APPLICATION FOR AN AMENDMENT TO PERMIT NO. 2012 – 072
DIRECT TRANSFER COAL FACILITY

JULY 9, 2015
Table of Contents

1. Introduction ........................................................................................................................................ 4
2. Project Amendment ............................................................................................................................... 5
   2.1 Project Rationale ............................................................................................................................. 5
   2.2 Engineering ..................................................................................................................................... 6
       2.2.1 General ...................................................................................................................................... 6
       2.2.2 Design ..................................................................................................................................... 7
       2.2.3 Capital Investment .................................................................................................................. 8
   2.3 Operations ....................................................................................................................................... 8
       2.3.1 Rail Operations ......................................................................................................................... 9
       2.3.2 OVG Loading Operations ........................................................................................................ 10
   2.4 Construction ................................................................................................................................... 10
       2.4.1 Shed 4 Demolition ..................................................................................................................... 10
       2.4.2 Construction Schedule ............................................................................................................. 11
   2.5 Studies .......................................................................................................................................... 12
3. Mitigation Strategies ............................................................................................................................ 17
4. Consultation & Communications ........................................................................................................ 19
   4.1 Community Engagement .................................................................................................................. 19
   4.2 Construction Communications Plan ............................................................................................... 19

Appendices
Appendix 1: Project Review Application Form
Appendix 2: Engineering Summary Table – Comparing Original vs. Ship Loader Redesign
Appendix 3: CWA letter regarding Ship Loader Design Parameters
Appendix 4: Statement on Telescopic Spout Operation
Appendix 5: Project Drawings
Appendix 6: Shed 4 Hazard Assessment
Appendix 7: Technical Memo: Rail & Vessel Operations Model
Appendix 8: Project Construction Schedule
Appendix 9: Addendum Report to the Human Health Risk Assessment
Appendix 10: Environmental Impact Assessment Addendum
Appendix 11: Air Quality Assessment Addendum
Appendix 12: AQ Mitigation Summary Table – Comparing Original vs. Ship Loader Redesign
Appendix 13: Risk Assessment Update for Coal Operation
Appendix 14: Construction Environmental Management Plan
Appendix 15: Coal Transload Facility – Pit Excavation and Dewatering Management Plan
Appendix 16: Direct Transfer Coal Facility Water Management Plan Addendum
Appendix 17: Direct Transfer Coal Facility Spill Response Plan
Appendix 18: Direct Transfer Coal Facility Fire Life Safety Plan
Appendix 19: Proposed Coal Transload Facility Amendment Geotechnical Report
Appendix 20: AOA Fraser Surrey Docks, Draft AOA Deliverable Date
Appendix 21: Building Code and Fire Code Summary
Appendix 22: Mitigations Summary Table – Comparing Original vs. Ship Loader Redesign
Appendix 23: Construction Communications Plan
Appendix 24: Consultation Summary Report
Appendix 25: Consideration of Public Comment Period Input
Appendix 26: Consultation Plan
Appendix 27: Round 2 Public Consultation Notification Plan
1. Introduction

Fraser Surrey Docks LP (FSD) is applying to amend its existing Permit (No. 2012 – 072), which gives it conditional approval to build and operate a Direct Transfer Coal Facility within its existing lease area. The Project Review Application Form is attached in Appendix 1.

The proposed amendment would allow FSD to load coal directly to ocean-going vessels (OGVs), giving more operational flexibility than loading only to barges, as per the original permit. This application also includes information regarding changes to the facility layout and proposed equipment, along with further environmental and technical information, and details of consultation and communications associated with the proposed amendment. The proposed changes do not impact the overall facility concept that has already been approved, and would have no impact on the volume of coal permitted to be shipped through FSD, which would be maintained at a maximum of 4 million metric tonnes per year.

The initial project design considered the use of an approximate total of 640 barges (round trip). With the implementation of the proposed amendment, the number of vessels navigating the river could be reduced to 80 OGVs (round trip), if FSD were to use only OGVs and no barges. Tugs would be used to assist navigation within two kilometres of the facility, approaching and departing, as well as during berthing.

