

# FreshWater Accountability Project

Dedicated to preserving  
and protecting our *freshwater*,  
a basic human need, belonging to us all.

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- VIA CERTIFIED MAIL -

March 12, 2013

Eighth Coast Guard District  
Hale Boggs Federal Building  
500 Poydras Street., Suite 1240  
New Orleans, Louisiana 70130-3310

ATTN: Rear Admiral Roy Nash

SUBJ: Ohio River Barge Shipments of Hazardous Waste from  
Unconventional Shale Drilling

Dear Adm. Nash:

As the co-founder of Southeast Ohio Alliance to Save Our Water and in affiliation with the FreshWater Accountability Project Ohio ([www.FWAPOH.com](http://www.FWAPOH.com)), we are pleading to the Coast Guard to prohibit waste produced by unconventional shale drilling to be transported by barge on the Ohio River to service the GreenHunter LLC facility.

Even though the waste produced by High Volume Horizontal Fracturing (fracking) is classified as non-hazardous because it is erroneously exempted from important environmental regulation, it is a known fact that the produced and flowback waste from fracking operations is highly toxic, even radioactive. Barges can carry massive amounts of liquid, and just one accident could severely damage water quality. The Ohio River provides drinking water for over 3,000,000 people.

A spill or accident could cause untold sickness and suffering, with emergency responders unable to contain the damage or doctors unable to treat those exposed because some toxic ingredients in fracking waste are classified as "proprietary," so they are unknown. The lack of adequate environmental regulation for the industry and its huge amount of waste product is of deep concern to many people. The special exemptions this industry enjoys that no other industry in the United States can have makes it especially dangerous. Because of that, even greater agency oversight is needed to protect our environment and our future for our children.

Even though the majority of the public does not realize what is taking place in Ohio to allow the unconventional shale drilling industry to operate unimpeded by important environmental protections, we trust agencies such as the Coast Guard to protect us. We highly doubt that those making decisions regarding the permitting of the GreenHunter LLC facility know the exact ingredients of the frack waste themselves, nor is ongoing testing done to find out exactly how toxic the material is, which would vary from shipment to shipment. Without the bare minimum disclosure of vital information, we know that the shipping of frack waste by barge should not be allowed. To do so is inviting disaster. Once there is an accident or spill,

there will be public outcry. If then the public were to find out that the Coast Guard allowed the shipment of highly toxic and radioactive waste on the Ohio River to be shipped as non-hazardous material, without being classified as such and without testing to know exactly what is in it, there is certain to be congressional investigations and hearings, if not criminal prosecution. The public will demand how this could happen, and it would be a national media sensation. We have seen this so many times before. When there's a headlong rush to proceed without adequate knowledge, regulation and safeguards, the resultant disaster will lead to untold suffering that could have been avoided if someone such as you, in a position of important public service, would have flagged it and stopped it!

We do not understand why the Ohio legislature would allow frack waste to be disposed of as non-hazardous in Class II injection wells, which we know do leak. There have been accidents, and people have become sick. Some workers have died from exposures to these fracking chemicals. People have their drinking water from their private wells contaminated. There is already enough to know that fracking waste products are dangerous and damaging to human health. This is enough to know for certain that it would be irresponsible, even reckless, to transport it by barge on one of the nation's most important waterways.

Please do not allow the transportation of oil and gas industry waste on the Ohio River. Thank you very kindly for your serious consideration of our urgent request.

Best regards,

Lea Harper  
Southeast Ohio Alliance to Save Our Water  
In affiliation with FreshWater Accountability Project

cc: members