

**Penn State Shale Network 2017 Workshop**

# **Black Shale Waste Disposal Concerns**

By **Bill Hughes**

Wetzel County, WV

Developed with support from: FracTracker Alliance and Ohio Valley Environmental Coalition

# Black Shale Waste Disposal Concerns

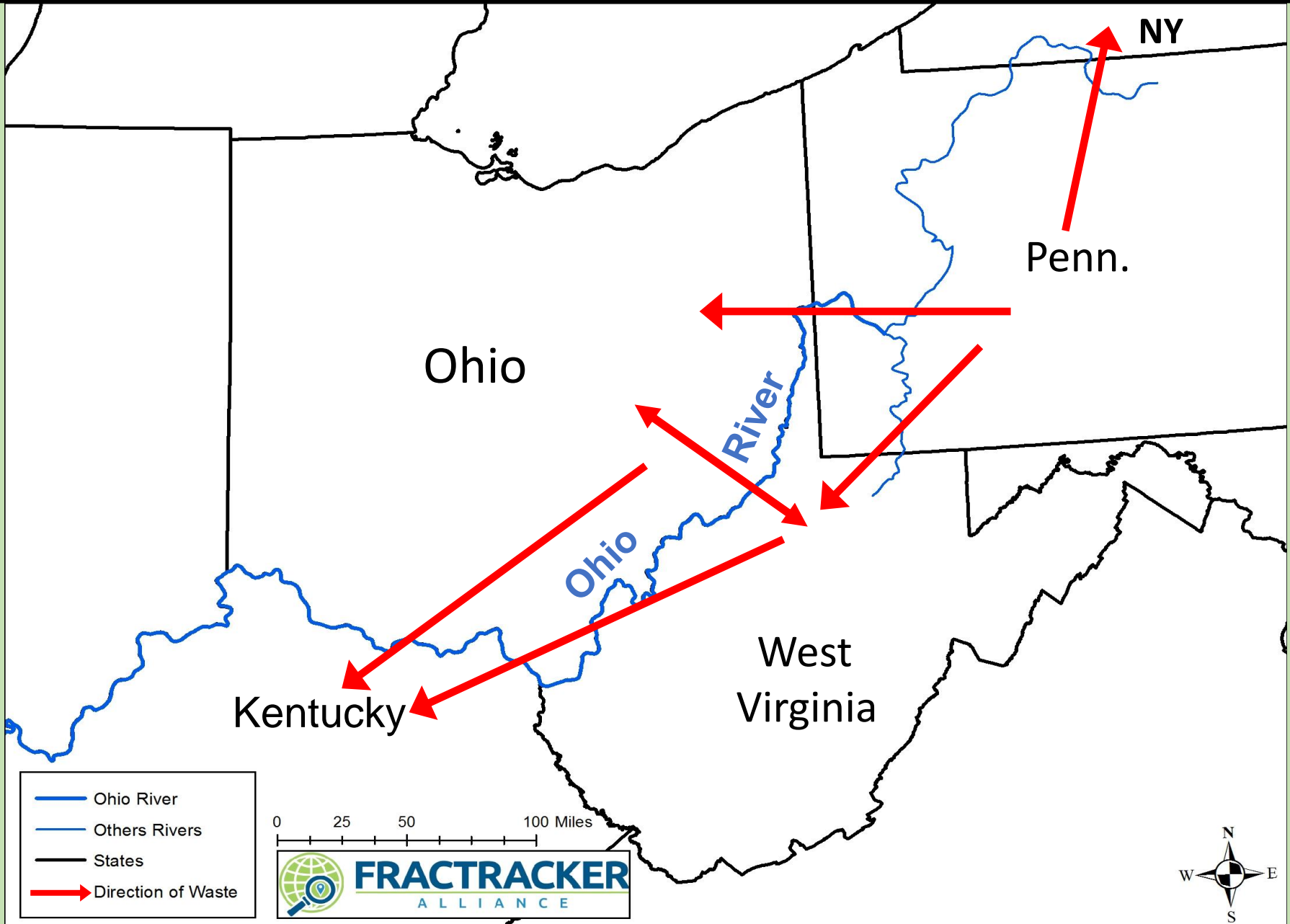
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1. Minimal restrictions on interstate waste transfers
2. Consists of a variety of solid; liquid; semi-solids
3. Inconsistent or non-coordinated state regulations
4. Overall weak state regulations; minimal Federal oversight
5. **Hazardous; toxic; threat to watershed—Ohio River**
6. **Inadequate waste characterization**



**We will explore the last two topics here**

# Some Known Interstate Waste Transfers



# Shale Waste



# Shell Game



# Shale Waste



# Shell Game



Shale Waste



?



