

Guide for Spoken Testimony on CSX Curtis Bay Coal Terminal Draft Permit to Operate

On August 29, 2024, the Maryland Department of the Environment (MDE) issued a draft renewal of CSX's Permit to Operate its coal export terminal in Curtis Bay. This terminal has [polluted](#) South Baltimore communities for decades, and in recent years, it has created a [dangerous explosion](#) and a [fugitive dust storm](#). Just this month, documentation that coal dust has been found throughout the Curtis Bay community as far away as Benjamin Franklin High School has been scientifically validated through peer review.

MDE is taking public comments on this permit through December 16, and is holding a public hearing in Curtis Bay on October 10. They need to hear from you! These comments will shape MDE's decision on whether to deny, issue, or add (or weaken) conditions to the final permit. By speaking out at the public hearing, you can send a clear message that coal dust in Curtis Bay is unacceptable and MDE must act now.

- **Hearing Time:** October 10, 2024, 6pm
- **Location:** ~~Curtis Bay Recreation Center, 1630 Filbert Street~~
UPDATE: now located at St. Athanasius Church
4708 Prudence Street
Baltimore MD 21226
- [MDE landing page](#)
- [RSVP with the South Baltimore Community Land Trust here](#)

Want to support the cause, but not sure what to say? Use the outline below to learn more about pollution from the coal terminal and prepare your testimony.

If you cannot attend the public hearing on 10/10, you can also submit written comments through 12/16. Stay tuned for a written comments guide, coming soon.

Questions about this document? Contact Jennifer Kunze (Maryland Organizing Director; Clean Water Action) at jkunze@cleanwater.org, Ezana Assefa (Student Attorney with UMD Environmental Law Clinic) at eassefa1@clinic.law.umaryland.edu, or Jon Mueller (Director of UMD Environmental Law Clinic) at jmueller@law.umaryland.edu

Sample Testimony Script

Plan to speak for 2-3 minutes; MDE will announce a time limit at the hearing.

1. Introduction: Who You Are and Why You're Speaking

The purpose of testifying is for you to express to MDE why clean air is important to you, how the CSX terminal harms air quality, how coal dust harms you and your family, and what you want MDE to do.

Give yourself an introduction like:

- "Hello, my name is [Your Name], and I am a [resident of Curtis Bay / community advocate / representative of ___ organization / concerned resident]. I've lived in _____ for [X] years, and I am speaking today because of the impact that coal dust and air pollution from the CSX terminal is having on the health and environment of our community."
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2. Supporting Facts, Arguments, and Stories

Share key arguments, scientific data, and/or personal testimonials about the impact of the Curtis Bay coal terminal's operations.

A. Basic Facts about Coal Handling and Air Pollution in Curtis Bay

- **Coal Exports and Handling:** The CSX terminal in Curtis Bay handled **7.1 million tons of coal in 2022** and **8.6 million tons in 2021**, contributing to significant coal dust pollution in the area.
- **Coal Dust:** Coal dust contains **particulate matter (PM)** in both **PM2.5** and **PM10** size ranges. It also contains traces of toxic **elements** such as **arsenic, mercury, and lead**, which pose additional health risks.

B. Health Impacts of Coal Dust

Example: "Coal dust from the CSX terminal contributes to high levels of particulate matter (PM2.5 and PM10), which are hazardous to human health. These particles settle on our homes, in our lungs, and on everything we own."

Select from the health issues listed below and explain which ones are of concern to you and your family.

1. Coal Dust as a Source of PM:

- Coal dust, generated from the handling and processing of coal, contains toxic substances such as arsenic, mercury, and lead, which are harmful to human health. Coal dust can produce particulate matter (PM1, PM2.5, PM10) that contributes to air pollution.
- Fugitive coal dust emissions from coal mining, handling, storage, and transportation pose significant risks to workers, nearby communities, and the environment.
- Coal dust has been found throughout the Curtis Bay community as far away as Benjamin Franklin High School; these findings have been scientifically validated through peer review.

