

## **PUBLIC NOTICE**

### **NORTHWEST CLEAN AIR AGENCY**

#### **DRAFT REVISED ORDER OF APPROVAL TO CONSTRUCT**

NOTICE IS HEREBY given that the Northwest Clean Air Agency (NWCAA) will take action on and seeks comments on a draft Revision to an Order of Approval to Construct (OAC) for the following facility and its existing equipment:

**Trans Mountain Pipeline (Puget Sound) - Laurel Station  
1009 E Smith Road  
Bellingham, WA 98226**

**Project Description:** The revision changes how Trans Mountain Pipeline calculates air emissions of volatile organic compounds (VOCs) from usage of two (2) existing breakout tanks that store crude oil. Instead of tracking the volume of crude stored in the breakout tanks, a surrogate for calculating VOC emissions, Trans Mountain Pipeline will perform monthly VOC emission calculations.

No new equipment, and no physical changes to the existing equipment, are being approved. The amount of air emissions (VOCs) will not increase above the amount that Trans Mountain Pipeline applied for in 2007 when the facility permitted the construction of the breakout tanks.

Trans Mountain Pipeline also requested, and NWCAA is proposing to approve, submission of monitoring reports to the Environmental Protection Agency's online portal instead of requiring paper submittal.

**Public Review:** Interested parties may view the draft revised OAC and associated technical support documents on the NWCAA's website, <http://www.nwcleanair.org/publicNotices/publicNotices.htm>. Documents are also available Monday through Friday between 8:00 am and 4:30 pm at the following location:

**Northwest Clean Air Agency  
1600 South Second Street  
Mount Vernon, WA 98273**

**Public Comment Period:** All persons, including the applicant, may submit verbal comments during the public comment period for the administrative record on this preliminary determination.

The NWCAA will accept comments until the close of business May 7, 2026. All persons, including the applicant, must raise all issues and submit all arguments supporting their position by the end of the comment period. The NWCAA cannot incorporate any supporting materials by reference unless they are already part of the administrative record in the same proceeding, or are generally available reference material.

**Final Determination:** The NWCAA will send copies of the final determination on the proposed project to all persons who submit comments and have provided a mailing address. The final determination will also be available for review at the NWCAA.

**Appealing Decisions:** Within 30 calendar days following the NWCAA's final determination on this matter, any person may petition the Washington State Pollution Control Hearings Board (PCHB) to review any condition of that decision (Chapter 371-08 WAC, and Chapter 43.21B RCW). Please see <http://www.eluho.wa.gov/Board/PCHB> for details regarding the appeal procedures.

For more information regarding this proposed project or the agency's preliminary permit determination, please call Crystal Rau at 360-419-6771 or e-mail [crystalr@nwcleanairwa.gov](mailto:crystalr@nwcleanairwa.gov).

Published April 6, 2026

Original Issuance: November 14, 2007

Revision a: January 9, 2020

Revision b: Withdrawn

Revision c: TBD

**Northwest Clean Air Agency (NWCAA) hereby issues  
Order of Approval to Construct (OAC) 1002c DRAFT**

**Project Summary:** Operation of an existing crude oil pipeline breakout station.

Current project allows demonstration of compliance by performing 12-month rolling total VOC emission calculations from use of two internal floating roof breakout tanks, tanks #170 & #180 and fugitive equipment leaks. This revision also updates the LDAR reporting requirements allowing submittal of semiannual LDAR reports to EPA directly through the CEDRI website or to NWCAA.

**Approved Emission Units:**

- (2) 100,000 barrel (4,200,000 gallon) above ground breakout tanks controlled with internal floating roofs with primary and secondary seals.
- (1) 324 hp diesel powered emergency generator engine
- (1) 71 hp diesel emergency firewater pump engine
- (3) electric pumps with associated piping, valves and pressure relief devices

<b>Owner/Operator</b>	<b>Facility Name and Location</b>
Trans Mountain Pipeline (Puget Sound) LLC Suite 2700 300 5 <sup>th</sup> Avenue SW Calgary AB T2P 5J2 Contact: Brooke Coburn, Senior Environmental Advisor	Laurel Station Trans Mountain Pipeline (Puget Sound) LLP 1009 E Smith Road Bellingham, WA 98226

**Permit History**

- As of the date of issuance, this Order supersedes OAC 1002a issued January 9, 2020.

