
**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION
BY SCS CARBON TRANSPORT LLC FOR
A PERMIT TO CONSTRUCT A CARBON
DIOXIDE TRANSMISSION PIPELINE**

HP22-001

**SHERI DEAL-TYNE
INITIAL PRE-FILED TESTIMONY
IN SUPPORT OF LANDOWNER
INTERVENORS**

Q: Please state your name and purpose for providing testimony in these proceedings.

A: My name is Sheri Deal-Tyne. The purpose of my testimony is to provide the PUC information helpful when considering the threat of serious injury to the environment, to the social condition, and substantial impairment to the health, safety or welfare of current and expected inhabitants should the PUC approve this Application.

Q: What experience, education, training, or background qualify you to provide opinions and your concerns as you have herein?

A: Please see a summary of my education and experience in **Attachment No. 1**.

Q: Does Attachment No. 2 to this testimony describe your opinions and concerns that you want the PUC to be aware of relative to the proposed CO2 pipeline in question?

A: Yes, that is a true and accurate copy of an Op-Ed I co-authored on this subject. I stand by my positions and opinions discussed therein and am competent to testify about them as necessary.

Q: Does Attachment No. 3 to this testimony further describe your opinions and concerns that you want the PUC to be aware of relative to the proposed CO2 pipeline in question?

EXHIBIT

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A: Yes, that is a true and accurate copy of an article I authored on this subject for the Iowa Chapter – Physicians for Social Responsibility on Carbon Capture and Public Health. I stand by my positions and opinions discussed therein and am competent to testify about them as necessary. I the PUC to carefully consider this testimony during the Hearing in this matter and in your deliberations. I further reserve the right to amend or modify these opinions upon presentation of any additional information that may justify such a change.

/s/ Sheri Deal-Tyne

Sheri Deal-Tyne

Sheri Deal-Tyne, MPP

Outreach Counselor
Iowa City, Iowa, United States

Experience

Successful Living
Outreach Counselor
April 2023 - Present (2 months)
Iowa City, Iowa, United States

Independent Contractor
Consultant: Research and Communication Support
January 2022 - March 2023 (1 year 3 months)
Iowa City, Iowa, United States

- Conduct research on carbon capture and sequestration and related issues
- Compose reports, fact sheets, op-eds, issue briefs, and social media content based on findings, to support stakeholder collaboration needs
- Identify areas for policy advocacy; strategize; and implement activism, including stakeholder collaboration

Iowa Legal Aid
AmeriCorps Justice Advocacy Project
February 2021 - December 2021 (11 months)
Iowa City, Iowa, United States

- Assist managing attorneys with research and project support
- Work with clients to increase access to community resources
- Research & collate state-wide eviction prevention resources database
- Manage agency-wide volunteer applications using Better Impact
- Participant recruitment and data collection for Intimate Partner Violence Project Evaluation

Physicians for Social Responsibility-Iowa
Organizer
August 2019 - February 2021 (1 year 7 months)
Iowa City, IA

- Raised public awareness on the health implications of climate change & nuclear weapons via education events, social media, LTE's, and direct-action efforts

Contact

www.linkedin.com/in/sheri-deal-tyne-mpp-5504ba199 (LinkedIn)

Certifications

Social and Behavioral Research
Certificate in Public Administration

Publications

A Contradiction of Intent: How
Carbon Capture Perpetuates Fossil
Fuels

Fact Sheet: Low Carbon Fuel
Standard, Ethanol, and Carbon
Capture

What is Carbon Capture and Why
Should We Care?

