

Gateway Pacific Terminal Documents, Comments

From: Mark Buford [mailto:mark@nwcleanair.org]

Sent: Thursday, April 07, 2011 3:03 PM

To: Dewell, Jane (ORA)

Cc: Mark Asmundson; Dan Mahar

Subject: RE: April 7 comments

Regarding the draft submittal dated 2/28/2011 for the proposed bulk terminal at Cherry Point.

The NWCAA does not consider this to be a permit application. Comments provided do not represent determinations of the NWCAA and are not proposed permit conditions. Similarly, lack of comment at this time does not imply NWCAA approval. The NWCAA may comment further at any time prior to permit issuance.

- The project proponent may find pre-project ambient monitoring to be helpful in determining the pre-existing ambient particulate concentrations.
- The project proponent has referred to fabric filters controlling dust from the rail unloading stations as being able to achieve 10% opacity. Typical permitted opacity from a fabric filter system in the NWCAA jurisdiction is 5% or less.
- The project proponent discusses covered and enclosed conveyors in different areas. The NWCAA anticipates that the eventual permit application would address why enclosed conveyors are not used throughout.
- Similarly, the project proponent is pre-proposing controls throughout the project (such as dust control on the piles) without ranking available controls by effectiveness and selecting the most effective (BACT) as will be necessary in the permit application. The proponent may find it advantageous to go through that exercise prior to the SEPA/NEPA process to minimize the chance of a potential change in control systems at the permitting stage.
- Greenhouse gas emissions will need to be addressed.
- A comparison of the proposed dust controls at Cherry Point with those used at the similar terminals in British Columbia and Alaska will be helpful. The NWCAA understands that those facilities have generated complaints about windblown dust. The NWCAA suggests learning from the experiences at those facilities when proposing controls for the Cherry Point facility.

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