



To: Northwest Region AQ Permit Coordinator
Oregon Department of Environmental Quality
Via email: NWRAQPermits@deq.state.or.us

Subject: Comments on Proposed Air Quality Permit for Global Partners/Cascade Kelly Holdings, LLC/Columbia Pacific Bio-Refinery (CPBR)

July 31, 2019

Board of Directors

Michele Bernal-Graves, MS
Treasurer
David Chatfield
Andy Harris, MD
Maxine Fookson, PNP
Elaine McKenzie, RN, MPH
Vice President
Patricia Murphy, ND, LAC
Secretary
Nicki Nabavizadeh, MD
Joel Nigg, PhD
Patrick O'Herron, MD
President
John Pearson, MD

Advisory Board

George Austin
Sonia Buist, MD
Martin Donohoe, MD
Ben Duncan
Charles Gallia, PhD
Chisao Hata
Charles Hudson
Zeenia Junkeer, ND
Susan Katz, MD
Yukiyo Kawano
Bonnie Reagan, MD
Karen Steingart, MD, MPH
Frances Storrs, MD

Guided by the values and expertise of medicine and public health, Oregon Physicians for Social Responsibility (PSR) is a statewide organization of more than 2000 health professionals and public health advocates working to protect human life from the gravest threats to health and survival, including environmental pollution. We have a 36-year history of advocating for environmental health for all Oregonians.

Because the company (ies) for which this permit is proposed has (have) a poor record of transparency in past oil operations¹ as well as a poor safety record; and because the proposed air quality permit is confusing and poorly written, we are asking that this proposed air quality permit for ethanol operations be rejected, not renewed. If it is not rejected, then it must be rewritten and a new comment period begun on the revised air permit. Furthermore, we are asking that the Oregon Department of Environmental Quality consider seriously the benefits of prevention and the precautionary principle in its deliberations about this and other proposed air quality permits to give attention to the cumulative impacts of adding/permitting another generator of air pollutants into an already seriously compromised air shed.

More specifically, after buying the bankrupt Columbia Pacific Bio-Refinery, instead of starting up ethanol production, in 2012 and 2013, Global Partners began to ship large volumes of crude oil via rail to the ethanol plant for export. With little public input or knowledge, Global switched from corn trains to oil trains. In addition, this June, in a separate application, Global Partners asked DEQ to renew its air permits for its oil transloading operation.

The proposed ethanol permit is confusing because it does not clearly separate equipment used for ethanol from equipment used for oil. Any DEQ permit should clearly separate those two types of equipment. The ethanol production permit

¹ <https://www.pressherald.com/2019/07/11/unhappy-south-portland-residents-to-share-grievances-about-oil-tanks/>



should not allow the company to build, buy, or operate tanks that will handle oil. Global/Cascade Kelly/CPBR clearly intend to use some of the permitted facilities to store and ship crude oil. Multiple tanks—totaling over 30 million gallons of storage—are proposed for use for oil as well as ethanol. The permit does not evaluate the potential air pollution impacts of ethanol tanks being used for oil. Heavy crude oil can contain significant quantities of toxic air pollutants such as hydrogen sulfide and volatile organic compounds such as benzene, a carcinogen, that are not evaluated in the permit for ethanol production. Furthermore, even small amounts of hydrogen sulfide (H₂S) present a health risk to personnel as well as the public in case of accidents. Hydrogen sulfide is an irritant and chemical asphyxiant and is highly corrosive. Over time, corrosion from H₂S occurs in pipelines, storage tanks, and rail cars, increasing the risks of deadly accidents. Using storage tanks or rail cars interchangeably for crude oil and ethanol imposes risks of exposure to toxic air pollutants and explosions that are not considered in the permit. These risks are not imaginary: in May, an emptied crude oil rail car exploded as it was being cleaned out, killing 2 workers and injuring 4 more.² In the permit, DEQ must prohibit the permittee from using tanks or other equipment authorized under the ethanol production permit for unloading, **storing**, handling, or transloading crude oil.

DEQ should not allow the applicant to establish an oil-by-rail terminal under the guise of an ethanol facility. Expansion of crude oil transport is unacceptable when global climate science shows we need to drastically reduce carbon emissions by eliminating fossil fuel use. We can no longer act as though these projects exist in isolation and have no impact on planetary life systems. We are in a climate emergency and we must act to reduce its worst impacts immediately.

The public deserves a clear picture of how Global/Cascade Kelly/CPBR's facility will operate and its potential to produce significant air pollution. The proposed permit indicates that DEQ's permit only assesses the air pollution coming from the facility, not pollution or risks related to the oil trains that deliver oil to the site, or trucks, barges or other marine vehicles that deliver raw materials for ethanol production to the site. These sources of emissions related to the facility would not exist if the facility did not exist and could add significantly to the emissions of particulate matter and greenhouse gases predicted for the site. Greenhouse gas emissions for the site are estimated at 665,800 tons of carbon dioxide equivalent per year, particulate matter (PM₁₀) at 99 tons per year and PM_{2.5} at 97 tons per year. If the transportation emissions sources, that are necessary for the site to function, are included in the emissions estimates, the health risks resulting from these emissions would be increased and the burden put on local and regional populations and ecosystems and not on the permittee for this facility. The health risks associated with diesel particulate matter include increased cancer rates, especially lung and breast; increased rates of asthma, worsening of preexisting asthma and chronic obstructive pulmonary disease (COPD); higher rates of heart attacks and strokes; and higher rates in children (exposed prenatally) of neurodevelopmental disorders such as autism spectrum disorder (ASD), attention deficit hyperactivity disorder (ADHD), lowered

[2 https://www.ksat.com/news/second-worker-dies-from-tanker-explosion-injuries-police-chief-says](https://www.ksat.com/news/second-worker-dies-from-tanker-explosion-injuries-police-chief-says)



IQ, and adverse behaviors.³ If this is not alarming enough, then add in the many and worsening health impacts of climate disruption that will be increased by this project. One thing is certain: we have to find another way to do business, because what we are doing is causing unnecessary and preventable harm.

Therefore, we strongly urge DEQ to withdraw the draft permit, amend the permit to remove the overlap between oil and ethanol operations, and issue a new draft for public comment. Or, in consideration of the unacceptable cumulative impacts on air quality, please reject the air quality permit for ethanol operations and put real environmental and public health protection through prevention into effect.

Theodora Tsongas, PhD, MS
Healthy Climate Action Team
Oregon Physicians for Social Responsibility

Damon Motz-Storey
Healthy Climate Program Director
Oregon Physicians for Social Responsibility

Kelly Campbell
Executive Director
Oregon Physicians for Social Responsibility

[3https://d3n8a8pro7vhmx.cloudfront.net/oregonpsrorg/pages/29/attachments/original/1491857988/Airborne_Particulate_Matter_and_Public_Health_Factsheet_%28FINAL__updated_10-5-15%29.pdf?1491857988](https://d3n8a8pro7vhmx.cloudfront.net/oregonpsrorg/pages/29/attachments/original/1491857988/Airborne_Particulate_Matter_and_Public_Health_Factsheet_%28FINAL__updated_10-5-15%29.pdf?1491857988)



Oregon Physicians for Social Responsibility
The U.S. affiliate of International Physicians for the Prevention of Nuclear War, Recipient of the 1985 Nobel Peace Prize
1020 SW Taylor Street, Suite 275, Portland, OR 97205
Tel: 503-274-2720 info@oregonpsr.org www.oregonpsr.org