

Makarow, Irina (EFSEC)

From: Tom Pratum [tkpratum@romarr.com]
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Conversation: BP DEIS Comment
Posted To: EFSEC

Subject: BP DEIS Comment

Thank you for the opportunity to comment on the BP Co-generation Facility DEIS. In this comment, I wish only to make two points:

1. Water quantity and quality (sections 3.3 and 3.4). Water quantity is being measured against what is currently used by Intalco for once-through cooling of an air compressor (approx 2,700 gpm). It is stated that, if the Intalco plant continues at full operation, this water will be used again for cooling of the co-generation plant, thereby creating no net increase in water use from the Nooksack River. However, it is highly unlikely that Intalco will continue at anywhere near full operation. In such a case, the co-generation plant will indeed result in a net increase in water withdrawals over what would be present if the plant were not to come into existence. To state otherwise is somewhat dishonest. In addition to this somewhat misleading presentation of the water usage, it should be noted that this water will then be discharged into the Strait of Georgia with chemical and physical parameters much different from what would come out of the Nooksack River, or if it were just to proceed through the Intalco air compressor. Even if we compare the water quality parameters of the water from Intalco with what would come out of the co-generation facility after treatment, we see that the temperature would increase from 21.4 C (70.5 F) to 93.8 F and COD would increase from ND (not detectable) to 323 lbs/day. This is significant for these two parameters, and that assumes Intalco still supplies the cooling water. If this water were to instead come from the Nooksack River the comparison looks very much more grim. This level of increased water usage and water quality degradation is clearly unacceptable - especially given the fact that most of the electricity generated by this facility is destined for distant markets, and will not in any way mitigate the local environmental impacts.

2. Wildlife Habitat (section 3.7) In this section, there is scant mention of the effect of the project on the protected heronry located fairly close to the site. As the document states "Increased noise levels created by heavy machinery could cause birds to abandon their nests" Given that such a possibility is acknowledged, it would be reassuring if the applicant provided more information to ensure that this will not occur at the heronry.

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