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Pacific and Yukon Region  
Environmental Protection  
224 West Esplanade  
North Vancouver, B.C. V7M 3H7

ENERGY FACILITY SITE  
EVALUATION COUNCIL File: 4191-5-50

May 1, 2001

Allen J. Fiksdal  
Manager  
Energy Facility Site Evaluation Council  
PO Box 43172  
Olympia  
Washington 98504-3172 USA

Dear Mr. Fiksdal:

**Re: Potential Site Study relating to Proposed Cogeneration Plant  
at BP Cherry Point Refinery**

Further to your letter of March 29, 2001 to my Regional Director General on the above subject, I wish to confirm that I have been assigned as the point of contact within Environment Canada for all matters relating to our involvement in the above-referenced study. For your records, my communication information is as follows:

Telephone: (604) 666-0670  
Fax: (604) 666-7463  
email: [adrian.duncan@ec.gc.ca](mailto:adrian.duncan@ec.gc.ca)

As you know, I attended the April 20, 2001 meeting of the Lower Fraser Valley Air Quality Coordinating Committee at which Mike Torpey of BP and his associates provided preliminary information relating to the project. This meeting was also attended by Michelle Elling of your staff. My broad understanding of the project based on this meeting is as follows:

- BP is pursuing the possibility of establishing a 750 MW 3-unit natural gas turbine generating plant at its existing Cherry Point refinery near Birch Bay in Whatcom County, State of Washington.
- The basic function of the plant will be to supply both power and steam for use in the existing refinery operation. However, the power to be generated will be well in excess of refinery requirements, and the surplus will be sold to external users through the existing Washington State grid system.
- Construction will take place entirely on land already owned by BP and zoned for Heavy Impact Industrial use.
- The plant will require some 6 million USG/day of water. This will be obtained through the existing Whatcom County public utility system, which has Washington State's Nooksack River as its primary source.

Canada



- Any wastewater generated by the plant will be directed to BP's existing on-site wastewater treatment system.
- In order to maintain the plant's capacity to at least supply the refinery at all times, a back-up fuel system will likely be proposed. Since diesel fuel is a major product of the refinery, this is definitely a candidate alternative at the present time. However, no final decision has been made as yet on what back-up fuel will be used.
- The pipeline from the Canadian border which will supply the gas already exists and is largely owned by BP. Furthermore, Cherry Point is the prime candidate site for the departure point of the proposed Georgia Strait Crossing (GSX) gas pipeline project to Vancouver Island. It is not yet clear as to what extent (if any) there may be a connection between the GSX and BP existing and proposed Cherry Point operations.
- Best Available Technology (BAT) will be applied to the control of air emissions from the cogeneration plant. In addition, offsetting emissions reductions are being evaluated in relation to the overall refinery operation. BP believes at this point that a net overall reduction in emissions of certain criteria pollutants such as NOx can be achieved. However, there will be a net increase in Greenhouse Gas (GHG) production, specifically carbon dioxide, since on-site offsets are apparently not available.
- In order to mitigate potential residual environmental impacts, BP is considering a range of options including (but not necessarily limited to) on-site offsetting emission reductions for certain criteria pollutants, off-site CO2 mitigation measures, wetland enhancement, etc. Details of these proposals have as yet to be worked out and enunciated.

Based on the above understandings, it appears that the project has little potential to give rise to water quality or groundwater impacts within Canada. Furthermore, any direct physical impacts on wildlife habitat appear at this point to be confined to the actual project site, which is already impacted by industrial activity. It is therefore our preliminary view that the immediate interests of Canadians will be essentially confined to the implications of the project (if any) in connection with air quality on the Canadian side of the international boundary, particularly within the Fraser Valley airshed which has been identified as sensitive because of meteorological and topographical features as well as existing emissions. Naturally, this view is subject to change as more information becomes available.

Although not a regulatory concern from a Canadian standpoint, we also have an interest in understanding the GHG implications of the project, since this is a matter of international concern at the present time and public interest in this issue is to be expected.

In the context of the present Potential Site Study, the following information will be of interest to Canadians in evaluating the implications of the project as far as air quality in Canada is concerned. This list is based, in part, on our observation of the issues and concerns expressed by Canadians during the review of the Sumas 2 proposal. It is of course possible that more information may become necessary as our understanding of the project and its implications improves. Therefore, this list should not be viewed as definitive at this time.

