



GREATER BOSTON PHYSICIANS
FOR SOCIAL RESPONSIBILITY

CARING FOR OUR CLIMATE
PREVENTING NUCLEAR WAR

November 7, 2018

Monica Bharel, MD, MPH
Commissioner of the Massachusetts Department of Public Health
250 Washington Street
Boston, MA 02108

Dear Commissioner Bharel,

The Greater Boston chapter of Physicians for Social Responsibility (PSR) has been a strong supporter of the health impact assessment (HIA) for the proposed natural gas compressor station in Weymouth. Greater Boston PSR members have participated in the public process, and our chapter has followed the deliberations closely.

We write this letter to underscore our professional concerns about the HIA, which we outline in detail below.

The process has been rushed. The HIA was ordered by Governor Baker on July 14, 2017, but the first public meeting to initiate the process was not held until June 21, 2018. This has left very little time to gather and evaluate appropriate data before the report is to be issued in November 2018. This is also substantially less time than is typically taken for a HIA focused on environmental health.

The HIA evaluation of existing air quality conditions is inappropriately limited, but nevertheless has identified significant human health concerns for local residents.

- (1) Citizen scientists have performed and reported air quality sampling in Weymouth, Quincy, and Braintree using certified commercial labs and EPA-designated methods. These data were collected over more than 1 year and show recurrent benzene elevations and periodic elevations of other hazardous air pollutants. These data have been disregarded in the HIA. Furthermore, some of these hazardous air pollutants were not tested for by the Massachusetts Department of Environmental Protection (DEP) in their evaluation for the HIA.
- (2) The air quality sampling performed by the Massachusetts DEP is limited in time and scope. In particular, the sampling occurred only in the summer (whereas concentrations of volatile organic compounds are often highest in the winter), and the sampling evaluated only 24-hour averages and hence fails to account for peak emissions levels.
- (3) The air quality data are presented with “urban background” (i.e. Boston) levels as a comparator. Whether air quality in the South Shore is comparable to Boston is not relevant and disregards the further degradation in air quality that would result from constructing the Weymouth compressor station.
- (4) Air quality measurements from the Massachusetts DEP identify levels of formaldehyde, chloroform and carbon tetrachloride that are many times above the allowable ambient limit. Methanol concentrations exceeded the state’s 24 hour limit but were not included as part of the HIA.

The surrounding community has existing health conditions that make it uniquely vulnerable to the health effects of air pollution. Health statistics provided by the Department of Public Health thus far for the communities of Weymouth, Quincy and Braintree show significantly elevated levels of coronary artery disease and chronic obstructive pulmonary disease, relative to the state average. Both conditions are exacerbated by air pollution. These communities should be provided with air quality improvement programs and not subjected to further permitting of polluting facilities.

The infrastructure around the proposed site has fundamental and irremediable deficits in emergency preparedness. The proposed compressor station is to be sited in a densely populated area with only one route of access. The police, fire, ambulance, and trauma hospital capacity of the region would be unable to appropriately manage an unanticipated emergency incident at this site. This has become tragically more apparent after the Columbia Gas disaster in the Merrimack Valley and a subsequent gas overpressure event in Woburn.

The surrounding community is already the site of heavy industrial development and hence an additional natural gas compressor station raises environmental justice concerns. The industrial concentration presently includes a Citgo Gas/Oil Tank Farm, a Clean Harbors Hazardous Waste facility, Twin Rivers Technologies, Sprague Tank Farm, the MWRA Fertilizer Pelletizing Plant, the BELD power generation plant, the Calpine power generation plant, and the MWRA sewage pumping station.

Based on these concerns, we urge the Department of Public Health to acknowledge the many irremediable health problems associated with the Weymouth location and to recommend **against** siting the proposed compressor station there.

Yours truly,

The Steering Committee of Greater Boston Physicians for Social Responsibility:

John Belge — *vice-chair/secretary*

Matt Bivens, MD — *chair*

Richard Clapp, MPH, DSc

Ira Helfand, MD

Amy Hendrickson

Joseph Hodgkin, MD

Martha Katz, MD

Tatjana Kobb, MD

Peter Moyer, MD, MPH

Krupa Patel, MD

Cornelia (Kea) van der Ziel, MD — *treasurer*

Cc:

Weymouth Mayor Robert Hedlund: RHedlund@weymouth.ma.us

Matthew Brennan, Assistant Director, Weymouth Board of Health: MatthewBrennan@weymouth.ma.us

Quincy Mayor Thomas Koch: mayorkoch@quincyma.gov

Andrew Scheele, Health Commissioner: ascheele@quincyma.gov

Braintree Mayor Joseph Sullivan: mayorsoffice@braintreema.gov

Marybeth McGrath, Director, BOH: mmcgrath@braintreema.gov

Hingham Selectman Paul Healey: healeyp@hingham-ma.gov

Hingham Board of Health: healthdirector@hingham-ma.gov

Barry Keppard, Director of Public Health, Metropolitan Area Planning Commission: BKeppard@mapc.org

Jana Ferguson, Director, Bureau of Environmental Health: Jana.Ferguson@State.MA.US

Marylou Sudders, Secretary, Executive Office of Health and Human Services: marylou.sudders@state.ma.us

Charlie Baker, Governor, via Brianna Wehrs, Exec. Assistant,: brianna.wehrs@massmail.state.ma.us