

NO: **R156**

COUNCIL DATE: July 22, 2013

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## REGULAR COUNCIL

TO: **Mayor & Council** DATE: **July 22, 2013**

FROM: **General Manager, Planning and Development** FILE: **5650-20(FRPA)**  
**General Manager, Engineering**

SUBJECT: **Update on the Application to Port Metro Vancouver by the Fraser Surrey Docks to Implement a Direct Transfer Coal Facility at the Fraser Surrey Docks**

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## RECOMMENDATION

The Planning and Development Department and the Engineering Department recommend that Council:

1. Receive this report as information; and
2. Instruct the City Clerk to forward a copy of this report to each of Fraser Surrey Docks and PortMetro Vancouver along with a copy of Council's resolution related to this report.

## INTENT

The purpose of this report is to provide an update on the application by Fraser Surrey Docks ("FSD") to implement a Direct Coal Transfer Facility at FSD and regarding strategies that FSD is proposing to address the concerns raised by Council and the community in relation to the installation and operation of the proposed Direct Transfer Coal Facility at FSD.

## BACKGROUND

At its Regular Council meeting on March 11, 2013 Council considered Corporate Report No. R044, titled "Application to Port Metro Vancouver by Fraser Surrey Docks for a Proposed Direct Transfer Coal Facility at Fraser Surrey Docks", a copy of which is attached as Appendix "A" to this report. The report provided details on an application by FSD to Port Metro Vancouver ("PMV") to install and operate a Direct Transfer Coal Facility (the "Facility") at the existing Surrey terminal. Under the proposal, coal hauled from the USA by Burlington Northern Santa Fe ("BNSF") railway would be loaded at the Facility onto barges for towing to Texada Island. The proposed Facility would handle up to four million metric tonnes of coal per year. The report outlined concerns related to the transportation of coal through Surrey by way of the BNSF railway and the operation of the Facility. The concerns centred around three main issues:

- coal dust;
- noise; and
- increased rail traffic.

Council instructed the City Clerk to forward a copy of that report and the related Council resolution to PMV and FSD as the City's comments on the application. Council also directed staff to request that a specific response be sought from PMV addressing the concerns outlined in the report.

At its meeting on May 6, 2013 Council considered the following recommendation of the Environment and Sustainability Advisory Committee:

*". . . that Council recommend staff and the Environmental Advisory Committee be part of the consultative and Environmental Assessment Review process for the Fraser Surrey Docks Ltd. Partnership – Coal Facility Project proposal".*

After considering the recommendation, Council resolved as follows:

*"That the recent correspondence received by the City of Surrey from Port Metro Vancouver related to the Fraser Surrey Docks Coal Transfer Facility be forwarded to the Environmental Advisory Committee and that the Committee be advised that the authority related to approving the Fraser Surrey Dock (FSD) application including environmental considerations rests with Port Metro Vancouver who are consulting with stakeholders including affected municipalities as part of the process of considering the application".*

Council also requested that:

*"Staff to provide a summary or copy of the environmental review information from Washington and Oregon to Council and the Environmental Advisory".*

Staff has researched information about similar proposals that have been or are being considered at US Pacific ports. Appendix "B" attached to this report provides a summary of staff's research.

On May 15, 2013 the City received a notice from PMV of additional consultation in the form of open houses being hosted in Surrey by FSD on May 23 and 25, 2013. Included in the PMV notice was information about how the concerns outlined in Corporate Report No. Ro44;2013 would be addressed, among other concerns. A copy of the PMV notice is attached as Appendix C to this report. Staff attended the FSD open house on May 23, 2013 and found that the concerns raised at this meeting were consistent with those previously considered by Council

## **DISCUSSION**

FSD is proposing a variety of mitigation strategies to address the concerns raised by the community and stakeholders during the initial phase of consultation. These strategies relate to the following elements of the proposal:

- Construction of the Facility;
- Transportation of coal by rail cars through Surrey;
- Operation of the Facility (including the unloading of rail cars, the loading of coal onto barges, and the temporary storage of coal at the Facility in an emergency stockpile);
- Transportation of coal by barge down the Fraser River; and
- Emergency response (in relation to the Facility itself).

