



*Via Website Comment Form*

<http://millenniumpulkeiswa.gov/submit-comments.html>

November 18, 2013

Millennium Bulk Terminals EIS  
c/o ICF International  
710 Second Avenue, Suite 550  
Seattle, WA 98104

**Re: Addendum on coal dust--Scoping Comments on Proposed Millennium Bulk Terminals—Longview Shipping Facility Project**

To Whom It May Concern:

As a follow up to the comments previously submitted by Earthjustice on behalf of the Sierra Club, et al. (“Coalition Comments”) on November 15, 2013, this letter addresses a subsequent development on coal dust that should be considered in the NEPA and SEPA scoping processes.

The EIS’s analysis of coal dust should include a discussion of the efficacy of surfactants to control coal dust, potential impacts of the use of surfactants to control dust emissions, as well as consequences from not using surfactants. *See* November 15, 2013, Coalition Comments at page 24.

The case studies of Canadian coal transport and export may well prove useful in this endeavor. Canada currently exports coal from British Columbia at the Westshore Terminal (approximately 29 MTPA), Ridley Terminal (approximately 9 MTPA), and Neptune Terminal (approximately 8 MTPA), with plans for a new 4-8 MTPA terminal at Surrey Fraser Docks. Much of the existing coal exported from these terminals is metallurgical coal from Canada, with some amount of thermal coal from the U.S. Powder River Basin (PRB). Canadian residents have called for additional health and environmental assessments<sup>1</sup> associated with the expansions and new capacity at these

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<sup>1</sup> Coal Threat Report Full of Holes Officers Say, *Peace Arch News*, November 15, 2013, <http://www.peacearchnews.com/news/232134991.html>

export facilities due to their already significant concerns about coal dust and diesel particulate matter pollution from existing Canadian coal exports.

Burlington Northern Santa Fe Railway Company (“BNSF”) has recently stated its intent to build a surfactant re-topping station on the rail route between the U.S. Powder River Basin and Canada at the request—indeed perhaps mandate—of the Port of Metro Vancouver. BNSF’s letter dated November 7, 2013, is attached hereto as **Exh. A**. In addition to requiring<sup>2</sup> additional coal dust surfactant re-topping along the rail journey, the Port Metro Vancouver is also demanding additional re-topping at the Canadian Port before loading barges, and is eliminating the coal storage pile at the Port due to the concerns of local residents about coal dust. The BNSF letter and Port’s requirements are noteworthy to acknowledge that: (1) coal dust is a significant problem during the rail transport, handling, and storage of coal even far away from the mine site, and that (2) surfactants wear off all along the rail journey from the PRB to the coastal Ports and thus themselves are pollutants to waterways and communities all along the rail line. These impacts must be analyzed in this EIS for Longview.

Sincerely,



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<sup>2</sup> See Port orders Dust Control, Health Study for Surrey Coal Terminal, *Surrey North Delta Leader*, September 12, 2013, <http://www.surreyleader.com/news/223537111.html>; Conference Call to Media on New Measures Required by Port Metro Vancouver for the Direct Transfer Coal Facility Proposal, September 12, 2013, <http://www.youtube.com/watch?v=I-DoDSrzNSA&feature=youtu.be>. See also slide from Port Metro Vancouver, attached hereto as **Exh. B**.