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c/o ICF International
710 Second Avenue, Suite 550
Seattle, WA
98104

12 November 2013

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

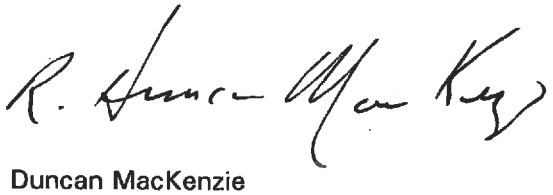
RE: Millennium Bulk Terminals Environmental Impact Statement Scoping Comments

Dear Co-Lead Agencies:

Thank you for the opportunity to offer comments on the scope of the proposed Millennium Bulk Terminals – Longview [MBTL] Draft Environmental Impact Statement [DEIS]. As an area resident, directly affected by transportation and air quality aspects of the proposed project, I trust that my comments may help to define areas of concern regarding the project, which may require further investigation, remediation, and mitigation.

The information provided to date by the applicant, Millennium Bulk Terminals Longview, LLC [MBTL], as found on the project website, is extremely limited in scope. Major industrial projects of the intended scale proposed, are usually supported by Resource Reports, technical data, plans and supplementary information. The information found in the Joint Aquatic Resources Permit Application dated 22 February 2012, and the update letter from the applicant dated 5 August 2013; serves as an overview at best. It is to be hoped that the agencies will require any needed project details from the applicant prior to defining the scope of the EIS.

Very truly yours,



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Rainier, Oregon 97048

Attachment:

Bonneville Power Administration Related Issues

Noted in Part 4 of the Joint Aquatic Resources Permit Application [JARPA], dated 22 February 2012, is the following phrase: "A small portion of the site is owned by the Bonneville Power Administration" [BPA]. Shown on JARPA drawing sheet 2 of 14 "Coal Export Terminal - Site Plan View" the proposed rail loop in the North Eastern corner appears to overlap the power transmission tower and associated BPA property parcel ID 61954 as shown on the Cowlitz County tax assessment map. It would seem incumbent upon the applicant to explain how, without full control of the site property, the site layout can accommodate the proposed project.

NEPA/SEPA – Air Quality

Coal dust pollution of electrical insulators and equipment can result in contamination flashover of high voltage power transmission equipment [1]. Flashover can lead to ground faults and disruption of service. There are major North/South 230kV and 115kV BPA power transmission lines [refer to BPA All KV System Map [2]], which cross the project property [JARPA at Part 5n]. Additionally, the BPA Longview Substation associated with these power transmission lines is located directly adjacent to the project [JARPA at Part 5n]. The applicant has apparently provided no information as to seasonal, or historical data on wind speeds and direction (referred to as a 'Wind Rose') of the proposed coal stockpile locations. It is suggested that this information is necessary to the scope of the EIS. This data might be used in conjunction with the method outlined in the US Environmental Protection Agency [EPA] document, AP-42 Section 13.2.4 "Aggregate Handling And Storage Piles" [3] as possible method of estimating the wind erosion contribution to fugitive coal dust emissions that may be expected from the coal stockpiles. Additionally, AEROMOD atmospheric simulation modeling could then be used to predict the dispersion of coal dust particulate matter onto the BPA facility areas located both adjacent to the facility and across SR432 on tax parcel ID 1021401. It is further suggested that the BPA should be consulted and requested to comment on the perceived potential for coal dust contamination as it relates to the operational, system reliability and maintenance aspects of their equipment and power transmission systems.

NEPA/SEPA – Transportation/Socioeconomic

Site access to the BPA Facilities is required for operating and maintenance personnel. Track 13A – the Reynolds Spur lead to the proposed project when occupied by a unit train will prevent access to the BPA Substation in tax parcel 61954. In view of the importance of this facility to the western electrical grid, it is suggested that scoping consideration be given to a means of mitigating the BPA facility access.

