

Keskinen, Kim

Subject: Re: Westshore Terminals Equipment Replacement -- EIA for comment

From: Nicole Cote [<mailto:nicole.cote@hc-sc.gc.ca>]

Sent: December-17-13 1:22 PM

To: Desjardin, Darrell; Brown, Carrie

Cc: Patterson, Michelle; Blair, Tim; Gregory Kaminski; Gladis Lemus; Henry Ip; Daniel.Wolfish@hc-sc.gc.ca

Subject: Re: Westshore Terminals Equipment Replacement -- EIA for comment

Dear Mr. Desjardin:

I am pleased to respond to your communication of December 9, 2013, requesting Health Canada's feedback on the Environmental Impact Assessment (EIA) prepared for the work pertaining to a Permit Application for Equipment Replacement and Upgrades from Westshore Terminals Limited Partnership. As this is not currently a designated project under the Canadian Environmental Assessment Act, 2012, Health Canada will not be providing comments on the EIA during the Project Review Process conducted by Port Metro Vancouver. However, if Port Metro Vancouver after reviewing the EIA has specific technical areas of concern they wish Health Canada to review, the department is willing to carry out that review in areas relevant to its mandate and in which it possesses specialist expertise, information or knowledge.

Health Canada is the federal department responsible for helping Canadians to maintain and improve their health. As a part of our mandate, the Department may participate in environmental assessments as a federal authority under CEAA, upon request. In this role, Health Canada would assist in the evaluation of potential human health impacts of proposed projects undergoing an assessment under CEAA, by providing the responsible authority (i.e., the department/agency responsible for decision making) with specialist or expert information or knowledge on the potential impacts of project-related exposure to contaminants in water, air, and foods.

Health Canada does not assess the significance of the human health effects related to a project, but rather focuses its comments on the accuracy, scientific validity and completeness concerning these effects. Consistent with its responsibilities under CEAA, the Department does not grant any approvals or make any regulatory decisions with respect to proposals that undergo an environmental assessment.

Thank you for contacting Health Canada and please do not hesitate to contact me should you have any further questions.

Nicole Cote

Manager for Environmental Assessment and Contaminated Sites Division //
Gestionnaire de la division de l'évaluation environnementale et des sites contaminés
Environmental Health Bureau / Le Bureau de la santé environnementale
Safe Environment Directorate / Direction de la sécurité des milieux
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Tel: 613-952-8267
email: Nicole.Cote@hc-sc.gc.ca

From: "Desjardin, Darrell" <Darrell.Desjardin@portmetrovancover.com>
To: undisclosed-recipients::
Cc: "Brown, Carrie" <Carrie.Brown@portmetrovancover.com>, "Blair, Tim" <Timothy.Blair@portmetrovancover.com>

responses on our website after conclusion of the comment period and prior to a decision being made. Please submit your comments on the EIA by 4 pm on January 17, 2014 through the following contacts:

By email: carrie.brown@portmetrovancover.com

By mail: Carrie Brown, Manager, Environmental Programs, Port Metro Vancouver
100 The Pointe, 999 Canada Place
Vancouver BC V6C 3T4

By fax: 1-866-284-4271

Regards,
DARRELL DESJARDIN, B.Sc.
Director, Environmental Programs



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Canada Place, an inspiring national landmark, welcomes you to Canada's Pacific Gateway.*

Attached: Ortho Image

[attachment "2013-11-04 Westshore Consultation Ortho G2013-109.pdf" deleted by Nicole Cote/HC-SC/GC/CA]

Keskinen, Kim

Subject: RE: Port Metro Vancouver: Westshore Terminals Equipment Replacement -- EIA for comment due Jan 17, 2014

From: Haberl, Kevin J FLNR:EX [<mailto:Kevin.Haberl@gov.bc.ca>]

Sent: Monday, December 16, 2013 12:39 PM

To: Brown, Carrie

Cc: Berardinucci, Julia F FLNR:EX <Julia.Berardinucci@gov.bc.ca>; Kreye, Ross A FLNR:EX <Ross.Kreye@gov.bc.ca>

Subject: RE: Port Metro Vancouver: Westshore Terminals Equipment Replacement -- EIA for comment due Jan 17, 2014

Hi Carrie. Two things to bring to your attention:

1. Our ministry has reviewed this information, and will not be making any additional comments on the EIA regarding these improvements at Westshore Terminals; and
2. Up until this time, Julia Berardinucci has been the contact for our agency for these "BIEP / FREMP" issues. Due to changing roles and responsibilities in our region, please update your distribution list to
 - a. Remove Julia, and
 - b. Replace her with both myself and with Ross Kreye (cc'ed on this note).

