

Customer:

BONNEVILLE POWER ADMIN

TO MILLENNIUM BULK TERMINALS-LONGVIEW  
C/O ICF INTERNATIONAL

(555) 000-0000

FedEx  
Ground

710 SECOND AVE, STE 550

SEATTLE, WA 98104

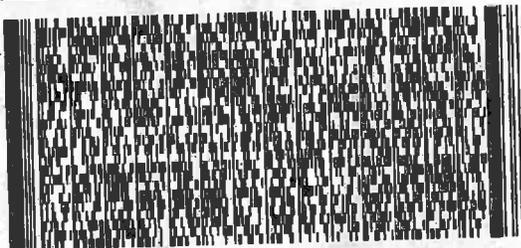
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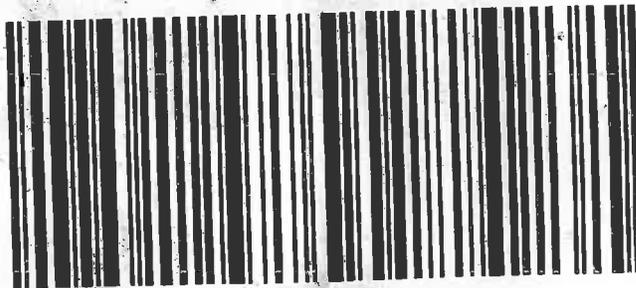
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INV: PKG ID: 41381  
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UNITED STATES DEPARTMENT OF ENERGY  
BONNEVILLE POWER ADMINISTRATION

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OFFICIAL BUSINESS

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



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

**NOV 15 2013**

In reply refer to: KEC-4

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

RE: Scoping Comments on the Proposed Millennium Bulk Coal Export Terminal

The Bonneville Power Administration (BPA) has prepared the following comments in response to Millennium Bulk Terminals-Longview, LLC proposal to construct and operate a marine terminal for export of coal in Cowlitz County, Washington. We understand that the Cowlitz County Department of Building and Planning, the U.S. Army Corps of Engineers, and the Washington State Department of Ecology have entered into a memorandum of understanding (MOU) to work cooperatively as co-lead agencies for the completion of a NEPA and SEPA Environmental Impact Statement (EIS) and have requested scoping comments.

BPA owns, maintains and operates approximately 75% of the high voltage transmission system in the Pacific Northwest. BPA is committed to providing safe, reliable and low-cost transmission service to the Pacific Northwest in part by ensuring the safe operation and maintenance of its existing transmission facilities. BPA is an adjacent landowner to the terminal facility with a substation located immediately to the east of the terminal facility and a parcel of undeveloped land immediately to the north of the terminal facility.

Accordingly, BPA has two primary concerns at this time associated with the proposed coal terminal facility. First, trains would be directed into the facility via an existing train track running parallel to Industrial Way and bisecting our access road to our substation. Current train traffic volume is low to none but the proposed project would greatly increase train traffic and could result in trains blocking access to the substation. Unimpeded access to the substation at all times is critically important to our mission at BPA. We expect this matter to be addressed in the EIS as well as the development of an emergency access plan if there is any potential for trains to be idle and blocking access to the facility.

Secondly, we are concerned about the potential for coal dust from the transfer facility to migrate to our equipment at the substation. Fugitive dust from trains waiting to be off-loaded or from the transfer process itself could migrate to the substation yard and coat the exposed equipment. BPA is concerned that a build up of dust could be corrosive to the equipment and/or increase the potential for coated insulator to arc or flashover - a very dangerous occurrence resulting in outages and damaged equipment.

Routine and regular maintenance and repairs occur at the substation. Some of these repairs can require the need for welding equipment and we would be very concerned with workers safety with using such equipment in an area that may have a build up of coal dust – a potentially explosive combination. We would expect the EIS to address the potential for fugitive dust from transfer operations to affect our substation equipment and maintenance.

As the Draft EIS is developed, we encourage appropriate Ecology, Corps, Cowlitz County, and/or Millennium staff representatives to coordinate with our Longview District Maintenance Staff on these issues as well as access and emergency plans. We trust that through your analysis of these issues, we can gain a greater understanding of the likelihood and magnitude of these potential impacts to our operations and work to find solutions to minimize or avoid any such impacts.

Dave Kennedy of our Environmental Planning and Analysis staff will serve as your point of contact for now and can bring in other staff and/or subject matter experts as necessary for reviews and assistance. Please add Mr. Kennedy to your mailing list. He can be reached at 503-230-3769 or [dkkenedy@bpa.gov](mailto:dkkenedy@bpa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard L. Shaheen", with a long horizontal flourish extending to the right.

Richard L. Shaheen  
Vice President  
Engineering and Technical Services