

# ***Overlook Neighborhood Association***

Christian Trejbal, Chair

chair@overlookneighborhood.org



April 22, 2019

Union Pacific Railroad  
1400 Douglas Street  
Omaha, NE 68179

Re: Albina Rail Yard emissions

Dear Union Pacific Railroad leaders:

The Overlook Neighborhood Association is deeply concerned about volatile organic compound emissions (VOCs) and diesel particulate emissions from the Albina Rail Yard located near 1134 N Knott St., Portland, OR 97227. We join the undersigned neighborhood associations and other community organizations requesting that Union Pacific install a thermal oxidizer at the Albina Rail Yard to reduce these emission and work with us to develop an actionable Good Neighbor Agreement regarding unfiltered diesel trucks serving the Albina Rail Yard.

For many years, residents of the Overlook Neighborhood have reported a strong chemical odor outside their residences. Over the past two years, the group Portland Clean Air ([portlandcleanair.org](http://portlandcleanair.org)) has researched VOC emissions throughout Portland and concluded that a small number of industries including the Albina Rail Yard are responsible for the majority of emissions due to a lack of control devices that mitigate such pollution. We are particularly concerned about the impacts on residential neighborhoods bordering Swan Island and the Albina Yard.

VOC exposure is dangerous and can cause eye, nose and throat irritation; headaches, loss of coordination and nausea; and damage to the liver, kidney and central nervous system. Some, such as formaldehyde, also can cause cancer.

The Oregon Department of Environmental Quality tracks emissions in the Swan Island area of Portland. Based on that data from the DEQ Cleaner Air Oregon 2016 Chemical Balance Sheets and corresponding 2014 Environmental Protection Agency 2014 National Emissions Inventory, the Albina Rail Yard is the third-highest emitter by ranked weight. The rail yard emitted 14,778 pounds in a year. By comparison, other emitters that concern Overlook are Vigor (5,782 pounds of VOCs annually) and Daimler North America (500 pounds annually).

We therefore urge Union Pacific to install a thermal oxidizer system at the Albina Rail Yard to safely abate VOC emissions. Standard VOC emission devices such as thermal oxidizers can destroy 97 percent to 99 percent of VOCs before they are released into the atmosphere. Newer devices have heat exchangers that save most of the energy that they use, and VOCs in the waste stream can be used as fuel to increase the temperature.

Grants are available that can cover up to half of the cost of a newer, energy-efficient device. Thanks to increased efficiency and grant support, the upfront investment in a thermal oxidizer system can be recouped within just a couple of years. We spoke with Energy Trust of Oregon who provides these grants and they expressed an interest in helping you with the cost of a regenerative thermal oxidizer. We would be happy to connect you with them.

We are concerned also about the use of unfiltered diesel trucks that pass through the Overlook Neighborhood and North Portland on the way to the Swan Island area. The Oregon Department of Transportation reports that the Albina Rail Yard generates the greatest number of truck trips.

According to the 2014 EPA National Air Toxics Assessment released in August 2018, Portland ranks in the worst 1.3 percent of counties for diesel particulate exposure, an airborne carcinogen. These pollutants affect all Portland residents, inordinately harming people in neighborhoods of lower income near highways and industrial areas.

We therefore request that you meet with us to develop an actionable Good Neighbor Agreement so that we can collaboratively agree on steps to mitigate impacts on the surrounding neighborhoods. For example, we might work together to encourage state lawmakers to set a reasonable timeline to phase out unfiltered trucks, keeping all businesses on an equal footing. During the interim, we might reach agreement on temporary mitigation measures such as minimizing idling time.

Emissions issues have come under increased scrutiny in the past couple of years. Portland residents and the Oregon DEQ have worked with several businesses to install or update emissions reduction systems. Perhaps most prominent among them was the Bullseye Glass facility, which was required to install a \$70,000 scrubber. After that and other high-profile incidents, DEQ now requires Oregon industries that pose the greatest threat to human health to mitigate per the new Cleaner Air Oregon program.

DEQ appears to lack authority over Union Pacific, but you have, in the past, demonstrated a willingness to work with the neighborhood. We ask that you do so again by voluntarily reducing your emissions as industries consistent with the rules that apply throughout Oregon. We have not doubt that voluntary action to make Portland's air cleaner and its neighborhoods healthier would receive positive media coverage and the appreciation of neighbors.

We are working closely with 39 Neighborhood Association boards, six churches and synagogues, three coalitions, and three other local organizations on this issue.

Thank you for your attention to this matter. We look forward to an opportunity to discuss in greater detail how we can all work together to ensure the quality of life that is so much part of why people choose to live and work in Portland.

Sincerely,



Christian Trejbal, Chair

On behalf of the  
Overlook Neighborhood Association Board

Citations available at:  
<http://pdxcleanair.org/files/reports/Swan%20Island%20VOCs.pdf>

We undersigned, on behalf of our organizations, agree with and endorse this request of the Overlook Neighborhood Association and urge you to resolve this issue with good faith negotiation.

Adam Lyons  
Executive Director  
North East Coalition of Neighborhoods

Andy Beers & Elianne Lieberman  
Co-chairs  
Climate Action Team of Havurah Shalom, Portland

Cassie Cohen, MSW  
Executive Director  
Portland Harbor Community Coalition

Chelsea Powers and Pam Hodge  
Chairs  
Brentwood-Darlington Neighborhood Association

Debbie Aiona  
Action Chair  
League of Women Voters of Portland

Eldon Potter  
Chair  
Church Council of Ainsworth United Church of Christ, Portland

Fr. Dave Zegar  
St. Andrew Catholic Church, Portland

Ginger Edwards  
Chair  
Arbor Lodge Neighborhood Association

Janet Hawkins  
Chair  
Hayhurst Neighborhood Association

Jennifer Vitello  
Chair  
Cathedral Park Neighborhood Association

Jim Teisher  
Chair  
First United Methodist Church, Planet Church Committee, Portland

Joanna Jenkins  
Chair  
Brooklyn Action Corps

Josh Heumann  
Chair  
Cully Association of Neighbors

Kymerly Jeka  
Chair  
Humboldt Neighborhood Association

Mark Gillette  
Chair  
Reed Neighborhood Association

Mary-Margaret Wheeler-Weber  
Chair  
Portsmouth Neighborhood Association

Michael Heumann  
Chair  
Climate Change & Environmental Justice Team  
Metropolitan Alliance for the Common Good (MACG)

Rev. Elizabeth Winslea  
Pastor  
Lincoln Street United Methodist, Portland

Rev. Dr. Janet L. Parker  
Council of First Congregational United Church of Christ, Portland

Shawn Looney  
Chair  
Linnton Neighborhood Association

Stanley Perkins  
Chair  
Pearl District Neighborhood Association

Virginia Bruce  
Chair  
Washington County Citizen Participation Organization One