- A summary of present overall air emissions on an annual basis from BP's existing Cherry Point operation and any directly associated facilities, broken out into the full range of key criteria and toxic pollutants as well as GHG components.
- A summary of air emissions expected to result from the proposed cogeneration facility, broken down into the pollutants of concern noted above.

- A summary of any offsetting air emissions reductions which will be achieved on-site at the overall facility.
- A summary of any proposed offsite air emission mitigation proposals, including any proposed mitigation of CO<sub>2</sub> and other GHG emissions.
- Based on the previous four items, a summary of predicted overall air emissions following completion and commissioning of the proposed cogeneration facility, with a summary of net increases or reductions of key pollutant emissions by comparison with the present situation.
- Comparison of project emissions to inventoried emissions from Whatcom County, the Greater Vancouver Regional District, the Fraser Valley Regional District, and the combination of these three areas.
- Persuasive information on transportation patterns for airborne pollutants originating at the Cherry Point facility, with particular emphasis on the extent to which the revised plant could change the existing pollutant concentrations in the Canadian and US portions of the Fraser Valley airshed. This should include comparison with present loadings from BP's existing operations.
- Comparison of pre- and post-project peak ambient air quality concentrations with Canadian maximum desirable and acceptable objectives and the Canada-wide Standards for PM and Ozone.
- Information on the potential human health impacts of any change in air quality emissions and the resultant change in ambient air quality, together with the geographic extent of any such impacts.
- Information on the change in atmospheric deposition of contaminants, including comparison with available criteria for ecosystem sensitivity.
- Information on the potential impact of any change in air emissions on agricultural crops in the potentially affected region.
- Comparison of the proposed emission control technologies with Canadian standards and guidelines for similar technologies.
- Comparison of pre- and post-project ambient air quality concentrations in the Georgia-Coast-Cascade air basin with the air quality in other communities in Washington, Oregon and California, particularly communities that may be considered alternate sites for the facility or those that may be major markets for the electrical power. This air quality comparison should also include comparison of the air quality in the project area with air quality in major communities across Canada, and communities across British Columbia.
- Information on the impacts of the proposal on visibility in the air basin should be provided. As an initial proposal, we suggest that analyses for sight lines such as the following be considered, in addition to the potential impacts on parks:
  - Victoria – Mount Baker
  - White Rock – Mount Baker
  - Vancouver – Mount Baker
  - Vancouver – Lions
  - Langley, Abbotsford and Chilliwack - surrounding mountains.

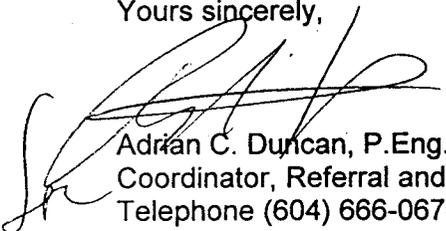
- Information on any new or physically modified infrastructure, for example, powerlines, pipeline upgrades, compressor stations, which could be required within Canada or adjacent to the international boundary as a result of the project, including any environmental implications.
- Information on any operational changes to existing facilities such as pipelines and compressor stations which could affect Canadian interests in any way, including any environmental implications.
- Information on the implications (if any) of the project on operation of generating facilities within Canada. For example, will the power generated by the project reduce the required level of operation or change operational patterns at any generating facilities within Canada or immediately adjacent to the international boundary? If so, what are the implications of such changes in environmental terms?
- Basic information on the cumulative effects of this proposal in context with any other proposals in the same area (e.g., GSX).

I trust that the above preliminary comments will assist EFSEC, its consultants and the proponent in completing a Potential Site Study that will allow all parties to authoritatively determine the degree, if any, of their concerns relating to this proposal. In saying this, it must be understood that the above comments are based on very preliminary information, and are therefore subject to amendment as our understanding of the project evolves over time. However, inclusion of the information recommended above should do much to ensure the preparation of a complete application.

Please feel free to contact me at any time if you or your consultants have any questions relating to the above comments. We look forward to receiving more project details as they become available.

Thank you for the opportunity to comment.

