

Windstream Mail

From: Julie Boetger <julieb44004@yahoo.com>
Sent: Saturday, October 09, 2021 3:21 PM
To: mrohrbau@windstream.net
Subject: Opposition To Brine Spreading On Roads, Trumbull Township

Dear Trumbull Township Trustees,

My name is Julie Boetger, and I am with the Ohio Poor People's Campaign.

I am writing to day in opposition to permit the application of brine to township roads for dust control and/or deicing.

ODH stated - "The Ohio Department of Health has not studied large volumes of AquaSalina products applied to roadways or the impact of multiple applications over a winter season, or over multiple years of application," said Alicia Shoultz, a spokesperson for the Ohio Department of Health.

The Ohio Department of Natural Resources tests show it contains high levels of radioactive Radium that is 333 times the current allowable limit for release into the environment. Radium is a bone seaking cancer causing substance that mimics calcium in the body. Radioactivity will build up in soil, on surfaces, and in creeks and rivers. This may harm generations of citizens, especially children.

Toxic radioactive oil and gas waste spread on roads, sidewalks and parking lots can be spread from the bottoms of your shoes and can be tracked into your home to expose children, and our pets.

In a June letter from ODNR Director Mary Mertz expressed serious concerns with two bills currently in our legislation, HB 282/SB 171. She states, and I quote, "This legislation would allow the spreading of oilfield brine on roads and other similar surfaces without any tracking of the disposition of the oilfield brine, without the use of registered brine haulers, and without county, township, or municipal corporation approval.

Under HB 282/SB 171, brine that meets certain criteria would be deemed a commodity. Further, this commodity would be exempt from any and all references to brine in the law. By creating this commodity exemption, the legislation creates public safety concerns by doing all the following:

? Eliminates the requirement for a person or entity who wishes to spread brine deemed a commodity to notify their local board of county commissioners; ? Eliminates the requirement that local governments who wish to spread brine deemed a commodity on the roads they own or control to first vote to adopt a resolution; ? Eliminates the requirement to use registered brine haulers for the surface application of oilfield brines; ? Eliminates the requirements of bonding and insurance for liability and surety purposes that is required of brine haulers; and ? Eliminates all regulatory authority over oilfield wastes that would be classified as a commodity, including tracking and safety protections.

To put the potential impact of this legislation in perspective, please consider the following scenario:

A church hires a contractor to spread the commodity (brine) on their parking lot for ice control.

The contractor overspreads the commodity because the contractor charges by the gallon and there are no requirements. The overspreading causes offsite impact to private water wells. The impacted well owner calls the ODNR Division of Oil and Gas Resources Management regarding brine impact to their water well. The Division investigates nearby oil and gas wells and tank batteries to identify the source of brine contamination but cannot find a source. The source may never be found due to the loss of regulations that would require the spreader to report annually the locations where it was spread and the volumes. Additionally, the ten safety standards that are stripped in this legislation, would have limited the spreading volumes to those that would not cause offsite impacts.

The Department of Natural Resources and the Division of Oil and Gas Resources Management have met numerous times with the company who is seeking this legislative change. Under previous General Assemblies, where the same legislation has been proposed, accommodations via law change have been made while still providing the necessary regulatory protections, such as lowering the one-time brine hauler fee from \$500 to \$50. However, in its third legislative iteration, HB 282/SB 171 does not ensure the protection of public health and safety or the environment."

Why on earth would anyone want to use a material that is radioactive when there are many other alternatives? For the health and safety of our families and pets I urge a NO VOTE on brine spreading in any city or township in Ashtabula County.

Thank you for your time,
Warmest Regards,
Julie Boetger
Poor People's Campaign
<https://www.poorpeoplescampaign.org/>

Ohio Poor People's Campaign
<https://www.poorpeoplescampaign.org/committee/ohio/>

Ohio Brine Task Force
<https://www.ohbrinetaskforce.org/>