Proposed changes to the existing permit would include:

- A taller and longer ship loader that could accommodate both OGVs and barges;
- Relocation of the transfer station between the out feed conveyor and the ship loader;
- Mounting the ship loader control room above the out feed conveyor transfer point;
- Relocation of the rail receiving building and associated infrastructure;
- Relocation of the waste water settlement basins; and,
- Realignment of the rail services to the rail receiving building.
- Removal of Shed 4

The changes to the rail layout are considered paramount to achieving seamless interactions between different commodities due to the creation of rail loops. The proposed rail changes would also introduce the opportunity for interchangeable storage space between different commodities. FSD has brought forward these changes for Port Metro Vancouver’s review, in addition to the changes associated with the new ship loader.

The proposed use of OGVs would provide increased operational flexibility, and would offer additional mitigation measures to address concerns about fugitive dust in coal handling, which were identified through the original consultation process.
FSD remains committed to meeting all conditions set out by Port Metro Vancouver, and to building and operating a facility that meets the highest environmental and safety standards. It is understood that, if approved, this application for an amendment may result in additional conditions to the project permit.

2. Project Amendment

The proposed amendment outlined in this application would allow FSD to increase the current size of the ship loader, allowing for direct loading to OGVs.

The amendment design adheres as closely to the permitted design as possible. The overall concept for receiving, rail transfer, conveyance and dust mitigation processes are identical to what was originally permitted. To accommodate the larger ship loader, the conveyance system, receiving pit and rail tracks would need to be shifted to achieve proper angles and elevations. Categorized major changes are described further in this document.

The OGVs that would be used at the facility would be Panamax class vessels with a 225m LOA, 32.26 beam and a maximum load capacity of 80,000 deadweight tonnes (DWT). At the facility, these vessels would be loaded to a maximum of 54,000 tonnes to a maximum draft of 11.5m and within the PMV Navigational Channel Guidelines for the Fraser River. Any vessels accommodated at FSD would be in accordance with the current size limitations of the Fraser River; as a result, no capital dredging or channel modifications would be required in support of, or as a result of, the proposed amendment.

2.1 Project Rationale

FSD is seeking a permit amendment due to changes in commercial and market conditions. With the proposed amendment, FSD anticipates shipping most or all of the permitted volume of coal by OGVs. The implementation of a ship loader would provide more operational efficiency and flexibility, and would also minimize the potential for dust by loading into hatches on OGVs, which would be closed for transit.

With the proposed amendment, FSD anticipates the addition of up to 20 new direct jobs, in addition to the 25 jobs already identified in the original project permit application. The anticipated additional jobs are a result of the increased loading operations at the facility related to OGVs which in many cases could require a second shift of labour, as opposed to the one shift needed for the original project permit (based on 100% shift to ocean-going vessels).
2.2 Engineering

2.2.1 General

The complete list of changes associated with this amendment application include:

a) Replacing the permitted barge loader with a taller ship loader that has a longer outreach to allow for the loading of Panamax size vessels. The design and footprint requirements of a taller ship loader would result in:

- A ship loader with a 27.4m outreach and a height of 36.2m. The original barge loader was designed with a 14.3m outreach (length of boom) and a maximum height of 15.0m. The change would require a spout on the ship loader that is approximately 6.4m longer than the spout designed for the barge loader. Refer to Appendix 4 for further details regarding the ship loader.

- The relocation of the transfer point between the Out Feed Conveyor and the ship loader away from the berth face by approximately 23.8m and downriver by 55m.

- The receiving pit and rail receiving building being shifted 12m east and 16m south, with the pit dimensions remaining the same.

- Re-alignment of the Out Feed Conveyor angle with respect to the receiving pit by 24 degrees, which in turn increases the length of the conveyor by approximately 40m.

