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ACE

alternatives for
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Building Power for Environmental Justice

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Tel 617-442-3343 • Fax 617-442-2425 • www.ace-ej.org
OFFICE OF THE CITY CLERK
CAMBRIDGE, MASSACHUSETTS

September 25, 2012

Cambridge City Council
795 Massachusetts Ave
Cambridge MA 02139

Re: DOT Study to determine the impact on the public safety of transporting ethanol by train, Section 24 of Chapter 242 of the Acts of 2012.

Dear City Councillors:

Thank you for your opposition to Global Partners' proposal to transport ethanol via rail. Following is a letter ACE sent to Secretary Davey at the Massachusetts Department of Transportation that discusses recommendations for what the study should consider. We urge you to share your expertise about the impacts and concerns of transporting ethanol by rail with the Massachusetts Department of Transportation.

Sincerely,

Staci Rubin, Staff Attorney



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OFFICE OF THE CITY CLERK
CAMBRIDGE, MASSACHUSETTS

September 25, 2012

Richard A. Davey
Secretary and Chief Executive Officer
Massachusetts Department of Transportation
10 Park Plaza, Suite 4160
Boston, MA 02116

Re: DOT Study to determine the impact on the public safety of transporting ethanol by train.

Dear Secretary and CEO Davey:

This letter concerns Section 24 of Chapter 242 of the Acts of 2012, which requires the Department of Transportation (DOT) to commission a study to determine the impact on the public safety of transporting ethanol by train through the cities of Boston, Cambridge, Chelsea, Everett, and Revere. Alternatives for Community & Environment (ACE) represents residents of Boston, Chelsea, and Revere who believe the transport of ethanol by train through their communities presents unacceptable risks to public health and safety.

ACE urges the DOT to:

- convene a study Advisory Committee that includes residents and a representative of the Boards of Health from the following municipalities: Boston, Cambridge, Chelsea, Everett, and Revere; and representatives of the following state and local agencies: Executive Office of Public Safety and Security, Massachusetts Public Health Commission, and Boston Fire Department;
- conduct a public hearing to obtain input on issues the study should consider; and
- conduct a public hearing to obtain feedback on the draft study.

We and the committee of residents from Revere, Chelsea, and East Boston recommend a thorough review by DOT of Global Partners' proposal to transport ethanol via rail and that DOT consider the suggestions in this letter. We suggest the DOT study should include the following items:

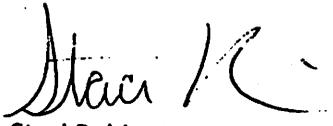
- Determine the train route(s) of the ethanol trains;
- Determine the amount of time it will take for the ethanol trains to travel along the entire route of the commuter rail tracks and unload the ethanol at the Revere facility and how the transportation and unloading will affect commuter and subway trains;
- Determine the railcar capacity of the spur located on Global Partners' property;
- Determine the time available for the ethanol trains to use the commuter rail tracks when the commuter trains are not running;

- Analyze the number of healthcare institutions within a one mile radius around the entire train route(s);
- List and analyze all derailments in Massachusetts since 2000;
- List and analyze all ethanol train derailments and train fires throughout the United States since 2003;
- Review reports from the National Transportation Safety Board concerning other derailments of trains carrying hazardous material;
- Determine the safety of the rail tanker designs currently in use and likelihood that a tanker could be pierced;
- Determine the impacts to the subway and commuter rail if a derailment occurs;
- Determine the impacts of an ethanol fire in the following scenarios: rural community; urban community; within proximity to other gasoline tanks and chemical storage tanks, including ammonia; within proximity to the New England Produce Market; over a drinking water supply; over a water recharge area; and under a major roadway;
- Conduct an inventory of alcohol-resistant foam in Massachusetts, the equipment available to deploy the alcohol-resistant foam, and the time it would take to extinguish an ethanol fire;
- Conduct an analysis of each municipality's risk communication capacity including the language and cultural challenges of such risk communication;
- Review the municipal evacuation policies and economic capacity of each town to acquire training and materials for responding to an ethanol train derailment and/or explosion;
- Make recommendations to minimize the public safety, environmental, and public health risks of the transportation of ethanol via rail;
- Conduct an analysis comparing the health and safety impacts of transporting ethanol via rail to transporting ethanol via barge to the Global Partners' facility in Revere;
- Complete an analysis of potential terrorist attacks and ways to minimize ethanol trains as a target for such attacks;
- Analyze the number of trucks that will be added to the roads to distribute the blended gasoline product as a result of the increased ethanol transported to the site via rail;
- Discuss the long term environmental and public health effects of the alcohol-resistant foam and other materials used to extinguish ethanol fires, including the chemical composition of these materials, and any information not available on health and environmental effects;
- Conduct an environmental justice analysis that assesses air, water, safety, and health impacts to all environmental justice communities identified by the Executive Office of Energy and Environmental Affairs, along the train route(s); and
- Propose measures to avoid, minimize and/or mitigate disproportionately high and adverse environmental and public health effects on environmental justice communities of transporting ethanol via train.

Given the public interest in the method and content of this study, we request a meeting with DOT staff to discuss our recommendations. We can be contacted at 617-442-3343 ext. 226 (Eugene) and ext. 236 (Staci).

Sincerely,

 Eugene B. Berison, Legal Counsel and
 Director of Environmental Justice Legal Services Program


 Staci Rubin, Staff Attorney

Cc:

- Congressman Michael Capuano
- Congressman Ed Markey
- Speaker of the House Robert DeLeo
- Senator Sal DiDomenico
- Senator Anthony Petruccelli
- Representative Kathi-Anne Reinstein
- Secretary Mary Elizabeth Heffernan, Executive Office of Public Safety and Security
- Honorable Jay Ash, Chelsea City Manager
- Mayor Dan Rizzo, Revere
- Bart J. Shea, Deputy Chief / Fire Marshal Boston Fire Department
- Boston Board of Health
- Boston City Council
- Cambridge Board of Health
- ✓Cambridge City Council
- Chelsea Board of Health
- Chelsea City Council
- Everett Board of Health
- Everett City Council
- Revere Board of Health
- Revere City Council
- Somerville Board of Alderman
- Town of Shirley Board of Selectmen
- Waltham City Council