Shell Game



Shale Waste

OH

PA



KY

WV

Shell Game



# Shale Waste

OH

PA

KY

WV

# Shell Game







Shale Waste



Shell Game



# Shale Waste



# Shell Game



# Shale Waste



?



# Shell Game

Quick review  
of  
Shale Gas Drilling  
And  
Drill Cuttings



Sketch of Typical  
Shale Gas Well Drilling

Drill Rig on surface

Vertical Bore

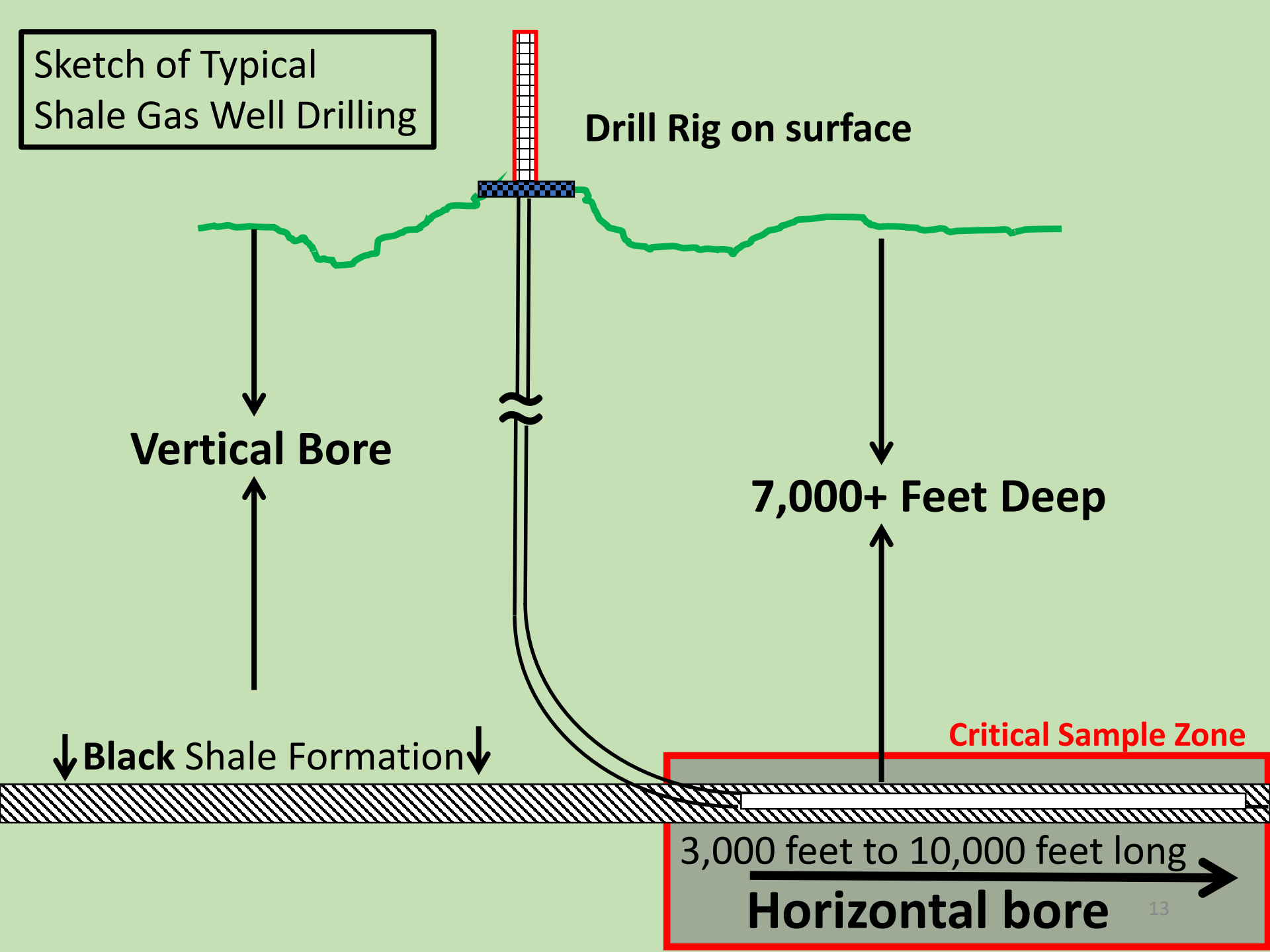
7,000+ Feet Deep

Black Shale Formation

Critical Sample Zone

3,000 feet to 10,000 feet long

Horizontal bore



# More Benign Drill Cuttings from the Vertical bore on a Horizontal Well Pad



09.13.2015 15:09



