

Statement by Moisha Blechman, **Citizens for a Healthy Environment**, for the Army Corps of Engineers concerning application for a Department of the Army permit by St. Lawrence Cement pursuant to Section 10 of the Rivers and Harbors Act of 1899, and Section 404 of the Clean Water Act.

On behalf of **Citizens for a Healthy Environment**, I am testifying that the benefits of the proposed cement making operation to the society as a whole would not be sufficient to justify the many adverse and dangerous consequences of future cement manufacture by the proposed facility. This is true for both the local population and the regional population in the northeastern and mid-Atlantic states who would be the probable consumers of the product.

Although cement manufacture poses many serious problems for these populations, I would like to focus this statement on the effect of the daily release of 55,000 pounds of toxic pollutants on the health and welfare of the fetus, infants and growing children.

First, however, it is important to note that should the proposed facility be built, it would be making a major contribution to an already degraded environment. Unless the ACOE has made a comprehensive study of the existing background levels of pollutants, I would like to propose that such a study be undertaken, so that it places the SLC proposed air emissions into that context.

There needs to be a record, for the general public and health professionals alike, of the total existing background levels and the annual rate of increase and what the background levels will be in 10 years, 20 years etc. with and without the facility. This may be difficult to achieve with accuracy, but it does need to be a subject of inquiry. The amount and kind of background pollutants affects the health of our citizens, especially our children, and should be a paramount consideration in deciding if the proposed facility is in the public interest.

It is well documented and universally accepted that 150 years of American industrial activity have bequeathed to the people polluted lakes and rivers, diminished avian and frog populations, sick and dying trees, people with maximum body burdens of dioxin or cancer, and epidemic numbers of children struggling to breathe on smog days. A true picture of the consequences of future emissions cannot be created unless the existing background levels of heavy metals, dioxin, and other pollutants are a part of the evaluation.

The future child in utero, infants, and children are the most highly affected by an environment saturated with toxic chemicals. The level of exposure of each child could now be the single most important factor determining that child's future quality of life.

The pregnant woman transfers the pollutants in her body to the developing fetus. For example, lead in her bones will leach out into her blood stream and thence to the infant who will absorb them. Yet, no amount of lead in children is healthful. The United States Academy of Sciences calls lead poisoning the number one environmental threat to the

children of the United States. In children even very low levels of lead cause reduction of I.Q., attention span, and reading ability, other disabilities, impaired growth, and hearing loss. It also affects behavior and personality. The proposed plant would release at least 9 pounds a year beyond existing levels. Since lead does not break down, the burden for the community and its children is cumulative.

Ten percent of American women carry 5.8 parts per billion or more mercury in their blood. When a woman becomes pregnant that amount of mercury poses a serious health problem to the developing fetus. The National Academy of Sciences says that 60,000 children are born with an elevated risk of learning disabilities due to mercury-contaminated fish consumed by their mothers. This is primarily due to coal-fired facilities. St. Lawrence Cement is asking for a permit to burn 250,000 tons annually in a region where Attorney General Eliot Spitzer has identified 22 lakes and reservoirs with mercury contaminated fish advisories. The steady release of mercury has resulted in ambient air levels 3 to 6 times higher than in the pre-industrial era. What is the future for our children and our community if we continue this trend by building the proposed facility?

The Center for Children's Health and the Environment at Mount Sinai Hospital in New York ran a series of full-page ads in the New York Times last summer saying that, as physicians and scientists, they are deeply troubled that an estimated 12 million American children suffer from developmental, learning, or behavioral disabilities. Attention deficit disorder affects almost 6 percent of school children. There is an alarming increase in cancers among children, especially brain cancer, testicular cancer, and acute lymphocytic leukemia. Cancer has become a leading cause of death in children. Why? In large measure because of the unrelenting incremental increase in the background levels of toxic chemicals in food, water, and air.

Children are more vulnerable than adults because they breathe, per body weight, twice as much air, eat 3 to 4 times as much food, and drink as much as 7 times more water. Thus the criminal pollutants: dioxin, mercury, lead, benzene, cadmium and more, that would be produced in huge quantities day and night by the proposed cement mining, manufacturing, and shipping facility, pose a much greater threat to children. Already every mother has as much dioxin in her breast milk that, when she nurses, she will transfer to her infant the lifetime tolerable dose of dioxin after just three months. About 20 percent of the pollutants stored in the mother's fat transfers to their infants in about 6 months. Twenty-seven percent of nursing infants exceed the maximum daily intake of carcinogenic benzene according to the World Health Organization.

As we see from the above statistics, the Clean Air Act and the Clean Water Act have not been stringent enough to protect the health of children. To propose to increase the background levels of the criminal pollutants, most of which never breakdown in the environment once there, is to exact from our community, and from our collective future, a cruel price. Since at this time there is a surfeit of cement, its only value is to enhance the bottom line of St. Lawrence Cement/Holcim. Not only is it not in the public interest,

but can be demonstrated to be a multigenerational health catastrophe for the community at large.

One of our great sons of the Hudson River Valley was the naturalist-philosopher, John Burroughs. Already, back in 1913, he had this to say. “We can use our scientific knowledge to poison the air, corrupt the waters, blacken the face of the country, and harass our souls with discordant noises, or, we can mitigate and abolish all these things.” (Ensuring healthy children and much more productive adults.)

Because there is no certainty yet that the DEC will adjudicate the air pollution issues identified for adjudication in the Ruling, a full Federal Environmental Impact Statement should be required by the Army Corps of Engineers before proceeding.

M. K. Blechman

Citizens for a Healthy Environment

A member organization to Hudson Valley Preservation Coalition