

31 August 2015

Mr. Stephen Posner
Energy Facility Site Evaluation Council
Washington Utilities and Transportation Commission
P.O. Box 43172
Olympia, WA 98504-3172

Subject: Vancouver Energy
EFSEC Application No. 2013-01, Docket No. EF131590
Response to 6 August 2015 Letter Regarding Industrial National Pollutant
Discharge Elimination System (NPDES) Permit Application Review – Rail Car
Exterior Washing Practices

Dear Mr. Posner:

The purpose of this letter is to respond in-part to your letter dated 6 August 2015 regarding Washington State Department of Ecology (Ecology) comments on Vancouver Energy's industrial stormwater NPDES permit application. This letter specifically responds to the comments regarding rail car exterior washing activities. The remaining review comments will be addressed under separate cover.

The comment regarding rail car exterior washing activities states:

"The revised engineering report submitted in the response to comments states that there are two containment tanks installed southeast to the administration/supporting building that receive stormwater from the rail unloading building floor drains, drip pans and occasional wash water for parts and fittings. A licensed hauler will empty content of the tanks and dispose of the content appropriately. However, EFSEC's review of the revised air permit application revealed there may be railcar washing activities using a large quantity of soapy water in the unloading facility. According to the revised air permit application, wash water from railcar washing process will be collected at 6 containment tanks located within the railcar unloading area. The information on the expected railcar/equipment wash water characteristics (quantity and quality), collection, conveyance, treatment and ultimate disposal is not included in the NPDES permit engineering report and should be provided."

Below we address: (1) the correction of inconsistency between language in the Engineering Report and the air permit application documents; (2) quantification and disposal method of wash water; (3) clarification of the "rail car exterior washing" and other parts and equipment

wash; and (4) confirmation that rail car exterior washing is not a “new” activity and has been previously described in the Vancouver Energy documentation submitted to EFSEC.

1. Correction of inconsistency between Engineering Report and Air Permit Application Documents

The revised Engineering Report correctly describes the two containment tanks. These tanks were described in Section 2.3.3.1 of the Application for Site Certification (ASC) Supplement (submitted January 2014 to EFSEC), with an updated description appearing in the Applicant-prepared preliminary Draft Environmental Impact Statement as follows¹:

“Rail Car Unloading Facility Spill Holding Tanks

Two double-shelled holding tanks, with a total capacity of approximately 900 bbl, would be constructed or installed adjacent to the administrative/support area. These tanks would be connected, and providing secondary containment, to a piping system that would receive stormwater and inadvertent releases captured in the collection pans. The combined volume of the tanks is sized to contain the entire contents of a single tank car plus at least an additional 10 percent. Crude oil captured in a collection pan would flow by gravity into a dedicated line and would be conveyed from the unloading facility to the containment tanks. The tanks would be constructed of steel, covered, and anchored in accordance with applicable seismic design requirements. The tank contents would be disposed of or recycled at an offsite facility with the ability to handle the waste.”

The purpose of these containment tanks is to capture inadvertent releases of crude oil during the rail car unloading activity, as well as to capture other sources of process water related to unloading operations and a small amount of water resulting from miscellaneous parts and equipment washing. This has been described and identified in numerous instances in the ASC Supplement, as well as other documentation submitted, as summarized in Table 1 below. Specifically, Section 2.9.1 states:

“Miscellaneous part and equipment washing will be completed in a designated area located within the Rail Unloading and Office Area. Wash water will be generated from a single 5-gpm pressure washer and will be collected and conveyed to the Unloading Facility Containment Tanks.”

¹ The number and overall containment capacity of these tanks was revised between the ASC submitted in August 2013 and the ASC supplement; however, the tankage, and its purpose, has always been included as part of the Facility description.

These activities were addressed in the Engineering Report in the following two sections:

6.1.1 Area 200 - Unloading and Office

“Interior to the unloading area, rail drip pans will be installed and floor drains will collect any runoff from the rail cars or blown-in stormwater to a collection system. Any stormwater collected in this system will be pumped to the containment tanks located at the administration and support building area to be hauled off and legally disposed of. The floor will be graded and designed to direct any spill internally into the rail drip pans or the containment trenches.”

15.1 Unloading Stations

“Underground “wastewater” collection systems, including floor drains, will be installed and routed to the collection system for the entire rail unloading facility. Stormwater that is “blown” into the covered facility from the sides and any leaks, drips, wash water, etc. will be pumped to the containment tanks located in the area of the administration/support buildings for haul off and disposal.”

