



## Erie County Medical Society Position Statement Regarding the Proposed Tire-Burning Plant revised July 15, 2008

On December 6, 2007 Erie Renewable Energy LLC (ERE) submitted an air pollution permit to the Pennsylvania Department of Environmental Protection (DEP) for the construction and operation of a tire burning facility. The plant would be located in a well-populated area within the City of Erie, 500 yards from the Lake Erie shoreline. Each year the plant is expected to release 354 tons of nitrous oxide, 690 tons of carbon monoxide, 179 tons of sulfur dioxide, and 230 tons of particulate matter (PM<sub>10</sub>). The latter includes fine particulate matter less than or equal to 2.5 microns (PM<sub>2.5</sub>). Many other harmful substances, including volatile organic compounds, arsenic, mercury and dioxins will be dispersed. Serious adverse health effects linked to these toxins have been well described. The amount of material released must meet the current DEP thresholds for these agents.

Presently, Erie County has poor air quality with regard to particle pollution documented by the American Lung Association in their *State of the Air Report 2008*. The 24 hour grade for our County was rated as F (worst on a scale A-F). In addition, the Pennsylvania Department of Health found the observed cancer incidence in Erie County from 2000-2004 was statistically above the expected cases for that time period (294 excess cases, majority being lung cancer). Long term exposure to combustion-related fine particulate air pollution is considered an important environmental risk factor for cardiopulmonary and lung cancer mortality (ref. 1). There is a linear relationship between the air concentration of PM<sub>2.5</sub> and percent increase in deaths (ref. 2). There is **no threshold** below which exposure to these particles would not increase deaths. As stated by the U.S. Environmental Protection Agency regarding cancer-causing air pollutants, "EPA assumes that there are no exposures that have zero risk." Other potential hazards include pollution of Lake Erie waters, influx of diesel trucking, additive effect of neighboring industrial plants, and risks associated with large standing piles of tires.

Based on the above, the Erie County Medical Society is concerned that simply meeting DEP standards will not adequately define the health risk to our local citizens over time. It is our position that an independent **health impact assessment** be obtained to further delineate the increased risks of disease and death which may result from the operation of the proposed tire burning facility. This should also include industrial hygiene management to minimize ongoing toxic dispersals. Methodologies to perform such studies have been established. Study results should be disclosed to all parties concerned including ERE, DEP, Erie City Council, and the general community prior to subsequent DEP public hearings.

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1. Reference: Journal Amer. Med. Assoc. March 6, 2002 – Vol 287, No. 9
2. Reference: Environmental Health Perspectives. October 2002 – Vol 110, No. 10