

The Recorder

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Little Valley resident presses federal regulators for pipeline coating information

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Editor's note: The following letter was sent April 25 to Kimberly D. Bose, secretary of the Federal Energy Regulatory Commission, regarding the proposed Atlantic Coast Pipeline.

Secretary Bose:

I am writing to you again regarding the threat to public health from the 3M Scotchkote Fusion Bonded Epoxy 6233 coating (FBE) on the pipes used for the Atlantic Coast Pipeline.

The Material Safety Data Sheet (MSDS) for the FBE lists carcinogens, mutagens, and other toxins that can have significant negative impacts to human health, including reproductive health, developmental impacts, respiratory impacts, and others.

I have been in touch with numerous regulatory agencies and public health experts, and none have advised me that this material is safe for human health.

This material is chalking off the pipes as a result of UV degradation, and it is escaping into the environment. The pipes intended for use for the ACP have been exposed to UV degradation for about three years at this time, and experts advise that they may be losing 1-2 millimeters of FBE per year.

A large amount of this material has already escaped into our environment. Since the ACP is currently stopped due to illegal permits, federal agency errors, and routing issues, this material will continue to degrade and invade our air, land, and water for at least several more years, unless actions are taken to prevent it. If and when these pipes are placed in the ground the chalking degraded material will still invade our land and water.

It is likely that this material is being inhaled as it becomes airborne, especially near the large pipe storage yards, or where pipes are located along the right of way. It is likely as well that this

material has been, or will be ingested through drinking water, especially in karst areas along the right of way where citizens use private wells and springs for their drinking water.

Please note that I have been in further contact with the National Sanitation Foundation (NSF) regarding this product. NSF now confirms that they have not tested either 3M Scotchkote Fusion Bonded Epoxy 6233, nor 6233W, and they have not sanctioned either product under Standard 61 for use in drinking water systems.

I have been in touch with the Virginia Department of Health, and the Virginia Department of Environmental Quality regarding these concerns, but they have not taken meaningful action to protect the public health, or Virginia waters from this material. They have not advised that this material is safe for human health.

I have learned that VDH and DEQ sent a letter to you on March 21, 2019 regarding the FBE, our concerns that a colleague and I have shared with them regarding the FBE, and our earlier letters to you regarding the FBE.

I respond to VDH and DEQ mischaracterizations in their letter as follows:

- VDH and DEQ misrepresented our position when they stated that we believe there are health impacts with FBE. Our letters to you and VDH indicated a concern of possible health impacts.
- Besides our concerns about FBE leachate or particulate matter entering, and possibly contaminating groundwater and potable water supplies, we expressed concerns about health issues where this material is becoming airborne and inhaled. This reflects our fears for pipeline workers, as well as others breathing air containing the particles.

VDH and DEQ did point out in their letter to you that FERC's environmental impact statement (EIS) for the Mountain Valley Pipeline, where pipes are coated with the same FBE material, that "... the pipeline coating would not release dangerous chemicals into the ground," although that claim was not substantiated in any way.

Please provide me with the studies showing scientific data FERC used to make this assertion.

VDH and DEQ further stated they have identified benzene, styrene, benzophenone, benzoic acid, and benzaldehyde as being produced by photo-degradation of epoxy resins. A brief look through the scientific literature provides the following preliminary information regarding these chemicals:

- CDC — Benzene has been found by the Department of Health and Human Services to cause cancer in humans, including leukemia and cancer of the blood forming organs. It causes harmful effects on the bone marrow, and a decrease in red blood cells leading to anemia. It causes irregular menstrual periods and a decrease in the size of the ovaries.
- CDC — Styrene is listed as "reasonably anticipated to be a human carcinogen" by DHHS, and a possible carcinogen by the International Agency for Research on Cancer. It has been found to negatively impact the human nervous system. It has been shown to impair learning and damage sperm in rats.

- CDC — Benzophenone is a naturally occurring chemical that is used in sunscreen and cosmetic products. It has been shown to cause weak hormonal activity in laboratory animals. More research is needed to determine human health effects.
- NIH — Benzoic acid is an irritant to the skin, eyes, and respiratory system, but with only minor residual injury.
- NIH Benzaldehyde easily penetrates the soil to contaminate groundwater and nearby waterways. Immediate steps should be taken to limit its spread in the environment. It is a fire hazard and easily ignites. It is listed as causing significant irritation, but with only minor residual injury.

Given the risks to human health identified here, and in the MSDS, coupled with the fact that no health agency or expert has declared that this material is safe, it is all the more important that FERC take the following actions:

- Order the ACP to stop all work until such time that FERC determines that there is no threat to human health from the chalking FBE.
- Order the ACP to take measures to prevent further chalking, and disbursement of FBE into the environment.
- Order the ACP to clean up FBE that has chalked off the pipes at storage locations, and along the right of way.
- Hire an independent qualified laboratory to conduct sampling in areas where ACP pipes are stored, or in the ground, to determine if chalked FBE, or its analytes or components, is on the ground, in the air, in surface water, or in groundwater.
- Respond in full to all questions presented to FERC in the VDH and DEQ letter of March 21, 2019, including scientific evidence to support FERC's stated position in the EIS for the MVP that the FBE would not release dangerous chemicals into the ground.

Similar public health concerns exist with the chalking 3M Scotchkote Fusion Bonded Epoxy 6233 from the pipes used for the Mountain Valley Pipeline, as well as other FERC approved pipelines using this same coating material.

Therefore, FERC must substantiate their claim of safety with valid studies and hard scientific data, followed by a public statement reporting those findings, and identifying their sources.

We expect transparent and honest communication from FERC based on the commission's second guiding principle, "Due process and transparency: Paramount in all of its proceedings is the commission's determination to be open and fair to all participants."

Bill Limpert
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