From: Charles Davidson <charlesdavidson@me.com>
Subject: Public Comment: The October 2019 Lehigh Southwest Stockton Terminal Project Notice of Preparation and Initial Study
Date: July 6, 2020 at 4:56:42 PM PDT
To: jcashman@stocktonport.com

To: Jason Cashman 7 July 2020
Port of Stockton Environmental and Regulatory Affairs Manager Port of Stockton
2201 West Washington Street. Stockton, California 95203
By email to: jcashman@stocktonport.com
From: Charles Davidson. Hercules CA 94547
Re: The October 2019 Lehigh Southwest Stockton Terminal Project Draft Enviroinmental Impact Report

Mr. Cashman,
The October 2019 Lehigh Southwest Stockton Terminal Project Draft Environmental Impact Report has the following comment for your consideration as the Final Environmental Impact Report (FEIR) is being prepared.

Specifically, the health hazards of the handling of massive amounts of hazardous materials is my concern regarding the Lehigh, Port of Stockton project.

The two types of cementitious materials included in the DEIR that are currently handled at Lehigh are Portland Cement and finely ground granulated blast furnace slag cement (waste from the steel industry, which may contain significant amounts of extremely toxic hexavalent chromium and various heavy metals) and which are considered hazardous materials according to safety data sheets. (1,2) These metals, if airborne as dust, are both highly inflammatory and carcinogenic.
Additionally, in the future Lehigh will be distributing cementitious material containing fly ash (waste from coal combustion, used in making cement products), which is similarly toxic, if not worse.
According to the EPA:
Coal is a fossil fuel used to produce power in the United States. Coal contains trace amounts of naturally-occurring radioactive elements. The process of burning coal at coal-fired power plants, called combustion, creates wastes that contain small amounts of naturally-occurring radioactive material (NORM). (3)
According to Duke University researcher Avner Vengosh, levels of radioactivity in the ash were up to five times higher than in normal soil, and up to 10 times higher than in the parent coal itself because of the way combustion concentrates radioactivity. (4)
Radium isotopes and lead-210 occur naturally in coal as chemical by-products of its uranium and thorium content. Vengosh's research team revealed that when the coal is burned, the radium isotopes become concentrated in the coal ash residues, and the lead-210 becomes chemically volatile and reattaches itself to tiny particles of fly ash. This causes additional enrichment of radioactivity in the fly ash.

The California Air Resources Board (CARB) in its letter in response to the project's NOP noted that:
CARB staff is concerned about the air pollution and health risk impacts that may result from the Project. If the throughput maximum occurs on a regular basis, the Project would result in more than doubling of the number of bulk marine vessels, heavy-duty trucks, and trains visiting the Project site over existing conditions. This net increase in activity could negatively impact local air quality by the health-harming emissions, including particulate matter, toxic air contaminants, and diesel emissions generated during the construction and operation of the Project. These emissions also contribute to regional air pollution by emitting precursors that lead to the formation of secondary air pollutants, like ozone, and contribute to an increase in greenhouse gas (GHG) emissions.

There are residences, schools, and senior centers for the community located near the Project, [in addition to several places of worship]. (5)

The Project DEIR makes no mention of the true extent of potentially significant health threats from heavy metals and radioisotopes found in blast furnace slag and coal fly ash, two substances which are intended to be handled in *vastly* larger amounts at the Port of Stockton, Lehigh facility, should this permit be approved, as is. A thorough assessment of health risks from these commodities so close to residents nearby the Lehigh facility must be adequately answered in all future considerations of this project, such as when preparing and considering the FEIR.

REFERENCES:

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2 https://www.lehighhanson.com/docs/default-source/safety-data-sheets/sds-slag-cement.pdf?sfvrsn=c2c71cbf_2
3 https://www.epa.gov/radtown/radioactive-wastes-coal-fired-power-plants
4 Naturally Occurring Radioactive Materials in Coals and Coal Combustion Residuals in the United States," Nancy E. Lauer, James C. Hower, Heileen Hsu-Kim, Ross K. Taggart, Avner Vengosh. Environmental Science & Technology, Sept. 2, 2015. DOI: dx.doi.org/10.1021/acs.est.5b01978
5 https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0