# Radioactive and Toxic Drill Cuttings From the Horizontal bore on a Horizontal Well Pad





# Drill Cuttings on way to Landfill





# Drill Cuttings being dumped at the Wetzel County Landfill



11.10.2014 10:36



Rainfall or  
Drilling Fluids or  
Fracturing Fluids or  
Formation fluid



Fresh  
Water

Marcellus Shale  
Drill Cuttings  
Buried in Landfills



Coffee  
Grounds

Leachate

Fresh Coffee

OUR  
LANDFILLS

Municipal  
Solid Waste

Your  
KITCHEN



**Marshall University** was tasked by the WVDEP  
To  
Investigate **Five Topics**

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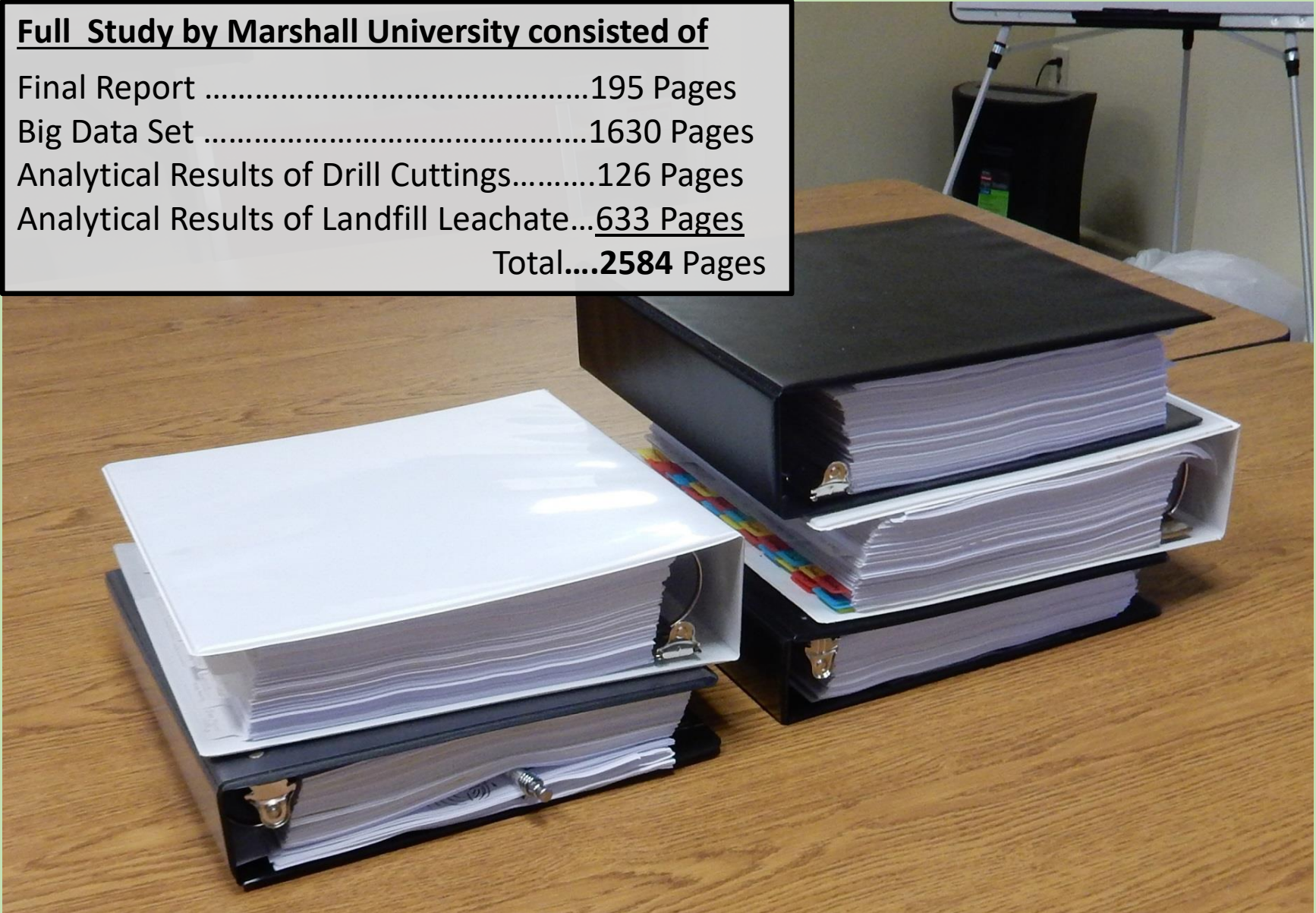
We will only review part of the **FIRST TWO**

