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As an organization that works to eliminate hazardous chemicals from our surroundings, Center for Environmental Health (CEH) urges you to issue a rule that provides public disclosure of the chemical substances used in hydraulic fracturing. Public health and safety should be prioritized over confidential business information, as many people's lives are potentially at stake. The EPA should require that the chemical composition, volume, and concentration of all chemical substances and mixtures used in fracking be publicly disclosed, including chemical mixtures considered proprietary. Such disclosure—as well as known health and environmental effects of chemicals—would provide vital information to citizens, health officials, and scientists about the substances used within the fracking process.

Hydraulic fracturing often uses thousands of chemicals that are injected into the ground and can spill or leak at the surface. Studies indicate that more than 350 of these substances are linked to cancer, birth defects, and other serious illnesses. Such leaks have had detrimental effects on the health of workers, neighboring residents, and on the environment. The chemicals used can easily pollute nearby drinking water sources and end up in our homes, poisoning ourselves and our families. If fracking companies are required to disclose what chemicals they are using in their wells, we could protect children and families in the community from those hazardous substances by banning dangerous chemicals, requiring rigorous safeguards, or at least treating our water before letting our children drink from it.

As outlined in CEH's Report, "Toxic and Dirty Secrets: The truth about fracking and your family's health" [http://www.ceh.org/legacy/storage/documents/Fracking/fracking_final-low-1.pdf] infants and children living near fracking operations can be affected in their neurological and respiratory development. Ambient air pollution from oil and natural gas operations can reduce lung function, induce or exacerbate asthma, and irritate the respiratory tract leading to adverse health outcomes. We have also found that these oil and natural gas operations often create neurotoxic byproducts like methylene chloride and heavy metals, which can cause serious neurological health issues in infants and children. These impacts from pollution exposure can range from delays in learning to disorders such as autism. Sadly, we have already seen these harmful developments in many children who live near these

operations. If the EPA had requirements to disclose the chemicals used within fracking processes, we could understand and prevent these problems before it is already too late.

Fracking operations also often hide their use of hazardous substances by deeming their formulas as "trade secrets." However, these "trade secrets" could be poisoning nearby populations and should not be concealed from the public. We recognize the need to protect legitimate trade secrets as a function of innovation, particularly in the innovation of safer alternatives. However, if a company is truly just trying to protect their technology from other companies, they could obtain a patent or find other ways of restricting the use of their formula. There is no need to completely hide the composition of a certain substance unless the company using it understands that there are potential hazards that come along with it. To prevent these untraceable toxins from endangering our health and the environment, all fracking chemicals used and information about their known health and environmental effects should be made publicly available before drilling can even begin.

CEH has long advocated the need to modernize the Toxic Substances Control Act (TSCA). Fortunately, the disclosure of chemicals used in oil and natural gas operations is one area in which TSCA should succeed. The EPA is authorized under the act to obtain information on the risks of chemicals and to regulate those that it determines to pose unreasonable risks. Thus, the EPA should have the right to know exactly what chemicals are being used by fracking companies and if they should be deemed hazardous or not. However, even under EPA oversight, there are some substances for which their health or environmental effects remain unknown. With public disclosure of what chemicals and mixtures are used, more researchers can better study the unknown risks of using them and determine if they should be considered dangerous or not.

People deserve to know what chemicals are being released into their communities. Emergency responders and medical professionals need to know what chemicals their patients may have been exposed to in order to treat them. Scientists can also better study the impacts of fracking when they know what substances are present. The EPA should not rely on voluntary reporting mechanisms for obtaining information on the chemicals used in fracking—they should make disclosure a requirement.

Thank you for your time and consideration.

Ansje Miller, Eastern States Director
Center for Environmental Health