

DEIS - 125
5/1/00 McKay John

April 28, 2000

To: Mr. Allen Fiksdal, Manager
Washington State Energy Facility Site Evaluation Council
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From: John McKay
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ENERGY FACILITY SITE
EVALUATION COUNCIL

Re: Sumas 2 Draft EIS

Please add the following comments to those I submitted on April 6 and April 15, 2000:

On page 22 of Appendix B-3 in the Sumas 2 Generation Facility EFSEC Application 99-1, the subject of sulfuric acid mist is discussed. Approximately 13.5% of the SO2 emitted by S2GF will be converted to SO3 which combines with water to form H2SO4 (sulfuric acid). It is estimated that more than 9 tons of H2SO4 will be emitted each year which exceeds the EPA Prevention of Significant Deterioration (psd) level of 7 tons per year. Because H2SO4 has a high specific gravity, the mist will settle locally in the Sumas and Abbotsford area in the form of acid rain. This will be in addition to SO2 reacting with water to form the weaker acid, H2SO3.

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Both acids are devastating to agriculture, and certainly not healthy for humans or other critters. Ponds and lakes in the area would be impacted.

The subject of sulfuric acid is not addressed in the DEIS, but should be included in the final draft with, hopefully, mitigation measures.

Sulfuric acid does not evaporate from soil, and can only be neutralized by a base such as lime. Farmers should be compensated if crops are destroyed and if soil treatment is required.

Additional comments about proposed power lines as they relate to the total power produced by S2GF: The 230,000 volt line to the Clayburn substation in Canada will carry 1570 amperes for a total of 361 mw. If the two lines into Whatcom County are added (each carrying 115,000 volts and 1,470 amperes and 1665 amperes respectively), the total (more than 721 mw) exceeds the plant capacity of 660 mw by approximately 10%. Page 3.12-7 mentions avoidance of "loop-flow" by isolating lines from the combustion turbines and the steam turbine, but if the 230kv line to Canada is included, this appears to be impossible. The entire question of power lines and the delivered power to each line, reconciled with the total power produced, needs to be addressed and explained clearly in the final EIS.

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Thank you.

cc: Mary Barrett