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Formal Comments Regarding Millennium Bulk Terminals-Draft Environmental Impact Statement

According to Table 5.6-5 of the Millennium Bulk Terminals DEIS, the maximum annual average emissions of PM 10 from operations of the coal terminal from total project area sources is 7.08 tons. This would be a miraculous achievement if compared with actual emissions reports from operating coal terminals.

Hay Point Coal Terminal in Australia has been in operation for almost 50 years, and has been addressing coal dust and pollutant emissions the entire time. They promote the most current dust suppression systems. There is a long record of emissions data. Significantly their rail and ship operations are similar to that proposed for MBT and their terminal capacity until recently was the same, 44 million metric tons.

Hay Point Coal Terminal self-reported to the Australian National Pollutant Inventory for 2014-2015 PM 10 air emissions of 140,000 kilograms, or 154 tons, or more than 20 times what the MBT DEIS predicts. PM 2.5 emissions have a similar wide discrepancy- MBT 2.4 tons, HPCT 19 tons. Which data has more credibility?

Important data in the MBT DEIS is too good to be true and not to be believed. Please support the No Action Alternative.

Thank you,

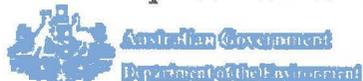


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National Pollutant Inventory

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2014/2015 report for BHP COAL PTY LTD, Hay Point Terminal - Hay Point, QLD

A list of Substances for an individual report.

Substance	Air Total (kg) ^{[1][2]}	Air Fugitive (kg) ^[1]	Air Point (kg) ^[1]	Land (kg) ^[1]	Water (kg) ^[1]	Total (kg) ^[1]
Antimony & compounds ^[1]	0.15	0.15				0.15
Arsenic & compounds ^[1]	0.43	0.43				0.43
Beryllium & compounds ^[1]	0.19	0.19				0.19
Boron & compounds ^[1]	4.8	4.8				4.8
Carbon monoxide ^[1]	22,000	18,000	3,200			22,000
Chromium (III) compounds ^[1]	4.4	4.4				4.4
Cobalt & compounds ^[1]	1.3	1.3				1.3
Copper & compounds ^[1]	5.0	5.0				5.0
Cumene (1-methylethylbenzene) ^[1]	0.39	0.39		1.6		2.0
Fluoride compounds ^[1]	7.5	7.5				7.5
Lead & compounds ^[1]	2.8	2.8				2.8
Manganese & compounds ^[1]	38	38				38
Mercury & compounds ^[1]	0.010	0.010				0.010
Nickel & compounds ^[1]	3.2	3.2				3.2
Oxides of Nitrogen ^[1]	230,000	220,000	14,000			230,000
Particulate Matter 10.0 um ^[1]	140,000	140,000	1,000			140,000
Particulate Matter 2.5 um ^[1]	17,000	16,000	1,000			17,000
Polycyclic aromatic hydrocarbons (B[a]Peq) ^[1]	0.22	0.22	0.000050			0.22

Individual report emissions

Substance	Air Total (kg)	Air Fugitive (kg)	Air Point (kg)	Land (kg)	Water (kg)	Total (kg)
Selenium & compounds	0.42	0.42				0.42
Sulfur dioxide	160,000	160,000	3.4			160,000
Total Volatile Organic Compounds	7,200	6,100	1,100			7,200
Zinc and compounds	7.1	7.1				7.1

[1] All emission/transfer quantities are displayed to two significant figures. Displayed emission totals may not exactly equal the sum of their individual emissions.

[2] Air Total = Air Point + Air Fugitive

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History of Dust Management

A sustainable future in management of dust emissions from coal terminals.



Port of Hay Point (2011)



PORT OF HAY POINT

Growth of Hay Point communities

Between the 1960's and 1980's many residents moved to communities surrounding the coal terminals at Hay Point, including Louisa Creek and Half Tide. Community numbers progressively grew alongside a series of port expansions.

Early days of dust monitoring practice

In 1996, nearby residents expressed concerns about coal dust and a community action group was formed. The Port Authority responded to the communities concerns and recognised a need for further investigation. The following were implemented:

- Property Buy-Back Scheme at Louisa Creek
- Consultation with Louisa Creek Progress Association
- Revegetation and fire breaks
- Complaints hotline
- Newsletters
- Open days
- Monthly environmental monitoring reports supplied to the Progress Association and Sarina Shire Council (20 dust deposition monitoring sites have been operational in coal terminals and surrounding communities since 1994).

Improving dust management with scientific research

In 1999, a sustainability review was conducted and a new approach to dust management was adopted including:

- A scientific understanding of dust emission source and a detailed review of dust deposition data
- Laboratory tests on each coal type
- Wind tunnel tests to simulate operational conditions
- Comprehensive site dust management investigations
- Action on major operational sources of dust emission
- Dispersion modelling of air quality and dust deposition
- Improved stockpile spray systems

- Test program to identify "dusty coals" and determine dust extinction moisture content for each coal type and a suitable stockpile chemical veneer
- On-line moisture monitoring at rail receipt to measure moisture level in each coal type
- Community consultation.

Following community concerns relating to coal in domestic rainwater tanks, a study was conducted to determine the likelihood of being a health problem. The study included leaching tests to determine solubility of major and minor trace elements from coal types.

Sample tests were analysed at the School of Environmental & Life Sciences, University of Newcastle and all leaching test results were less than the Australian Drinking Water Guidelines (NHMRC, 2004).

These tests indicated a minimal likelihood of coal dust in drinking water being an issue with respect to human health.

Measurable improvement with knowledge and time

Through recognising that there was a high level of dust emissions in early stages of coal terminals throughout Australia, the Port of Hay Point was a base for development through improved dust management procedures from 1999-2010. Dust management techniques were implemented to mitigate dust and minimise impacts on those living in the area.

The below statistics provide an indication of the improvement:

- Air quality forecast 1976 – HPCT and DBCT **40.5 Mt/pa**
Maximum forecast dust concentration eastern end Louisa Creek **200 ug/m³**
- Air quality forecast 2010 – HPCT and DBCT **135 Mt/pa**
Maximum forecast dust concentration eastern end Louisa Creek **20 ug/m³**

The operators of the coal terminals in the Port of Hay Point as well as NQBP are committed to continually improving mitigation strategies to lessen the impacts of coal dust on neighbouring communities.