The concerns raised in the previous report to Council related to the transportation of coal through Surrey, and the operation at the Transfer Facility. The mitigation strategies related to these elements are discussed in this report.

Coal dust, noise, and increased rail traffic are the main issues of concern for the City with respect to the proposed Facility. The proposed Facility is expected to generate an average of approximately one train every two days in the first year of operation and increasing after the first year to approximately one train per day. Each train will result in two train trips through Surrey; one in each direction. Presently, approximately 16 to 20 trains per day pass through Surrey on the BNSF railway. The additional trains carrying coal would amount to a 10% increase in rail traffic on the BNSF railway.

FSD is a 24-hour-a-day 7-day-a-week operation. The proposed Facility may operate at any time of the day and any day of the week. Rail cars are expected to arrive at the Facility between 12:00 a.m. and 6:00 a.m.; unloading of rail cars is expected to occur between 8:00 a.m. and 4:30 p.m.; and trains hauling the empty rail cars are expected to depart the rail yard between 5:00 p.m. and 10:00 p.m. FSD notes that arrival, unloading and departure may occur at any time of the day due to unforeseen circumstances with logistics, failures, weather, etc.

The following strategies have been proposed by FSD to mitigate the concerns raised by various stakeholders who have shared their concerns.

#### **Coal Dust Mitigation Strategies:**

- BNSF rail cars will be loaded with coal in accordance with BNSF's Load Profile Template which requires smoothing of the coal in each rail car such that it is more aerodynamic and less susceptible to dust loss from wind;
- The coal in the rail cars will be covered with a topper coating or surface stabilizer to reduce the release of dust in transit;
- Rail cars will unload coal through doors in the bottom of each car;
- The coal will be dumped into receiving pits at FSD from a maximum height of about three feet;
- The coal receiving pits will be within a covered structure;
- Atomized water mist will be sprayed at the receiving pits during unloading to capture coal dust that results from the unloading operation;
- The sides and bottom of each empty rail car will be sprayed with water at a rail car wash station and the runoff will be collected in an adjacent water treatment/settling pond;
- Coal will be transferred from the receiving pits to barges via a covered conveyor system;
- All transfer points from one conveyor to another will be fully enclosed and equipped with water/misting spray to capture dust;
- Coal drop heights onto the barge and emergency stockpile area will be limited through the use of a variable height loader and directional snorkel;
- The coal pile on the barge and emergency stockpile area will be manually shaped to reduce the ability of the coal to catch wind and create dust;
- On days with no precipitation, sunny conditions and winds greater than 19 km/hr water will be applied to wet the coal as it is loaded onto the barge and when the barge is sitting at the berth awaiting departure;
- A wind speed gauge and dust monitor will be installed near the barge loader. Operations will shut down in periods of winds in excess of 40 km/hr on a sustained basis of more than five minutes;

- Two of the six re-circulated barges will be fitted with dust monitoring stations. Based on the collected data after the first year of operations the monitoring strategy will be assessed and modified where necessary;
- The height of the emergency stockpile will be limited to 3 metres and a concrete wall/berm will be constructed to a height of 2.3 metres;
- Coal will not be stored in the stockpile for more than 48 hours; and
- On days with no precipitation, sunny conditions and winds greater than 19 km/hr water will be applied to wet coal in the stockpile.

### **Noise Mitigation Strategies**

- All rail movement within FSD and the adjacent Port Authority Rail Yard will be restricted to a speed of 3 mph or less;
- Cars will be shunted through the receiving pits via an electric positioner which is quieter than a locomotive as it eliminates the frequent starting and stopping that occurs with a locomotive;
- The on-dock rail line has been designed to have turning angles no greater than 12.5 degrees in order to reduce noise. If unexpected wheel squealing noise does occur at certain points, track lubricators will be installed; and
- The coal will be dumped into the receiving pits from a maximum height of about three feet to limit noise.