- 1. The hazardous characteristics of leachate in landfills accepting drill cuttings**
- 2. The negative impacts of that liquid on surface and ground water**

# Marshall University Report Total over **2,500** pages.

## Full Study by Marshall University consisted of

Final Report .....	195 Pages
Big Data Set .....	1630 Pages
Analytical Results of Drill Cuttings.....	126 Pages
Analytical Results of Landfill Leachate...	<u>633 Pages</u>
Total....	<b>2584 Pages</b>





# Marcellus Shale Operations Potential Water Contamination

1. Well pad drill rig → Drill cuttings → Landfills
2. → Moisture drains out becomes → Leachate
3. Leachate shows radioactive levels of concern
4. **Radioactivity** cannot be filtered out →
5. **Leachate** goes to Water treatment plant →
6. Effluent from water treatment plant goes into **Surface Streams and Rivers**
7. Surface waters → water intake → **Drinking water**

Why is this Waste Critical ?

Drill Cuttings  
Are Radioactive--  
Toxic---Hazardous  
And  
Lots of It



**Total Tonnage** of Drill Waste in West Virginia now over **1.5 million**

**840,000 Tons  
Drill Waste  
2012-2014**

tons

**Brook County**

Brook County

**Ohio County**

Short Creek Land.

**Ohio River  
Water Shed**

Wetzel Landfill

**Wetzel County**

**850,000 Tons Here**

**Wood County**

Northwestern Landfill

Image Landsat

Google earth

**What We**

**Do**

**Know**

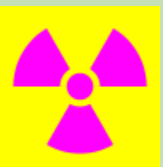




# Marcellus Shale

Is

# Radioactive



DON'T TELL ANYONE ELSE

# How do we know that Marcellus is Radioactive

- Geologists reports from over **35 years ago**
- WVDEP required landfills to test **leachate**
- Marshall University report confirms it 7-01-2015
- Drillers use **gamma** logs to identify it
- A few drill waste loads trip alarms at landfills



# General Observations

Taken from the Marshall University Report

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- Few existing studies on landfills with drill cuttings
- Little or no empirical data on risks with drill cuttings
- Studies of long-term exposure to unconventional natural gas development have not been conducted
- **Landfill liners will leak**

# The Marshall University report states:

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1. The **Marcellus Shale** has higher concentrations of **radioactivity** than other shales
2. Drill cuttings contain **radioactive** compounds.
3. The **Radium** isotopes within the Marcellus shale are **soluble in water**
4. **Radioactive** compounds are present in landfill leachate
5. **Radium 226** has a half-life of **1600** years.
6. **Landfill liners will leak**



# Conclusions

From the Marshall University Report

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- Drill Cuttings **toxic** to plants
- Leachate **toxic** to plants and invertebrates
- Radioactive compounds are in **LEACHATE**
- **Long term** studies have **not been done**