Yours sincerely,



Adrian C. Duncan, P.Eng.  
Coordinator, Referral and Liaison  
Telephone (604) 666-0670

cc: B. Wilson  
K. Johnstone  
E. Wituschek  
P. Scott, CEAA



July 5, 2001

File: CP08 01 BPA

Mr. Allen Fiksdal, Manager  
Energy Facility Site Evaluation Council  
State of Washington  
P.O. Box 43172  
Olympia, WA  
98504-3172

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JUL 19 2001

ENERGY FACILITY SITE  
EVALUATION COUNCIL

Dear Mr. Fiksdal:

**Re: Proposed BP Cherry Point Cogeneration Project**

Further to your letter to the GVRD dated March 29, 2001 and Mr. Ken Cameron's reply of April 12, 2001 regarding a proposed 750 megawatt power generation facility at the BP Cherry Point refinery just south of Blaine, Washington, I would like to advise you of the position of the GVRD Board of Directors on this important issue.

GVRD staff have participated in the EFSEC Potential Site Study for this proposed project, and have attended a number of public and agency meetings at which BP staff presented information about the proposed cogeneration facility. BP staff attended the May 16<sup>th</sup> meeting of the Planning and Environment Committee of the GVRD Board and provided a very informative overview of BP's current concept for the proposed facility. The Committee was advised that:

- BP needs this proposed power generation facility to provide dependable and affordable power for the Cherry Point Refinery.
- The proposed cogeneration component of the project will use waste heat from the power plant in the refinery operations, providing an opportunity to achieve a very high overall energy efficiency for the facility.
- Best available control technology will be utilized to minimize air emissions from the proposed facility, and BP is pursuing in-plant emission offsets so that there will be no increase in air contaminant emissions from the refinery location as a result of the commissioning of the cogeneration facility.
- While the cogeneration project will result in increased greenhouse gas emissions, BP remains committed to meeting the Kyoto emission reduction target for its facilities on a worldwide basis.

The Georgia Coast Cascade air basin bounded by the Coast Mountains, the Cascade Mountains and the Strait of Georgia/Puget Sound is a region of high air pollution potential. Representatives of the GVRD member municipalities that are closest to the BP Cherry Point Refinery, White Rock, Surrey and Delta, have expressed concern about the potential air quality impacts from this proposed project. The GVRD Board of Directors is very committed to improving the air quality in this air basin, and want to ensure that

Mr. Allen Fiksdal  
July 5, 2001

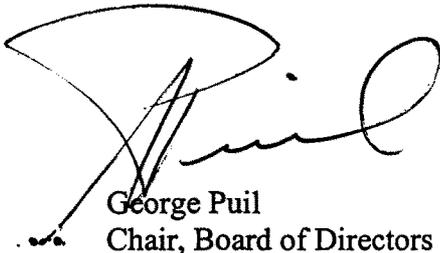
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this proposed facility does not compromise the air quality of communities or the health of residents that live within the impact zone of the emissions from the Cherry Point Refinery.

We look forward to working with clean air agencies, local governments and other parties to ensure that, if BP decides to go forward with this proposed cogeneration facility, there will be no resulting impacts on the surrounding environment. Please continue to keep the GVRD advised of further developments and opportunities for review and consultation on the BP Cherry Point Cogeneration Project.

Yours truly,



George Puil  
Chair, Board of Directors



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COLUMBIA

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Reference: 61615

JUL 09 2001

JUN 28 2001

The Honourable Gordon Hogg, MLA  
(Surrey-Whiterock)  
Parliament Buildings  
Victoria BC V8V 1X4

ENERGY FACILITY SITE  
EVALUATION COUNCIL

Dear Gordon:

I am responding to your letter regarding the Cherry Point power plant proposal. The Washington Energy Facility Site Evaluation Council (EFSEC) is aware of the interest of British Columbia citizens and agencies in projects that have the potential to affect air quality, and has been pro-active in providing information about new site proposals, including the one at the Cherry Point refinery.

The company has requested that a scoping study be carried out by EFSEC prior to the preparation of any detailed proposal, which would then be subject to environmental review. There are few technical details available at this stage. The current proposal calls for a co-generation facility (which is inherently more efficient than the recent Sumas proposal). It would also lead to the retirement of several existing boilers, with a possible overall emission reduction from the site, depending on the technologies employed.

