

November 18, 2013

MBTL Coal Export Terminal EIS
c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA 98104

Subject: State Environmental Policy Act (SEPA) Scoping Comments

Weyerhaeuser Company owns and operates forest products manufacturing facilities on a nearly 700 acre site adjacent to and immediately east of the proposed Millennium Bulk Terminals (MBTL) project site in Longview, Washington. The MBTL project construction and operation, as described in the February 2012 JARPA package, suggests the potential for significant adverse impacts to the Weyerhaeuser manufacturing activities.

Cowlitz County has determined and Millennium Bulk Terminals has accepted a SEPA Determination of Significance for this project proposal. Public comments on Environmental Impact Statement scoping are now being accepted. Weyerhaeuser expects the following concerns will be addressed in the EIS, and mitigation measures identified.

1) Incremental railroad traffic to and from the MBTL site will harm Weyerhaeuser's manufacturing activities.

The existing rail corridor to the MBTL runs between the Weyerhaeuser site and Industrial Way, State Highway 432. Road access to the Weyerhaeuser site occurs through multiple controlled gates off of Industrial Way. Approximately 1,400 employees, as well as maintenance/supply contractors, raw materials and product shipments enter and leave the site across the rail lines parallel to Industrial Way. Emergency vehicles (ambulance, fire fighting, law enforcement) would use these same access gates. The prospect of multiple unit trains entering and leaving MBTL each day and physically blocking essential access to the Weyerhaeuser site is not acceptable.

The SEPA evaluation scope must assess/quantify train movement along the Industrial Way corridor and identify steps to mitigate the impacts to Weyerhaeuser's operations.

2) Fugitive emissions of coal dust from the rail transport and storage at MBTL has the potential to contaminate raw materials and finished products.

Weyerhaeuser operates two large pulping and papermaking operations on site. The products from these operations must meet exacting and stringent quality specifications to satisfy customer expectations. The product from one of these operations is used for food packaging. Extraordinary effort is made at each step of the manufacturing processes to

limit contaminants which might result in operational jeopardy or degraded final products. Specific concerns include the prospect of fugitive coal dust fallout on the stored wood chips on the site (i.e., the fundamental raw material in the manufacturing of wood pulp), and the infiltration of coal dust into the product manufacturing areas and final product storage and shipping warehouse.

The SEPA evaluation scope must assess/quantify the fugitive dust contribution from the rail delivery and MTBL storage of coal to the Longview airshed, and onto the Weyerhaeuser property. Mitigation measures to avoid adverse impacts to Weyerhaeuser's manufacturing operations must be described.

- 3) The use of diesel-fueled locomotives arriving and departing the MBTL site will contribute criteria and hazardous air pollutant emissions into the Longview airshed. These emissions will consume finite air pollution capacity in the airshed.**

Transportation-related air pollutant emissions should be quantified and an assessment completed on the increment consumption against promulgated state and federal ambient air quality standards, and Acceptable Source Impact Levels for toxic pollutants as presented in Washington's *Controls for New Sources of Toxic Air Pollutants*, Chapter 173-460 WAC.

The SEPA evaluation scope should assess viable options to reduce criteria and toxic air pollutants from coal transportation, including diesel engine technologies, diesel fuel specifications, strategies to minimize idling, etc. In addition, the SEPA review should include a quantification of ambient air impacts attributable to diesel-fueled locomotives.

Thank you for considering these suggestions. Weyerhaeuser Company intends to be an active participant in the review of the draft Environmental Impact Statement arising from this SEPA scoping process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tim Haynes". The signature is fluid and cursive, with a large initial "T" and "H".

Tim Haynes

VP /Mill Manager – Longview Operations