Note that in addition to other applicable rules and regulations, the approved emission units are subject to applicable portions of the following federal regulations:

**New Source Performance Standards (NSPS)**

- 40 CFR 60 Subpart A - General Provisions
- 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction or Modification Commenced after July 23, 1984.

- 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

**Issuance of this Order is authorized by Northwest Clean Air Agency Regulation Section 300. The Owner/Operator must comply with the following restrictions and conditions<sup>1</sup>:**

**Internal Floating Roof Tanks #170 and #180**

- (1) The true vapor pressure (TVP) of products stored shall not exceed 11.1 psia at any time. Keep Safety Data Sheets (SDS) for each stored product. These records shall include Reid vapor pressure (RVP), which shall be used in the absence of more specific information (e.g. lab testing), to determine the TVP of stored.
- (2) Install a temperature measurement device, such as a resistance temperature detector (RTD) or a thermocouple in each tank to monitor the temperature of stored products. Record temperatures on an hourly basis and shall be used to calculate the maximum TVP of each product stored over its storage period.

**Fugitive Equipment Leaks**

- (3) Pump station equipment including pumps, valves and pressure relief devices shall be monitored for fugitive leaks and repaired in accordance with §60.481 through §60.487 of 40 CFR 60 Subpart VV - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry, with the following modification:
  - (A) Use the following leak definitions for instrument monitoring:
    - (1) 500 ppm for valves
    - (2) 2,000 ppm for pumps
- (4) Submit semiannual leak detection and repair (LDAR) reports to NWCAA or through CEDRI using the appropriate electronic template on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>). Submit reports by August 1 for monitoring during the period of January 1 – June 30, and by February 1 for the monitoring during the period of July 1 – December 31.

**Emergency Generator Engine**

- (5) The emergency generator engine shall combust only ultra-low sulfur diesel (ULSD). Demonstrate compliance by retaining fuel purchase records as per condition (10) of this OAC.

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<sup>1</sup> Nothing in this permit is intended to, or shall, alter or waive any applicable law [including but not limited to defenses, entitlements, challenges or clarifications related to the Credible Evidence Rule, 62 FR 8315 (Feb. 27, 1997)] concerning the use of data for any purpose under the Act, generated by the reference method specified herein or otherwise.

Pursuant to Section 300.10 of the NWCAA Regulation and ch 43.21B RCW, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon the NWCAA within 30 days of the date the applicant receives this Order. Additional information regarding appeal procedures can be found at: <http://www.eluho.wa.gov/> under PCHB.

- (6) The emergency generator shall not exceed five hundred (500) operating hours in any calendar year. The generator shall be equipped with a non-resettable meter that records cumulative operating hours. Keep records of the number of hours the generator runs during each calendar year.
- (7) A written operation and maintenance (O & M) manual shall be kept up to date that includes methods to ensure that the generator is operated and maintained in a manner consistent with good air pollution control practices. Operate and maintain the generator in a manner consistent with the O & M manual.
- (8) Visual emissions from the generator shall not exceed ten percent (10%) opacity for more than an aggregate of three minutes in any sixty-minute period as determined by Washington State Department of Ecology Method 9A. Emissions during the initial five minutes of operation during cold startups are exempt from this limit.

**Facility-Wide**

- (9) Limit total emissions of VOC to less than 23 tons per year (20.9 metric tons), combined, from Tanks 170 and 180, and from fugitive equipment leaks, combined, during any 12-month rolling period.
- (10) Within 30 days after the end of each calendar month, for that month and the previous 12-month period, calculate total VOC emissions from:
  - (A) Both breakout tanks using EPA TANKS Version 5.1 (or more recent version) software, or other software approved in advance by NWCAA to account for working losses and standing losses, from using both tanks, plus
  - (B) Fugitive equipment components using EPA AP-42 emission factors, or site-specific emission factors, if approved in advance by NWCAA.Report total VOC emissions annually to NWCAA, in accordance with NWCAA Section 320.2.
- (11) Retain records required by this order for no less than five years from the date of generation, readily available for inspection by NWCAA personnel.

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Crystal Rau  
Air Quality Scientist

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Agata McIntyre, P.E.  
Engineering Manager

Revision a: Removed redundant and completed, therefore no longer applicable, conditions. Updated language. Removed requirement for fuel analysis because USLD has a standard that

meets the sulfur standard requirement. Removed quarterly LDAR monitoring requirement to align conditions with those referenced in 40 CFR 60 subpart VV's monitoring program. Updated records retention requirement to include electronic files.