Each of the noise mitigation strategies described above relate to activities at the Facility or adjacent PMV properties. No mitigation strategies have been proposed to address the increased noise along the BNSF railway resulting from additional trains including noise from locomotives, the wheel noise of the train cars, and the train whistle noise at road crossings.

### **Stopped Train Mitigation Strategies:**

The existing Stopped Train Protocol provides immediate access at railway crossings during emergency situations. This protocol will apply to all trains including trains hauling coal to the Facility. No additional mitigation strategies have been proposed to address the increase in rail traffic and its impacts on emergency access to areas like Crescent Beach. Similarly, no strategies have been proposed to address the impacts on public access related to the additional trains.

FSD advises that the increase in rail traffic will be modest (about a 10% increase in the number of trains per day) and train movements to and from the Facility are expected to occur outside of heavy road traffic volume periods. Trains are expected to arrive at the Facility between 12:00 a.m. and 6:00 a.m. and depart from the Facility between 5:00 p.m. and 10:00 p.m.; however, FSD acknowledges that train movements may occur at any time of day.

### **Impacts to Municipal Infrastructure**

The proposed Facility and the planned on-site coal dust mitigation strategy of spraying water will have an impact on the City's infrastructure. To assess these impacts further information is required. Appendix "D" attached to this report lists the information that is required to evaluate the impacts on the City's infrastructure.

## CONCLUSION

An application by FSD to install and operate a Direct Transfer Coal Facility is under consideration by PMV. As part of the consultation process the City has been asked for comment on the application. It is noted that the City does not have any jurisdiction or authority in relation to the approval of the application. A previous report to Council was forwarded to the FSD, which identified concerns related to the proposed Facility, including issues related coal dust, noise, and increased rail traffic at the proposed Facility and along the BNSF railway through Surrey. FSD has developed a set of mitigation strategies intended to address these concerns. Staff has identified some servicing matters that will also need to be addressed in relation to the subject Facility. These are listed in Appendix "D" attached to this report. It is recommended that Council instruct the City Clerk to forward a copy of this report to the FSD and PMV as information and for appropriate follow up.

*Original signed by*  
Jean Lamontagne  
General Manager,  
Planning and Development

*Original signed by*  
Vincent Lalonde, P.Eng.  
General Manager, Engineering

AD/JRA/saw

### Attachments:

- Appendix "A" Corporate Report No. Ro44, titled "Application to Port Metro Vancouver by Fraser Surrey Docks for a Proposed Direct Transfer Coal Facility at Fraser Surrey Docks"
- Appendix "B" Information regarding Coal Transfer Facility Proposals in the United States
- Appendix "C" Notice from Port Metro Vancouver, dated May 13, 2013
- Appendix "D" Items that need to be Addressed in relation to the City's Infrastructure

# CORPORATE REPORT

NO:

COUNCIL DATE:

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## REGULAR COUNCIL

TO: **Mayor & Council**

DATE: **March 7, 2013**

FROM: **General Manager, Engineering  
General Manager, Planning and Development**

FILE: **5650-20(FRPA)**

SUBJECT: **Application to Port Metro Vancouver by Fraser Surrey Docks for a Proposed  
Direct Transfer Coal Facility at Fraser Surrey Docks**

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## RECOMMENDATION

The Engineering Department and the Planning & Development Department recommend that Council:

1. Receive this report as information; and
2. Instruct the City Clerk to forward a copy of this report and the related Council resolution to Port Metro Vancouver (PMV) and the Fraser Surrey Docks (FSD) as the City's comments on the application by FSD to PMV to install and operate a Direct Transfer Coal Facility at Fraser Surrey Docks and include in such communication a request that PMV address the concerns listed in this report in the application review process.

## INTENT

The purpose of this report is to provide an overview of a Direct Transfer Coal Facility that is being proposed by Fraser Surrey Docks (FSD) at the Fraser Surrey Docks in Surrey and for which an application has been submitted to Port Metro Vancouver (PMV) and to document concerns with the proposed Facility that should be addressed by PMV in its consideration of the subject application.

