

VERMONT LAW SCHOOL



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November 22, 2017

VIA REGISTERED MAIL
RETURN RECEIPT REQUESTED

William B. "Brock" Long, Administrator
Federal Emergency Management Agency
500 C Street S.W.
Washington, D.C. 20472

Lieutenant General Todd T. Semonite
Commanding General and Chief of
Engineers
U.S. Army Corps of Engineers
441 G Street, NW
Washington, DC 20314

Re: Notice of Intent to File Suit Under the Resource Conservation and Recovery Act

Dear Sirs:

On behalf of the Island Green Living Association, the Virgin Island Conservation Society, and the Sierra Club, we write to notify you that the planned burning of up to 400,000 cubic yards of hurricane-related wood waste debris in St. Croix, U.S. Virgin Islands using air curtain incinerators presents an imminent and substantial endangerment to health and the environment in violation of Section 7002 of the Resource Conservation and Recovery Act (RCRA). We intend to file suit in the United States District Court for the Virgin Islands on the 90th day from the date of this notice, in accordance with 42 U.S.C. § 6972(b)(2)(A), if you commence burning the waste. This letter also serves as notice for any similar plans to burn wood waste in the U.S. Virgin Islands.

Background

In September 2017, Hurricanes Irma and Maria battered the U.S. Virgin Islands causing extensive damage. Gale-force winds, rain, and flooding caused tremendous damage by ripping apart buildings, downing trees, and leaving the islands without critical infrastructure. The federal government, led by the Federal Emergency Management Agency (FEMA), responded with financial assistance and on-the-ground help pursuant to its authority under the Stafford Act.

At the direction of FEMA, the U.S. Army Corps of Engineers (Corps) has cleared hurricane-related debris from areas throughout the Islands, including downed trees and other woody debris. The Corps stockpiled some of this wood waste on St. Croix in an area known as Body Slob where it plans to burn up to 400,000 cubic yards of the waste using air curtain incinerators. Neither FEMA nor the Corps have applied for or received a permit for this activity from an air pollution control agency, including the U.S. Environmental Protection Agency and the U.S. Virgin Islands Department of Planning and Natural Resources.

Air Curtain Incinerators

Air curtain incinerators resemble a large metal dumpster, similar to those found at construction sites. The main difference is that these incinerators have an industrial fan that blows a “curtain” of air over the top to help fuel the fire. Like a dumpster, however, there are no emissions controls.



Figure 1. Air Curtain Incinerator in Use at Floyd Bennet Field, Brooklyn, New York following Hurricane Sandy

Emissions from Combusting Wood Waste

There are numerous classes and examples of chemical hazards in emissions from the combustion of wood that present known human health hazards, including those chemicals and pollutants identified in Table 1. These include ultrafine particles, fine particulate matter (PM_{2.5}), carbon monoxide, polycyclic aromatic hydrocarbons (PAHs), arsenic, cadmium, and nickel. Burning brush and wood from poisonous trees, such as the Machiineel, which is found in the Virgin Islands, can also cause severe eye and skin irritation and likely lung irritation as well. Similarly, the mango tree contains the same toxin as poison ivy and poison sumac (urushiol), which can also cause severe allergic reactions.

Location of the Planned Burn

The Corps plans to burn this wood debris near several public school campuses: Charles H. Emanuel Elementary School (less than one mile); St. Croix Educational Complex (less than two miles); and the University of the Virgin Islands (less than two miles). The Central High and Educational Complex campuses will be serving an extraordinary number of students during the current school year as they are operating on split sessions with their regular student bodies along with the student bodies from the Elena L. Christian, John H. Woodson, and Arthur A. Richards junior high schools all in attendance on those two campuses. In addition, the Superior Court on St. Croix is located within a mile of the site and Good Hope Country Day School is within three miles of the site. The site is also within four miles of residential communities in the vicinity of Grove Place.

