

To: DEQ, July 9, 2013 OREGON TESTIMONY

Re: Air Quality Permits for Coal Vehicles

My name is Gerri Sue Lent. I live at 1834 SE Spokane St. in Portland, Oregon. I've come to speak out about the proposed draft permits. I am troubled by the unregulated nature of the industrial projects being permitted. Specifically at draft permit "Standard Air Contaminant Discharge Permit Review Report," page 12 of 20, at point 27 (a) the Special Conditions states the permittee must develop, install, and maintain best management practices to minimize fugitive and visible dust emissions, listing some best management practices. However, in my opinion, it can not be best management practices to open a plant that does not have a plan envisioning responses to a total emergency.

Here however there is no discussion of requirements in the event of a catastrophic failure -- no emergency back up. What will be done if massive fire or explosion takes place? Where are the protections for air and water in the event electricity is interrupted and the cooling system fails? Where is talk of requiring insurance against coal dumping accidents? Where is the suggestion of bonding by the railroads and the coal companies for damage to towns, river, and air sheds in the event the "closed system" coal transfer project fails? Where is there generally talk of developing a Catastrophic Failure Plan?

Why will you think of planning only for the 10 year life of the permit? Real protections from catastrophic failure of this industrial system need to be mandated and in place before this plant is up and running.

I do not want unlimited amounts of coal -- up to four million tons the first year of operation alone -- being carried through such a dangerous facility. Such coal traffic is inherently subject to terrible accidents. The greater the traffic, the greater the risk of catastrophic failure. Best Management Practices, mandated in these permits, recognizes this fact.



Submitted as written testimony only before the Washington Department of Ecology, public testimony, September 17, 2013.