

January 16, 2026

To: Ohio EPA

SUBJ: Comments for 2025 Triennial Review

- 1) Leachate from all Ohio waste disposal sites that accept toxic, radioactive frack waste must be analyzed for fracking-related chemicals like radium and "forever" PFAS chemicals inherent in frack waste. When found, regulations must be put into place to filter these extremely toxic chemicals out before discharge. This is of utmost importance because of the cumulative amounts of frack waste being generated, especially from other states like PA with Marcellus shale that can be highly radioactive that are accumulating in Ohio's landfills like APEX in Amsterdam. These protocols must be implemented immediately to ensure that the lax monitoring schedules for radium are not allowing radium 226 and 228 to accumulate in water bodies from leachate treatment plants that discharge into Ohio's water bodies.
- 2) Protocols must be established after fully characterizing all chemicals related to fracking that could be released, including "proprietary" chemicals because of the lack of traceability and monitoring requirements. Without the necessary federal regulations, the Ohio EPA must institute protocols either at the source of discharge or through private and public water incoming source monitoring for these chemicals not included in the existing regulations.
- 3) The Ohio EPA should be furnished a list of all chemicals related to fracking so that the OEPA can develop the necessary monitoring plans and analyses needed to ensure that wastewater treatment plants that accept landfill leachate from dump sites that accept frack waste, especially drill cuttings which are known to be highly radioactive, have continuous monitoring and testing to ensure that the inadequately monitored fracking-related chemicals are identified and prevented from being released into water bodies that are often drinking water resources to ensure protection of public health. Reference this recent news report: <https://www.statenews.org/section/the-ohio-newsroom/2025-12-10/ohio-landfills-take-drilling-waste-but-dont-track-or-test-much-of-it>
- 4) Fracking and many other industries produce and use PFAS chemicals in Ohio. Releasing PFAS and forever chemicals into the environment without identification, monitoring and removal before discharge into water bodies must be stopped because of the disastrous cumulative environmental and public health impacts of these chemicals. Now that fracking is a [known public health threat](#), additional safeguards must be put in place, especially to protect drinking water. Because of the public health risks along with the expense to remove PFAS chemicals from water (see this report from the GAO, <https://www.gao.gov/blog/pfas-forever-chemicals-may-be-biggest-water-problem-lead>) all efforts must be made to identify those who produce, use and discharge (forever) chemicals into our environment. This means that there must be monitoring for the chemicals incoming to wastewater treatment plants as well as before discharge back into the receiving water bodies to reduce harmful exposures. PFAS chemical precursors must also be monitored in treated wastewater before discharge so that the cumulative impacts to drinking water of these persistent, toxic chemicals do not continue to increase (<https://pratt.duke.edu/news/uncovering-the-source-of-widespread-forever-chemical-contamination-in-north-carolina/>).
- 5) Federal and state agencies need to not only address specific chemicals such as "forever chemicals" and their precursors to adequately protect public health, but there are other, unknown, "proprietary"



chemicals that are likely to enter ground and surface water over time because of use for fracking and inherent in the massive amounts of frack waste that is inadequately regulated and falsely labeled as, “non-hazardous.”

- 6) Because Ohio has so many frack waste injection wells that are known to leak, additional monitoring must be done around all large injection well disposal sites and for those wastewater and water treatment plants in proximity to injection wells taking frack waste. Ohio does not require monitoring wells for Class 2 injection wells so no one knows until it is too late when the “brine” migrates outside the injection zone (<https://www.propublica.org/article/oklahoma-oil-gas-wastewater-pollution>).
- 7) No spreading of biosolids without adequate testing for forever chemicals should be allowed to avoid the accumulation over land and into produce and farm animals and into water from run-off (<https://www.youtube.com/watch?v=pt3bR5ht0Ds>)
- 8) For all water bodies and wastewater treatment plants that operate in areas in which “brine” spreading on our roads take place, additional monitoring for harmful contaminants inherent in oil and gas waste must take place until Ohio passes the appropriate legislation to stop the use of brine on our roads.

Because of fracking and the continued production and use of forever chemicals, along with the lack of political support for environmental and public health protections, there are many requirements that should be implemented, not just for regulatory compliance but for important public health protections from known harmful contaminants that are not easily detectable and accumulate. Because of the lack of necessary action from the federal government (<https://www.selc.org/news/new-epa-study-of-genx-toxicity-highlights-need-to-better-regulate-all-forever-chemicals/>), states must take action to protect themselves. Even though compliance with the Clean Water Act does not make this a requirement, Ohio has the authority to issue stricter, necessary rules for water monitoring and treatment which must be done because of Ohio’s unrestricted and unsafe permitting of industries known to concentrate and release harmful chemicals into water bodies. Because of political influence and negligence that result in the lack of necessary legislation, funding and oversight resulting in extremely limited opportunities to advance the necessary environmental protections, this Triennial Review is a vitally important mechanism to advance necessary public health protections before it is too late to adequately and cost-effectively protect drinking water. Especially with industries like fracking and now data centers operating on such a massive scale in Ohio, their cumulative waste impacts upon Ohio’s water are substantial. Ohio ranks as 41 out of 50 states for environmental protections (<https://www.dispatch.com/story/news/2025/05/12/ohio-worst-states-rank-us-study-2025/83491781007/>). Without the necessary laws such as to reclassify frack waste as the toxic, and radioactive waste that it is and to stop producing and using forever chemicals and their precursors, and to stop brine and biosolid spreading, protective rules to detect and remove harmful chemicals that bioaccumulate before releasing into the environment must be put into place. This is just a lay person’s, common sense input without the necessary expert and legal assistance needed to make more specific and compelling recommendations, so I hope that our time and resource limitations to provide adequate comments for the OEPA’s Triennial Review do not keep these concerns from being elevated to the level necessary to implement important rules and oversight to protect our water and public health.