

Environmental Quality Commission Meeting  
Corvallis, Oregon  
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Public Comments - Written  
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Re: Tar Sand Crude Export from Port Westward

Thank you for this opportunity to provide public comments. My name is Greg Pettit and I live in Warren Oregon. I am here today to raise your awareness and express concerns regarding the shipment of Canadian Tar Sand Crude oil from Port Westward in Columbia County on the Columbia River Estuary. In 2014 I retired from DEQ where I was the Administrator of the Laboratory and Environmental Assessment Division. Relevant experience while in that position included representing DEQ on the Oregon's Ocean Policy Advisory Committee and serving on the Lower Columbia River Estuary Program Scientific Advisory Committee. In my 38 years of experience at DEQ I worked on many environmental damage assessments from spills and accidents. These included the *New Carrissa* on the Oregon Coast in 1999 and the 42,000 gallons of oil spilled from the ship *Mobiloil* in 1984 when it ran aground near Warrior Rock on the Columbia River. I am currently the Chair of Columbia County Democrats and President of the Scappoose Bay Watershed Council. The Columbia County Democrats have taken a position in opposition to the export of crude oil from Port Westward. However, today I am here representing Envision Columbia County, a citizens group based in St. Helens. Our vision is: "A commitment to our quality of life, safety of our communities and the stewardship of a healthy Columbia River as our sacred trust".

Port Westward is a deep-water port on the lower Columbia River near Clatskanie Oregon at river mile 53. The Port of Columbia County (formerly Port of St. Helens) manages 11 different industrial property sites in Columbia County. The largest of which at 1700 acres is Port Westward. The Port is served by a rail line from the southeast that parallels Highway 30 and the Columbia River. Under DEQ's watch, an ethanol refinery was built to receive corn trains and export ethanol. In 2014 DEQ allowed Global Partners to switch from ethanol to Bakken crude, which was later then changed to shipments of ethanol. Recently Global Partners asked for and has been granted permission by the Port Commission to ship up to 38 unit trains per month of Canadian tar sands crude from Port Westward. This is a much-abbreviated version of the Port Westwards complicated history and remarkably unsuccessful plans for economic development usually involving environmentally undesirable initiatives.

The economic viability of the tar sands oil industry is questionable due to cheaper, better quality U.S. shale oil, refinery capacity and lack of access to Asian Markets.

There are three primary reasons we oppose the export of Canadian tar sands crude oil from Oregon ports; human safety risks, environmental risk particularly regarding the Columbia River, and overall adverse environmental impacts of the tar sands oil industry.

1. Safety: Canadian Tar Sands Crude is known as bitumen. It is heavier than water and sinks. It is too thick and viscous to be pumped and transported as a liquid. In order to do so it must be either heated (not commonly done) or diluted with a lighter product, commonly natural gas condensate. While bitumen is less flammable and explosive than crude oil, it is not true that diluted bitumen or dilbit is. On the U.S. Department of Commerce web-site, documents about the Keystone XL pipeline classifies it as the most flammable category, Packing Group 1. Cenovus, one of the first companies to ship tar sands oil by rail clearly identifies it as being “highly flammable liquid and vapor”. The reason light fracked oils like those from Bakken are so explosive is that the crude comes out of the ground with many of the components of condensate (e.g. propane, ethane, pentane, hexane). Dilbit is so flammable and potentially explosive because these are the very same components intentionally added to the bitumen to create dilbit. Quoting an article in *Oil Change International* titled “Transporting Tar Sands as Dangerous as Shale Oil” – “Following a derailment and explosion in Ontario in February there is growing evidence that transporting tar sands oil is as inherently dangerous as carrying volatile Bakken Shale Oil.” In this accident only 37 cars derailed and 21 caught on fire. The fire burned for six days. This train transported dilbit. An article in *Railway Age* titled Properties of Dilbit and Conventional Crude concluded with the statement “Should TSB (Transportation Safety Board) conclude that dilbit has a volatility similar to Bakken Crude, as the Alberta research suggests, the hazmat classification of crude oil could be in question”. Increased train traffic and longer trains regardless of the commodity they transport create their own safety issues. In Columbia County due to the lack of overpasses and modernized infrastructure emergency services are blocked for getting to areas where they may need to be needed including residences, schools, nursing homes and businesses. These delays are very serious and if unaddressed can predictably result in fatalities. The danger from these trains is along the entire route including disproportionately impacting environmental justice communities in Multnomah County. Oregon dodged a bullet with the Bakken crude oil derailment near Mosier, the impacts could easily have been much worse.
2. Environmental Risk: The more oil trains and ships (we cannot forget the ships going into and out of the Columbia River) the greater the chance of spills. Quoting the U.S. Department of Commerce Emergency Response Division, “Diluted Bitumen Oil Spills: Responder Guidance: After loss of the light fractions, diluted bitumen spills have a greater potential to submerge and form aggregates with suspended particulates in fresh water---; These oil particulate aggregates can be heavier than water and sink in low flow areas, which can be miles downstream of the release area; Spills of diluted bitumen crude oil will be persistent because the bitumen is already highly weathered---“. The most expensive inland oil spill in U.S. history was a dilbit spill from a leaking Enbridge pipeline into the Kalamazoo River. Over 1.2 billion dollars was spent trying to address the spill and six years later the river bottom and sediments were still contaminated with the product. Existing oil spill training and planning is largely based on containment and clean-up of conventional crude oil spills and do not adequately address the special risks associated with sinking oil.

Much of the train tracks the oil would be transported on are immediately adjacent to the Columbia River. A massive oil train derailment along the Columbia river, despite existing oil spill planning, would create an environmental disaster of historic proportions. Such a disaster would

not only endanger the ecological integrity of the Columbia River, including threatened salmon stocks, it would threaten public water supplies depending on a clean river.

3. Global Warming: Global warming is our greatest environmental threat and will have enormous adverse consequences for our planet and mankind. The extraction and consumption of tar sands oil is about the worst environmental practice there is when it comes to increasing greenhouse gases, producing three times the greenhouse gases of conventional crude extraction, not to mention damage to aquifers, ecosystems and the creation of massive hazardous waste spoil sites. The State of Oregon, the EQC and DEQ staff are doing much to address this issue and reduce our contributions of green-house gas emissions. Supporting the tar sands oil industry by providing the transportation and export of their product is completely inconsistent with Oregon's efforts to be a leader on global warming and climate change.

### **Conclusion**

Much of my career at DEQ I spent in the pursuit of a better and scientifically valid understanding of environmental quality, and the relative risk of impairments. I know that the DEQ staff are competent, dedicated and do an excellent job of implementing rules and guidance policies. Sometimes, however, significant environmental and public health risks are inadequately addressed because of a lack of regulatory drivers; such as understanding of risk, unclear regulatory responsibilities, or lack of public awareness. Until recently that was true for air toxics but as a result of Bulls Eye Glass and the public awareness that ensued much improvement has been made on this issue. It is still true regarding the health risks from contaminated private drinking water wells with arsenic, nitrates, and pesticides. I suggest that all three factors mentioned above make it also true regarding the tar sands oil issue. The most difficult job for the EQC and DEQ is translating risk into appropriate levels of protection from those risks. I hope that the State of Oregon and the EQC will determine that the risk to human safety, our environment, and the world's climate from the exportation of Canadian tar sands crude across Oregon rails and from Oregon ports exceeds any benefits to our State from such activities.