1) Ramos Hernaz, Jose A., et. al. "Insulator Pollution in Transmission Lines", 2006 **International Conference on Renewable Energies and Power Quality**, Palma de Mallorca, 5, 6, 7 April, 2006 http://www.icrepq.com/icrepq06/256-hernanz.pdf [accessed 09/08/13]

2) http://transmission.bpa.gov/LanCom/Geographic_Information_Services/pdf/All_BPA_KV.pdf [accessed 08/20/13]

3) AP 42, Fifth Edition, Volume I, Chapter 13: Miscellaneous Sources Fifth Edition US Environmental Protection Agency, US Government Printing Office, 2006 http://www.epa.gov/ttnchie1/ap42/ch13/final/c13s0204.pdf [accessed 09/10/13]

Proposed Dock2 and Dock 3 Issues

NEPA – Transportation/River and Harbors

As found in the proponent's Joint Aquatic Resource Permit Application [JARPA] dated 22 February 2012, the proposed new coal export loading docks are shown on sheet 3 of 14 "Coal Export Docks - Plan View". These docks are sited at the 25° turn transition in the Columbia River navigation channel from the Barlow Point Channel (downstream) to Slaughter's Channel (upstream) [4]. The co-lead agencies, notably the US Army Corps of Engineers [USACE] are requested to consider the following based on the design factors noted in USACE publication EM1110-2-1100 (Part V) Chapter 5:

- The current 25° degree turn represents the threshold between a Cutoff turn and an Apex turn as defined in Table V-5-12. While the existing channel does widen at this point, will this existing widening be consistent with the Turn Width Increase Factor shown in the noted table when the stated design intent of the proponent to accommodate 100,00DWT New Panamax vessels is considered?

- There is currently no turning basin at the proposed dock location. Even if the ships shown on sheet 3 of 14 were to pivot directly from the proposed dock they will be apparently turning into the navigation channel with no allowance for the turning circle dimension and current factors noted in Section V-5- 7 (a) (1). If a turning basin is to be created, what will be the increased maintenance dredging considerations?

- While the berthing line appears to offer sufficient setback from the navigation channel given the noted project depth of –43' CRD with a –2' overdredge allowance [application Part 6b]; the siting of the docks on the channel turn may offer challenges to tug and barge tow maneuverability, especially in view of the proposed Pacific Morrow project use of the downstream Port Westward docks for coal export. Is the setback space sufficient?

NEPA/SEPA - Water Quality

The applicant makes passing reference to the Dredged Materials Management Program in the JARPA, and assumes that, based on prior dredging; all dredged materials will be suitable for flow lane disposal [application Part 6b]. It is suggested that the anticipated scale of the proposed dredging may not be accurately reflected in the small scale maintenance dredging that has previously been done. It is further suggested that, given the prior use of the adjacent site as an aluminum smelter and bulk materials import/export facility, with attendant entry of potentially toxic materials into the river as recently as 2010 [5]; the EIS scope include test borings and analysis of sediment materials in the proposed dredge area adjacent to the existing and proposed dock areas that will accurately reflect the entire dredge prism area to the proposed depth and over-dredge depths.

4) U. S. Department of Commerce - National Oceanic and Atmospheric Administration Chart 18524, United States, West Coast, Oregon - Washington, Columbia River, Crims Island to St. Helens

5) Matthew Preusch, "Environmental group says mile-long spill into Columbia River is a sign that better regulation is needed", The Oregonian February 05, 2010 at 9:42 PM, updated February 27, 2010 at 10:08 AM http://www.oregonlive.com/environment/index.ssf/2010/02/environmental_group_says_mile-.html [accessed 09/10/13]

Statewide Railroad Issues

NEPA/SEPA - Transportation

The information found in the applicant's JARPA, and Project update letter dated 5 August 2013 available from the EIS website provides little detail as to the actual railroad impacts expected from the project. However, it has been reported and estimated that at full build-out, the project would add up to 16 unit trains (eight loaded + eight empty trains) exceeding 7,000 feet in length within Washington state each day [6]. Additionally, the applicant states in the JARPA that the existing bulk terminal handling facility will remain in operation [application Part 5m]; however, the number of trains to serve this existing facility function are not stated as the applicant's plans are stated as still being in the conceptual stage. It is suggested that the EIS scope seek to clarify the actual railroad traffic to and from the project site, the number and length of trains, and to analyze the transportation implications of imports received at the project site.