# Marshall Report Flaws

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- A. **NO METHODS Discussion Section** in the final report on the **choice** of Test Protocols used for radiologicals
  
- B. **INACCURATE TEST Protocols** were used for radiologicals



# Test Methods for **SOLID DRILL CUTTINGS** by Marshall

Well name Date of sample	Test method used for Gross Alpha	Test method used for Gross Beta	Test method used for Radium 226	Test method used for Radium 228
Sheep Run 4-17-15	EPA 9310	EPA 9310	901.1	901.1
Bierstadt 4-20-2015	EPA 9310	EPA 9310	901.1	901.1
McGee 1-28-2015	900.0	900.0	901.1	901.1
Morton 1-28-2015	900.0	900.0	901.1	901.1
Wentz 1-28-2015	900.0	900.0	901.1	901.1

## EPA Method 9310

For the measurement of gross alpha and gross beta particle activities in surface and ground waters.

## EPA Method 900.0

For Gross Alpha and Gross Beta in **Drinking Water**

## EPA Method 901.1

For Gamma Emitting Radionuclides In **Drinking water**

# Summary of test methods used

Leachate Samples	Solid Samples
Existing Data Set from WVDEP	Samples obtained by Marshall U.
900.0	
903.1	
904.0	
900.0M	
SM7110C & EPA 9310	
Newer samples by Marshall U.	Newer Samples by Marshall U.
900.0	901.1
903.1	9310
904.0	900.0
SM7110C	

These SEVEN test protocols were used with **NO discussion of WHY** any specific one was used.



