

**Abbreviated version – comments to US Army Corps re GreenHunter barge dock proposal LRH-2013-848-OHR.**

**Be sure to include LRH-2013-848-OHR in your subject line.**

U.S. Army Corps of Engineers  
ATTN: CELRH-RD-N  
Public Notice No. **LRH-2013-848-OHR**  
502 Eighth Street, Huntington, West Virginia 25701-2070

*Via email to Teresa Spagna, [teresa.d.spagna@usace.army.mil](mailto:teresa.d.spagna@usace.army.mil)*

**RE: Comments on Sect. 10 Permit Application #LRH-2013-848-OHR  
(GreenHunter Meigs County Docking Facility)**

Dear Ms. Spagna:

I hereby submit my comments in strong and informed opposition to U.S. Army Corps of Engineers issuance of a permit to GreenHunter Water, LLC for construction and operation of a barge unloading and pipeline facility in Meigs County, Ohio, to deliver “bulk liquids” generated by hydraulic fracturing (“fracking”) operations to upland facilities.

I request a public hearing and an Environmental Impact Statement (EIS) on this matter, owing to its significant, likely or even certain and largely irreparable impacts, especially on public water supplies, water conservation, and air and water quality as well as on public safety and the needs and welfare of the people throughout the eleven-state region who would all be affected by impacts of the project. The unloading and storage of vast quantities of highly hazardous, highly flammable, explosive, toxic radioactive chemicals[1] on the Ohio River are a matter of extreme public interest. In addition to chemicals used in the drilling and fracking process, mercury and other heavy metals, high salinity (chloride at up to 196,000 mg/l), radioactivity (for example, EPA reports liquid Marcellus Shale waste to contain radium 226 at concentrations of up to 16,030 pCi/l; the MCL is 5 pCi/L), and hydrocarbons are at significant levels in frackwaste.[2].

More than 3 million people rely on drinking water supplies downstream of this project. Vast volumes of unidentified and unidentifiable mixtures of highly toxic, radioactive material would likely cause untold and irreparable catastrophe from barge accidents, explosions during off-loading, leaks and spills, which are increasingly common. Spills, leaks, explosions and fires are occurring with increasing frequency at frack chemical and frackwaste transfer sites. They are therefore likely occurrences if this project were to be permitted. Chemical mixtures in the recent week-long Monroe County frackpad fire included chemicals for which testing protocols are not even developed. How can

downstream water suppliers know whether these chemicals are in their systems if there are no testing protocols yet available? How can firefighters know how to handle emergencies? The C-8, Elk River, Toledo, and Opossum Creek 70,000 fishkill disasters are all ongoing disasters that would be dwarfed by the scale of disaster that could occur at this facility.

The project has no benefits to the region. Its reasonably foreseeable detriments are of great public consequence and must be considered in a public hearing and an EIS.

I look forward to notice from you of further opportunities for public comment and public hearings in communities that would be affected by this proposal.

**NAME**  
**COUNTY and STATE**

[1] See for example U.S. House of Representatives Committee on Energy and Commerce, Minority Staff, *Chemicals Used in Hydraulic Fracturing* (April 2011), identifying 750 chemicals used in hydraulic fracturing, including 29 chemicals that are known carcinogens, regulated under the Safe Drinking Water Act, or listed as Hazardous Air Pollutants; US General Accountability Office, *Information on the Quantity, Quality, and Management of Water Produced During Oil and Gas Production*, GAO-12-56, January 2012; PADEP “Permitting Strategy for High Total Dissolved Solids (TDS) Wastewater Discharges,” April 11, 2009; Warner, N.R. et al, , *Impacts of Shale Gas Wastewater Disposal on Water Quality in Western Pennsylvania?*, **Environ. Sci. Technol.**, 2013(47):11849–11857 ([pubs.acs.org/doi/abs/10.1021/es402165b](http://pubs.acs.org/doi/abs/10.1021/es402165b))

[2] New York State Department of Environmental Conservation, Revised Draft Supplemental Generic Environmental Impact Statement on the Oil, Gas, and Solution Mining Regulatory Program, Well Permit Issuance for Horizontal Drilling and High-Volume Hydraulic Fracturing to Develop the Marcellus Shale and other Low-Permeability Gas Reservoirs, September 2011, Table 5.9; Appendix 13; Marvin Resnikoff, Ph.D., Radioactive Waste Management Associates, “Comments on Marcellus Shale Development”, October 2011; USEPA letter from Shawn M. Garvin, Regional Administrator to The Honorable Michael Krancer, Acting Secretary, PADEP, 3.7.11; US General Accountability Office, *Information on the Quantity, Quality, and Management of Water Produced During Oil and Gas Production*, GAO-12-56, January 2012.