Violation of 42 U.S.C. § 6972(a)(1)(B): Creation of an Imminent and Substantial Endangerment

Pursuant to Section 7002(a)(1)(B) of the Resource Conservation and Recovery Act (RCRA), our clients are authorized to bring an action against FEMA and the Corps for solid waste disposal practices that “may present an imminent and substantial endangerment to health or the environment.” 42 U.S.C. § 6972(a)(1)(B).

Burning up to 400,000 cubic yards of wood waste in an air curtain incinerator will emit the chemicals identified in Table 1. Those chemicals, as indicated in the table, are known hazards to human health. Attached, and incorporated by reference, is a recent letter authored by leading experts in public health as evidence of the imminent and substantial endangerment to health or the environment that this project will cause.

Conclusion

The planned burn of up to 400,000 cubic yards of wood waste in air curtain incinerators is both unnecessary and unlawful. FEMA and the Corps should dedicate resources available for disaster relief and recovery to alternate means of disposal that do not endanger public health.

Table 1. Classes and Examples of Chemical Hazards in Wood Combustion

Published as Table 10.1, page 180, in Hoppin P and Jacobs M, "Emissions and Health Effects of Wood Biomass Combustion," Chapter in Jacobson M and Ciolkosz, Eds., Wood-Based Energy in the Northern Forests. New York: Springer Press, 2013.

Chemical class	Primary Examples	Known Health Hazard
CRITERIA POLLUTANTS	Carbon monoxide	Cardiac
	Lead (and compounds)	Carcinogen ^a , cardiac, reproductive/developmental toxicant
	Nitrogen oxides	Asthmagen ^b , immune toxicant, other respiratory toxicant,
	PM _{2.5}	Asthmagen ^b , cardiac, other respiratory toxicant
	PM ₁₀	Asthmagen ^b , cardiac, other respiratory toxicant
	Sulfur dioxide	Asthma (exacerbation), other respiratory toxicant
INORGANIC ACIDS	Hydrochloric acid	Corrosive, respiratory irritant
	Sulfuric acid	Corrosive, respiratory irritant
METALS [20+ potential compounds]	Arsenic	Carcinogen ^c , cardiac, other respiratory toxicant, reproductive/developmental toxicant
	Cadmium	Carcinogen ^c , endocrine disruption (osteoporosis), other respiratory toxicant, reproductive/ developmental toxicant,
	Chromium and compounds	Asthmagen ^b , carcinogen ^c , other respiratory toxicant, reproductive/ developmental toxicant
	Mercury	Reproductive/ developmental toxicant
	Nickel and compounds	Asthmagen ^b , carcinogen ^c (nickel), immune toxicant, other respiratory toxicant
POLYAROMATIC HYDROCARBONS (PAHs) [20+ potential compounds]	Benzo(a)pyrene	Carcinogen ^c , immune toxicant
	Indeno(1,2,3,cd)pyrene	Carcinogen ^a
	Naphthalene	Asthmagen ^b , carcinogen ^a
VOLATILE ORGANIC COMPOUNDS (VOCs) [20+ potential compounds]	Acetaldehyde	Asthmagen ^b , carcinogen ^a , respiratory irritant
	Acrolein	respiratory irritant
	Formaldehyde	Asthmagen ^b , carcinogen ^c , respiratory irritant
	Benzene	Carcinogen ^c , cardiac, reproductive/ developmental toxicant, immune toxicant, neurotoxicant
	Toluene	Neurotoxicant, respiratory irritant,
	1,3 Butadiene	Carcinogenic ^c , respiratory irritant
	n-Hexane	Neurotoxicant
Dioxins, furans and other "dioxin-like" compounds	2,3,7,8 tetrachlorodibenzo-p-dioxin; 2,3,7,8 tetrachlorodibenzo-p-furan	Carcinogen ^c , cardiac, endocrine disruption (type II diabetes, thyroid disorders), immune toxicant, reproductive/ developmental toxicant

^a Classified as "probable" or "possible" human carcinogen by the International Agency for Registry on Cancer (IARC) or "reasonably anticipated" to be a human carcinogen by the US National Toxicology Program (US NTP), respectively