Fact Sheet: CO2 Pipeline Safety
Carbon Capture and Public Health

- Mobilized community stakeholders to collaborate on concrete solutions using volunteer recruitment and networking strategies

Green Iowa AmeriCorps

Education Coordinator

September 2018 - August 2019 (1 year)

Iowa City, Iowa, United States

- Developed, coordinated, & presented community environmental educational events for diverse audiences
- Identified & collaborated with community partners to implement environmental education programs
- Assisted with home energy audits & weatherizations

Education

University of Northern Iowa

Master's degree, Public Policy · (2019 - 2021)

University of Iowa

BA, Ethics and Public Policy · (2018)

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Los Angeles Times

Op-Ed: California wants more ethanol and carbon capture. That would lock in pollution for decades

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Carolyn Raffensperger and Sheri Deal-Tyne

August 5, 2022 · 4 min read



Using more fertilizer to raise more corn to produce more ethanol is not a solution. (Carolyn Kaster / Associated Press)

As California prepares to update its low carbon fuel standard — a policy aiming to reduce emissions from transportation fuels — Indigenous groups and environmentalists across the Midwest are fighting one of its key provisions. The policy would incentivize ethanol production through technology that stores carbon underground not just in California, but anywhere in the U.S.

Here in Iowa, where much of the nation's corn is raised and corn-based ethanol is produced, we are facing a corporate stampede to build thousands of miles of dangerous pipelines crisscrossing six Midwest states. This includes the development of underground toxic waste disposal sites to store carbon under Midwest lands.

California's incentives wouldn't deliver carbon reductions as promised. Instead, supplementing gasoline with ethanol

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Ethanol producers [say the substance generates](#) less carbon than gasoline, but a study this year found that ethanol is [24% more carbon-intensive](#) than traditional fuel. The enormous rise in nitrogen fertilizer to raise corn for ethanol has increased emissions of nitrous oxide, a potent greenhouse gas that is [289 times as powerful](#) as CO2. Adding carbon capture to ethanol production will only compound these problems. Fertilizers used in corn production, including for ethanol, also cause vast water pollution extending from drinking water in Iowa to the [Dead Zone](#) in the Gulf of Mexico.

Building ethanol infrastructure locks in ethanol and gasoline for decades, reducing incentives for investors or policymakers to shift towards more sustainable transportation. In Iowa, [politicians](#) are [fighting every policy and law](#) that might move the nation toward electric vehicles or public transportation. California's low carbon fuel policy is making their obstruction of cleaner transportation that much easier.

Carbon capture technology is aggravating climate change in other ways as well. Drilling companies pump captured CO2 underground to help extract more oil, ultimately leading to more pollution. As the Los Angeles Times [reported](#) last month, "Eleven of 12 large-scale carbon storage facilities in the United States use captured carbon dioxide for oil production."

Such technology will require [thousands of miles](#) of CO2 pipelines across six states. Three pipeline projects are in the proposal stages in the Midwest. Sections of the proposed pipeline paths run adjacent to the existing Dakota Access pipeline, which prompted the huge Indigenous resistance at Standing Rock, N.D.

Farmers are familiar with the damage of pipeline construction because of Dakota Access. Farmers have contended with soil compaction, drainage issues and a 60 to

are [working with government authorities](#) to seize the land using eminent domain. Iowans' opposition to the pipelines is [fierce](#) and includes county government officials, farmers, Indigenous organizers, [scientists](#) and environmental activists.

CO2 pipelines also pose serious public health hazards. [Rupture](#) of a highly pressurized liquid CO2 pipeline results in an explosive release of a CO2 cloud that hugs the ground and displaces oxygen — potentially killing everything in its path and crippling internal combustion engines. This would mean that emergency responders using fossil-fuel vehicles couldn't get to pipeline rupture victims. Mass casualties could overwhelm rural emergency health systems.

In 2020, a [CO2 pipeline in Satartia, Miss., ruptured](#), sending 49 people to the hospital and leaving many with long-term health impacts including fatigue and lung problems. More than 250 people required evacuation. First responders needed self-contained breathing apparatuses to conduct their rescues. Residents' cars ceased to run, and victims were found dazed or unconscious.

