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Whatcom County P&DS

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**EIS SCOPING FOR GATEWAY PACIFIC TERMINAL PROJECT:  
SPONTANEOUS COMBUSTION AND FIRE POTENTIAL**

Agency Representatives:

We live in Birch Bay with a front row seat to the Cherry Point Refinery. We watched with concern the February, 2012 fire. Now, as plans for the Gateway Pacific Terminal (GPT) plans are available, we have concerns about spontaneous combustion of Power River Basin Coal. According to the Major Project Permit and Shoreline Substantial Development Permit for GPT, which can be viewed on-line, the coal will ultimately be stored in five huge piles at the terminal site, which is adjacent to the Cherry Point Refinery. These piles will be at least 60-feet high and will cover a total area of 2.5 miles.

**Please study in depth the potential for spontaneous combustion within the coal piles at the terminal or in the rail cars during transportation. Please include a realistic and scientific study of the effect on human health of release of toxic gases in case of fire, property damage likely to be affected both at the terminal and in adjacent communities, and the likelihood of fire from the terminal jumping to the refinery or of being carried by wind.**

It is documented that Powder River Basin (PRB) coal is a high moisture, highly volatile sub-bituminous coal which can easily smolder and catch fire while in storage piles. PRB coal has been delivered in rail cars partially on fire. Therefore, it seems likely that the piles of coal planned for storage at Cherry Point will be a fire hazard over time, and may cause fires. The fact that this terminal is in close proximity to the Cherry Point Refinery is also very unsettling and the potential for fire at one location to ignite fire in the other should also be studied. We have strong winds almost daily which buffet the coast and blow inland. Obviously, these winds will exaggerate any fire hazards.

Stockpiles of coal are known to emit concentrations of carbon monoxide, hydrogen, and hydrocarbons like methane and propane. If there is a fire at the coal terminal, additional toxic gases will be released into the atmosphere, quite the same as if we were burning the coal here instead of in Asia. The idea of toxic plumes of chemicals such as mercury, sulfur, and other heavy metals does nothing to make those of us who live in close proximity to the terminal feel safe and secure.

The geographic scope of fire potential could be unlimited, depending on size of fire and reaction time. Certainly, Birch Bay and Ferndale, Custer would be adversely affected by fires, but all of Whatcom County would be duly concerned about fires at or near the terminal. People living all along the transportation route would also be at risk. What affects one affects all in an indirect way.

The costs of damages from potential fires should be studied and calculated as a significant risk in the EIS. It seems that no amount of mitigation will ever completely eradicate the fire potential. Coal is coal and that fact cannot be mitigated. No amount of water will change the potential for smoldering coal deep within the piles and there is no mitigation for the capricious winds. Whatever water is sprayed onto or into the coal piles will simply cause further problems with runoff and groundwater contamination. The toxicity and volatility of coal cannot be mitigated.

Respectfully submitted,

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