## BACKGROUND

The Vancouver Fraser Port Authority, which operates under the name Port Metro Vancouver (PMV), is a federal agency that is responsible for the operation and development of port interests along 600 km of shoreline in the Metro Vancouver area including the port activities along the Fraser River in Surrey.

Fraser Surrey Docks (FSD) is a tenant of the PMV lands in Surrey and is a large multi-purpose marine terminal that handles a variety of cargo including containers, steel, forest products, salt, and bulk materials.

FSD has submitted a project permit application to PMV for the development of a Direct Transfer Coal Facility (the "Facility") at the southwest end of the existing FSD terminal to handle up to 4,000,000 metric tonnes of coal per year.

The coal will be hauled by Burlington Northern Santa Fe (BNSF) railway to the Facility and will be loaded directly onto barges from the rail cars. The coal is expected to originate from Montana and Wyoming and will ultimately be shipped overseas. No coal is expected to be stored at the FSD terminal during normal operations; however, the Facility is being designed to accommodate the temporary storage of up to 30,000 metric tonnes of coal to address unforeseen circumstances.

When the coal is loaded on barges at the Facility, tugs will tow single barges down the Fraser River to its mouth. Once the barges pass Sand Heads, they will be towed in tandem to Texada Island, where the coal will be off-loaded and stored before being transferred to deep sea vessels for shipment overseas.

Although the current application is seeking to transfer as much as 4,000,000 metric tonnes per year, there is potential to increase volumes up to a total of 8,000,000 metric tonnes per year over the longer term but such an expansion would be subject to a new application to PMV for a project permit.

The current application process has included community engagement and has included referral to First Nations.

## **DISCUSSION**

Staff has met with representatives of PMV and of FSD to better understand the proposed Facility and to identify potential implications that its implementation may have on stakeholders in Surrey.

The following sections document the results of staff's review of the proposal and list the concerns that from staff's perspective should be addressed by PMV in relation to its consideration of the application for the Facility. There are two fundamental aspects to the proposal, each of which has potential concerns to stakeholders in Surrey. These aspects are:

- A. The transportation of the coal through Surrey by way of the BNSF railway to the Facility;  
and
- B. The operation of transferring the coal from rail cars to barges at the Facility.

### ***A. Concerns Related to Transporting Coal by Railway through Surrey***

#### Description:

The FSD is planning to receive coal by way of trains that will travel on the BNSF railway through Surrey and that will be approximately 135 rail cars long, approximately 7,500 feet in length. At the outset of the operation, FSD is planning to transfer 2,000,000 metric tonnes of coal per year at the Facility, which equates to approximately 160 trains per year or on average approximately one train every two days. FSD has advised that after the first year the amount of coal to be transferred through the Facility will be increased to 4,000,000 metric tonnes per year, which equates to 320 trains per year or an average of 1 train per day approximately. Each such train would pass through Surrey in a loaded condition going north and would pass through Surrey again after being

unloaded heading south (i.e., each train would result in two trips through Surrey; one in each direction).

Concerns:

1. *BNSF train blockages at Crescent Road and at other grade level rail/road crossings in Surrey*  
Increases in rail traffic on the BNSF railway will result in increased delays at the single access point to Crescent Beach at Crescent Road. Approximately 16 to 20 trains per day currently pass Crescent Beach on the BNSF rail line. Six hundred and forty (640) new trains per year, which is the expected volume for the Facility, would increase total train movements by approximately 10% at this crossing (i.e., an average increase of just under 2 movements a day).

There is already concern within the Crescent Beach community regarding emergency access and regular access to the community being blocked due to trains on the BNSF railway. As mentioned above, Crescent Road is the only road connection to the Crescent Beach community. Although a “stopped train” protocol has been implemented with the BNSF through the Crescent Beach area, even when trains don’t stop they can cause extended blockages at Crescent Road due to speed restrictions on the railway trestle that crosses Mud Bay.

