

Why the Harris Quarry is a bad idea

Ron Epstein, Ukiah Daily Journal, 8-24-10

Letter to the editor

The Harris Quarry Asphalt Batch Plant proposal is once again before the Mendocino County Planning Commission, and a new EIR is in the works. The project was a bad idea the first time around, and it is still a bad idea.

I am surprised that the past and recent discussions about Harris Quarry Asphalt Batch Plant proposal have not seriously considered the significant cancer risks involved. Asphalt fumes include known carcinogens. The asphalt plant proposed by Northern Aggregates, which would be located off Black Bart Drive, would seriously pollute the greater Ukiah area, which is downwind, with those carcinogens. Men in this country have a one in two chance of getting cancer during their lifetimes. Women have a one in three chance. About 80 percent of cancers are environmentally caused. In assessing the danger of the carcinogens from the proposed asphalt plant, we need to remember that the effect of carcinogens on our bodies is cumulative. Even small doses of carcinogens accumulate in our cells and can combine with other carcinogens to create a risk which is greater than the sum of the individual risks.

The question that the Mendocino County Planning Commission should be considering is not whether quarries and asphalt batch plants are needed in Mendocino County. Given the current business models and lifestyles that govern life in the county, there is no question that they are needed. What is in question is where they should be located. In such a large county with so much open space and so many areas of low population density, there is no need to locate such facilities in areas, such as the current Harris Quarry at the top of the Ridgewood Grade, where they pose a significant danger to human health.

The previous, 2008 Harris Quarry Draft Environmental Impact Report's (HQDEIR) evaluation of risk to the public health from the proposed asphalt plant was inadequate. Contrary to the findings of that HQEIR, the plant poses a significant risk to the health of large numbers of county residents. The current proposed EIR should correct those inadequacies. Further, if the Mendocino County Planning Commission employs the Precautionary Principle in its evaluation of the current plan for an asphalt batch plant, denial of the application is clearly the logical conclusion.

Although the 2008 HQDEIR summary states that because of mitigation factors, "health and odor impacts would be reduced to a less than significant level," it does not adequately take into account that "asphalt plants are sources of air pollution that may emit significant levels of both particulate matter and gaseous volatile organic compounds (VOCs). These pollutants are considered to be dangerous to human health."
(www.bredl.org/pdf/factsheet-asphaltplants.pdf)

The "Health" section of the 2008 HQDEIR claims, without providing any basis for the claims, that none of those substances will be emitted from the plant in quantities sufficient to adversely influence either the health of the workers or of those who live in the surrounding communities. Its claim seems to be based solely on the fact that there are county, state and federal agencies that handle these things, so we don't have to be concerned. Given the track record of those agencies, I doubt whether there are many people in the county who believe that they are effectively safeguarding our health. It is also widely known that the so-called safe pollution levels set by the federal government for the toxic substances that will be emitted by the proposed plant are believed to be

grossly inadequate by the mainstream communities of medical and scientific researchers in this area of research. The current proposed EIR should take this information into account.

In the appendix section of the 2008 HQDEIR long lists of toxic substances that would be emitted by the facility are listed. The claim is made there, without substantiation, that these substances will be destroyed by heating and by water washing. The devices mentioned do not do the job that they are supposed to do, and indeed, no evidence is provided for the efficacy of these measures or the probability of the devices in question operating at 100 percent efficiency, 24 hours a day, that the analysis assumes. The current proposed EIR should take this information into account.

The 2008 HQDEIR also failed to adequately consider: 1) the cumulative effect of the buildup in the body of the toxic compounds involved together with other pollutants that county residents are routinely exposed to; 2) the magnified effects on infants, children, the elderly, and people with special sensitivities to pollution; 3) the consequences of failure of the pollution filtering equipment; 4) the possibility of equipment failure due to employee error, and 5) the financial inability of the county to monitor adequately the proper functioning of equipment at the site.

The 2008 HQDEIR also failed to consider adequately the consequences of an accident on Highway 101 in the general area of the site in question between a tanker containing toxic substances for asphalt manufacture and another vehicle or a single vehicle accident involving a tanker alone. Such an accident has a high likelihood of probability and would release a large amount of toxic substances into the environment.

The 2008 HQDEIR also failed to consider adequately the serious health problems in workers at existing asphalt plants and residents of the communities surrounding them that have been extensively documented in scientific studies. It is also a well-known corporate tactic in building any kind of facility that is harmful to a local community to claim that the new facility will not have any of the problems associated with the facility in question, but that almost never turns out to be the actual case. The current proposed EIR should correct these inadequacies.

The 2008 HQDEIR contained no data or analysis from the Mendocino Air Resources Board, the Water Quality Control Board or from the Mendocino County Environmental Health Department. The Board of Supervisors should direct those agencies should report on the risks of this project to the environment and the population.

If the Mendocino County Planning Commission approves the Harris Quarry project, the commission will be taking a major step toward responsibility for serious illness and the premature deaths of a significant number of county residents. Although the problems of serious illness and premature death associated with asphalt batch plants can never eliminated, they could be seriously reduced by only allowing such plants in areas of the county that are sparsely populated and not upwind from major population centers such as Ukiah.