

**From:** [Sunset Advisory Commission](#)  
**To:** [Elizabeth Jones](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Private/Before Publication)  
**Date:** Monday, June 27, 2022 8:50:52 PM

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**From:** Texas Sunset Advisory Commission <[sunset@sunset.texas.gov](mailto:sunset@sunset.texas.gov)>  
**Sent:** Monday, June 27, 2022 4:52 PM  
**To:** Sunset Advisory Commission <[Sunset.AdvisoryCommission@sunset.texas.gov](mailto:Sunset.AdvisoryCommission@sunset.texas.gov)>  
**Subject:** Public Input Form for Agencies Under Review (Private/Before Publication)

Submitted on Mon, 06/27/2022 - 13:16

Submitted by: Visitor

Submitted values are:

**Choose the agency that you would like to provide input about**

[Texas Commission on Environmental Quality](#)

#### **Public Comments**

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#### **First Name**

Ranjana

#### **Last Name**

Bhandari

#### **Title**

Executive Director

#### **Organization you are affiliated with**

Liveable Arlington

#### **Email**

[liveablearlington@gmail.com](mailto:liveablearlington@gmail.com)

#### **City**

Arlington

#### **State**

Texas

#### **Your Comments or Concerns**

I am the Executive Director of grassroots environmental group Liveable Arlington. Our advocacy work is primarily focused on children's exposure to pollution, and children's health, and on fracking

impacts on neighborhoods where most residents are people of color in the Barnett shale city of Arlington.

Arlington has 400,000 residents in 99 square miles. More than 400 fracked gas wells have been developed here in 52 drill sites, and we are going through a new drilling boom. There is drilling infrastructure, gas gathering lines, and massive compressor stations all over Arlington, as well.

“More than 30,000 Arlington children go to public school within half a mile of wells and up to 7,600 infants and young children attend private day cares within that radius. Eighty-five percent of the public school students are children of color, and more than two-thirds live in poverty.”

In our county of Tarrant, almost a million people live within a half mile of active gas wells.

TCEQ permitting, monitoring of fracking, and regulatory decisions, affect the lives of about a million people, and often disproportionately impact residents of color.

Tarrant county has the highest rate of childhood asthma nationally, and the highest rate of birth defects of any similar county in Texas.

Most drill sites are issued air emissions permits via Permit by Rule by the TCEQ. These drill sites are often sited 300 feet from protected uses like homes, schools, daycares - which means drilling and fracking happen in backyards and next door to playgrounds.

Many of these sites have produced horrific emissions, odors, health impacts, inability to enjoy property for residents. Three of the scores of compressor stations moving fracked gas rank in the top 10 emitters in Tarrant county.

Since January 2022, Total Energies has applied to the Railroad Commission to drill 19 new gas in Arlington at 3 sites with air permits that the TCEQ previously approved via Permit by Rule. 11 of those gas wells are at Total's Bruder site (3701 W Interstate 20 Hwy), which has a TCEQ air permit allowing Total to emit up to 25 TPY of VOCs and 250 TPY of NO and CO respectively. Despite this potential large expansion in gas wells at the site, Total has not been required, as far as we know, to apply for a new air permit from the TCEQ to account for the added pollution from drilling new gas wells nor has the TCEQ verified what the current emissions levels actually are at the site. It is the TCEQ's responsibility to regulate air pollution, yet we do not know what the current pollution levels are that residents are enduring nor do we know how much the new gas wells will increase pollution burdens on residents.

From our experience at Total's Rocking Horse drill site, we know that once new drilling operations begin, residents will be exposed to loud noises, noxious odors, pollution and traffic from trucks, and other impacts. Yet, once drilling commences, residents will have no means to complain to the TCEQ and have them sufficiently address their concerns due to the inadequacies of the TCEQ's complaint process and its continual failure to properly respond to and resolve issues that residents bring up.