Thanks Carrie,

Kevin Haberl, RPF

Manager, First Nations Relations, South Coast Region

Manager, Regional Initiatives Office, South Coast Region

Ministry of Forests, Lands, and Natural Resource Operations

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Our Vision: Economic prosperity and environmental sustainability

From: Patterson, Michelle [<mailto:Michelle.Patterson@portmetrovanouver.com>] **On Behalf Of** Desjardin, Darrell

Sent: Monday, December 9, 2013 4:17 PM

Cc: Brown, Carrie; Blair, Tim

Subject: Westshore Terminals Equipment Replacement -- EIA for comment

Good afternoon,

Re: Permit Application by Westshore Terminals Limited Partnership for Equipment Replacement and Upgrades (P2S5) - PP 2013-144

The Vancouver Fraser Port Authority, doing business as Port Metro Vancouver (PMV) has received a Permit Application from Westshore Terminals Limited Partnership (Westshore) for works on their site at Roberts Bank. We are writing to notify you of the proposed works as part of the Project Review Process, and request your feedback on the Environmental Impact Assessment (EIA) that has been prepared in support of the application.

The proposal is for the replacement of the existing office and administration buildings, as well as replacement of yard equipment. The project includes the following components which are subject to the Project Review Process:



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Attached: Ortho Image



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Best in health care.

January 16, 2014

Carrie Brown
Manager, Environmental Programs
Port Metro Vancouver
100 The Pointe, 999 Canada Place
Vancouver, BC V6C 3T4

Dear Ms. Brown:

**Re: Permit Application by Westshore Terminals Limited Partnership
for Equipment Replacement and Upgrades (P2S5) – PP 2013- 144**

Thank you for forwarding the Environmental Impact Assessment regarding work on their site at Roberts Bank for our review and comment.

I am responding as the Chief Medical Health Officer, under my required activity to protect the public as set out in the Public Health Act. I have reviewed the EIA with our Health Protection staff.

We are pleased to see that Westshore Terminals Limited Partnership (Westshore) has decided to replace and upgrade the existing equipment with more modern and efficient equipment, which is expected to help reduce overall operating emissions, decrease noise levels and reduce potential for dusting.

We are encouraged that Port Metro Vancouver requested Westshore to include a human health impact assessment in their Environmental Impact Assessment (EIA) document. We acknowledge that Westshore has been monitoring dustfall as part of their air emissions permit, and that they have constructed two mobile air monitoring units to collect ambient air quality data in the community and a remote surveillance station at the 80th Street overpass in Delta to monitor coal train dusting.

While the EIA focuses on the site at Roberts Bank, and ambient air quality in the area surrounding Westshore (such as the BC Ferries Terminal and the community of Tsawwassen), we note that the scope of the EIA does not include the transportation of coal through Fraser Health region to Westshore or after the coal is loaded to the bulk vessel carriers. Since the equipment replacement and upgrades project could increase the terminal throughput capacity of coal by 3 million tons per year from the current capacity of 33 million tons per year, we do not have sufficient information to determine the extent of the potential health impact from this project on human populations residing near the railways used to transport coal to Westshore.

VP Public Health
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A comprehensive public health impact assessment with multiple pathways of exposure and detailed health risk characterization is not provided in the current EIA for the Westshore Terminals.

2. Air Quality

We appreciate that the EIA includes the Westshore Terminals Air Quality Study (Appendix 1) and that it appears that Westshore has been working cooperatively with Metro Vancouver and the Corporation of Delta regarding air emissions and coal dust.