At the time of submittal of the ASC Supplement and the August 2014 revised air permit application, the language the reviewer is referring to was inadvertently not corrected. Section 5.1.2.1.3 of the revised air permit application (which supersedes the language in the ASC Supplement) is now, therefore, corrected as follows²:

~~“There will be six two additional containment tanks at the Facility not intended to store crude oil. It is occasionally necessary to clean railcars that enter the Facility with dried crude oil from the loading process. This cleaning process uses a large quantity of soapy water to scrub dried crude oil from the shell of the railcar. There are six containment tanks located within the railcar unloading area that could be used to collect wash water from railcar cleaning. In addition to collecting wash water, these tanks could be used to store spilled material. The containment tanks are fixed roof tanks with an estimated height of 24 feet and a 12-foot diameter. It is expected that the throughput for these tanks will result in roughly one tank turnover per week. The liquid itself will be almost entirely soapy water, with only a very small portion of crude oil present in the mixture. Occasional parts wash and maintenance will occur in the rail car unloading area; this water is routed to and collected in these containment tanks. Stormwater that is “blown” into the covered unloading facility from the sides and any leaks, drips, wash water, etc. will also be captured in the unloading area drip pans and routed to these same tanks.~~

² These corrections will be incorporated into the ASC and air permit application materials when the Applicant submits its revised application in accordance with WAC 463-60-116 (2) as EFSEC staff has previously requested. The Applicant will also correct the nomenclature of the tanks to “containment tanks” throughout the ASC.

Because of this relatively small throughput and small fraction of crude oil present in the oil/water mixture collected in these tanks, emissions from these containment tanks are considered to be negligible.”

2. Quantification and disposal method of wash water generated

The Applicant has included a very conservative assumption for required parts/equipment wash in the various application documents submitted to date. Table 1 below summarizes the document instances where parts and equipment wash water have been referenced, including the quantity of such wash water generated. The Applicant assumed that rail car exterior washing activities are included in “parts and equipment wash.”

3. Clarification of “rail car exterior washing”

In accordance with 49 Code of Federal Regulations (CFR) 173.24(4) and 49 CFR 174.57, the Facility is prohibited to release tank cars back to the mainline carrier if there is presence of oily residue on the exterior of the cars as a result of unloading operations. Facility operators will identify cars whose exterior must be washed for this reason at the time the cars are being unloaded in Area 200. At such time, and within the Area 200 unloading facility (where there is full containment to collect wash materials), the exterior of the rail car, limited to the immediate location of any oily residue, will be spot washed. Spot washing will be accomplished by placing absorbent pads under the rail car below the location being washed, spraying the affected area with environmentally friendly detergent soap (using a hand spray bottle for example), and wiping the area clean by hand with rags/wipes. Rags/wipes and absorbent pads used for cleaning will be collected, bagged, and managed in accordance with appropriate disposal practices for this type of waste. Typically the use of additional wash water is not necessary to complete the cleaning. However, should wash water be needed, it would be applied only to the area from which oily residue is to be removed. As indicated in Table 1 below, a single pressure washer may be used. Any residual wash water not collected in the absorbent pads will be collected in the rail drip pans and discharged to the two containment tanks located at the admin/support area of Area 200. A licensed hauling and disposal company will haul off the tank contents for disposal off site at an appropriate location.

The Applicant’s experience is that rail car exterior washing averages one rail car per month at facilities that receive on average one unit train per day. Thus with an average receipt capacity of four unit trains per day, this activity would occur approximately four times per month.

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4. Rail car exterior washing has been previously described

As demonstrated in the responses above, and summarized in Table 1, the Applicant has disclosed the potential for rail car exterior washing and other miscellaneous parts and equipment wash since the original ASC was submitted in August 2013.

Finally EFSEC's reviewer has requested that the Engineering Report incorporate elements addressing process waste water collection and discharge. The information regarding process waste water collection and discharge was presented in the August 2013 ASC, and was resubmitted in the January/February 2014 ASC Supplement. The Applicant requests clarification as to where and how additional information regarding process waste water must be documented as part of EFSEC's review of Vancouver Energy's application for a state industrial waste water discharge permit.

Please feel free to contact me at 206/431-2373, or irina.makarow@abam.com, if you have any questions about this submittal. We look forward to further coordination with you, your staff, and EFSEC's consultants.

