



October 11, 2011

### **An Open Letter to the Whatcom County Community**

One of the principle reasons for the existence of labor unions is to carefully study and continually protect workers from risks to their health and safety. Union members have fought hard and risked much in order to gain quality healthcare for millions of Americans, union and non-union alike. Our hard work and union health care plans help fund the health care system and our medical professionals all across this country. In fact, 84% of union workers in the U.S. have health insurance through their employers, so when it comes to discussing the health of our workers and community, we are major stakeholders in that conversation.

Recently, a group calling themselves the "Whatcom Docs" has made statements about the Gateway Pacific Terminal project that have caught our attention. They claim that this project will lead to adverse health effects, so we decided to look into the facts ourselves, which are readily available to the public.

While we appreciate the concern for public health, what we found is that by using incomplete and inapplicable data, the Docs' statements do a disservice to the public dialogue and generate unfounded fear in our community. Because of this, we encourage the Docs, other health care professionals, and the rest of the community to take a closer look at the facts.

- For example, no one argues that inhaling excessive amounts of diesel particulates and coal dust can be harmful to a person's health. Where we part company is the **false assumption of exposure** and that building a shipping terminal will increase exposure in any meaningful way. Of course, most doctors don't have the expertise to make that assessment, and these particular ones made no attempt to do so.
- An easily identifiable flaw in their argument is the lack of relevant research; the studies cited don't actually refer to marine terminals. Instead, they apply studies based on occupational exposure, such as at a coal mine in India that would not meet U.S. environmental standards, to what the general public would experience here over 1,100 miles away from any mining operation.

In doing this, the Docs misrepresent the situation and imply that we'll be exposed to the same level of pollutants as someone working in a poorly regulated coal mine, which is a highly misleading application of the facts.

### **Trains Rank Among the Lowest Contributors of Emissions**

Doctors often counsel their patients on keeping health risk factors in perspective. A tiny fractional risk does not generally justify drastic action. The same logic applies here. For example, of the 19 activities monitored by the Washington Department of Ecology (DOE), locomotives rank among the three smallest contributors of air particulate emissions.<sup>1</sup>

- According to the DOE's Comprehensive Air Emissions Inventory, **trains only contribute 0.8% of the state's total PM2.5 (fine particulate matter) emissions, and only 0.3% of PM10 emissions (coarse particles)-way behind farming equipment (34%), road dust (32%), and wood stoves (7%).**<sup>1</sup>
- In fact, **wood stoves and fireplaces actually release more toxic particles into Washington's air every year than industry and motor vehicle exhaust sources combined.**<sup>2</sup>
- If health risks are truly at the forefront of the Whatcom Docs' argument, then why aren't they focusing on the sources that actually contribute significant amounts of airborne particulates?
- **Even if current train counts doubled, they would still represent less than 1% of total particulate emissions.**
- Not to mention, locomotives are subject to new stringent standards by the EPA that are projected to reduce diesel emissions by 90 percent.<sup>3</sup> All of this is readily available public information, although it's absent from the Doc's discussion of the topic.

Depicting locomotives as massive contributors of these emissions is simply inaccurate. Even the studies cited by the Docs do not point to locomotives as significant contributors of diesel particulate emissions-they simply state repeatedly that particulate matter emissions can be harmful at certain levels of exposure. The Docs fail to connect the dots between the studies referenced and the Gateway Pacific project, which will be subject to modern high environmental standards.

## Mixing Apples and Oranges in Coal Dust Studies

The Whatcom Doc's coal dust studies are also off-base in wrongly assuming a potential for exposure. Almost all of the studies cited involve coal mining, not shipping terminals, and the level of exposure is not comparable. They even go so far as to compare a marine terminal to an open pit mine in India. Even a layman can see that this is not good science.

- The Whatcom Docs also overlooked a 2010 New Zealand study<sup>4</sup> of transporting and storing coal for export. The conclusion of the report states: "*The health effects of respirable dust on coal miners is an intensively researched area and the adverse health impacts are well documented. Those studies show that both relatively extremely heavy and lengthy exposure to respirable coal dust is necessary before adverse health impacts occur.*"
- Similarly, pneumoconiosis from coal dust, although cited by the Docs as a possible health risk, is caused by occupational exposure. According to the National Institute for Occupational Safety and Health, not only do physicians rarely encounter this disease, but "**The principal cause of the pneumoconiosis is work-place exposure; environmental exposures have rarely given rise to these diseases.**"<sup>5</sup>

In raising the issue of coal dust from trains, the Whatcom Docs again **mistakenly assume exposure** and overlook important and obvious facts.

