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Mr. William Ruckelshaus
Environmental Protection Agency
401 M St. SW
Washington, D.C. 20460

22 July 1983

Dear Mr. Ruckelshaus:

As a resident and homeowner on Vashon Island I would like to express my concern over your agency's plans to grant the ASARCO Smelter in Tacoma, Washington a variance to permit discharges of arsenic at levels greater than those allowed for other smelters in the United States.

In my opinion, the discharge of any arsenic at all is completely unacceptable. Your agency is not tasked to weigh jobs against health hazards. It is absurd for EPA to permit ASARCO to smelt low-grade ore in a location which exposes so many people to the poisons they pump out of their smokestack. This is a situation where we, as citizens and taxpayers living in the ASARCO plume, have a right to demand the "protection of our environment."

The new arsenic emission standards proposed by EPA are based on a pseudo-objective "study" of health hazards versus economic factors (575 jobs/ASARCO's profits). How important are the profits of ASARCO when weighed against the loss in quality of environment to the thousands who breathe and eat the tons of poisons the smelter is allowed to discharge into their air.

An objective look at the situation would ask the question: "If ASARCO can ship the low-grade ore all the way from the Phillipines, why does it have to be smelted upwind of a major United States urban center?"

ASARCO's reasons for using the antiquated smelter in Tacoma certainly stem from the profit margin they can realize from a plant which was paid for long ago. EPA should be concerned with the reasons ASARCO should not be located where it is.

I assume that you are familiar with Vashon Island's location. If not, we can be found on the map in any of ASARCO's EIS publications right under the shading that indicates the extent of their plume.

The King County Health Department has tested our garden soils, the hair and urine of area schoolchildren, and published brochures telling us not to eat the leafy vegetables we grow in our gardens. Data from Dr. J. Bromenshank's study of bee brood survival on the island indicate that ASARCO's plume has a definite effect on bee mortality. This is a clearcut case. ASARCO is the source of the arsenic and other noxious substances that rain down over Vashon Island, Tacoma, Ruston, Des Moines, and wherever the wind carries them. ASARCO can ward off assaults from the concerned citizens in the area by claiming that no ill effects have been demonstrated in humans and paying off expert witnesses to tell us that arsenic is a "micronutrient." Yet, according to articles in the Seattle Post-Intelligencer the levels which EPA has allowed for arsenic emissions are based on "four cancer deaths per year " directly related to the smelter arsenic discharges. Of course proving what causes a particular cancer is elusive. The waters are muddied by long time factors and the variety of tissue malignancies which can occur. Should we sit around in the fumes of ASARCO waiting for the results to come in? Data can easily be discredited or called incomplete or not pertinent when dealing with an issue like Cancer which has virtually no demonstrated cause and effect relationship in most human cases due to the long time factors involved. If every tumor or malignancy had a little flag in it saying what irritant caused which type of cell to go haywire when, your job would be much easier. Large companies whose major goal is to maximize profits always benefit when their noxious byproducts produce slow-developing, insidious diseases.

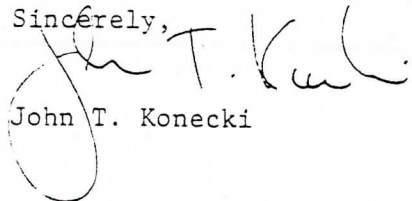
My question for you is this: Why should the people living on Vashon Island and other communities under the plume of the Tacoma Smelter be subjected to the kind of deadly pollution that ASARCO is allowed to pump out of its' stack by The Environmental Protection Agency?

Even considering a variance for arsenic emissions at the Tacoma Smelter is a travesty of your agency's role of "environmental protection."

If the smelter is allowed to stay open money should be made available by your agency to fund additional studies of arsenic, cadmium, SO₂, fluorides, and other pollutants which the plant puts into our air each day. The hair and urine tests of schoolchildren and other area residents should be continued. The results of the first tests are shocking.

In my opinion the ASARCO Smelter in Tacoma should be closed down. ASARCO can certainly find a less populated location to poison. I would suggest that EPA set forth some ^{more objective} criteria as to which communities in the Greater Seattle-Tacoma should be allowed to vote on closing down the Tacoma Smelter. Allowing Tacoma residents to be the only ones to vote emphasizes the jobs/money issue which should be of no concern to your agency. Vashon Island definitely deserves a say in the ASARCO closure issue.

Sincerely,


John T. Konecki



VASHON ISLAND
IS IN OUR SIGHTS!
LOAD ARSENIC!
HIT 'EM
WITH ANOTHER ROUND!