Noted in the Washington State Department of Transportation 2010-2030 Freight Rail Plan [7] Figure 3-9 (page 3-21) depicts the Rail Capacity found on all the major Washington rail lines in 2008. As shown in the noted figure, the BNSF lines from Spokane through the Columbia Gorge and up to the Longview junction were noted to be near to or at theoretical capacity especially on the BNSF Fallbridge division (Pasco, WA to Vancouver, WA). As found in Exhibit 3-12 (page 3-28) the Kalama-Longview to Vancouver section of the line was at 79% capacity on 2008 and was projected to exceed capacity by 2028 at 131% even without the potential traffic arising from coal exports. While it is fully understood that the actual route for the railroad traffic to proposed coal terminal has not, as yet, been decided; it is important for the EIS to look at the rail system as it currently exists and the potential for this system to handle the estimated traffic in the most likely routing scenarios, especially in a cumulative sense if the proposed Gateway Pacific project is vetted.

The Washington State Department of Transportation in conjunction with Oregon State Department of Transportation and AMTRAK operate the AMTRAK Cascades passenger rail service from Eugene, Oregon to Vancouver, British Columbia, Canada. Approximately U$D800 million has been allocated by the federal government for the upgrading of passenger service over this route. As noted supra, the EIS scope should examine the capability of the rail system to handle not only the existing traffic requirements, but this specific upgrade requirement as well. A requirement, which could be affected by unit coal trains serving not only the proposed Millennium project, but the additional cumulative issues arising from coal unit trains servicing the Gateway Pacific project as well.

Local Railroad Issues

The Longview Switching Company (a subsidiary of Burlington Northern Santa Fe Railroad) rail lead, Line 613 - Track 13A services the applicant's proposed export facility as noted in the Project update letter. This rail lead crosses Washington SR432 (Industrial Way) in two locations at 3rd Avenue [US-DOT Crossing 101826T] and Industrial Way west of the intersection with SR433 [US-DOT Crossing 101806G]. The rail lead also crosses Oregon Way (SR433) [US-DOT Crossing 101805A] and California Way [US-DOT Crossing 101821J]. These four intersections are the major access routes from the city of Longview and its services to the Port of Longview and the industries along the Columbia River as well as the only access via the Lewis and Clark Bridge to northwestern Oregon and highway US30. All crossings are currently at grade and rail speed is limited to 10 miles per hour. It is estimated that a unit train of 128 cars would block each intersection for a minimum of 8-1/2 minutes each, and all noted intersections for 1-1/2 minutes sixteen times per day. These noted rail and road interfaces are at the crux of number of issues scoping should seek to address.

NEPA – Transportation / SEPA – Transportation
Scoping should require and incorporate a full traffic impact analysis of the existing rail and road crossings based on the throughput tonnages noted in the two stages of development described in the JARPA [application Part 6a].

NEPA – Transportation/Socioeconomics / SEPA – Transportation
Scoping should examine in detail access to emergency services and health-care facilities served by the noted roadways for not only the Port of Longview area and riverside industries, but the large affected area of northwestern Oregon as well.

NEPA – Transportation/Socioeconomics / SEPA – Transportation
Scoping should examine the economic impact of goods and services establishments serving not only Longview, but the northwestern Oregon as well, which could be affected by the proposed rail traffic.

It should be noted that SR433 and SR432 are designated as Washington State 'Highways of Statewide Significance'. The scoping review should fully coordinate with the Washington State Department in the determination of the level of service required (per RCW 47.06.140) and be cognizant of the requirements found in RCW 47.06.130 for a cost-benefits analysis to be performed by the Department of Transportation should any plans for mitigation of the rail and road crossings incur a projected cost of one-hundred million dollars or more.