^b Classified as an agent that can cause asthma *de novo* by the Association of Occupational and Environmental Clinics (also associated with triggering subsequent attacks)

^c Classified as "known" to be a human carcinogen by IARC and the US NTP

Persons Giving Notice

Island Green Living Association's mailing address is P.O. Box 410, Cruz Bay, St. John, VI 00831. Its telephone number is (215) 620-8809. Virgin Islands Conservation Society's mailing address is 4126 Anna's Retreat, Suite 102, St. Thomas, VI 00802. Its telephone number is 340-626-9007. Due to the hurricane, this number is temporary. The Sierra Club's mailing address is 2101 Webster Street, Suite 1300, Oakland, California 94612. Its telephone number is 415-977-5500.

The parties giving notice request that any person receiving this notice direct all inquiries to the undersigned legal counsel.

Environmental and Natural Resources Law Clinic

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Sincerely,



Kenneth J. Rumelt, Lead Counsel
Environmental and Natural Resources Law Clinic

COPIES SENT BY U.S. MAIL TO:

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U.S. Environmental Protection Agency
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U.S. Environmental Protection Agency Region 2
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Jeff Sessions, United States Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Roger E. Merritt, Jr., Executive Director
Virgin Islands Waste Management Authority
P.O. Box 1689
Kingshill, VI 00851-1689

Attachment

Senate President Myron Jackson

By e-mail

November 21, 2017

Dear Senator Jackson,

As health professionals with expertise in the links between air pollution and human health, we are writing to express our grave concern about and opposition to the proposed plan to dispose of wood debris on the Virgin Islands by burning them in air curtain incinerators. Burning of brush and wood on St. Croix, St. Thomas and St. John will increase air pollution and therefore the risk of associated health problems, including exacerbation of asthma in children and adults; increased severity of chronic obstructive pulmonary disease; and fatal myocardial infarction.

The alternative to burning—mulching and composting—is a far wiser choice on many levels. Mulching and composting add essential nutrients to the soils of the islands which will increase overall soil health. Mulching and composting avoid harmful exposures that pose health risks to people. And mulching and composting will save money for the Virgin Islands now and in the future by avoiding the unnecessary health care costs that will result from cardiac and respiratory illnesses produced by smoke exposure.

The authors of this letter include air pollution and wood smoke scientists who have published extensively. Several of us have led international, national and regional assessments of the impacts of air pollution, and wood smoke in particular, on human health. The authors include environmental and occupational health scientists and practicing pediatricians with particular expertise in asthma and neurodevelopment. Among us are long-term visitors to the Virgin Islands with strong connections to island residents and the beautiful environment on which the regional economy depends.

Below we summarize the relevant scientific/medical literature and our assessment of the exposure and health conditions in the Virgin Islands which form the basis for our concern. We cite over 30 peer reviewed articles; the references are attached.

Relevant Scientific Literature

Decades of research on air pollution have established that fine particulate air pollution, a mixture of solids and liquid droplets generated by combustion fuels including wood, is associated with significant health effects. These include shortened life expectancy, as well as increases in specific health conditions such as asthma attacks, heart attacks, stroke, chronic obstructive pulmonary disease, and a range of other conditions, including neurological impairments (Grandjean P et al 2014; Kioumourtzoglou, MA et al 2015). Air pollution and particulate matter specifically has been identified as a human carcinogen by the International Agency for Research on Cancer (Straif 2013). There is evidence that short-term exposure to particulate matter with the aerodynamic diameter of 2.5 microns or less--PM_{2.5}--is associated with stroke and heart failure as well as subclinical cardiovascular conditions such as systemic inflammation, increased blood coagulation, increased blood pressure, and increased vascular dysfunction (Brook RD et al, 2010). Numerous epidemiological studies examining the relationship

between increases in PM_{2.5} pollution and the most serious adverse health outcomes have not been able to identify a “no risk” level of PM 2.5 (i.e. a no threshold model) (Pope III AC and Dockery DW, 2006 and Book RD et al 2010). Fine particulates emitted into the outdoor ambient air pose an indoor as well as outdoor air quality hazard (Allen R et al 2003; Larson T et al 2004).