The highly pressurized state of liquid CO2 in pipelines, along with its corrosive nature when in contact with water, increases the risk of leaks, fractures and ruptures. In response to the Satartia CO2 pipeline rupture, the Pipeline and Hazardous Materials Safety Administration issued a [report](#) in May warning about the potential for damage to pipelines caused by earth movement and climate change, such as increased rainfall and higher temperatures. In Iowa, the pipelines are slated to be buried in farmland, where heavy farm machinery will drive over them, further increasing risks of ruptures.

Ethanol produced from corn and using carbon capture is not a climate solution. It causes a new set of problems. California's new fuel standard should not be enabling it.

February 28, 2022

Iowa Chapter
Physicians for Social
Responsibility



Sign in Colorado. ----- Source: [Jeffre Beall](#)

Carbon Capture and Public Health

By [Sheri Deal-Tyne](#), Health & Energy Policy Researcher, PSR Iowa, 2/28/22.

This series began with [Carbon Capture Basics](#), a basic overview of the process of Carbon Capture and Sequestration (CCS) and a brief synopsis of the current debate concerning its promotion. In this second report, we dive deeper into a frequently overlooked issue: the public health implications of CCS. [Read the first report here.](#)

Anthropogenic, or human-made, CO₂ has been a focus of concern for scientists and environmentalists for decades. CO₂ makes up about **80%** of total greenhouse gas emissions (methane is next at 10%). The burning of fossil fuels (coal, natural gas, and oil) is the largest source of CO₂ emissions.

The UN Intergovernmental Panel on Climate Change (IPCC) released a report in 2018 announcing that CO₂ emissions would need to decline 45% from 2010 levels by 2030 and reach “net-zero” by 2050 to avoid a global temperature rise **beyond 1.5°C**. Many in the business and academic communities promote CCS and Carbon Capture and Utilization Sequestration (CCUS) as vital to reaching “net-zero” for the IPCC goal. PSR Iowa feels it is essential to recognize the significant public health risks associated with CCS. This report discusses the hazards accompanying each stage of the CCS process.

In the first stage, the CO₂ is captured and separated from other gases, using expensive technology requiring an additional energy source. Capture is proposed at various sites, including coal- and gas-fired power plants and ethanol production facilities. In the second stage, the CO₂ is compressed into liquid form, again requiring energy, and then pumped into and transported via pipelines. In the third and final stage, the liquid CO₂ is injected into the earth at the sequestration site.

Lethality of CO₂

CO₂ is the colorless and odorless gas humans exhale during respiration, contributing to the perception that CO₂ is harmless. Concentrated CO₂ is an asphyxiant and a recognized **toxicant** cited by OSHA, ACGIH, DOT, and NIOSH. Gaseous CO₂ is 1.5 times heavier than air. Liquid CO₂ is 10% heavier than water. When released in large

quantities as gas or liquid, CO₂ settles on the ground, flows downhill, and displaces ambient air.

Ambient air is the air we all breathe. The concentration of CO₂ in ambient air is around 400 parts per million (ppm) or 0.04% but can be elevated in areas with high vehicle traffic or industrial activity. *Atmospheric CO₂* is the measurement of CO₂ in the earth's atmosphere. Atmospheric CO₂ **levels** are tracked by the National Oceanic and Atmospheric Administration (NOAA) and the Scripps Institution of Oceanography.

Table. Health Effects of Exposure to Elevated CO₂ Levels

— *Information courtesy of Ted Schettler, MD, MPH*

CO ₂ concentration	Health Effect	Exposure Time
0.04% (Ambient Air)	No Health Effect	Lifetime
2% (20,000 ppm)	Respiratory center stimulated causing increases in breathing (tidal) volume	Rapid
4% (40,000 ppm)	Increases in breathing rate becomes distressing;	Immediately dangerous to life or health (IDLH) [NIOSH]
7-10%	Dimmed sight, sweating, tremor, unconsciousness	After only a few minutes
Over 10%	Convulsions, coma, death	Less than a minute
Over 20%	Emergency, Loss of consciousness, rapid death	Seconds

The physiological response to and seriousness of CO₂ inhalation varies depending on the concentration of CO₂ and the length of exposure time. Conditions from low to moderate exposures are generally reversible when a person is removed from the high CO₂ environment.