- Mounting the Loader Control Room above the Out Feed to Loader Transfer Point and elevating the cabin to provide a safe and efficient field of view for the operator.

b) Relocating the Waste Water Settlement Basins to underneath the Out Feed Conveyor to provide greater efficiency towards waste water management. Changes would involve:

- Shifting and rotating Waste Water Settlement Basins by 37m to the west and 90 degrees in a counter clockwise direction, respectively. Both basins would reside under the Out Feed Conveyor to create better effective use of space and water management practices.

- Overall water catchment area for Facility footprint being decreased to 3,680 m$^2$ from the original footprint of 5,340 m$^2$. 
c) Relocating the rail receiving building approximately 10 meters south west to accommodate a greater rail growth corridor between Shed 1 and the rail receiving building. The proposed relocation of the rail receiving building would result in:

- Moving the coal rail loop north, closer to the Bekaert office building, as the rail enters the facility near the front gate.
- Removal of Shed 4 and the corresponding valve station. Refer to Section 2.4.1 for additional information.
- Relocation of power and domestic sanitary lines running near and on the pre-Bekaert/FSD leasehold areas as opposed to the described utilities required to be relocated in the existing Permit.
- No work in relocating the Front Gate will be undertaken, as the proposed rail traverses through the current location of Shed 4.

d) No additional structural works (i.e. pilings) on, in front of or behind the berth with the proposed larger ship loader would be required, other than what has been permitted.

In addition to the above, it is noted that rail receiving building will now be metal clad as opposed to soft-sided.

Exact details of changes to each area and component are laid out in the “Engineering Summary Table – Comparing Original vs. Ship Loader Redesign,” found in Appendix 2.

2.2.2 Design

Design work follows all applicable regulations and is based on existing site conditions.

Important aspects considered in this permit amendment application include:

- Load limitations of the berth structures
  - Load limitations of berth structures have been considered in the design of the ship loader. CWA Engineers Inc. has provided a letter indicating that the ship loader has been designed within the maximum allowances for loading on the berth face (Appendix 3).
- Best Available Technology
  - The design process for the ship loader included the review of Best Available Technology Not Entailing Excessive Cost (BATNEEC). A letter from Thor Global,
the equipment manufacturer has been included as Appendix 4 in this document for reference.

- Updated Project Drawings (Appendix 5)
- The design process has also addressed potential changes associated with lighting, and a Lighting Plan has been included in Appendix 5.
- Shed 4 Hazard Assessment (Appendix 6)
  - Changes to the rail alignment under the proposed amendment will require the demolition of Shed 4.
- Water Management Plan Addendum (Appendix 16)
- Direct Transfer Coal Facility Fire Life Safety Plan (Appendix 18)
- Amendment Geotechnical Report (Appendix 19)
- Revised mitigation is provided in the updated Mitigations Summary Table (Appendix 22).

2.2.3 Capital Investment

The total capital expenditure of the project at the time of the original permit submission was estimated to be approximately $15 million. With the amendment, the estimated capital expenditure would be approximately $50 million and would allow FSD to load coal directly to OGVs, which would eliminate or reduce the number of barges required. This increase in capital expenditure is a result of the design changes from moving from a barge loader to a ship loader, the increased costs of materials and labour, updated estimates based on advanced engineering, and inflation.

2.3 Operations

Current operations at Fraser Surrey Docks include the import and export of containers, steel, forest and agricultural products, as well as general cargo.

FSD handles up to 400 vessels, and 76,000 rail cars per year. The terminal also handles up to 300 container and 175 steel trucks per day. These numbers fluctuate depending on market conditions.

The terminal maintains approximately 300 full-time equivalent positions, depending on vessel schedules and operations. Approximately 140 of these people work a regular day shift, while the balance is distributed between afternoon and graveyard shifts. The site receives an average of 20 visitors per day. For the purposes of this report, it is assumed that all workers drive to and park at the site.
The terminal operates 24 hours per day, 7 days per week, with three 8-hour shifts per day in total.

