

## Letter 254

Dear Members of EFSEC:

4/03/00

There are many concerns in this DEIS, aside from the fact that this document is inconsistent and not user-friendly.

I find it interesting that Whatcom county transmission lines are now discussed as an alternative and BC Hydro has no interest in purchasing the power. I also find it interesting that PSE trucks are cruising down our road taking notes today. My family is located 20 feet from a proposed line and I have concerns about the high amperage and EMF's, stray voltage for our dairy cows, falling lines and the obvious property devaluation that according to the county assessor, would drop our property value 20-30%. Mailings between Christmas and New Years were not received by many residents and were not designed to stimulate any concern. There are discrepancies throughout the DEIS on how the transmission line corridors would be maintained and where they would go. References and graphs for electromagnetic fields (pg 3.12-8) are poorly referenced because there are far, far more than 7 studies on electromagnetic fields and bioeffects that should have been included. Choosing sentences out of context from 7 studies shows a definite bias.

The massive amount of water (at peak-1.2 million gallons/day) being pulled from the aquifer leaves the Northeast county and City of Sumas with little hope for future development that requires water. And the use of all the water presents another issue, a maximum discharge of 368,640 gallons/day of cooling tower blowdown, chemical neutralization tank discharges, and domestic sewage. Has the Abbotsford treatment plant contracted for this tremendous increase and if so, do they understand all the chemicals that will need to be taken out before discharging into the Fraser River. Page 2-30 states that "All indications are that Abbotsford and FRVD will welcome S2GF's flows as an additional revenue source....." The city of Sumas has a wastewater treatment plant and NPDES permit to discharge up to 124,000 gallons/day into the Sumas River. If Abbotsford does not accept this wastewater, is it then going to go in the Sumas River? The residents of this county need to know that and what is expected to be in this discharge and whether or not it will be treated properly.

A 2.5 million gallon fuel tank used for backup power generation sits atop the aquifer. Yes, an impervious basin will be built, but is this really worth the risk. An alternative refueling route for this tank would be to take trucks from Ferndale to the Axton Road to the Guide Meridian and then to the Lynden border crossing. They would then go across Canadian highways to the Abbotsford border crossing and cross back into this country. These roads, particularly the Guide Meridian, are already heavily traveled and don't need any more trucks.

Several other tanks of oils and chemicals will also be present. These are listed on page 2-17. As part of the community's right to know act (per DOE), we feel it necessary to have MSDS sheets on all these chemicals so the general public can see what hazards are associated with all of them. A couple of these mixtures are proprietary products (trade secrets); however, we do have the right to know their dangers.

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Another interesting discrepancy is the solicitation of 200-400 workers for 3 years. Page 2-11 states that there may be 400 workers for the peak construction activity of 4 months. Total construction activity is estimated at 18 months. Last week at the public hearing for anhydrous ammonia, a company representative said they would hope to complete construction in one year.

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Our air quality is of extreme importance and company proponents have been claiming how clean and "state of the art" this plant would be. To show how clean our ambient air is they chose 96, 97, 98 air quality data from Abbotsford air station to compare to Canada's and the U.S. standards. I contend that none of the air quality data is valid and should be resubmitted with 1999 values, since IKO roofing came into production after the air quality data on page 3.1-7 was taken. Page 3.1-9 shows that IKO is an increment consuming industrial source that has significant emissions of particulate matter and SO<sub>2</sub>. Shouldn't the company have to take into consideration any increment sources from across the border also, since there is not a wall for air at the border? PM<sub>10</sub>, along with ozone was already a concern in 1998, what about doing 1999? VOC, the surrogate for ozone, is listed as being 156 tons per year. (pg3.1-10) Per DOE, "Any net increase of 100 tons per year of VOC's requires an ambient impact analysis." I have yet to see such an analysis.

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While observing these inconsistencies, which I certainly do not have the time to attack in detail, I was puzzled by a difference in tables from the application to the DEIS. These tables were identical but for one exception. In the application, table 6.1-19 on pg 6.1-43, compares S2GF predictions and all other industrial sources to Class I increment levels. Next to that is the proposed Class I significant impact levels. The same table in the DEIS on page 3.1-18 is lacking the proposed levels. Per DOE, these proposed levels are in the federal register, VOL 61 since 1996. The department has been working on these revisions for 3 ½ years, and are slated to repropose and adopt these regulations this fall. They would cover ambient monitoring and computer dispersion modeling. It was confirmed that if this company were permitted prior to adopting these new regulations, Sumas Energy 2 would be grandfathered in under the old levels and would be able to legally continue polluting for the life of the plant which may be anywhere from 20 to 50 years. That's 761 tons per year at let's say 30 years. That's 22, 830 tons of regulated pollutants and that doesn't even include the 2 million tons of CO<sub>2</sub> per year. Also, they didn't feel it necessary to include other sources when their levels seemed insignificant. Is all this just an oversight or is this an intentional deletion in the DEIS that would enhance the quick permitting process, just as they requested expedited permit processing with their first application. Asking for the comment period to precede the DEIS was also an attempt to speed up the process and avoid the public's scrutiny.

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There are many more issues in this overwhelming impact statement and we, the citizens, don't get a salary to educate, study, and determine the significance; therefore, I respectfully request a 30 day extension to this comment period to allow equal time for thorough investigation and answers to our questions.

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Cc:Mary Barrett, Attorney General, CFE

Marlene Noteboom