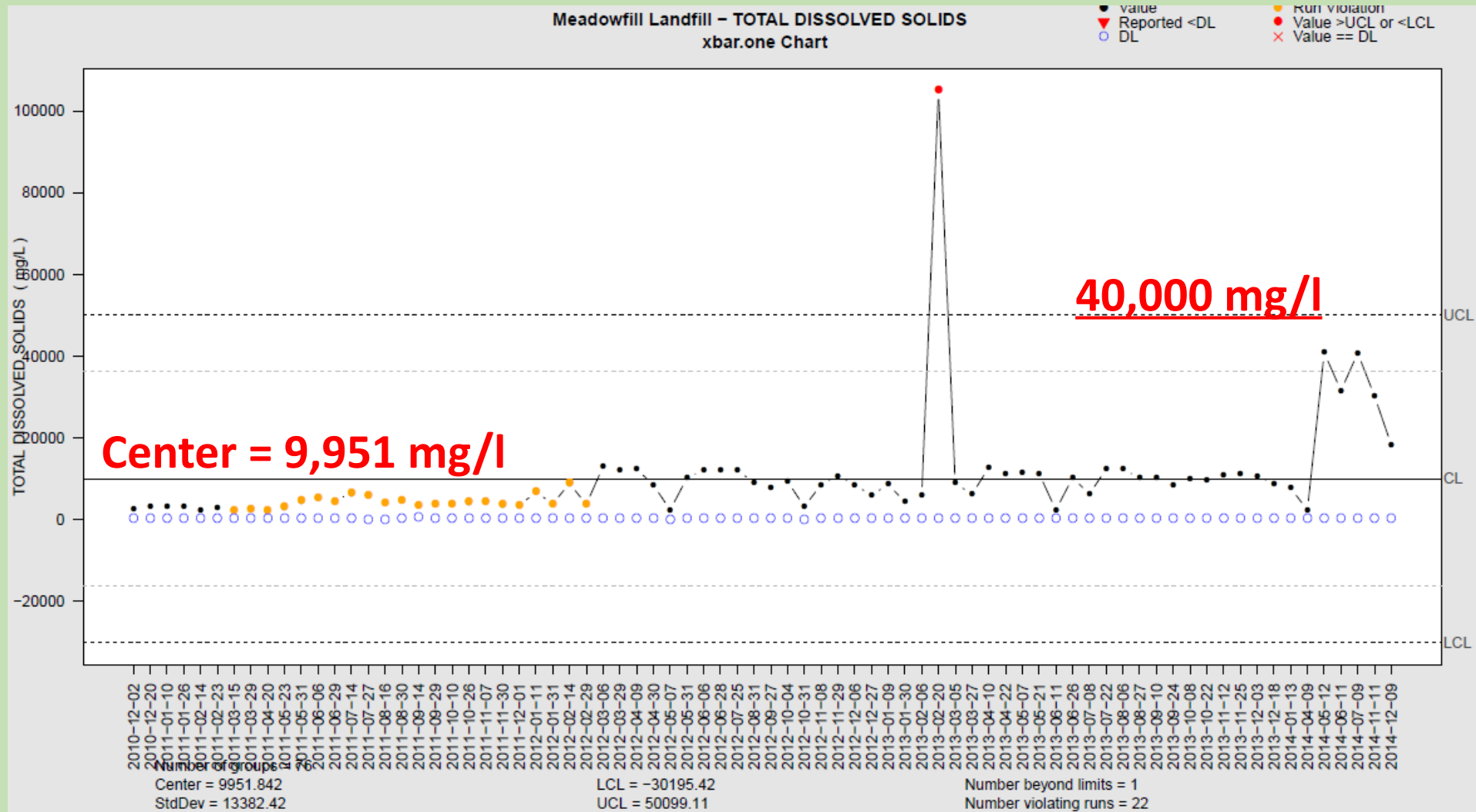
# EPA TEST METHOD 900.0

## Technical Notes for EPA Method 900.0 — *Gross Alpha and Gross Beta Radioactivity in Drinking Water*


**1.9** Drinking water samples with high levels of solids will prove challenging for this technique as the solids will contribute significantly to self-absorption of the alpha and beta particles

The alternate method for Gross Alpha Screening, 900.1 is meant for radium isotopes in water with **HIGH DISSOLVED SOLIDS** ...recommended if the sample has solid loading of > 500 ppm.

# Total Dissolved Solids in Leachate at Meadowfill Landfill







# TENORM Analytical Measurements

May 12, 2014

## Techniques

- GAB Screen (900.0, 9310)
  - Cost vs. TDS Limitation
- GAB Co-precip (SM7110C)
  - Robust vs. Cost
- Radiochemical (903.1, 904.0, 9315, 9320)
  - MDC & speed vs. matrix effects
- Gamma Spec (901.1)
  - Selectivity vs. sensitivity & speed?

## Shale Related Challenges

- Dissolved solids  
100 mg limit for 900.0

## Conclusion

- ▶ Presence of dissolved Radium species may be indicated by increased Cation, Anion, or Dissolved Solids concentrations
- ▶ In the presence of these high concentration interferences, traditional methods for Radium analysis may result in erroneous results
  - ▶ Dilution may remove interferences but result in increased detection limits and decreased counting efficiency
- ▶ Use of Gamma-Spectroscopy for analysis may be more appropriate for these matrices

Used with Permission

TestAmerica



**What we**

**Do not**

**Know**



Small



Medium



Large

? ? Residual Waste ? ?





Fresh—Brine—Fresh—Brine—Fresh--Brine







**Radiation Detectors at the Scales at Wetzel County Landfill**

They Look Good, they are brand new  
—**but they will not detect Radium 226**

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*From the manufacturer*

“**Portions** of Radium 226/228 may be detected but our gate monitor systems do not “quantify” isotopes”

“**Radium** contains Alpha and Beta particles; these cannot travel far or penetrate like Gamma waves.  
**Therefore they are nearly impossible to detect with a gate monitor** scintillator detector through a metal sided vehicle”.



# Known Problems

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- **Inaccurate test methods are being** used to measure the radioactivity in leachate with high **Total Dissolved Solids**
- **Horizontal** drill cuttings are **NEVER REQUIRED** to be tested for any radioactive isotopes
- **Leachate is radioactive** and drill cuttings are toxic to plants and aquatic life
- **Goal-post** radiation monitors will **not likely detect Radium** or Radon
- Waste—routine and **HOT** — transferred among states in the **Ohio River** Basin is not tracked
- This is a **new problem with little historical guidance**

# Our HIGH Priority **TO-DO** List

1. We must get this right
2. We must use proper test protocols
3. We must test the horizontal bore material for radiologicals
4. This will be a very long-lasting problem
5. We must accurately identify all risks to waters in the Ohio River Basin from shale waste

**We Just Do NOT Know Now**

# The End

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