The same is true for Total's Truman pad site (310 N Collins St, Arlington, TX 76011), where Total

plans to drill 6 new gas wells in a census a block group (#484391222001) that is in the 90-95th percentile for Air Toxics Cancer Risk and 80-90th percentile on the Air Toxics Respiratory Hazard Index, according to the EPA's EJ Screen. That block group is overwhelmingly people of color (84%), majority low-income (68%), and has a high concentration of children under 5 (10% of the population), who are at high risk for childhood asthma and other impacts associated with living near fracking and gas wells. In that block group, 56% of residents do not have a high school education (98th percentile nationally) and 48% of households are linguistically isolated, primarily non-English speaking (99th percentile nationally). The surrounding block groups are also in the 80-95th percentile for linguistic isolation and lacking a high school education. There are two large apartment complexes just north of the site, and we know they are already exposed to emissions/pollution from existing gas well operations.

Please see the next box for some proposed improvements that will help reduce residents' exposure to severe pollution from fracking.

### **Your Proposed Solution**

We recommend that the TCEQ take the following steps:

1. Look at how many people and children live, work, go to school, around these sites, and consider neighborhood impacts before issuing the permit. By their own admission the TCEQ has issued a permit by rule without even verifying if a polluter meets the standards for such a permit. This must stop.

2. Look at the density and distribution of pollution permits already issued in an area before issuing another permit to pollute in a neighborhood. After a certain cumulative level is reached, no more PBRs should be allowed. TCEQ must stop the practice of stacking permits to help polluters avoid New Source Review and public hearings. This practice of stacking permits is endangering residents in Barnett shale cities.

Inform the neighborhood about what will be emitted, and how to file complaints in English, Spanish, and Vietnamese in Arlington. Require that the TCEQ complaint number be posted at each drill site, and it be mailed along with relevant information to all residents within half a mile of a frack site in multiple languages.

3. Provide 24/7 air monitoring at the fence line of each drill site and compressor station for hazardous air pollutants. The complaint driven system of investigating after a problem has occurred and is reported, subjects neighbors to dangerous emissions.

4. Amend and improve permitting and regulatory processes based on the best available peer reviewed public health research.

5. Improve inspections regime - in 2020, of the approximately 6500 gas wells in Tarrant county, TCEQ inspected a mere 134.

6. We often receive heart wrenching calls from people in distress from fracking emissions. TCEQ must allow, and give the same urgency, to complaints filed by community and watchdog groups on behalf of impacted residents.

7. OSHA and NIOSH issued a Hazard Alert because of the large number of worker fatalities when they open tank hatches at drill sites. These incidents happened in remote places. When they happen in Arlington, within a few hundred feet there are homes, daycares, schools and our children would be exposed. Two daycare workers were overwhelmed by emissions in their playground in December 2022 when Total workers were conducting thieving operations behind the playground. TCEQ must require use of hatched recommended by API Standard 18.2 to protect residents and children at close quarters to drilling.

8. Former TCEQ employees at the very highest levels work for polluters once they leave TCEQ and invoke their TCEQ backgrounds to help secure permits from cities. This must not be allowed.

9. Look at density of population, demographics including race and income of surrounding community and use that data before issuing permits to pollute.

10. Greater transparency and making it easier for Texans to navigate the TCEQ website - the TCEQ website is a nightmare, finding permit information, filing complaints are impossible - it feels to community members that it's designed to obscure pollution information and to silence them from informing the state about pollution threats to their health.

11. Greater air monitoring and inspections for compressor stations - Compressor stations are significant sources of air pollutants, including benzene and formaldehyde, constituting potential health risks to those living nearby. According to a 2020 Indiana University study, "Overall, counties with VOC emissions from compressor stations were associated with a higher age-adjusted mortality rate than counties without such emissions."

This is a compilation of the FLIR videos Earthworks has taken at the DWG compressor station site in Arlington since 2016. <https://youtu.be/1j1lDs-a7lw>

It is surrounded by schools, homes, businesses, and we receive complaints about it from impacted neighbors constantly. Despite complaints to the TCEQ, no improvements have been made. All compressor stations in cities must have fence-line air monitors with community supervision, and monthly Leak Detection and Remediation.

### **My Comments Will Be Made Public**

Yes