The proposed amendment would not result in any change in commercial truck calls. The proposed amendment would result in an increase of 80 OGVs calling at the site (based on a 100% shift to OGVs), as opposed to an increase of 640 barges (based on the shipping option that has already been permitted). Tugs would be used to assist navigation within two kilometers of the facility, as well as during berthing and upon leaving the facility.

An additional 20 full-time equivalent high-paying jobs would be created as a result of this amendment application. These 20 jobs are in addition to the 25 jobs already identified in the original application, resulting in a potential total of 40-45 additional jobs overall. The anticipated additional jobs are a result of the increased loading operations at the facility related to OGVs which in many cases could require a second shift of labour, as opposed to the one shift needed for the original project permit (based on 100% shift to ocean-going vessels).

The summary of the scope of the proposed amendment in terms of logistical implications to the project Permit and operations of the facility are described below:

a) Compliance with PMV Port Information Guide would remain unchanged.

b) Dust suppression equipment remains the same and has not been altered or adjusted. The amendment would have no impacts on safety, operability, dust mitigation, water management system, lighting and/or noise propagation.

c) The amendment would have no impact on rail, road or emergency access routing or logistics.

The following section provides details on rail and loading operations.

2.3.1 Rail Operations:

Rail Operations remain as described in the original application; however, FSD has conducted further operational modelling in order to ensure that all steps of the process are well understood. Assumptions used in the model include:

<table>
<thead>
<tr>
<th>Item</th>
<th>Assumption</th>
</tr>
</thead>
<tbody>
<tr>
<td>Car Unload</td>
<td>2.5 mins/car max</td>
</tr>
<tr>
<td>Time per 25 block of cars</td>
<td>60 mins</td>
</tr>
<tr>
<td>Warping</td>
<td>100 Meters/HR</td>
</tr>
<tr>
<td>Train Delivery</td>
<td>One – 125 car unit train/day *</td>
</tr>
<tr>
<td>Item</td>
<td>Assumption</td>
</tr>
<tr>
<td>-----------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Unloading Rate</td>
<td>2,700 MT/Hr</td>
</tr>
<tr>
<td>Unit Trains</td>
<td>Unit Trains must be delivered on time for a block of 25 cars to be positioned in front of the rail receiving building at 7:00AM to start unloading at 8:00AM</td>
</tr>
</tbody>
</table>

*up to a 135 car unit train. A 125 car unit train will be the standard, however the carrier has asked for flexibility for operational purposes.

Results of the operational modelling can be found within the Technical Memo: Rail and Vessel Operations Model (Appendix 7).

2.3.2 OVG Loading Operations:

OGV loading operations are based on the rail unloading and handling sequence and the size of the vessel.

The OGVs that would be used at the facility would be Panamax class vessels with a 225m LOA, 32.26 beam and a maximum load capacity of 80,000 deadweight tonnes (DWT). At the facility, these vessels would be loaded to a maximum of 54,000 tonnes to a maximum draft of 11.5m and within the PMV Navigational Channel Guidelines for the Fraser River.

Based on the rail unloading sequence, the production rate and the target volume, it is estimated that the OGV will be loaded in four days.

The Technical Memo: Rail and Vessel Operations Model outlining the rail and OGV loading sequence can be found in Appendix 7.

2.4 Construction

2.4.1 Shed 4 Demolition

The construction of the relocated receiving pits and the rail receiving building will require the demolition of Shed 4.

The scope of work for the demolition of Shed 4 will generally include:

- Disconnect and relocate water, sewer and hydro services
- Removal of approx. 96 m³ of concrete (footings/foundations)
• Removal and Disposal of 400,000 Lbs of Steel
• Removal and Disposal 4,750 m² of cladding (roof and walls)

All soils will be tested as per the Construction Environmental Management Plan, and disposed of in accordance with applicable regulations.

A detailed Shed 4 Demolition Plan will be requested from the contractor prior to the start of construction, and submitted to PMV for review at that time.