FSD has advised that it is expecting trains to arrive at the Facility between 12:00 a.m. and 6:00 a.m. and depart between 5:00 p.m. and 10:00 p.m. thereby minimizing the likelihood for delays at rail crossings in Surrey during normal higher road traffic periods.

2. *Coal Dust*  
Members of the community have raised concern with the potential for the coal on the trains to shed coal dust due to wind turbulence that occurs as the trains move through Surrey and that the coal dust could have health, environmental and aesthetic impacts on the residents and properties located along the railway.
3. *Noise*  
Additional train traffic will result in additional noise caused by the engines pulling the trains, the wheel noise of the train cars and the whistle noise at road crossings.

***B. Concerns Related to the Transfer of Coal from Rail Cars to Barges at the FSD Facility***

1. *Coal Dust*  
Members of the community have raised concern with the potential for the transfer operation to cause coal dust that will be blown into the adjacent communities and which could cause health, environmental and aesthetic impacts on the residents and properties in these communities.
2. *Noise*  
There is concern that the additional train traffic and the transferring of coal at the Facility will cause noise that will be a disturbance to those that work and/or live in the vicinity of the Facility. The City has experienced receiving complaints from residents in the area of the FSD in the past in relation to materials being handled at the FSD such as the moving of steel that has been handled at FSD.



3. Safety

There is concern that the storing of and transfer of coal at the Facility could be dangerous in relation to potential fires in view of the volatility of coal as a fuel.

### **Economic Development Interests**

The City of Surrey is interested, subject to all stakeholder interests being reasonably addressed, in ensuring that the Fraser Surrey Dock Facility is used to its maximum potential so as to assist in ensuring a vibrant and sustainable economy in our City and the Region. It is recognized that port-related jobs are relatively high value jobs and therefore are good for the broader economy.

### **Public Consultation**

PMV representatives and FSD representatives have met with City staff and have made presentations to each of the Environmental Advisory Committee (EAC) and the Transportation and Infrastructure Committee (TIC).

The EAC has resolved to advise Council as follows:

“that Council be made aware of the community and Environmental Advisory Committee concerns of coal dust and train noise when considering the Coal Transfer Facility proposal from the Fraser Surrey Dock Ltd. Partnership.”

The TIC did not pass a formal resolution but the comments in this report generally reflect the comments that were made by the Committee.

PMV representatives and FSD representatives have also met with the Crescent Beach Property Owners Association, the Corporation of Delta and the City of New Westminister. The concerns that are listed in the previous sections of this report are consistent with those raised during these other consultations.

### **CONCLUSION**

Based on the above discussion, it is recommended that Council instruct the City Clerk to forward a copy of this report and the related Council resolution to Port Metro Vancouver (PMV) and the Fraser Surrey Docks (FSD) as the City’s comments on the application by FSD to PMV to install and operate a Direct Transfer Coal Facility at Fraser Surrey Docks and include in such communication a request that PMV address the concerns listed in this report in the application review process.

*Original signed by*  
Jean Lamontagne  
General Manager,  
Planning & Development

*Original signed by*  
Vincent Lalonde, P.Eng.  
General Manager,  
Engineering

JB/JA/brb

## **Information regarding Coal Transfer Facility Proposals in the United States**

Over the past few years, there have been as many as six coal transfer projects being considered in Washington and Oregon State.

Plans for one coal transfer project in Washington and two in Oregon were recently withdrawn by the applicants. They are as follows:

- Grays Harbor at Hoquiam, Washington, in August 2011;
- Port of Coos Bay in Coos Bay, Oregon, in April 2013; and
- Port Westward at the Port of St. Helens in Columbia City, Oregon, in May 2013.

Currently there are two active applications for coal transfer projects being considered in Washington and one in Oregon. They are as follows:

- Gateway Pacific Terminal at Cherry Point, Washington;
- Millennium Bulk Terminals – Longview, Washington; and
- Coyote Island Terminals, Oregon.

### ***Gateway Pacific Terminal at Cherry Point – State of Washington***

Pacific International Terminals, a subsidiary of SSA Marine, has proposed building a new deep-water marine terminal at Cherry Point in Whatcom County, which is approximately 15 km south of the Surrey / Washington State border.

