

# Syar Mine & Asphalt Facility Air Quality & Health Risks

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## Crystalline Silica @ Syar

- “Respirable crystalline silica constitutes a small fraction of the dust that will be emitted by the project.” (Staff Report, Exhibit A, 28/79)
- A majority of the dust is amorphous silicon dioxide and too large to be respirable. Evidence of this is presented in the Appendix... (FEIR 31/755)
- “Respirable crystalline silica equal to four percent (4%) of the total dust was assumed based upon the article PM4 Crystalline Silica Emissions Factors and Ambient Concentrations at Aggregate Producing Sources in California (Appendix L).” (Section 7.2 Health Risk in AQHRIA 8/14/13 [36/448])
- The actual amount of Crystalline Silica in rock at Syar has never been reported!

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## Silica @ Other Mines

- The actual amount of Crystalline Silica in rock at Syar has never been measured. It is estimated from:
- Data from Barstow, Carroll Canyon (San Diego), Tracy
- “The measured PM4 crystalline silica emissions ranged from 3.21 to 7.95% of the simultaneously measured PM10 emission factors.”
- “ The PM4 crystalline silica emissions measured in this study appeared to be related to the crystalline silica content of the mineral being handled. The concentration of crystalline silica in PM4 PM averaged 44% of the crystalline silica content of the bulk mineral.”
- (JAWMA (Appendix L) [438/448])

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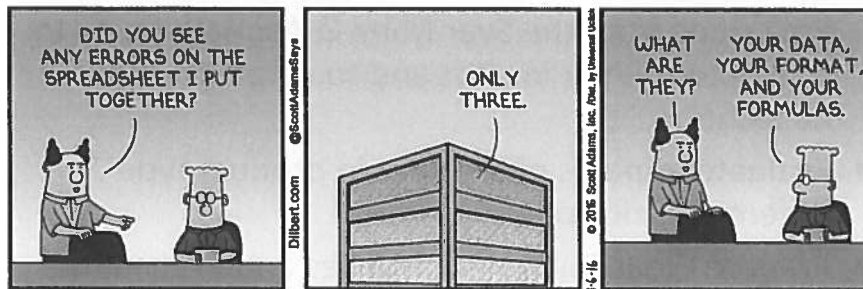
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10) Why is assuming that 4% of the dust is silica a reasonable percentage within the range of 3.5 – 7.9? How was 4% derived and how is it representative of the conditions of the project site?

Response:

The source of the 4% assumption could not be found in the technical paper that was used as a basis for that value (Appendix L of AQHRIA found in DEIR Appendix I). Nevertheless, the difference even if 8% or 10% (as would be the default in San Diego APCD) is chosen instead, does not rise to a level that would change any impact determination...

## Questionable Modeling



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### *Deceit and Denial The Deadly Politics of Industrial Pollution*

- "...it is absolutely essential to have as much openness and free access to information as possible. Without such information Americans are dependent upon the limited and sometimes inaccurate information given them by companies...when it comes to public health, the society has a right to insist that the community's interests come before the shareholder's profits." [Markowitz & Rosner 2002]

## Recommendations

- Analyze % Crystalline Silica in Syar Mine
- Independent Perimeter Monitoring of Real-Time Emissions from the Syar Mine & Asphalt Plants to understand their impact and to establish true baseline
- Evaluate impacts of changes in product type-3 different toxicological profiles
- Prepare Clear Mitigation Policies and Procedures
- Need certified third-party inspections