6) Refer to RCW 47.05.022 and associated listing **Transportation Commission List of Highways of Statewide Significance** Designated by Resolution 660, dated January 21, 2004 Adopted by the Washington State Legislature Through Engrossed House Bill 1433 on March 31, 2004 Modified by House Bill 3266 on June 7, 2006 and by Senate Bill 5642 on July 26, 2009; and as noted in RCW 47.17.625.

Coal Stockpile Management Issues

NEPA – Hazardous Materials
In neither the JARPA nor the Project update letter has the applicant outlined any of the accepted industry techniques for PRB coal stockpile management. Absent is any information from the applicant as to the manner in which individual received shipments will be segregated or identified, nor is there any mention of the energy industry stockpile management practice of 'first in/first out'. Also absent in any of the presented materials is a discussion of procedures to be followed if for some reason it is not possible to receive and ship PRB coal in the continuous operational sequence described, i.e. Columbia River bar closure and ship scheduling delays, extended power failures, stacker/re-claimer failures, conveyor system failure, etc. Scoping should require further detail from the applicant on coal storage pile management practices under both normal and abnormal operational conditions.

NEPA – Hazardous Materials
The pyrophoricity (potential for spontaneous combustion) of PRB coal is well known. However, not found in the JARPA or the Project update letter is any discussion of the manner by which the applicant plans to monitor, segregate, and remove from the stockpiles or conveyors 'hot' coal. As noted supra, scoping should require additional detail from the applicant on coal storage pile management practices for coal received or found to be at or above 55 degrees C. Reference is made to the International Marine Organization publication *Bulk Cargoes Code – General Requirements for All Coals*, and attention should also be given to the more applicable federal regulations covering the carriage of hazardous cargoes in vessels and barges within the territorial waters of the US, 46 CFR §148.240 Coal.

NEPA – Socioeconomics / SEPA - Public Services
The JARPA notes that the facility will include "Support services, utilities and infrastructure including maintenance workshop, offices and staff amenities" [application Part 6a – Physical Components Stage 1]. There is no mention of fire suppression or emergency response equipment or training to address the potential of fire at the facility. Scoping should require a detailed response from the applicant regarding Emergency Procedures, Emergency Access to the site especially in view of the potential for unit trains to block access, and Specialized Training and Funding for local first responders.

NEPA/SEPA Air Quality/Hazardous Materials
While the JARPA alludes [application Part 8a Operations] to the use of a covered conveyor system to move the coal from the stockpile stacker/reclaimer units to the proposed docks, nowhere is there found any mention of dust suppression or housekeeping procedures to prevent the buildup of coal float dust in these covered and enclosed spaces [7]. Scoping should include mitigation and suppression methods to be employed by the applicant to reduce the presence of this potentially explosive material.

7) Edward B. Douberly, "Fire-protection Guidelines for Storing and Handling PRB Coal," Power August (2003): 70 – 73, Powder River Coal Users Group
http://www.prbcoals.com/pdf/PRBCoalInformation/Power-Oct03-Fireprotection.pdf Last accessed on 10/25/2012

Coal Stockpile Management Issues (continued)

NEPA – Visual Resources / SEPA – Aesthetics

Based on information shown in the proponent's Joint Aquatic Resource Permit Application [JARPA] dated 22 February 2012, the proposed coal stock piles shown on sheet 2 of 14 "Coal Export Terminal - Site Plan View" scale at approximately 200' wide. Using a 40 degree angle of repose [8], the resulting height of the coal stockpiles would be approximately 84'. While it is understood that this area is an industrial zone, there are few structures of this height in the area and the visual massing of these piles presents a distinct alteration of the current visual aesthetic. It is suggested that scoping seek an evaluation and possible mitigation stategies of this aspect of the project.

8) The Babcock & Wilcox Company. *Steam: its generation and use*. The Babcock & Wilcox Company. pg. 12-14. ISBN 0-9634570-1-2