2. PM Size and Penetration:

- PM is categorized by size. Fine particulate matter (PM2.5) consists of particles with diameters of 2.5 microns or less, while coarse particulate matter (PM10) includes particles up to 10 microns in diameter.
- Smaller particles (PM2.5) can penetrate deeper into the body, reaching the lungs and even entering the bloodstream, leading to more harmful health effects. Larger particles (PM10) can reach the upper parts of the lungs but do not penetrate as deeply.

3. Health Impact of PM2.5:

- PM2.5 has been linked to a range of severe health effects, including premature mortality, respiratory disease, cardiovascular disease, nervous system impacts, and low birth weight.
- Both short-term (acute) and long-term (chronic) exposure to PM2.5 can have harmful health effects, and these risks persist even at levels below regulatory guidelines.
- According to the Global Burden of Disease Study 2019, PM2.5 pollution (both outdoor and indoor) ranks as the fourth highest risk factor for death globally, after high blood pressure, tobacco use, and dietary risks.

4. No Safe Level of Exposure:

- The World Health Organization (WHO) and the EPA state that there is no safe level of exposure to PM2.5, meaning any exposure to these fine particles can pose health risks.

5. **Premature Mortality:**

- PM2.5 exposure is linked to premature mortality from various causes. Studies have consistently found that both short- and long-term exposure to PM2.5 increases the risk of early death.

6. **Respiratory and Cardiovascular Diseases:**

- PM2.5 exposure is associated with an increased risk of respiratory diseases like asthma and bronchitis, as well as cardiovascular diseases like heart attacks and strokes.
- PM10 exposure, though less penetrating, is still linked to significant health impacts, including respiratory and cardiovascular mortality.

7. **Mental Health and Nervous System Effects:**

- PM2.5 exposure is associated with negative effects on the nervous system, including mental health impacts such as depression and anxiety.

8. **Low Birth Weight:**

- Pregnant women exposed to PM2.5 have an increased risk of delivering babies with low birth weight, which can lead to long-term health complications for the child.

9. **Hospital Admissions:**

- Exposure to both PM2.5 and PM10 has been linked to increased hospital admissions for respiratory and cardiovascular diseases. Even coarse particles like PM10 have been associated with incident lung cancer and hospital admissions for cardiovascular and respiratory conditions.

10. **Long-Term Exposure Risks:**

- Long-term exposure to PM2.5, even at levels below regulatory limits, is linked to chronic health conditions and can lead to increased rates of premature death and other serious health outcomes.

C. Stories: Have You Experienced This?

Personal stories about how coal dust and the coal terminal have impacted you make a huge difference in a public hearing. Here are some examples from the [Curtis Bay Collaborative Report](#). If you have your own story to share, please include it in your comments.

- *“We had a pool for my grandson, but by the next morning, there was black soot all over the water. We have to clean coal dust off the pool and the house every day. Since I moved here, my breathing has gotten worse, and my grandson struggles to run without gasping for air.”*
 - *“In the summertime, the kids sweat off black stuff from the coal terminal. We have to spray the house off because the dust is terrible. Breathing this stuff can't be good.”*
 - *“You can't even open your windows because of the coal dust. By the time you go to bed, you've got coal dust all over the windows, inside and out.”*
 - *“We've got coal dust all along the outside window sills and even on the inside, where it comes through the screens. It's nasty.”*
 - *“Every day, I clean coal dust off my house. By the time I come back out later, it's covered again. This is a concern because I have oxygen in my home due to my respiratory condition.”*
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3. Demands

State what action you would like MDE to take:

- *“My neighborhood is impacted by this terminal and these results prove that any air pollution permit issued to CSX must end the emission of coal dust from the terminal.”*
 - *“MDE should deny this permit renewal because...”*
 - *“If it issues a permit, MDE must strengthen the permit's requirements because...”*
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4. Conclusion

Conclude your remarks by summarizing your main ideas and demands.

- *"In conclusion, I urge the Maryland Department of the Environment to deny this permit or impose stricter regulations on coal dust emissions from the CSX terminal. The health of Curtis Bay residents must come first. Thank you for your time and consideration."*