Revision b: Withdrawn.

Revision c: Allow different compliance demonstration (VOC emission calculations instead of crude throughput) for both breakout tanks and fugitive equipment leaks. Allows semiannual LDAR reports to be submitted directly to EPA via CEDRI website or to NWCAA.

DRAFT



1600 South Second Street  
Mount Vernon, WA 98273-5202  
ph 360-428-1617

# Notice of Construction Technical Worksheet

NOC No. <b>1002c</b>	Source: Laurel Station – Trans Mountain Pipeline (Puget Sound) LLC 1009 E Smith Road Bellingham, WA 98226 NOC Contact: Brooke Coburn, Trans Mountain Pipeline Application: Tegan Conner, ALL4
Permit Engineer: <b>Crystal Rau</b>	
NOC Received: <b>June 27, 2025</b>	NWCAA No.: 1430

## A. Project Description

Trans Mountain Pipeline – Laurel Station has requested a revision to OAC 1002a to change how they track VOC emissions from the two existing 100,000 barrel (4.2 million gallon) tanks previously approved under OAC 1002. OAC 1002 was written with a simplified tracking method (crude throughput as a surrogate for VOC) instead of requiring monthly VOC emissions calculations. This revision will change the tracking method to require monthly VOC emission calculations.

In 2007 Trans Mountain submitted an application (OAC 1002) to NWCAA and SEPA checklist to Whatcom County. The application identified “modifications proposed for Laurel Station facility are a part of Trans Mountain Pipeline’s Puget Sound Reactivation (PSR) Project to increase its Puget Sound pipeline system crude oil throughput capacity”. To increase the system capacity, Trans Mountain was proposing to install new crude oil pumps and re-activate existing crude oil breakout tanks at Laurel Station.

Both the application and SEPA checklist identified potential emission increases from the combination of changes to the two tanks and pipes and components that carry crude oil at Laurel Station of 23.0 tons per year VOC, as well as toxic air pollutants (TAPs) which make up a portion of the 23.0 tons/yr of VOC. Only the tanks required a NWCAA permit as the pumps themselves had no air emissions and NWCAA only permits equipment that emits air pollution.

NWCAA regulations require that emission increases from a proposed project be compared to numerous thresholds, including the air toxics thresholds (aka ASILs) in WAC 173-460. Emissions must be below all applicable thresholds for the permit to be approved. The application included this comparison based on 23 tons of VOC and the corresponding air toxics that make up the 23 tons/yr of VOC. NWCAA re-calculated emissions using different emission factors and also compared these re-calculated emissions to all applicable thresholds. In both the facility’s application and NWCAA’s re-calculation, emissions were below all applicable thresholds.

NWCAA issued OAC 1002 on Nov. 14, 2007 after Whatcom County issued a SEPA MDNS on June 31, 2007 (SEP2007-00065). The MDNS did not include any air related-conditions nor any conditions related to pipeline or tank throughput.

Trans Mountain submits annual emission inventories to NWCAA. These inventories take into account all of the actual operating variables the facility encounters. Based on actual

operation, some reported emissions since 2007 have exceeded the NWCAA re-calculated VOC emission estimate but remained well below the 23 tons/yr VOC emission estimate in the application. This is not entirely unexpected as emissions factors and the tools used to perform emission calculations for permit applications are estimates that change over time and may (or may not) account for all of the real-world parameters that influence actual emissions.

Up until 2024, the reported throughput of the Laurel Station tanks remained below the  $7.65 \times 10^8$  gal/yr limit written Condition 3 of OAC 1002. In 2024, Laurel Station exceeded the throughput limit in Condition 3 while reporting actual emissions of 6.1 tons/yr VOC for 2024.

NWCAA authorizes facilities to operate equipment that emits air pollution. It does not authorize throughput. In 2007, Trans Mountain could have requested a VOC limit instead of a surrogate limit based on throughput. They are doing so now.