2.4.2 Construction Schedule

The conservative construction schedule has been modified to address market conditions, overall project costs and design changes that require additional construction time. The updated schedule is shown below:

<table>
<thead>
<tr>
<th>Work</th>
<th>Activities Included</th>
<th>Start Date</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMV Project Amendment Permit</td>
<td>Permit Amendment Application to PMV</td>
<td>June 19, 2015 (FSD Application submitted)</td>
<td>August 2015 (PMV Decision)</td>
</tr>
<tr>
<td>PMV Coal Facility Building Permit</td>
<td>Building Permit Application to PMV</td>
<td>June 19, 2015 (FSD Application submitted)</td>
<td>August 2015 (PMV Decision)</td>
</tr>
<tr>
<td>Phase 1A</td>
<td>• Early works&lt;br&gt;• Receiving pit works&lt;br&gt;• Utility relocation and utility protection</td>
<td>September 1, 2015</td>
<td>January 7, 2016</td>
</tr>
<tr>
<td>Phase 1B</td>
<td>• Precast Concrete&lt;br&gt;• Concrete&lt;br&gt;• Shed 4 Demolition&lt;br&gt;• Electrical&lt;br&gt;• Rail works&lt;br&gt;• Road works</td>
<td>January 7, 2016</td>
<td>December 29, 2016</td>
</tr>
<tr>
<td>Phase 2</td>
<td>• Equipment procurement and installation&lt;br&gt;• Structural and mechanical Fabrication tender and installation</td>
<td>September 1, 2015</td>
<td>September 14, 2017</td>
</tr>
<tr>
<td>Work</td>
<td>Activities Included</td>
<td>Start Date</td>
<td>Completion Date</td>
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<tr>
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<td>--------------------------------------------------------------------------------------</td>
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<tr>
<td></td>
<td>Railcar receiving building</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Electrical &amp; Controls Installation</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Fire Protection</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Rail Works Tender and construction</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Waste/water management tender and construction</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Dust Suppression</td>
<td></td>
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</tr>
</tbody>
</table>

FSD is requesting that the project substantial completion deadline be extended to September 14, 2018. A complete Project Construction Schedule is included in Appendix 8.

2.5 Studies

Studies reviewed and updated in consideration of the proposed amendment include:

a) Human Health Risk Assessment (HHRA)

SNC-Lavalin Inc. (SNC-Lavalin) was retained to review the Human Health Risk Assessment dated July 18, 2014, which was undertaken for the original Direct Transfer Coal Facility application.

The purpose of this revision was to assess the proposed amendment and its potential impacts on human health. The findings of this Addendum Report, issued on June 19, 2015, are largely based on the Air Quality Assessment Addendum (2015) prepared by Levelton Consultants Ltd.

SNC-Lavalin concluded that no unacceptable risks were predicted for the receptors in the Study Area (residents, commercial workers, urban park users, agricultural receptors), including for the maximum North Delta residential receptor, industrial workers and people involved in fishing activities.

The Addendum Report to the Human Health Risk Assessment (including a condensed Summary of Addendum Report) can be found in Appendix 9.

b) Environmental Impact Assessment (EIA):
SNC-Lavalin Inc. (SNC-Lavalin) conducted a review of the Environmental Impact Assessment for the Direct Transfer Coal Facility in order to confirm the relevance of the environmental impacts and mitigation described in the EIA to the proposed project changes.

SNC-Lavalin’s scope of work included:

- Review of changes to the project under the Amendment;
- Review of environmental regulations which may apply to the Amendment and/or vessel size;
- Discussion of the extent to which the EIA adequately describes the potential environmental impacts, taking into account the proposed project changes; and
- Discussion of the extent to which the potential impacts should be reconsidered or re-assessed, where applicable.

SNC-Lavalin concludes that “the environmental effects and proposed mitigation measures identified within the EIA are adequate to address the project changes and, therefore, [the proposed amendment] results in no change to the overall conclusion of the EIA”.