CO₂ Capture Sites

As the debate about CCS gains momentum, that familiar idiom “can’t see the forest for the trees” springs to mind. Proponents of CCS focus on the potential value of removing CO₂ from industrial sites while quietly ignoring associated hazards. Combustion of fossil fuels and ethanol production release many pollutants along with CO₂. These co-pollutants are associated with a wide range of public health dangers.

Extensive **research** has demonstrated the health hazards of coal-generated electricity. NO_x, SO₂, mercury, and PM_{2.5} are emitted from coal plants along with CO₂. NO_x causes

airway inflammation, decreased lung function, asthma exacerbation, increased response to allergens, and contributes to particulate matter and ground-level ozone. SO₂ causes wheezing, shortness of breath, chest tightness and exacerbates asthma. Continued exposure reduces the ability of the lungs to function. SO₂ reacts with water to become acid rain. Mercury is a potent neurotoxin, especially for developing fetuses and young children. PM_{2.5} contributes to premature mortality, increased hospitalizations, cardiovascular disease, bronchitis, cognitive decline, dementia, preterm birth, low birth weight, and congenital disabilities.

Pollutants from natural gas-generated electricity include less NO_x and fewer particulates, do not include mercury, but do include significant methane leakage. In addition to being a precursor to ground-level ozone formation, and as a greenhouse gas, methane is **much more potent** than CO₂.

Note that each stage of CSS technology requires its own energy sources, which generate additional emissions. CO₂ capture systems at power-generation plants and ethanol production facilities **also require copious amounts of water** for cooling and other purposes leading to extensive water consumption and increased water pollution, often in areas already facing water scarcity.

CO₂ Transport

Large-scale development of CCS across the US will require the construction of thousands of miles of new pipeline infrastructure impacting ecosystems along their routes. Liquid CO₂ is transported in a **highly pressurized state**—higher than natural gas. Additionally, liquid CO₂ is corrosive when in contact with water, increasing the risk of leaks, fractures, and ruptures. Rupture of a highly pressurized liquid CO₂ pipeline results in an explosive release of an extremely cold (less than -70° C) flood of liquid CO₂ that forms ground-hugging clouds of gas and small particles that continue to spread until supply is turned off. Because CO₂ displaces oxygen, internal combustion engines would be rendered inoperable near a leak or rupture, interfering with emergency responders. Potential mass casualties would overwhelm rural emergency health systems.

Watch **this video** to see what a CO₂ pipeline rupture looks like.

CO₂ Injection Sites

The rollout of CCS projects at the scale required to slow climate change effectively would require establishing CO₂ sequestration sites throughout the US. **Estimates** (see pp 18-19) of the storage potential and feasibility are theoretical and vary widely.

The risks of CO₂ sequestration **include** leakage of CO₂ and increased occurrence of earthquakes like that experienced with high-pressure water injection at fracking sites. CO₂ leaks at the surface could damage surface ecosystems or structures, threaten people and animals from high concentrations of CO₂, and contribute to greenhouse gas accumulations, all undermining the theoretical value of CCS. Leaks that occur sub-surface could affect drinking water aquifers. Conceivably, using geologic formations as storage for carbon dioxide could compromise deep not-currently-used aquifers on which future generations may depend for drinking water.

Frontline Communities

[Dr. J.M. Bacon](#), Professor of Environmental Sociology at Grinnell College, cautions us to be skeptical of “purely technological fixes when it comes to complex eco-social problems. From an Environmental Justice perspective, the first question is: how have communities been involved at the planning and decision-making stage?”

As has been widely documented, fossil fuel extraction and industrial processes have a legacy of disproportionately impacting Black, Brown, and Indigenous communities. Adding carbon capture to an existing fossil fuel or industrial site functions to extend the lifespan of that facility. Many of the communities already adversely impacted by these facilities would be further harmed by the increased emissions and water pollution associated with carbon capture units.