With respect to air quality and coal dust, we offer the following comments:

- Although the prevailing winds in relation to the location of the Westshore Terminals appear to be directed away from the residential areas as presented in Appendix 1, the Roberts Bank facility is suspected to have an impact on the local airborne particulate matter levels with some 24-hour average total suspended particulate matter (TSP) exceedences observed at Tsawwassen Ferry Station. In addition, short- and long-term ground-level ozone (O₃) exceedences are observed at Metro Vancouver's ambient air quality monitoring station in Tsawwassen. The consultants provide the following explanation for the observed air pollution exceedences (page 16 of Appendix 1):

Ozone:

"Exceedences are noted in Table 3-4 for ground-level ozone (for 1-hour maximum, 24-hour maximum and annual averages). These all relate to the provincial ozone objectives (Level A and B), which are frequently exceeded in many parts of Canada. The CWS and Metro Vancouver values for ozone are considered up to date (an 8-hour average standard) and the ambient levels in Tsawwassen were well below these values in 2011 and 2012. Ground-level ozone is a regional, secondary pollutant that is influenced by long range transport from other areas and chemical mixing/reaction of primary pollutants in the atmosphere (NO_x and VOC) with solar radiation".

TSP:

"The maximum 24-hour TSP values at the Ferry Terminal exceeded the national objective of 120 µg/m³ on two occasions (both in 2012). It should be noted that these exceedences relate to the lower planning-oriented objective for TSP and not the higher thresholds that may imply regulatory action (the BC Level C objective of 260 µg/m³ and the federal Maximum Tolerable objective of 400 µg/m³). The exceedences were investigated further in terms of causal factors".

Wind Analysis:

"A simple wind analysis was conducted for these two exceedence days to evaluate which sources may have contributed to the relatively high concentrations. Westshore is positioned in the west northwest (WNW)

average PM₁₀ (see pages 59 and 61), and short- (1-h and 24-h average) and long-term (annual average) ground-level ozone (O₃) (see pages 14-15) exceedances at the nearest community of Tsawwassen and/or BC Ferries Terminal.

- The EIA refers to a report on dustfall measurements prepared by the Corporation of Delta. I received a copy of that report in October 2013 for review and our feedback included the following comments:
 - It is acknowledged in the discussion section of the Corporation of Delta Council Report (page 2) and the Acuren report (page 3) that "*estimates are provided to the **nearest 5%**, and tend to overestimate the coal present, to be conservative*" (emphasis added). However, these analytical results may not be considered sufficiently accurate to be comparable to the 2002 study by Metro Vancouver at English Bluff Elementary school, where it was found that "*less than 1% of the visible particles observed through a digital microscope were coal*". The detection limit for coal particulate matter in airborne dust samples should be at least 1% or lower if practically achievable (not +/- 5%) to enable us to assess possible health effects of low levels of fine particulate matter air pollution and even lower levels of fine particulate matter which may be attributed to coal.
 - The dustfall sample collected at sampling location 5 – North 40 area showed a significant deposition of dust which was estimated to be approximately 65% coal. However, as indicated in the Council's Report, the monitoring site "*was located 15 metres from the railway used by coal trains to access Westshore Terminals*". This is a very short distance between the passing trains and the dustfall sampling cylinder. Hence, it is not surprising that a significant amount of windblown dust from the passing trains was captured during a 32-day sampling period. Other than to compare the observed results with the current BC air quality objectives for dustfall, it is not possible to interpret these findings in terms of potential health impacts on the local communities. In addition, it should be established if the North 40 area sampling location at 15 meters from the railway is considered as a residential or commercial/industrial site.
 - It is reported in the study by Acuren (Table 1 on page 2) that approximately 299 mg from 300 mg or ~99.7% of dustfall collected at sample location 5-N40 (near railway) contained particulate matter greater than 10 µm in aerodynamic diameter (i.e., particles larger than PM₁₀), which are expected to fall much faster than smaller particles as the distance from the source (railway) is increased. In addition, particles greater than 10 µm in aerodynamic diameter are expected to have much lower pulmonary deposition rates when compared to smaller particles (e.g., PM_{2.5} or PM₁). PM₁₀ particulate matter is mainly deposited in the nasopharyngeal region of the respiratory tract with a very small fraction entering the tracheo-bronchial region.