Addendum to the Environmental Impact Assessment can be found in Appendix 10.

c) Air Quality Assessment (AQA)

Levelton Consultants Ltd. (Levelton) was retained to conduct a review of the Air Quality Assessment (AQA) submitted for the original permit to evaluate the potential impacts from the proposed changes. The scope of work for this assessment includes:

- An evaluation of the incremental changes as compared to the original assessment;
- A review of the description of the proposed project changes;
- A review of the extent to which the AQA provides a representative assessment of the potential air quality impacts, given the proposed project changes;
- A description and discussion of the proposed project changes that are material to the AQA; and,
- A discussion of the extent to which the potential impacts should be reconsidered or reassessed, including changes to the assessment methodology, where applicable.
The conclusion for this revised assessment are consistent with the ones presented in the original report. These conclusions are:

- Predicted air quality impacts including ambient background at sensitive receptors and within residential neighborhoods in the vicinity of FSD are generally low and remain below all ambient air quality objectives.
- The predicted air contaminant concentrations quickly diminish as emissions disperse further away from FSD’s facility.
- All maximum predicted concentrations lie on the FSD facility fenceline.
- For all air contaminants and averaging periods, there were no predicted exceedances of the ambient air quality objectives with ambient background added, with the exception of predicted annual nitrogen dioxide (NO₂) concentrations, which is consistent with the results of the previous June 20, 2014 AQA. Predicted annual NO₂ exceedances with ambient background added are located immediately to the west of the modelled facility fenceline and on the fenceline over the Fraser River. This is an area where the tugs and ships operate and public access is generally limited or controlled due to terminal marine operations.
- The magnitude of the maximum annual NO₂ exceedance is reduced slightly from the June 20, 2014 AQA.
- Maximum predicted fugitive coal dust impacts have decreased from the original AQA.
- The planned project and operational mitigation measures will continue to assist in the management and mitigation of combustion and fugitive dust emissions from the project and agricultural goods operations.

The Air Quality Assessment Addendum can be found in Appendix 11.

An Air Quality Mitigations Summary Table illustrating changes between the original application and the proposed amendment has been included in Appendix 12.

d) Marine Risk Assessment

Det Norske Veritas (Canada) Limited (DNV) was retained to update the results of the navigational risk assessment conducted in 2012. The update addresses the proposed replacement of 640 barges with 80 Panamax class vessels.

The conclusion of this review indicates that:
• Marine incidents are expected to occur most frequently when all barges are used in transit and least frequency when all Panamax class vessels are used in transit.
• The proposed coal export operations (with 80 Panamax class vessels) are acceptable according to the risk acceptance criteria in the applied risk matrix.

The Risk Assessment Update for Coal Operation can be found in Appendix 13.

e) Construction Environmental Management Plan (CEMP):

Soleil Environmental Consultants (Soleil) and Polaris Environmental Consultants (Polaris) were retained to conduct a review of the CEMP based on the amendment proposed for the Direct Transfer Coal Facility.

The attached letter provided by Soleil and Polaris indicates that “the proposed amendments will not change the proposed construction techniques, or mitigation measures associated with construction activities” and that “the preliminary CEMP prepared for the project, and included as part of the Environmental Impact Assessment (SNC Lavalin, 2013), still provides a suitable framework for mitigating impacts from construction activities”.

The letter outlining changes to the Construction Environmental Management Plan can be found in Appendix 14. An updated Coal Transload Facility – Pit Excavation and Dewatering Management Plan letter is also included and can be found in Appendix 15.

f) Direct Transfer Coal Facility Water Management Plan:

Omni Engineering Inc. (Omni) was retained to conduct a review of the Water Management Plan, prepared in July 2014, to assess the relevance of the report with respect to the proposed changes to facility design.

Omni provided a Direct Transfer Coal Facility Water Management Plan Addendum on June 3, 2015, which concludes that the only change is a reduction in the overall water catchment area.

