

June 7, 2016

Millennium DEIS Public Comment

Thank you for the opportunity to provide input for the DEIS recently released for the proposed coal export terminal in Longview, WA. I have the following comments for two areas of interest in which I have expertise as a Port of Longview staff member for 17 years, now retired. The areas of interest are rail and bulk terminal/vessel loading operations. I apologize if it is apparent that I did not read the DEIS in its entirety and some of my comments may or may not reflect the positions and findings of the study.

Rail: this project cannot go forward until the Reynolds lead from the switch yard to the coal site is totally upgraded and the intersections with rail have been separated. While there are plans to change the intersection at Oregon Way and Industrial, no other plans are forthcoming for the remainder of the at grade crossings. When the Port of Longview was looking to bring in ADM to export grains in the late 90's, the Port hired Mainline Management, a rail consulting firm, to review the ingress and egress of unit trains and its effects upon vehicle traffic. With volumes of 5 million to 10 million tons of grain the Port and ADM learned that this volume would overwhelm traffic particularly at the bridge. The Port then constructed the alternate rail corridor into the Port thereby bypassing the old route over Industrial Way. The cost was millions and a new overpass to Longview Fibre had to be built to insure staff could get to work on time and emergency vehicles could pass quickly. The railroads contributed nothing in terms of investment dollars to this project. Today the State is looking at \$ 85 to \$ 200 million to handle coal trains to the terminal and I'm sure the railroads again will not participate and neither will the proponents. So when Millennium came to town in 2010 offering 5 million tons per annum of coal exports I was concerned enough to attend the Cowlitz Commission meeting which at the time was considering the issuance of a Shoreline permit. Honestly I don't believe anyone in the room had a clue as to the impact of 5 million tons in unit trains routed over the old lead would cause to the traffic and emergency access to this community. Since then proponents had to fess up to their real intentions to ship 44 million tons and have made no attempt to reconcile the cost of the rail upgrades to facilitate rail through town. **Mitigation:** I would recommend that even at a base level of 5 million tons the grade separations must be in place first before terminal operations can begin.

Terminal operations and Fugitive Emissions: there has been much public concern for the issue of dust or better known as fugitive emissions. I am unaware of the science within the DEIS as regards emissions emanating at the terminal which is open to the prevailing westerly winds coming upstream without a windbreak. Bulk terminal operations are to employ BAT to control fugitive emissions. The best available for a coal terminal is sprinklers putting water on the piles. Now imagine, if anyone can, 75 acres of coal piled at different heights and moving 10's of thousands of tons of coal in and out of those piles every day. The numbers in the DEIS appear to me to vastly underestimate what I believe will be the reality of the experience particularly during hot windy days. There are few benchmarks in the United States and the world to adequately understand fugitive emissions from experience for a 44 million ton mega terminal having 550,000 MT of coal in surge piles on the ground at all times, uncovered and subject to the elements. Honestly, I cannot imagine or grapple with that volume of cargo. Maybe Australia. We do know that winds will cause a significant elevation of fugitive emissions and this has

been recorded at the Westshore coal Terminal in Canada. Most bulk terminals operate covered facilities not open as in coal. In my experience at the Port, if I solicited 4,000 tons of coal for the Port without being stowed in covered storage the Environmental Director would have laughed at me and turned it down. My best guess, and its without proof, is that this terminal will expose the community to fugitive emissions within 3 miles of the terminal on windy days and the annual loss of coal will be in the neighborhood of ½ to 1 percent or upwards of 440,000 tons per year. The only way to really measure the loss is to exhaust the pile and compare the reclaim volumes and this will not happen. I don't believe anyone has a handle on this subject and coal dust is difficult to discern in the air with the naked eye. Interestingly the CEO of Millennium who spoke at the hearing about dust has no background or experience in bulk terminal operations. I recommend that this subject go back to the drawing boards and a member of ecology's staff visit a mega terminal somewhere in the world to understand better the impact open coal storage will have on the greater community and in particular the Highland's area and Weyerhaeuser. As an aside I can't imagine how Japan will react when their newsprint loaded just upstream at the Weyerhaeuser dock out turns with black dust on the rolls. There will no doubt be coal dusting during vessel loading operations at the spout and the Weyerhaeuser mill will be most in line to receive the fugitive emissions. Coal will find its way into the River during vessel loading operations and any other day. Simply put there is no way in an open storage environment to effectively control the coal dust/fines with a BAT of sprinkler heads and the dust/fines will escape and find its way into the air and into the Columbia River. This project should not go forward with this volume of cargo per annum with unknown consequences and I therefor recommend that the project not be permitted.

Sincerely,

Gary Lindstrom
Lindship Maritime Services
1403 18th Ave., Longview, WA
360-431-8653
lindship@gmail.com