The proposed Gateway Pacific Terminal would handle import and export of up to 54 million metric tonnes per year of bulk commodities, mostly exporting coal. In a related project, Burlington Northern Sante Fe (BNSF) Railway Inc. has proposed adding rail facilities adjacent to the terminal site and installing a short segment of new track.

### ***Millennium Bulk Terminals - Longview – State of Washington***

Millennium Bulk Terminals – Longview, LLC, with members Ambre Energy North America and Arch Coal, has submitted an application for a proposed coal export terminal at the site of the former Reynolds Aluminum smelter, in Cowlitz County, which is approximately 400 km south of the Surrey / Washington State border. The terminal would export up to 44 million metric tons of coal annually.

### ***Coyote Island Terminals – State of Oregon***

Ambre Energy subsidiary Coyote Island Terminals, LLC, has applied to Portland District for a Department of the Army permit to build a new coal transfer facility at the Port of Morrow on the Columbia River near Boardman, Oregon, which is approximately 600 km south of the Surrey / Washington State border. The terminal would export up to 8 million metric tons of coal annually.

## **Environmental Reviews of the Proposed Projects**

Unlike the proposed Facility by FSD, each of the proposed projects being considered in Washington and Oregon requires a new terminal (dock) to be constructed at each location. As a result, each application must go through a significant application process.

The U.S. Army Corps of Engineers (USACE) are the permitting agency on all three projects, and as part of their application process they coordinate the environmental reviews under the National Environmental Policy Act (NEPA) and applicable local and state legislation.

Each environmental assessment includes consultation with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service to determine the project's potential impacts to species listed under the Endangered Species Act. Should any significant impacts be identified, a more rigorous environmental impact statement (EIS) is required. The EIS provides the public and agency decision makers with information on likely environmental impacts, including human health effects related to the construction and operation of the projects, as well as reasonable alternatives and measures to reduce those effects.

Environmental assessments have been completed for both the Gateway Pacific Terminal at Cherry Point and the Millennium Bulk Terminals – Longview and each assessment concluded that significant impacts are likely from each of the proposed projects, and therefore, each project must complete an EIS.

The Gateway Pacific Terminal at Cherry Point EIS process started in September 2012 with scoping, which included inviting the public, local agencies, and local governments to comment on what should be covered in the EIS. Approximately 125,000 comments were collected through this process, and were used to prepare the terms of reference for the EIS. A consultant has just been selected to complete the EIS, and it is expected to be completed in 2014 or 2015.

The Millennium Bulk Terminals - Longview EIS is just starting, with scoping just commencing. Public consultation has to take place, and USACE staff were unable to provide a timeline on when the EIS is expected to be completed.

The USACE are currently conducting their environmental assessment of Coyote Island Terminals, and have yet to determine if an EIS will be required. The environmental assessment is currently underway, and a 60-day public consultation process completed in April 2012 received approximately 20,000 comments. USACE staff were unable to provide a timeline on when the environmental assessment will be completed, and when an EIS would start if deemed necessary.



PORT METRO  
vancouver

May 13, 2013

VIA E-MAIL & COURIER

Jean Lamontagne  
General Manager  
Planning & Development  
City of Surrey  
14245 - 56 Avenue  
Surrey, BC V3X 3A2

Dear Mr. Lamontagne:

**Re: Application to Port Metro Vancouver by Fraser Surrey Docks for Proposed Direct Transfer Coal Facility at 11060 Elevator Road, Surrey, V3V 2R7**

Port Metro Vancouver (PMV) is currently reviewing an application by Fraser Surrey Docks (FSD) to develop a Direct Transfer Coal Facility for handling up to 4 million metric tonnes of coal (PP, 2012-072).

In response to municipal and community interest for more public consultation on this project, PMV has required FSD to conduct further consultation activities on the project and to provide opportunities for public, stakeholder and First Nation review and comment on their proposed mitigation strategies.

