

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
NATURAL RESOURCES DEFENSE	)	
COUNCIL, INC., et al.,	)	
	)	
Plaintiffs,	)	Civil Action No. 08-1363 (RLJ)
	)	
-v.-	)	
	)	
UNITED STATES DEPARTMENT	)	
OF STATE, et al.,	)	
	)	
Defendants.	)	
_____	)	

**DECLARATION OF JAN TERVYDIS**

I, Jan Tervydis, declare as follows:

1. I am over the age of eighteen years and suffer from no legal incapacity.

This declaration is based on my own personal knowledge, information, and belief.

2. I have been a member of the Natural Resources Defense Council ("NRDC") since 2003. I joined NRDC and other environmental organizations because I am concerned about the environment and maintaining my quality of life.

3. I live in Edwardsville, Illinois, nine miles due east of ConocoPhillips' Wood River refinery. I have lived in the St. Louis metropolitan area for most of my life.

4. I have learned that the Wood River refinery will be expanded to accommodate oil from the proposed Keystone oil pipeline. I have severe asthma, and I am very concerned that my asthma will worsen as a result of more air pollution from the expansion, but I do not feel I have the information I need to evaluate and respond to the expansion.

5. I have already altered my daily schedule and habits in an effort to minimize my exposure to air emissions from the Wood River refinery. In the evening, when the air pollution seems to be worst, I stay indoors and shut my windows. I would like more information on the environmental and health consequences of the expansion so that I can adjust my behavior accordingly. If conditions will decline significantly, I plan to move away from the city as soon as possible. I do not think the area can handle any more pollution.

6. The air quality in the St. Louis area used to be worse than it is now. After returning to the St. Louis area in 1979, I developed worsening asthma and often severe respiratory distress necessitating emergency room visits and hospitalization. Both of my children also developed asthma. For two years starting in 1995, I would pass the Wood River refinery while commuting to work, and I got into the habit of holding my breath when I drove through the refinery area. While working at another local hospital, I would have respiratory distress immediately upon arriving in the parking lot due to the operation of the hospital incinerator in combination with other air pollution factors. Since the shutdown of the incinerators in all Illinois hospitals a few years ago, there has been improved local air quality and I have not had to visit the emergency room for asthma-related conditions. I worry now that the refinery expansion will change that by causing my health to deteriorate.

7. My daughter lives with me. Although she does not have asthma now, she is very sensitive to chemicals and air-quality conditions. She often bicycles to work, and she spends a great deal of time outdoors. She would also like to know how emissions

from Wood River and other facilities may be affecting her health, because she plans to move away from the city with me if conditions decline.

8. I am a medical transcriptionist and have worked at several St. Louis area hospitals, where I have typed up many hospital reports for asthma and respiratory-related conditions, especially in babies, children, and the elderly. I have noticed that my asthma is much worse here than in most other areas where I have lived or visited. It scares me to think that if the Wood River refinery expands to take oil from the Keystone Pipeline, our air could become even more polluted.

9. In addition to air pollution, I am concerned about water pollution from refineries. I am already very concerned about local water quality, and I like to watch the birds that use our local waters. I worry that the Wood River refinery expansion will add to the chemicals in these waters that could harm humans and wildlife. However, I do not have good information about these impacts.

10. I am also very concerned about greenhouse gases and climate change. I can see changes in the areas where I live and vacation, such as in the temperature and the water quality. I am also very concerned about how climate change could affect wildlife habitat, including habitat for birds. I understand that the extraction of Keystone oil to supply Wood River and the refining of that oil at Wood River could increase greenhouse gas emissions, but I do not know how much changes at the refinery will contribute to the problem of climate change. I would like to have this information.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 09-30-2008

Jan Tervydis  
Jan Tervydis

**CERTIFICATE OF SERVICE**

I, Selena K. Kyle, hereby certify that on October 17, 2008, I served the foregoing document:

**DECLARATION OF JAN TERVYDIS**

on the following counsel via the Court's electronic filing system:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed October 17, 2008:

/s/ Selena K. Kyle  
Selena K. Kyle