The Water Management Plan Addendum can be found in Appendix 16.

g) Direct Transfer Coal Facility Spill Response Plan

The original Spill Response Plan has been updated to include:
• Addition of a Liquid Spill Response section encompassing spill classification guidelines, and class-specific liquid spill response procedures;
• Reclassification and alteration of coal spill response procedures to include spill events to land and to water;
• Expansion upon the connections between the Spill Response Plan and additional information located within the Emergency Response Plan;
• Clarification of response personnel roles and responsibilities;
• Further development of spill response procedure stages to include Immediate Notification, First Response and Spill Containment, and Cleanup and Reporting;
• Expansion upon contact information for internal personnel and required external personnel; and,
• Addition of a Marine Vessel Response section outlining vessel personnel actions and conduct requested in response to a spill event.

The updated Direct Transfer Coal Facility Spill Response Plan can be found in Appendix 17.

h) Direct Transfer Coal Facility Fire Life Safety Plan

Hatch Mott MacDonald was retained to prepare a Fire Life Safety Plan for the Direct Transfer Coal Facility. The document specifies the fire safety provisions that will be implemented for the Direct Transfer Coal Facility. In addition, the document indicates applicable standards and regulations governing facility operations, summarizes the fire and life safety design through hazard analysis and risk assessment, and details risk mitigation measures to assure an acceptable level of fire safety.

The Direct Transfer Coal Facility Fire Life Safety Plan can be found in Appendix 18.

i) Shed 4 Hazard Assessment

A Hazardous Assessment was prepared in support of the demolition of Shed 4.

The report provides:

• An inventory of hazardous materials;
• A description of hazardous materials storage and handling;
• An outline of the applicable regulations; and,
• A description of hazardous materials reuse, removal, recycling and disposal plan.

The Shed 4 Hazard Assessment can be found in Appendix 6.
j) Amendment Geotechnical Report

Exp Services Inc. (Exp) was retained to conduct an assessment of the geotechnical issues related to the relocation of the receiving pit, and to determine if the conclusions of the original report, dated August 13, 2014 remain relevant as they relate to this proposed change.

Exp issued a letter report, dated May 21, 2015, indicating that all the findings of the original report remain valid for the receiving pit relocation.

The Amendment Geotechnical Report can be found in Appendix 19.

k) Archeological Overview Assessment:

Fraser Surrey Docks retained Archer CRM Partnership (Archer CRM) to conduct an Archeological Overview Assessment (AOA) with respect to the proposed amendment.

Archer CRM is currently working to obtain the First Nation Heritage Investigation Permits required to conduct the AOA.

A draft copy of the AOA is expected to be completed in July 2015, and it will be submitted to PMV at that time.

The Archaeological Overview letter can be found in Appendix 20.

l) Building Code and Fire Code Review

CFT Engineering was retained to conduct a Building Code and Fire Code Review of the engineering changes proposed for the facility.

The Building Code and Fire Code Summary (attached in Appendix 21) indicates that the facility design meets all the current and applicable regulations.
Unless otherwise stated in the Mitigations Summary Table, all mitigation measures proposed in the original application remain in place. The following is a summary of updated mitigation measures associated with the proposed amendment:

Updated dust mitigation measures for the following activities include:

- **Construction**: visual site inspections when conditions are dry; minimizing exposure time of unpaved surfaces; covering stockpiled soils; and modification or reduction of activities that contribute to dirt track-out.
- **Rail transit**: the spraying of empty rail cars leaving the rail receiving building with veneer suppressant.
- **Receiving and conveyance**: wet chemical suppression for unloading and material transfer points.
- **OGV loading**: loading of coal directly into the confines of vessel holds.
- **Ship transit**: the containment of coal inside the ship’s hold, which will be covered with a hatch.

Updated noise mitigation measures include:

- **Hours of construction work** have been changed to 7:00AM to 7:00PM. This timing is consistent with Corporation of Delta and City of Surrey noise bylaws.

The complete Mitigations Summary Table can be found in Appendix 22.

