

# Coalition For A Safe Environment

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Jesse Marquez

09-8-5

September 25, 2009

Mary D. Nichols, Chairman  
Members of the Board  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

Re: Recommendations to Implement Locomotive & Railyard Emission Reductions  
Su: Request For Additional Locomotive & Railyard Emission Reductions Measures

Dear Chairman Nichols:

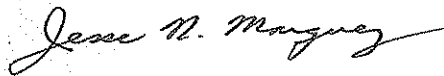
The Coalition For A Safe Environment (CFASE) has reviewed the proposed recommendations and wish to comment that they are not adequate to significantly reduce toxic air emissions and prevent increasing public health impacts. CFASE would also like to request a 30 extension of the public comment period.

CFASE would like to request the following additional measures be included:

1. Relocation of railyard facilities.
2. Downsizing of railyard facilities.
3. Use of alternative rail track routes.
4. Limit the hours of operation of railyards and track routes.
5. Relocation of railyard entrances.
6. Limit the hours of locomotive engine fueling and storage tank refueling.
7. Prohibition of fuel storage tanks & refueling pumps near fence-line residents.
8. Prohibition of maintenance facilities near fence-line residents.
9. Prohibition of more than 5 locomotive engines operating within 500' of fence-line residents for more than 1 hour..
10. Prohibition of more than 10 locomotive engines operating within 1,000' of fence-line residents for more than 1 hour.
11. The replacement of diesel fuel locomotive trains with MagLev Trains and Electric Trains in urban cities and Environmental Justice Communities.
12. The use of the Advanced Locomotive Emissions Control System (ALECS) technology at all railyards.
13. Prioritize the use of Electric Trucks at railyards bordering Environmental Justice Communities. Followed by LNG Trucks and lastly Diesel Fuel Trucks.

- 14.Immediately replace all diesel fuel yard handling equipment with electric equipment and vehicles followed by natural gas powered vehicles.
- 15.Immediately replace all diesel fuel locomotive engines with GenSet trains.
- 16.Immediately require the use of the lowest sulfur content fuel.
- 17.Conduct a Health Risk Assessment (HRA) of VOC emissions for the ambient leakage of VOC's from locomotive trains from the incomplete burning of diesel fuel, fuel storage tanks and ground contamination. Benzene is a VOC of diesel fuel which can cause leukemia, lymphoma, myeloma and anemia yet there is no reference to any study of public health impacts of these toxic chemicals.
- 18.Conduct a Health Impact Assessment in addition to an HRA in order to determine the complete public health impacts. The Los Angeles County Department of Public Health and US EPA Region 9 both support the use of HIA's.
- 19.Conduct an assessment of land and ground water contamination from diesel fuel emissions, fuel spillage and tank leakage.
- 20.Require the installation of air purification systems in residents homes, public schools, senior citizen housing and all sensitive receptors within 1,500 feet.
- 21.Require the installation of sound proofing of residents homes, public schools, senior citizen housing and all sensitive receptors within one mile. With an STC sound proof factor of 65 or higher.
- 22.Require 24/7 Fence-Line Monitoring & Reporting of all toxic emissions.
- 23.Require the railroad industry to provide public notice and disclosure of all public health illnesses caused by their business operations.
- 24.Require the railroad industry to establish a Public Health Care Trust Fund to mitigate its public health impacts.
- 25.Require the railroad industry to pay for the relocation of residents who wish to move but cannot afford to move.

Respectfully Submitted,



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