

Statement to the Energy Facility Site Evaluation Council about the Tesero-Savage oil export terminal

My name is Kate Ketcham. I am a nurse and resident of downtown Vancouver. I object the siting of a Tesero-Savage oil export terminal at the Port of Vancouver. What I have noticed is that much of the testimony and many of the safety systems for the terminal revolve around high visibility, low frequency events. My concern is about air and water quality degradation along the length of the oil transportation system to and from the proposed oil export terminal. I am concerned about the effects to air and water quality from high frequency, low visibility events. Specifically, I am concerned about the cumulative effects of small leaks, drips, vapor releases, overfills and other common incidents. I urge you to consider the entire length of the delivery system from rail car to barge or ship in your scoping. I am not an expert, but I have done some research. Even a little research reveals many opportunities for high frequency, low visibility incidents that cumulatively may cause environmental degradation.

The proposed Tesero-Savage oil export terminal will be located near a population center, several wildlife refuges and endangered fish habitat. I believe the potential for adverse environmental impacts due to the cumulative effects of oil loss and vapor losses along the entire oil export delivery path is significant and urge the Council to recommend that the Governor reject the Tesero-Savage oil export terminal proposal.

For example a few drips from a rail car valve are insignificant but multiplied over tens of thousands of cars in hundreds of trains these drips become gallons that have the potential to significantly contaminate water tables, rivers and streams harming endangered fish and other wildlife along the entire length of the route. While the tank farm will surely have non-permeable linings and dikes to contain oil spills, rail lines will not. Rainwater runoff will carry oil. I urge the Council to consider the cumulative effects to water tables, rivers and streams of small incidents along the entire rail line.

As I understand it, oil will be transferred from railcars to holding tanks, then onto barges and may then be transferred to ships. Each of the three or four transfers holds the potential for drips, overfills, vapor releases and accidental spills. There will be tens of thousands of transfers. Many incidents will be outside of dykes and containment systems. My review of the Washington Department of Ecology Prevention Recommendations on Bulk Oil Transfer Operations 1998-2005 leads me to believe that these kinds of incidents are not uncommon. Several barge companies and contractors will be likely be involved, some more knowledgeable, alert and well-trained than others. Given experience at facilities such as Cherry Point, accidents are predictable. Multiplied by thousands of transfers, small incidents will result in significant environmental damage. I urge the Council to consider the cumulative effect of transfer incidents to Columbia River water quality when making their recommendations.

Air quality is another concern. Although the tank farm will surely be equipped with some vapor recovery systems, releases outside recovery systems are likely. An example is small releases of vapor when valves are opened and closed. Air toxins like benzene, aromatic hydrocarbons and sulfur oxides will be released in small quantities with each transfer. These small releases are not infrequent and are predictable. There will be thousands of opportunities for small releases of vapor. Air quality is already a concern in the Columbia River air shed and Portland Metropolitan area especially during temperature inversions. I request that the EFSEC evaluate the environmental impact of cumulative small vapor releases on the air quality of Vancouver, the metropolitan area and the Columbia River air shed.

In conclusion, I believe there is significant potential for damage to water and air quality when cumulative small vapor and oil loss incidents along the entire oil delivery system are considered. I believe these low visibility, high frequency events will result in significant impacts on the health of the environment for wildlife, fish and the residents of Washington State. I urge you to recommend that the Governor reject the Tesero-Savage oil export terminal proposal.

Respectfully submitted


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OCT 29 2013

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Tesoro Savage CBR
Scoping Comment
#169

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Tesoro Savage Vancouver Energy Distribution Terminal; Public Comments

Thank you for allowing me to speak at the October 28, 2013 initial meeting but not being use to public speaking I have decided to make further comments that I could not make the evening before. I will focus on only one aspect that I feel disqualifies this project. I am surprised that Tesoro Savage had selected the Port of Vancouver, Washington in the first place. The Port is a bottleneck for smooth product transportation by sea. The Port of Vancouver sits 90 miles away from the Pacific Ocean. The river channels are narrow and ships transiting must pass close. I had the occasion to serve in the US Navy as a qualified Officer of the Deck on a ship similar in length and width to the vessels that will be used in transporting oil and ships of this nature are hard to stop and difficult to maneuver in almost any situation but in inland waters this presents a particular problem. Tesoro Savage will say that the ships being used are of the highest quality and manned by American crews. But the ships using the Columbia River are all not so qualified. Ships plying the Columbia come from all Pacific Rim Countries and are of questionable quality and crewed by maybe not so qualified crews. The difference now becomes apparent that the ships are not all carrying wood and grain products from the Northwest, but they are now carrying oil. If an accident should occur containment of an oil spill even from double bottom ships is an ever present possibility. Containment of oil in a river system will require traffic to be stopped in both directions until the clean-up is complete if at all. Once oil enters the estuaries of the various tributaries to the Columbia River, oil will be very hard to clean up; the effect on juvenile salmon fish using the estuaries for growth before entering the ocean will be dealt a death blow. The Pacific Northwest has spent millions of dollars in fish restoration and risking salmon recovery for short term profit, I believe, is not worth the price. What about low water in the river system. The Columbia River depends on Canadian snows and the water is also controlled by water users down the Columbia River system. Fish passage regulations now in place will require even further allocation restrictions. If global warming has an effect, who gets the water? Farms, Fish or Ships? What if the Columbia River Bar is closed because of winter storms? It has been closed in 2007 for at least 48 hours. Ships cannot move out to the ocean smoothly but must wait for a "Columbia River Bar Pilot" to take them safely across the Columbia River Bar. If ships must wait, they will have to anchor in the channel and wait their turn thus risking a possible collision from another ship maneuvering. If there is a delay in moving ships in and out of the Columbia River what about the trains coming into Vancouver. Trains carrying Oil, Coal, other products and Amtrak requesting space on just two tracks in Vancouver. I doubt that there is enough sidetrack in the Port of Vancouver to accommodate all the possible trains should the oil by ship transportation be delayed. The effect of having multiple trains stacked up in the system I feel will become detrimental to Vancouver and its continued growth. It all comes down to the main question, is the small profit in money and jobs that will come to Vancouver worth the risk? I say NO! Other ports will have to share in the burden from the inclusion of more ships in the river. Port of Portland, Longview, Kalama, and Astoria just to name a few.

Thank you
Philip Durkee