In addition to PM_{2.5} particles, wood smoke also contains ultra-fine particles with an aerodynamic diameter of less than 1 μm (Sippula O et al 2009). Both ultrafine and PM_{2.5} particles tend to deposit in the deep lung where they can penetrate into the blood stream and can have systemic biological effects. PM_{2.5} from wood biomass combustion can remain suspended in ambient air for longer periods of time, can be transported over long distances, and can penetrate more readily into indoor environments as compared to larger, coarser particles. (Wilson WE and Suh HH,al 1997)

Particulates are not the only pollutants of concern in emissions from wood burning. Wood smoke contains many other hazardous substances which are known contributors to acute and chronic illnesses, including asthma, cardiovascular disease, neurodevelopmental problems and cancer. These include Carbon Monoxide, and Polycyclic Aromatic Hydrocarbons (PAHs). Some studies of PAHs have found that wood combustion emits more carcinogenic PAHs per unit of fuel energy than several types of coal (Oanh et al. 1999 ; Truesdale RS and Cleland JG 1982). Emissions from wood burning can also include trace levels of heavy metals, such as arsenic, cadmium, and nickel which occur naturally in many types of wood (Washington State Department of Ecology 2003 ; Demirbas 2008). While metals are not a significant fraction of particulate pollution, one recent study of emissions from institutional and commercial wood biomass combustion units found that heavy metals and trace elements showed a tendency to concentrate in fine particles (Sippula et al. 2009). Burning “pressure-treated” wood is highly hazardous.

Numerous studies show that exposure to wood smoke causes a range of acute and chronic health problems, including harms to respiratory health in both children and adults, among them aggravation of asthma and of chronic obstructive pulmonary disease, bronchitis, and decreased lung function (Naehler et al, 2007; Boman BC, 2003). Two recent reviews add to the growing evidence of **cardiovascular impacts** of wood smoke exposure (Reid CE, Brauer M et al, 2015; Sigsgaard T et al 2015). One study documents a clear link between exposure to wood smoke and increased hospitalizations for heart attacks (Weichenthal S et al 2017). **Studies have also identified additional health risks for young children, notably an increased risk of bronchiolitis**—the leading cause of hospitalizations for children under one year old—among those exposed to the highest levels of wood smoke compared to those exposed to the lowest levels (Karr CJ et al 2009).

The scientific literature also establishes that individuals already burdened by significant environmental, social and economic stressors are more likely to be adversely affected by exposure to air pollution (Pope and Dockery 2006 ; Brook et al. 2010 ; Johnson PR and Graham JJ, 2005; Landrigan 1998). While not all of these populations have been studied with respect to wood smoke exposure, there is evidence as noted above that children as well as people with existing respiratory illness are particularly susceptible to the adverse effects of wood smoke (Naehler et al 2007).

Exposure and Health Considerations in the Virgin Islands

The level of risk to people's health from wood burning depends on factors related to the conditions of burning, and factors related to people. Several of these increase the likelihood that the proposed wood burning will harm the health of people in the Virgin Islands.

First, air curtain incinerators do not allow for high-temperature nor complete or efficient burning, which increases emissions of hazardous compounds. (Johansson et al 2004) Yet regardless of the method, burning wood debris left over from the hurricanes in the VI would generate higher hazard emissions because of physical and chemical properties of the wood. These include **moisture content** (Bignal KL et al 2008; Atkins A et al 2010), the variability in size and composition of wood debris, and the large amount of bark and roots, all of which contribute to incomplete combustion, higher levels of emissions and higher toxicity of particles. (Demirbas 2008 ; Beauchemin PA and Tampier M, 2008). In addition, some of the wood has likely been in contact with seawater, in which case dioxin emissions are possible (Lavric ED et al, 2004). Finally, **burning brush and wood from poisonous trees**, such as the Machineel, found in the Virgin Islands, can cause severe irritation of the eyes and skin (Brittanica Editors, accessed 2017) and likely the lungs as well (NIOSH accessed 2017).