Sincerely,



Irina Makarow
Senior Environmental Project Manager

IM:nb

cc: Kelly Flint, Savage Companies
Jay Derr, Van Ness Feldman

Table 1: Locations in Vancouver Energy Documentation where Rail Car Exterior Washing and Parts Wash Has Been Incorporated

Document	Text Where Rail Car Cleaning and Parts Wash Has Been Described																														
<p>Application for Site Certification Section 2.6.4</p> <p>(August 2013 and January/February 2014 Supplement versions)</p>	<p>Process Industrial processes at the Facility are limited to the transfer and storage of crude oil. Process water for the Facility is limited to the boiler plants, miscellaneous part and equipment wash, and cooling water for the fire suppression pumps.</p> <p>Inside the rail unloading area (Area 200), there is a process water line for the occasional use of a single pressure washer to clean miscellaneous piping fittings, work surfaces, and equipment. At a maximum, the pressure washer will be rated for 5 gallons per minute (gpm). Conservative water use estimates for the miscellaneous part/equipment wash is included in Table 2.6-1.</p>																														
<p>Application for Site Certification Table 2.6-1</p> <p>(August 2013 and January/February 2014 Supplement versions)</p>	<table border="1"> <thead> <tr> <th data-bbox="456 782 800 881">Industrial Process</th> <th data-bbox="800 782 1003 881">Average Water Use (gpd)</th> <th data-bbox="1003 782 1192 881">Maximum Water Use (gpd)</th> </tr> </thead> <tbody> <tr> <td data-bbox="456 881 800 918">Area 200</td> <td data-bbox="800 881 1003 918"></td> <td data-bbox="1003 881 1192 918"></td> </tr> <tr> <td data-bbox="456 918 800 987">– Miscellaneous Part/ Equipment Wash</td> <td data-bbox="800 918 1003 987">2,400</td> <td data-bbox="1003 918 1192 987">5,000</td> </tr> <tr> <td data-bbox="456 987 800 1024">– Fire Pump</td> <td data-bbox="800 987 1003 1024">100</td> <td data-bbox="1003 987 1192 1024">200</td> </tr> <tr> <td data-bbox="456 1024 800 1060">Area 300</td> <td data-bbox="800 1024 1003 1060"></td> <td data-bbox="1003 1024 1192 1060"></td> </tr> <tr> <td data-bbox="456 1060 800 1097">– Boiler Building</td> <td data-bbox="800 1060 1003 1097">3,000</td> <td data-bbox="1003 1060 1192 1097">3,700</td> </tr> <tr> <td data-bbox="456 1097 800 1134">– Fire Pump</td> <td data-bbox="800 1097 1003 1134">100</td> <td data-bbox="1003 1097 1192 1134">200</td> </tr> <tr> <td data-bbox="456 1134 800 1170">Area 400 – Fire Pump</td> <td data-bbox="800 1134 1003 1170">100</td> <td data-bbox="1003 1134 1192 1170">200</td> </tr> <tr> <td data-bbox="456 1170 800 1207">Area 600 – Boiler Building</td> <td data-bbox="800 1170 1003 1207">48,400</td> <td data-bbox="1003 1170 1192 1207">69,600</td> </tr> <tr> <td data-bbox="456 1207 800 1244">Total Process Water</td> <td data-bbox="800 1207 1003 1244">54,100</td> <td data-bbox="1003 1207 1192 1244">78,900</td> </tr> </tbody> </table>	Industrial Process	Average Water Use (gpd)	Maximum Water Use (gpd)	Area 200			– Miscellaneous Part/ Equipment Wash	2,400	5,000	– Fire Pump	100	200	Area 300			– Boiler Building	3,000	3,700	– Fire Pump	100	200	Area 400 – Fire Pump	100	200	Area 600 – Boiler Building	48,400	69,600	Total Process Water	54,100	78,900
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<p>Application for Site Certification Section 2.9</p> <p>(August 2013 and January/February 2014 Supplement versions)</p>	<p>Sources of wastewater from the Facility boiler plant effluent (including blowdown, cooling water, and treatment backwash from the two boiler plants), miscellaneous part and equipment wash, fire pump cooling water, and domestic sewage from the Administrative and Support Buildings and the restroom inside the Storage Area boiler building.</p>																														
<p>Application for Site Certification Section 2.9.1</p> <p>(August 2013 and January/February 2014 Supplement versions)</p>	<p>Miscellaneous part and equipment washing will be completed in a designated area located within the Rail Unloading and Office Area. Wash water will be generated from a single 5-gpm pressure washer and will be collected and conveyed to the Unloading Facility Containment Tanks.</p>																														