- First off, trains carrying coal have been passing through Pacific Northwest neighborhoods and metropolitan areas for years on their way to BC ports, yet the **Northwest Clean Air Agency has never received a complaint of coal dust** (their records go back almost 20 years). Similarly, the Puget Sound Clean Air Agency has no record of coal dust complaints along the Puget Sound rail corridor.
- Secondly, studies show that coal dust loss from untreated railcars occurs with the most frequency during loading at the mines and materially decreases as the railcars move farther from the mining areas in the Powder River Basin (PRB). BNSF has issued a new rule effective October 1, 2011, that requires PRB coal shippers to implement measures that will **reduce coal dust losses by 85 percent**.<sup>6</sup>
- BNSF research has confirmed that using certain topper agents (such as a glue-like sealant) along with modified loading (such as aerodynamic shaping) dramatically reduce the potential for dust loss.
- In discussing exposure, the Whatcom Docs also appear to be unaware that the project is subject to a permit requirement by Whatcom County that states: "**No odors dust, dirt or smoke shall be emitted that are detectable at or beyond the property line....**"<sup>7</sup>

It's difficult to imagine that with all of these measures our community will be exposed to coal dust at measurable or harmful quantities, let alone enough coal dust that these health issues will actually be a risk. The hard evidence speaks for itself and we are confident that coal dust has not been, and will not be a problem for this community.

### **No one is more concerned for worker safety and health than we are**

The Docs also mistakenly imply that lung diseases will increase due to coal dust exposure. One would think that if such health issues arise from coal dust, the most likely communities at risk would be the ones closest to the mines, and since the Docs have chosen to base their remarks on studies from mines, we decided to investigate for ourselves the real health status of the Powder River Basin (PRB) region.

We focused our research on the "Energy Capital of the Nation"-Campbell County, Wyoming. Not only is this County home to 14 coal mines, but it accounts for over a quarter of U.S. coal production. These surface mines were developed after the implementation of modern environmental laws, such as the Clean Air Act, Clean Water Act, and the Federal Coal Mine Health and Safety Act. The Powder River Basin also has over five times the amount of trains passing through the region as current Whatcom County rail traffic<sup>8</sup>.

Public health data show that **even with such close proximity to coal mines and with the frequency of trains carrying coal, the occurrence of adverse health effects on the general public cited by the Docs (the ones they say are linked to coal dust exposure) are either below or at the national average.**

- For example, **childhood asthma in Campbell County is noticeably less than the national average.**<sup>9</sup>
- Chronic bronchitis and emphysema incidence also sit below the U.S. average.<sup>10</sup>
- Interestingly enough, these are the very ailments cited by the Whatcom Docs as potentially harmful to Whatcom County children and families if the Gateway Terminal is built.
- Cancer rates in both Campbell County and Wyoming as a whole are almost all below the national incidence rate<sup>11 12</sup>, and the County meets all of the EPA Air Quality Standards, including particulate matter levels.<sup>13</sup>

All of this begs the question: **if coal dust exposure and its supposed adverse health effects aren't an issue for the communities *near* the mines, than why would they be an issue in a community located over *1,000 miles away*?**

### **Keeping the Conversation Rational**

Frank James is a local physician, leader of Whatcom Docs, and like many other Whatcom Docs, lives along the rail line.

In a recent article published in the Northern Light, James stated that if this project is built: "Families, children and parents will die".<sup>14</sup> James goes on to say that the Whatcom Docs statements are based on 400 scientific studies that examined the health effects of diesel particulates and coal dust on human health and "determined the increase in diesel-powered trains carrying coal will have significant health effects." First off, where are these 400 studies? And secondly, where do they offer any proof that the Gateway project will increase these pollutants in any meaningful way?

In ignoring the real potential for exposure (degree of exposure is a prerequisite for determining risk), James' comments defy ordinary logic. Cities to the south, such as Seattle, Tacoma and Portland, have significantly more train traffic than Whatcom County.<sup>15</sup> <sup>16</sup> Despite the increased traffic south of Whatcom County, **locomotives only contribute 0.4% of fine particle emissions in all of the Puget Sound region.**<sup>17</sup> Diesel trucks, on the other hand, contribute 4.4%, wood burning contributes 17.5%, and road dust contributes 20% (50 times as much as trains). Even with this increased rail traffic, we are unaware of any statistical increase in respiratory ailments in the many neighborhoods along the rail lines.

In summary, everyone acknowledges that maintaining a healthy community is an imperative. A healthy community also includes family-wage jobs—the kind of jobs that support the general prosperity of our county, including its medical professionals. But in many ways ***the Whatcom Docs show little respect for working families, many of whom are really hurting, in their dismissal of a huge opportunity to put people to work with good wages and benefits. It is not rational or even fair to suggest that the nation's commercial and industrial infrastructure, including ports and railways, cannot be put to use in job creation.***

If we are to have a constructive discussion of the issues, statements must be based on facts and relevant studies, which is why the EIS process is vital to the project. All we ask is

that Whatcom Docs apply the same respect for careful science that we want them to use in their medical practices. As neighbors, we will all benefit from a **rational, fact-based dialogue** and the orderly environmental assessment process established by law-this is the kind of procedure that leads to an accurate diagnosis.

Sincerely,

Mark Lowry, President  
Northwest Washington Central Labor Council  
Trades Council

Brad Owens, President  
NW WA Building & Construction

Chris Johnson, Vice President  
Northwest Washington Central Labor Council

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