On all three Virgin Islands, people of all ages from young infants to the very old live, work and play near where the burning will take place, increasing the risk of health problems. The percentage of pollution that is inhaled relative to the overall volume of emissions—known as the “intake fraction”—is higher the closer populations are to the source. The intake fraction can also increase when respiration rates are higher than normal, such as when people are exercising (Hoppin P and Jacobs M, 2012). Workers directly involved in the burning would be at particular risk for health problems (Yousouf H et al 2014; Hoppin P and Jacobs M, 2013).

The health risks from wood burning also need to be considered in the context of the high vulnerability and susceptibility of people on the Islands at this time.

People in the Virgin Islands suffer disproportionately from a range of health conditions (Callwood et al 2012) **which make them more likely to be affected by lower levels of pollutant concentrations.** In addition, some sub-populations are inherently more susceptible to health effects because of their age or condition—in particular pregnant women, infants, children and the elderly.

Health hazards abound during this hurricane recovery period. Exposure to diesel from generators; mold from infiltration of water into damaged buildings; high levels of dirt and dust indoors and outdoors; stress caused by the immediate experience of the storms and the hardships that have ensued, including lack of basic services and loss of livelihoods as well as poor economic prospects going forward—all these are risk factors for acute and chronic health conditions. Interactions among these risk factors can increase the risk of both disease exacerbation and onset; for example, the combined exposures of vehicle emissions and psychosocial stress can have a multiplicative impact on lung function in children exposed to both (Wright 2011). **It would be irresponsible to intentionally introduce additional environmental exposures to the people of the Virgin Islands at this time**, especially when non-polluting alternatives exist.

In conclusion, the robust scientific literature on the health hazards of wood smoke and the current conditions in the Virgin Islands—including the range of environmental and social risk factors to which people are currently exposed—provide the basis for our professional opinion that burning wood debris from the hurricanes poses unnecessary risks to human health. We strongly recommend that you do everything in your power to prevent burning of wood and brush debris, either in air curtain incinerators or otherwise.

We understand that public policy decisions often require trade-offs. In this case, we believe that a decision to burn virgin wood debris is unacceptable, both because of the risks we describe, and because of the feasibility of the much safer alternative of mulching and composting. To the extent that costs are central in the debate, we urge that you consider the increased health care costs associated with acute and chronic health impacts, as well as the long-term economic benefits of the Virgin Islands serving as a beacon for the region, indeed for the globe, in demonstrating policies and practices that both protect human health and establish sustainable infrastructure for the future.

Sincerely,

Polly Hoppin, ScD, Research Professor, University of Massachusetts Lowell and Program Director, Environmental Health, Lowell Center for Sustainable Production (Also Convenor, Northeast Regional Initiative on Wood Biomass and Health)*

Nicholas A. Ashford, PhD., JD, Professor of Technology and Policy and Director, MIT Technology & Law Program

Michael Brauer, ScD, The University of British Columbia (also National Academy of Medicine (U.S.): Standing Committee on the Medical and Epidemiological Aspects of Air Pollution on U.S. Government Employees and their Families (2017 -); World Health Organization, Guideline Development Group: WHO Global Air Quality Guidelines (2016 -); Global Burden of Disease. Member, Core Analytic Team. (2013-))

Catherine Chapman, MD, practicing pediatric neurologist, Boston Children's Hospital

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Ted Schettler, MD, MPH, Science Director, Science and Environmental Health Network

*Please address correspondence to Dr. Hoppin: Polly_Hoppin@uml.edu or 617 417-4340.

Please also note that we sent this letter to Governor Mapp as well. This letter to Senator Jackson includes additional co-signers. Our letter to Governor Mapp included cc's to the following people:

Michelle Davis, Health Commissioner

Dawn Henry, Commissioner, Dept. of Planning and Natural Resources

Roger Merritt, Executive Director, VI Waste Management Authority

Nelson Petty, Commissioner, Dept. of Public Works

Carlos Robles, Agriculture Commissioner

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