

COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE ENVIRONMENTAL HEARING BOARD

SIRI LAWSON, Appellant :  
:  
: EHB Docket No. 2017-051-B  
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COMMONWEALTH OF :  
PENNSYLVANIA, DEPARTMENT :  
OF ENVIRONMENTAL :  
PROTECTION, Appellee :  
:  
and :  
:  
HYDRO TRANSPORT, LLC, :  
Permittee, :  
:  
and :  
:  
FARMINGTON TOWNSHIP, :  
Intervenor :  
:  
and :  
PENNSYLVANIA STATE :  
ASSOCIATION OF TOWNSHIP :  
SUPERVISORS :  
Intervenor :

AFFIDAVIT OF SIRI LAWSON  
AS MEMBER OF DAMASCUS CITIZENS FOR SUSTAINABILITY, INC.

I, Siri Lawson, do hereby affirm and state that:

1. In 2009 my husband and I moved to our current residence on Lindell Road which is in Farmington Township, Warren County, PA. Lindell Road is an unpaved, dirt road. Most of the roads in Farmington Township and those surrounding Lindell Road are unpaved dirt roads.

2. In 2011, Farmington Township began allowing Lindell Road to be repeatedly spread with oil and gas wastewater (brine). I counted over 30 loads of brine spread on Lindell Road during 2011.

3. My husband and I complained verbally to Farmington Township about the excessive brine spreading. I wrote complaint letters to Farmington Township Board of Supervisors, the PA Department of Environmental Protection and the federal Environmental Protection Agency. The local newspaper ran an article about the brine situation. After each complaint Farmington Township would assure us that Lindell Road would not get brined. The brining was not completely stopped and has continued through 2017.

4. I react acutely to the brine spreading with wheezing, infection and many other symptoms. In 2011, when they began the excessive spreading in earnest, I was diagnosed with life-threatening adrenal insufficiency. I developed such acute gastric reflux that radical surgery was prescribed. I developed abnormal nodules and cysts in my thyroid, liver, breasts, ovaries, lungs and sinus. I developed abnormally high ParaThyroid and eosinophil levels.

5. In 2012 the number of loads of brine spread on Lindell Road dropped to seven. In late 2012, my husband, Wayne, had two back to back heart attacks. He was hospitalized for 18 days and received multiple stents. He was asked on the operating table if he had been exposed to chemicals as this was the type of heart attack linked to chemical exposure.

6. By my count, I noted five loads of brine spread on Lindell Road in 2013.; In 2014, I counted seven loads of brine spread. In 2015, there were multiple days in July and August when brine was spread on Lindell road. After each load either my husband or myself contacted the Township to complain. There were multiple occasions when I contacted the PA Department of Environmental Protection. I experienced adverse health impacts similar to those described above and below during each brine spreading event.

7. Despite aggressive treatment, my adrenal insufficiency continued to worsen. Persistent angina sent me to a cardiologist. I developed a fibromyalgia-type syndrome, a rib-cracking cough and neuropathy. I had no ability to fight off respiratory infections. Continued exposure to brine worsened these conditions.

8. In 2016, I was treated by doctors from Cleveland Clinic. My exposure to endocrine disrupting chemicals from brine was noted and discussed. Endocrinologists at Cleveland Clinic changed the diagnosis of adrenal insufficiency to adrenal suppression. I was told I had developed iatrogenic Cushings disease. I had been being treated with high doses of steroids which are

the standard treatment to control inflammatory and allergic reactions like I exhibited after exposure to each brine event. I had began reacting to the high steroid doses. I could no longer use steroids as a safe treatment for environmental exposures, injuries or illness. Steroids can - or will - now kill me.

9. In August of 2016, after Lindell Rd got brined. I had a violent response. For nearly 10 days, especially when I got near the road, I reacted with excruciating eye, nose and lung burning. My tongue swelled to the point my teeth left indentations. My sinus reacted with a profound overgrowth of polyps, actually preventing nose breathing. In September of 2016 Lindell Road again got brined. Again I violently reacted. The polyps required surgical intervention and in December 2016 I had sinus surgery, skin cancer surgery and a suspected cancerous cervical polyp removed. Earlier in the year, a large cyst in my leg was removed. During this time period, two of my female dogs each had a large polyp-like growth on their external genitalia.

10. In June of 2017, Farmington Township graded and raked Lindell Rd. They left behind inches of loose brine saturated road dirt. That loose brine saturated road dirt caused a tremendous dust issue. Water courses along Lindell turned nauseating colors after run-off events.

11. I reacted to the dust by re-growing the recently surgically removed nasal polyps. I experienced profound wheezing, coughing and subsequent sinus, ear and lung infections. My Ear Nose and Throat specialist opined the polyp re-growth

combined with my inability to tolerate large doses of steroids left me with no viable options for treatment. In July 2017 Lindell Road got brined once. I reacted as I had in prior brine events. I was in misery.

12. My doctor asked me to join a research project at University of Pittsburgh Medical Center after the dust exposure, I would be tested for ciliary dyskensia. It was found I had developed severe secondary ciliary dyskensia. I am unable to flush mucus or bacteria or viruses out of my system. It was discovered my lungs were nearly opaque, functional only because I still had a strong cough mechanism. My susceptibility to infection is overwhelming. My lung doctor has suggested treatment (experimental) with Nucala in a last ditch effort to thin mucus.

13. Brine has dramatically impacted our lives in other ways. Brine has caused our vehicles to rust more quickly than normal, often causing dangerous equipment failure and high maintenance costs.

14. From my personal observations and experiences dirt roads that are brined dry out more quickly after brining and result in even more dust than if the roads had not been brined. Vehicular traffic on these brined dried roads produces clouds of dust. This same dust caused by the over-brined roads penetrates our home and barn. It causes items in the home to prematurely rust, it also collects on surfaces such as fans, house siding, and windows.

15. Each time the roads are brined, the brine causes the road to become very slick and difficult to travel over. Vast amounts of sticky brine mud coat vehicles and buggies. Add seasonal moisture and the roads fill with ruts and potholes.

16. Because surface water contamination from brining is very visually apparent, I am worried about ground and well water contamination. In our case, we have a water well with multiple filters that need frequent changes. Because of the appearance of the filters, we drink only bottled water.

17. At public meetings in 2016-17, Hydro Transport, LLC, as well as Farmington Township Supervisors repeatedly invited residents to inspect or photograph Hydro Transport while spreading brine. Residents were repeatedly invited to identify whether or not Hydro Transport was using a spreader bar. In 2017, I encountered Hydro Transport twice and took pictures. Hydro Transport, charged me twice with harassment for taking those pictures while he was spreading on a public road.

18. During the Thanksgiving holiday, 2017, my house was broken into. Notes and pictures related to brine spreading, medical records, test results, and research papers, appeared to be the only items taken. A police report was filed.

I declare subject to the penalties of 18 Pa. C.S. § 4904 regarding unsworn falsification to authorities that the foregoing is true and correct to the best of my personal knowledge.

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Siri Lawson

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Date