otherwise toxic to humans.

In many instances, there is little or no information on the health effects of the chemicals being used. Evidence indicates that hydraulically fractured wells are leaking at unacceptably high rates, and

these leakage rates will increase over time. **The health of our communities, future of our lands, and survival of our wildlife depends on what Maryland decides to do with the concerns expressed in this Health Study.**

We applaud the administration for working closely with the various interest groups in the development of best management practices (BMPs) for fracking in Maryland. They need to know that we are behind them in supporting their efforts to find the best management practices, keeping in mind that BMP must be based on science and shown to be effective in protecting both public health and the environment.

We ask that the following items specifically be addressed by the Governor, prior to making any decisions on Marcellus Shale 'Fracking' in Maryland to protect the health of Maryland families and to bring transparency to the oil and gas industry. Our proposal has six important elements:

1. Chemical formulas and other agents injected into our environment must not be subject to disclosure restrictions under trade secret regulations.

2. Drilling operators must report the chemical ingredients and concentrations they use to a publicly accessible on-line database managed by the Department of Health and Mental Hygiene (DHMH).

3. Drilling companies must provide comprehensive data to DHMH, including toxicological profiles and epidemiological evaluations of chemicals and agents used in the production of natural gas, in addition to information on chemical changes that may occur as a result of the hydraulic fracturing of the well, including information on chemical reactions to other chemicals or substances.

4. Maryland must establish a process to ensure that health professionals could expeditiously obtain and share information needed to treat patients and to report public health concerns.

5. Maryland must prohibit non-disclosure agreements between drillers and local residents that restrict the ability of residents to discuss environmental or health issues associated with natural gas production.

6. Hydraulic fracturing companies must pay for the costs of these programs through permitting fees.

CONCLUSION

We applaud the Maryland Department of the Environment (MDE), Department of Natural Resources (DNR) and Department of Health and Mental Hygiene (DHMH) for working closely with the various interest groups in the development of best management practices (BMPs) for hydraulic fracturing in Maryland. However, the draft BMPs continue to create unnecessary barriers to understanding the potential health risks caused by the injection of hydraulic fracturing chemicals into the environment.

The risks posed by these chemicals are not hypothetical. A hydraulically fractured gas well typically requires between 60,000 and 100,000 gallons of chemical additives to be injected into the ground. Some of these chemicals are known or suspected carcinogens, endocrine disrupters, neurotoxins, or otherwise toxic to humans. In many instances, there is little or no information on the health effects of the chemicals being used. Evidence indicates that hydraulically fractured wells are leaking at unacceptably high rates, and these leakage rates will increase over time.

We appreciate your attention to this issue and the opportunity to submit public comments on the public health study and hope that you will support this common sense proposal.

Respectfully,

Ruth Berlin
Executive Director