

EIS Scoping Comment on Wind-Blown Coal Dust Emissions and Water Consumption at the Proposed Gateway Pacific Terminal (GPT)

My name is Michael Crum. As a resident and homeowner in Birch Bay, I am deeply concerned about reasonably foreseeable, significant and adverse impacts on air quality and local water resources from the proposed Gateway Pacific Terminal (GPT).

The Pacific International Terminals, Inc., Project Information Document states that GPT's entire 80 acre (five, 1/2 mile long, 60 feet high) coal stockpiles would be "uncovered." To prevent spontaneous combustion and to reduce coal dust emissions, coal stockpiles would be sprayed with water. GPT proposes to use 1.9 billion gallons of water per year, 5.3 million gallons per day on average. Putting that into perspective, GPT's daily water use would be more than all of Ferndale's or half of Bellingham's. GPT would use nearly one third of the amount of water the Public Utility District (PUD) currently supplies to six industrial and fifty irrigation customers in the Cherry Point area!

Neither spraying these huge quantities of water nor any other technique or combination of techniques prevents massive amounts of coal dust from escaping from uncovered coal stockpiles.

The attached image, taken April 12, 2012, shows wind-blown coal dust at Westshore Terminal at Roberts Bank, B.C. that occurred due to "an unexpected gust of wind" ... despite the terminal's tower-mounted water cannons and its use of millions of gallons of water per year for suppression of spontaneous combustion and coal dust emissions.



Westshore Terminal is less than half the size of the proposed GPT at Cherry Point. More than three (3) million pounds of coal dust per year likely would escape from GPT's uncovered coal stockpiles and it would blow more than 5 miles in every direction ... where thousands of us live and thousands more come to work and to vacation. Research reviewed by 205 Whatcom County physicians consistently concludes there is no safe level of exposure to the toxins in coal dust.

Given that the proposed GPT “East Loop” (2.75 million metric tons of uncovered coal stockpiles) would be located at a higher elevation, with winds equal to or exceeding those typically occurring over the stockpiles at Westshore Terminal, reasonably foreseeable, significant and adverse effects from wind-blown coal dust are likely to occur. Therefore, I ask that the scope of the EIS include and analyze:

- Impacts to the health and welfare of all residents, employees and visitors within a five mile radius of the proposed GPT from wind-blown coal dust emissions through a comprehensive Health Impact Assessment.
- Impacts to the available water resources for local area residents, businesses, industrial and irrigation customers from GPT’s proposal to draw 1.9 billion gallons of water per year, 5.3 million gallons of water per day from the Nooksack River via the Whatcom County Public Utility District (PUD).