EFSEC has advised BC agencies that they will be consulted during the scoping study. The company and EFSEC provided information about the proposal and the review process at the April 20<sup>th</sup> meeting of the Lower Fraser Valley Air Quality Coordinating Committee (which includes this ministry, Environment Canada, Greater Vancouver Regional District, Fraser Valley Regional District, and Northwest Air Pollution Authority). The agencies were also represented at the public meeting in Ferndale in May. While we do not anticipate a firm proposal to EFSEC for some months, I can assure you that we are in regular contact with EFSEC, and will continue a cooperative inter-agency approach through the scoping and review process.

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We remain committed to effectively representing BC's interests in any proposal that may negatively affect the already over-burdened Lower Fraser Valley airshed. The ministry is working with both Canadian and American air quality agencies as part of an international cooperative effort to improve the quality of the airshed, and to provide a broader context for evaluating projects such as the Cherry Point proposal.

Best regards,

ORIGINAL SIGNED BY

Joyce Murray  
Minister

- cc: Mayor McCallum & Council, Surrey  
Mayor Staub & Council, White Rock  
Lower Fraser Valley Air Quality Agency Members:
- Environment Canada – D. Fast
  - GVRD – J. Carline
  - FVRD – G. Kingston
  - MELP – Surrey office – J. McCracken
  - ✓ Northwest Air Pollution Authority – J. Randles
  - Washington Energy Facility Site Evaluation Council - A. Fiksdal
  - BP Amoco – B. Sullivan

**Official Opposition**  
Room 201, Parliament Buildings  
Victoria, B.C. V8V 1X4  
Phone: (250) 952-6784  
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**Constituency Office**  
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Surrey, B.C. V4A 9E3  
Phone: (604) 542-0388  
Fax: (604) 541-4551



Province of  
**British Columbia**  
Legislative Assembly

**FAXED**  
March 16, 2001

**ORIGINAL**



Gordon Hogg, MLA  
(Surrey-White Rock)

March 15, 2001

Hon. Ian Waddell  
Minister of Environment, Lands, and Parks  
Room 337 - Parliament Buildings  
Victoria, British Columbia  
V8V 1X4

Dear Minister:

I am writing to ensure you are aware of the 750 Megawatt natural gas-fired power plant proposed by British Petroleum at Cherry Point in northwestern Washington State.

I ask that you and your ministry closely monitor this proposal.

Your government failed to seek intervenor status during Washington State's environmental review of the Sumas Energy 2, Inc. project. If the British Petroleum proposal proceeds to a similar review, I trust the government will not make the same mistake.

Please work to protect the air quality and interests of British Columbians.

Sincerely,

Gordon Hogg, MLA  
(Surrey - White Rock)

cc. Mayor & Council, White Rock  
John van Dongen, MLA (Abbotsford)  
Rich Coleman, MLA (Ft. Langley-Aldergrove)  
Lynn Stephens, MLA (Langley)  
Murray Coell, BC Liberal Environment Critic

Mayor & Council, Surrey  
Mike de Jong, MLA (Matsqui)  
Barry Penner, MLA (Chilliwack)  
Val Roddick, MLA (Delta-South)  
Reni Masi, MLA (Delta-North)



Reference: 61895

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JUN 28 2001

JUL 09 2001

Barry Penner, MLA  
(Chilliwack-Kent)  
Parliament Buildings  
Victoria BC V8V 1X4

ENERGY FACILITY SITE  
EVALUATION COUNCIL

Dear Barry:

I am responding to your letter regarding the Cherry Point power plant proposal. The Washington Energy Facility Site Evaluation Council (EFSEC) is aware of the interest of British Columbia citizens and agencies in projects that have the potential to affect air quality, and has been pro-active in providing information about new site proposals, including the one at the Cherry Point refinery.

The company has requested that a scoping study be carried out by EFSEC prior to the preparation of any detailed proposal, which would then be subject to environmental review. There are few technical details available at this stage. The current proposal calls for a co-generation facility (which is inherently more efficient than the recent Sumas proposal). It would also lead to the retirement of several existing boilers, with a possible overall emission reduction from the site, depending on the technologies employed.

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