As part of this second phase of consultation, we wish to notify you that FSD will be hosting two open houses at the Sheraton Vancouver Guildford Hotel in Surrey on May 23 and May 25, 2013. Details are below should City representatives or staff wish to attend:

**Sheraton Vancouver Guildford Hotel  
15269 104 Avenue Surrey, BC  
Thursday, May 23rd, 5:30 pm to 8:30 pm  
Saturday, May 25th, 1:00 pm to 4:00 pm**

FSD representatives, along with their rail and marine logistic providers, BNSF and Lafarge, will be on hand to answer questions. PMV staff will be attending the open houses as observers and to answer questions about the PMV's Project Permit and Environmental Assessment process.

Enclosed are copies of FSD's consultation materials for your review and comment. The enclosed materials include the following:

- FSD Updated Drawings and Plans
- FSD Draft Air Quality Management Plan
- FSD Draft Mitigation Summary Table
- FSD Open House Discussion Guide and Feedback Form

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100 The Pointe, 999 Canada Place, Vancouver, B.C. Canada V6C 3T4

100 The Pointe, 999 Canada Place, Vancouver, C.-B. Canada V6C 3T4

portmetrovancover.com

These materials are also available for public viewing on FSD's website:  
<http://www.fsd.bc.ca/index.php/company/community-outreach/>

For additional information about the project, please visit our website at:  
[http://portmetrovancover.com/en/projects/OngoingProjects/Tenant-Led Projects/FraserSurreyDocks.aspx](http://portmetrovancover.com/en/projects/OngoingProjects/Tenant-Led%20Projects/FraserSurreyDocks.aspx)

Should the City wish to provide comments on this phase of the project, we would appreciate your submission by **June 17, 2013**.

Should you have any questions or would like to arrange a meeting to discuss this project further, please give me a call at (604) 665-9129 or email:  
[lilian.chau@portmetrovancover.com](mailto:lilian.chau@portmetrovancover.com).

Sincerely,



PORT METRO VANCOUVER

Lilian Chau  
Senior Planner

- Encl: FSD Updated Drawings and Plans  
FSD Draft Air Quality Management Plan  
FSD Draft Mitigation Summary Table  
FSD Open House Discussion Guide and Feedback Form
- CC: Mayor Watts & Members of Council, City of Surrey  
Vincent Lalonde, General Manager, Engineering, City of Surrey  
Jeff Scott, President & CEO, Fraser Surrey Docks  
Jurgen Franke, Director, Engineering & Maintenance, Fraser Surrey Docks  
Greg Yeomans, Manager, Planning & Development, PMV

## Items that need to be Addressed in Relation to the City's Infrastructure

### *Stormwater and Sanitary Sewer*

- A stormwater management plan needs to be prepared, as it is unclear as to the capacity for which the detention ponds are sized and what rainfall event it can manage. Any plan must clearly identify the location of all stormwater discharge points.
- Stormwater is not permitted to be discharged to the City's sanitary sewer system. Surrey's *Sanitary Sewer Regulation and Charges By-law, 2008, No. 16611*, states that:

"No person may discharge or continue to allow to be discharged into a *building sanitary sewer* or the *sanitary sewerage system* any *stormwater* or permit any *groundwater* infiltration." as it results in added costs resulting from the unnecessary conveyance and treatment.

The discharge of stormwater and groundwater to the City's sanitary sewer system can increase the frequency and duration of sanitary sewer overflows, which have recently occurred along Metro Vancouver's system in this area.

- A Waste Discharge Permit is required from Metro Vancouver in order to discharge a high volume, stormwater, uncontaminated water or water or any substance for the purpose of diluting any Non-Domestic Waste to the City's sanitary sewer system,

### *Water*

- A water use plan needs to be prepared that details the projected water use from the dust control system.
- The proposed dust control system may negatively impact the City's ability to supply water to the surrounding area. All water necessary to service the Proposed Direct Transfer Coal Facility and its dust control system must be solely obtained from the Metro Vancouver connection.
- All connections to the City's or Metro Vancouver's water system will require a water meter and the appropriate backflow prevention device.