



Frac Sand Mining Health Impact Assessment Is Not the Final Word on Air Quality Impacts and Human Health

Report on Industrial Sand Industry's Health Impacts Ignores Mine Neighbors' Air Quality Concerns, Cumulative Impacts

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MADISON, WI – Today, Midwest Environmental Advocates sent a letter to the Institute for Wisconsin's Health to express concern about a recent report's short shrift given to air quality concerns from ultra-fine particles of dust created in industrial frac sand mining.

The Institute for Wisconsin's Health released a Health Impact Assessment of Industrial Sand Mining in Western Wisconsin that fails to analyze or draw complete conclusions about the health threat of frac sand dust. This is a serious error that calls into question the rest of the assessment.

First, the science is settled that ultra-fine particulate matter, or PM_{2.5}, causes serious, life-threatening health problems. Exposure to the ultra-fine dust also exacerbates asthma and leads to serious cardiovascular and respiratory illness. This kind of dust is dangerous because it can travel deep into the lungs and cause illness, especially in vulnerable populations like children and the elderly.

We also know that industrial sand mines emit ultra-fine particles into the air. Tests at these facilities confirm that these ultra-fine particles make up part of the dust that comes from emissions stacks. The Journal of Environmental Quality* recently published a study of air quality monitoring near industrial sand mines in Wisconsin that showed elevated levels of ultra-fine particles around these facilities. The report did not include the latest academic research.

In spite of these well-recognized facts, the Institute for Wisconsin's Health's report was simply a literature review of incomplete studies and a repackaged summary of industry-produced air quality data. In the absence of requirements of air quality monitoring on frac sand mines in Wisconsin, the public – and researchers such as the Institute for Wisconsin's Health – cannot truly assess the comprehensive and cumulative impacts of the dust produced by this industry.

Midwest Environmental Advocates points out numerous errors or omissions in the Health Impact Assessment report, such as:

- The HIA report fails to assess cumulative, localized impacts of industrial sand mines that are concentrated in certain communities, and the data relied on in the HIA does not measure local impacts.
- The HIA report relies on and fails to take a critical look at voluntary, industry-sponsored air quality studies, and limited air quality monitoring for only larger particles, called PM₁₀.

- The HIA report ignores an independent, published, peer-reviewed study of air quality near industrial sand mines, which happens to show that there are elevated levels of ultra-fine particles, PM_{2.5}, downwind of these facilities.
- The HIA report discusses potential health impacts from ultra-fine particles, but fails to draw any conclusions or make any recommendations to protect the public from this air quality threat.

This HIA report comes at a critical time as the agency in charge of regulating this industry, the Wisconsin Department of Natural Resources, is conducting a strategic analysis to evaluate the health and environmental impacts of the industrial sand industry. Midwest Environmental Advocates is concerned that the cursory and incomplete air quality analysis in the HIA report will lead to a DNR strategic analysis that also fails to provide a complete picture of the health threats.

Staff attorney Kellan McLemore comments, "The HIA represents a missed opportunity to provide answers to the public about the health and environmental impacts of this industry. People are concerned, and their concerns should not be dismissed until we have more reliable evidence that their health will not be affected by living near these facilities. Voluntary, industry-sponsored studies are not going to provide a complete and accurate picture."

Midwest Environmental Advocates will continue to work with the DNR as it prepares its strategic analysis to ensure that it considers and takes a close look at all available data. We encourage members of the public to stay engaged as well.

* Journal of Environmental Quality issue Nov 2015 Vol. 78 No. 4 pp. 8-12

Midwest Environmental Advocates is a public interest organization that uses the power of the law to support communities fighting for environmental accountability. Learn more about the Midwest Environmental Advocates on the web at midwestadvocates.org, like MEA on [Facebook](#) or follow @MidwestAdvocate on [Twitter](#).

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