For example, an industrial corridor that stretches between New Orleans and Baton Rouge, Louisiana is being targeted as a [hub for carbon capture](#). This corridor is home to more than 200 oil and gas refineries, petrochemical plants, and other industrial chemical facilities. The area is known as “*Cancer Alley*” because decades of poor air and water quality from industrial pollution have increased cancer rates and other health problems. The [communities](#) most affected are predominantly Black.

The White House Environmental Justice Advisory Council (WHEJAC) Final Recommendations on climate and environmental justice include a list of “EXAMPLES OF THE TYPES OF PROJECTS THAT WILL NOT BENEFIT A COMMUNITY” ([see page 59](#)). Number 2 on the list is CCS or CCUS. It is also essential to note that number 1 on the list is “Fossil fuel procurement, development, and infrastructure repair that would in any way extend lifespan or production capacity, transmission system investments to facilitate fossil-fired generation or any related subsidy.”

History lessons: Satartia

In 2020, a CO₂ pipeline in Satartia, MS ruptured, sending 49 people to the hospital and leaving many with long-term health impacts. More than 250 people required evacuation. First responders needed self-contained breathing apparatuses to conduct their rescues. Residents’ cars ceased to run, and victims were found dazed or even unconscious. See the full story [here](#).



The Sartartia pipeline rupture. Source: [Yazoo County Emergency Management Agency](#)

Conclusion

Superficially, the potential CO₂ reduction associated with CCS projects seems desirable. However, CCS technology and associated pipeline infrastructure are economically costly and come with a significant set of public health hazards. We can achieve *more* CO₂ reduction *and* eliminate pollution and mining and pipeline infrastructure by utilizing existing and accessible renewable energy like wind, solar, efficiency, and other readily scalable and available strategies. It is reckless to spend money on unproven technologies that contribute negligible benefit or, worse, disproportionately impact already disenfranchised communities. If we instead focus funding on renewable energy projects and infrastructure, we avoid the myriad health risks associated with CCS altogether.

Dear Reader

Stay tuned for our next installment where we take a much closer look at issues surrounding three proposed CCS projects in Iowa.

GLOSSARY

ACGIH: American Conference of Governmental Industrial Hygienists

CCS: Carbon capture and storage/sequestration—The process of capturing human-made CO₂ at its source and storing it to prevent its release into the atmosphere.

CCUS: Carbon capture, utilization, and storage/sequestration—captured CO₂ is utilized in some way, typically for enhanced oil recovery.

Co-pollutant: Other types of pollutants that are generated during the burning of fossil fuels, along with CO₂

DOT: Department of Transportation

Net-zero: A nebulous term promoted by some meaning an overall balance between emissions produced and emissions taken out of the atmosphere. Net-zero often replaces the term *carbon neutral*. To save our climate and health, we need to go beyond net-zero to zero production of carbon emissions.

NIOSH: National Institute of Occupational Safety and Health

NO_x: Nitrogen oxide, a co-pollutant of fossil fuel combustion and potent greenhouse gas.

OSHA: Occupational Safety and Health Administration

Ozone: A co-pollutant of fossil fuel combustion, also known as “smog.” Ozone attacks lung tissue by reacting chemically with it.

PM_{2.5}: Particulate matter, fine particles of toxic pollutants 2.5 microns or smaller in size. Such small particulates are dangerous because they can get into the lungs’ alveoli, cross into the bloodstream, and lodge in internal organs.

Respiratory acidosis: A condition that occurs when there is an accumulation of CO₂ in body fluids that causes acidic conditions that can lead to death.

Sequestration: In context to CCS, sequestration is the storing of CO₂ in underground geologic formations.

SO₂: Sulphur dioxide, a highly toxic co-pollutant resulting from fossil fuel combustion.

WHEJAC: White House Environmental Justice Advisory Council

FURTHER READING

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https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4boddef8bodd8f