Based on this Mitigations Summary Table and the findings of the studies undertaken, FSD has concluded that the proposed amendment to the project permit will likely result in:

- Improved measures to control dust during transit, as coal will be transported in closed-hatch OGVs.
- A reduction in the volume of water needed for dust suppression. This is due to the fact that there will be limited need to spray water on the open barges, as it is anticipated that most shipping will be done by OGVs.
- A reduction in marine vessel movements through the Fraser River. The amendment would result in 80 annual OGV transits of the Fraser River, compared to 640 tug-and-barge transits for the same total volume to be shipped (4 million metric tonnes per year).
- More effective control and management of marine vessel movements during fisheries openings due to the reduced number of vessel movements along the river.
- A reduction in the number of idling tugs at FSD or along the Fraser River, compared to the original application. Tugs would still be used to assist navigation of the OVGs within two kilometers of the facility, during berthing, and upon leaving the facility.
4. Consultation & Communications

It is the intention that FSD provides stakeholders, First Nations and the public with a variety of opportunities and mechanisms to provide feedback regarding the proposed amendment. For an overview of planned consultation, please see Appendix 26. For an overview of the planned notification for the second round of public consultation, please see Appendix 27.

4.1 Community Engagement

Fraser Surrey Docks held a public comment period (May 4 to May 19, 2015) to provide an opportunity for the public and stakeholders to review the proposed changes to the existing permit, and specifically to seek comments on the proposed scope of the studies associated with the amendment. The input received during the public comment period was summarized in a Consultation Summary Report (see Appendix 24), and considered by FSD in the Consideration of Public Comment Period Input (see Appendix 25) along with further technical information, as part of the consideration to apply for an amendment to the existing permit.

The public comment period included a discussion guide, online feedback form, scope and rationale documents provided by FSD’s consultants pertaining to the studies being undertaken, and an opportunity to provide feedback through an online feedback form and through open submissions. FSD also met with the Fraser Health Authority and Musqueam First Nation during this period.

A second round of public consultation will be undertaken following the submission of this application. The focus of Round 2 Public Consultation is on the proposed project design associated with the amendment, and on the results of the studies.

Port Metro Vancouver will consult with First Nations on Fraser Surrey Docks' permit amendment application.

4.2 Construction Communications Plan

The construction communications plan originally submitted has been updated to include additional activities as per the project amendment. The amended plan includes:

- Revised list of proposed works
- Revised Project Construction Schedule (See Appendix 8)

The updated Construction Communications Plan can be found in Appendix 23.
Appendices

Appendix 1: Project Review Application Form
Appendix 2: Engineering Summary Table – Comparing Original vs. Ship Loader Redesign
Appendix 3: CWA letter regarding ship loader Design Parameters
Appendix 4: Statement on Telescopic Spout Operation
Appendix 5: Project Drawings
Appendix 6: Shed 4 Hazard Assessment
Appendix 7: Technical Memo: Rail & Vessel Operations Model
Appendix 8: Project Construction Schedule
Appendix 9: Addendum Report to the Human Health Risk Assessment
Appendix 10: Environmental Impact Assessment Addendum
Appendix 11: Air Quality Assessment Addendum
Appendix 12: AQ Mitigation Summary Table – Comparing Original vs. Ship Loader Redesign
Appendix 13: Risk Assessment Update for Coal Operation
Appendix 14: Construction Environmental Management Plan
Appendix 15: Coal Transload Facility – Pit Excavation and Dewatering Management Plan
Appendix 16: Direct Transfer Coal Facility Water Management Plan Addendum
Appendix 17: Direct Transfer Coal Facility Spill Response Plan
Appendix 18: Direct Transfer Coal Facility Fire Life Safety Plan
Appendix 19: Proposed Coal Transload Facility Amendment Geotechnical Report
Appendix 20: AOA Fraser Surrey Docks, Draft AOA Deliverable Date
Appendix 21: Building Code and Fire Code Summary
Appendix 22: Mitigations Summary Table – Comparing Original vs. Ship Loader Redesign
Appendix 23: Construction Communications Plan

Appendix 24: Consultation Summary Report

Appendix 25: Consideration of Public Comment Period Input

Appendix 26: Consultation Plan

Appendix 27: Round 2 Public Consultation Notification Plan