

Larysa Dyrszka

I would like to add this investigative report <https://waterfrontonline.blog/author/pmantius/> , just published, to my comments "Dyrszka DRBC 012318 final" which I have already submitted. In my comments I address concerns about radioactivity, and this report does as well. More specifically, this report contains three affidavits from scientists and doctors, attesting to the high radioactivity levels in frack waste imported to New York from Pennsylvania. One of the scientists, Dustin M. May, a chemist who has studied radioactivity of Marcellus shale drill cuttings with a team at the State Hygienic Lab at the University of Iowa, wrote that "nine leachate samples from sections of the Hakes Landfill that have received Pennsylvania drilling wastes show "extremely high" concentrations of lead-214 and bismuth-214, byproducts from the decay of radium-226 or radon-222."

Officially, New York allows solid waste landfills to accept imported drill cuttings. But, although they are not supposed to accept imports of bulk drilling fluids, flowback water, filter sludge or cuttings from operations using oil-based drilling fluids, DEC enforcement has been spotty; Pennsylvania records show certain NY landfills have accepted thousands of barrels of imported liquid fracking waste.

Although New York allows the import of fracking waste, there is concern in NY State about the radioactive components and there is a legal action currently pending in NY State regarding the expansion of one of the landfills cited in this report.

The proposed DRBC rules do not address radioactivity in waste, nor how it would be monitored etc. However, with the information available in this report and presented in my earlier testimony, the DRBC should be aware that the Marcellus shale is highly radioactive, and that other states have had difficulty measuring and controlling the radioactive components.

I would urge the DRBC not to accept fracking waste since this is a very difficult issue to deal with, and the repercussions of not addressing radioactivity adequately would be disastrous.

Respectfully,

Larysa Dyrszka MD.