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<p>Application for Site Certification Section 3.6.1.2 (August 2013 and January/February 2014 Supplement versions)</p>	<p>The Facility will consume water and incidental operations materials as follows.</p> <ul style="list-style-type: none"> • Process water will be consumed at an average of 41,298 gallons per day to operate the boiler plants, for miscellaneous part/equipment wash, and as cooling water for the fire suppression pumps (see section 2.6.4). 																																				
<p>Application for Site Certification Section 5.2 (August 2013 and January/February 2014 Supplement versions)</p>	<p>City of Vancouver Industrial Information Form, Applicant checked “yes” box under “Does this facility perform on-site vehicle maintenance or vehicle/equipment washing?”</p> <p>“The Rail Offloading area will have containment pans and equipment/part washing capabilities. Waste collected from these operations will be collected and pumped to holding tanks and hauled off site (Waste Stream No. 2).”</p> <p>Section C Plant Operations Characteristics Table. See Waste Stream No. 2.</p>																																				
<p>Application for Site Certification Section 5.1.2.1.4 (August 2013 and January/February 2014 Supplement versions)</p>	<p>Original text, August 2013:</p> <p>There will be six additional tanks at the Facility not intended to store crude oil. It is occasionally necessary to clean railcars that enter the Facility with dried crude oil from the loading process. This cleaning process uses a large quantity of soapy water to scrub dried crude oil from the shell of the railcar. There are six containment tanks located within the railcar unloading area that could be used to collect wash water from railcar cleaning. In addition to collecting wash water, these tanks could be used to store spilled material. The containment tanks are fixed roof tanks with an estimated height of 24 feet and a 12-foot diameter. It is expected</p>																																				

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<p>August 2014 Air Permit Application Revisions - Application for Site Certification Section 5.1.2.1.3</p>	<p>that the throughput for these tanks will result in roughly one tank turnover per week. The liquid itself will be almost entirely soapy water, with only a very small portion of crude oil present in the mixture. Because of this relatively small throughput and small fraction of crude oil present in the mixture, emissions from these containment tanks are considered to be negligible.</p> <p>As revised 31 August 2015:</p> <p>There will be two containment tanks at the Facility not intended to store crude oil. Occasional parts wash and maintenance will occur in the rail car unloading area; this water is routed to and collected in these containment tanks. Stormwater that is “blown” into the covered unloading facility from the sides and any leaks, drips, wash water, etc. will also be captured in the unloading area drip pans and routed to these same tanks. Because of this relatively small throughput and small fraction of crude oil present in the oil/water mixture collected in these tanks, emissions from these containment tanks are considered to be negligible.”</p>																								
<p>PDEIS Section 2.2.4.1</p>	<p>Process water use at the Facility would consist of water required at Area 600, West Boiler, miscellaneous part and equipment wash, and cooling water used during operation of the fire suppression pumps.</p> <p>Occasional pressure washing to clean miscellaneous piping fittings, work surfaces, and equipment would be conducted in Area 200.</p>																								
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PDEIS 4.3.3.2	<p>Maintenance, including equipment and parts wash, would be conducted in a covered portion of the rail unloading building. All wastewater produced would be pumped to the secondary containment tanks.</p>																																			

Document	Text Where Rail Car Cleaning and Parts Wash Has Been Described		
Draft Engineering Report Table 22 4/8/2014	BMP	Purpose	Discharge Location
	Loading and Unloading Areas	Pollution prevention installed underneath and around all unloading points	Containment tank for haul off
	Mobile Fueling of Vehicles and Heavy Equipment	Mobile fueling will occur at the bad order track location for the Savage rail locomotive	N/A
	Railroad Yards	Pollution prevention good housekeeping measures	Existing Terminal 5 stormwater system
	Washing of Vehicles/Equipment/ Building Structures	Cleaning of crude piping fittings, and occasional cleaning of rail cars to comply with FRA requirements	Containment tank for haul off
	Coalescing Plate Separator Bay	Separation of oil from stormwater	Stormfilter using ZPG media
	Oil Trap	Spill control measure allows for isolation of spill from downstream stormwater conveyance structures.	Coalescing plate separator bay
	Stormfilter using ZPG Media	Stormwater filtration for Basic treatment	Existing Terminal 5 stormwater system
Draft Engineering Report Section 11 2/11/2015	Sources of wastewater would include the boiler plant effluent, miscellaneous part and equipment wash, fire pump cooling water, and domestic sewage.		
oSWPPP Section 3.3	Miscellaneous Parts Wash – A part washing station will be located within the rail unloading building. The equipment will be used to clean miscellaneous connection parts. Runoff from the part wash will be contributed to containment collection system and pumps connected to the containment tanks.		
oSPPP Section 4.1.13	Wash miscellaneous parts/equipment within the rail unloading facility at a designated location which drains to containment storage for haul off.		

IM:nb