

Will Vancouver Become an Oil Town?

Air Permit Hearing May Be Final, Important Opportunity to Speak Up

In coming weeks, we expect the Washington Energy Facility Site Evaluation Council (EFSEC) to release a draft air pollution discharge permit for the Tesoro Savage oil-by-rail terminal proposed in Vancouver, WA. At 360,000 barrels per day, Tesoro's oil train terminal would be the largest facility of its kind in North America. Yet, Tesoro claims that it will be a minor source of dangerous, foul-smelling pollution.



Attend the hearing. EFSEC will hold a public hearing in Vancouver about Tesoro's air pollution, probably in May. *This may be the last opportunity to testify in front of EFSEC before the Council makes its final recommendation to Governor Inslee.* We will email you and post information on standuptooil.org and columbiariverkeeper.org as soon as the hearing is announced. EFSEC will be most receptive to comments that are specific to air pollution.

Get Informed. We know that oil trains are reckless. Here are some issues to consider about the impacts of the terminal on Vancouver even if the trains don't derail:

1. Tesoro will emit volatile organic compounds (VOCs)

According to expert testimony filed in 2016, Tesoro would release hundreds of tons of volatile organic compounds (VOCs) each year from its oil mega-terminal. **Volatile organic compounds (VOCs)** are chemicals that cause a wide variety of adverse health effects. VOCs are emitted in the process of storing and transloading crude oil. Benzene, toluene, ethylbenzene and xylene are examples of VOCs that can cause cancers, blood disorders, birth defects, damage to the nervous system, and short-term irritation of the digestive and respiratory systems. For certain VOCs such as benzene, there is no known safe level for air exposure.

VOCs also create smog. According to an expert report, "In addition to being toxic, VOCs form ground-level ozone, also known as smog, when they mix with...nitrogen oxides from diesel-fueled trucks and equipment...Exposure to ground-level ozone can cause irreversible damage to the lungs and significantly increase the chance of premature death."¹ The Vancouver-Portland

¹ Barbara Gottlieb & Larysa Dyrszka, MD in their report, *Too Dirty, Too Dangerous: Why health professionals reject natural gas.* <http://www.psr.org/assets/pdfs/too-dirty-too-dangerous.pdf>

metro area is already burdened by smog pollution, a problem that could worsen as a result of the Tesoro Savage oil terminal.

2. Tesoro claims it will be a minor source of VOCs, but experts disagree.

Tesoro asserts that its facility would release less than 34 tons of VOCs each year. But this is a dramatic underestimate, according to expert testimony filed by Dr. Ron Sahu in 2016. According to Dr. Sahu,

- Tesoro's emissions estimate for VOC sources is highly suspect, both for the emissions from the transloading operations and the emissions from the storage tanks.
- Tesoro significantly underestimated air emissions. EFSEC should not rely on Tesoro's estimates, which assume negligible VOC emissions from transloading oil into ocean-going vessels and significantly underestimate VOC emissions from storage tanks.
- Transloading operations, alone, could generate between 111 and 254 tons of VOCs each year.
- VOCs are not the only pollutant of concern, but they are a significant concern since they are precursors of ozone formation in the atmosphere and they contain many volatile hazardous air pollutants that can present adverse health impacts to the impacted population.
- EFSEC should use a realistic approach to evaluating transloading emissions and increase the estimates of storage tank losses to ensure that EFSEC is protecting nearby residents. It is not reasonable to expect Tesoro to capture 100% of its VOCs from marine loading.

Dr. Sahu's VOC emissions estimates confirm that Tesoro Savage will be a major source of VOC emissions. Yet, Tesoro continues to assert that its vapor recovery system will operate with near-perfection, preventing any major releases of VOCs into nearby neighborhoods and downtown.

3. Tesoro's air pollution will harm Vancouver and its residents

VOCs, diesel exhaust, carbon monoxide, nitrogen oxides, particulate matter and other pollution will be a constant issue for Vancouver if the oil terminal goes forward. In addition to being a potential nuisance to nearby homes and businesses, these pollutants will impact the health of Vancouver residents. For example, VOC pollution will increase ozone levels (smog), a significant respiratory irritant.



The Columbian

According to Dr. Elinor Fanning, a public health expert, “construction and operation of the Tesoro Savage Terminal will worsen air quality, cause consequent health harms, and pose the possibility, however small, of a highly consequential accidental spill, explosion, or fire in a Washington community that is already heavily affected by air pollution due to the I-5 corridor, industrial activities, and residential wood burning. The air pollution impacts cannot be fully mitigated, despite use of best available control technologies...”

Pollution from existing oil-by-rail terminals tells us all we need to know about why EFSEC should deny the oil terminal. For example, news reports from communities near existing oil terminals show that VOCs, other air emissions and odors are a major potential problem.

One local group in Albany, NY sued the nearby oil terminal, telling the *Albany Times Union*, "We are going to court today to be granted the basic right to breathe clean air," said Charlene Benton, president of the Ezra Prentice Homes Tenants Association, which represents about 300 families in the city-owned project. According to the *Times Union*, in 2014, twenty of 21 air samples taken in the neighborhood showed benzene levels that exceeded New York's annual guideline concentration. The same issues could plague Vancouver, the Fruit Valley Neighborhood and Vancouver's resurgent downtown if the Tesoro terminal gains approval. This is one reason why over 101 local businesses and 12 neighborhoods have opposed the terminal.

4. Here are some of the issues we will raise with EFSEC

Earthjustice is representing the Stand Up to Oil Coalition and will prepare detailed comments as well as a fact sheet once the draft permit is issued. Here are some of the key themes we expect to stress with EFSEC:

- EFSEC should deny the Tesoro Savage oil terminal, including rejecting Tesoro's unrealistic claims and low-ball estimates of air pollution.
- The Tesoro Savage oil terminal will be a major source of volatile organic compounds (VOCs), which are dangerous for human health and contribute to the formation of smog.
- Tesoro Savage has not properly modeled the dispersion of VOCs in Vancouver.
- Tesoro Savage fails to assess accurately the potential formation of smog in Vancouver. Additional VOC pollution will increase smog, a respiratory irritant that is already a problem for the Vancouver-Portland Metro Area.
- EFSEC shouldn't bet on Tesoro controlling air pollution any more than it should expect every oil train to reach its destination safely. North America's largest oil terminal will be a toxic, smelly neighbor to Vancouver's homes, businesses, and schools.

- There are sensitive communities that will be impacted by Tesoro's air pollution. Neighborhood schools, homes, businesses, and even the county jail will be impacted by pollution and odors from the Tesoro terminal. This is unacceptable and unnecessary.
- EFSEC may not consider some issues – such as pollution from rail engines, marine vessel engines, and the end use of the oil – as part of the proposed air permit. But these activities will produce diesel exhaust and other pollution that will have a real-world impact on Vancouver. EFSEC must consider all of Tesoro's potential pollution in its Final EIS, for those things not included in the air permit.
- Similarly, EFSEC should recognize that Tesoro's proposal will dramatically increase climate-changing pollution from the production, transportation, and end use of crude oil.

We know that oil trains are reckless. The oil terminal's daily pollution is also unacceptable. We will urge EFSEC to reject the project as a whole, including any permit to allow toxic air pollution for an unnecessary, unsafe oil-by-rail terminal.

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