In summary, Trans Mountain's current request (OAC 1002c) does not involve any physical changes to equipment, any new equipment, nor any increases in air emissions above those applied for and evaluated in 2007 under OAC 1002. It is simply a change in how VOC emissions from the existing tanks are tracked to ensure compliance with the emissions reviewed in the project proposal. This will allow Laurel Station to fully utilize the emission increase requested in the original application materials reviewed by NWCAA when the pump and breakout tanks were upgraded, including:

- Calculation of VOC emissions from usage of both tanks plus fugitive equipment leaks from piping to ensure VOC emissions remain less than 23 tons per year (20.9 metric tons), and
- Allow semiannual LDAR reporting to align with CEDRI semiannual reporting requirements incorporated into 40 CFR 60 Subpart VV or to NWCAA.

As this change in compliance demonstration methodology and updates to the semiannual LDAR reporting requirements result in no physical changes at the site, nor is there an increase in emissions from the original project reviewed, NWCAA has determined that this request represents an administrative revision of OAC 1002a.

## **B. New Source Review (NSR) Fees**

NWCAA NSR fees have been assessed in accordance with the NWCAA fee schedule. The NSR fees assessed and amount paid are listed in the NSR Fee Worksheet kept in the electronic folder for this project.

## **C. Public Notice**

In accordance with NWCAA Section 305.1, an internet notice that the NWCAA received this NOC application and/or OAC revision request was posted on the NWCAA website for a minimum of 15 consecutive days ending on July 24, 2025. On July 18, 2025 a public comment period and public hearing were requested, but the request was withdrawn July 24, 2025. Additional requests for a public comment period were made July 22<sup>nd</sup> and July 24<sup>th</sup>.

A public comment period was held \_\_\_\_\_ as requested ----

**NOTE: – If a permit goes through public comment (that's the full 30-day comment, not our 15-day notice of application receipt), the permit writer needs to send draft and final docs to**

[R10\\_Air\\_Permits@epa.gov](mailto:R10_Air_Permits@epa.gov). This includes all NSR that went through 30-day public comment, regardless of the reason. In addition, if the permit action is a synthetic minor, the permit writer needs to notify in the WA Permit Register (<https://ecology.wa.gov/regulations-permits/permits-certifications/air-quality-permits/air-operating-permits/permit-register-entry-form>).

## **D. SEPA Review**

State Environmental Policy Act (SEPA) review under NWCAA Section 155 is addressed as follows.

The original project's environmental checklist was reviewed and a mitigated determination of non-significance (MDNS) issued by Whatcom County Planning and Development Services on June 31, 2007 (this is the date listed on the document, though from context, it appears the MDNS was actually signed July 31, 2007). NWCAA has thoroughly reviewed the impacts from the proposed changes to permit approval conditions resulting from this request and has determined that the proposed changes are within the scope of the original project. Accordingly, following Washington Department of Ecology's guidance and WAC 197-11-600(3), NWCAA will rely on the existing MDNS issued by Whatcom County Planning in 2007 unchanged.

While not necessary to its SEPA review, NWCAA also has determined:

- The original documents meet our environmental standards and cover this current proposal,
- There are no proposed physical modifications to any equipment at the facility necessary to accommodate the proposed change to permit conditions, and
- The current proposal will not have any additional probable significant adverse impact on the environment beyond those previously disclosed in 2007.

The MDNS and the relied upon SEPA documents are included in the original NOC file.

## **E. Permit History**

Trans Mountain Pipeline (Puget Sound) submitted an NOC application to upgrade an existing crude oil pipeline pump and breakout station at Laurel Station in May 2007. OAC 1002, issued November 14, 2007, approved modification and reactivation of two 100,000 barrel (4,200,000 gallon) storage tanks to domed external floating roofs with primary and secondary seals, installation of a 369 hp diesel powered emergency generator, a 369 hp diesel powered emergency firewater pump, and the addition of three new pipeline pumps with piping.

OAC 1002a was revised January 9, 2020 to remove redundant/completed requirements that were no longer applicable; updated permit language; removed fuel analysis requirement; removed quarterly LDAR monitoring requirement to align with 40 CFR 60 Subpart VV's monitoring program; and updated records retention requirement to include electronic files.

Trans Mountain Pipeline submitted a request to revise OAC 1002a on May 6, 2025. The revision request included changes to the crude oil breakout tank throughput demonstration and future (3+ years in the future) replacement of the pipeline pumps. NWCAA OACs require the construction of the approved project within 18 months of receiving approval from NWCAA. As construction of the replacement pumps was expected to be more than 3 years from the approval of the requested revision, Trans Mountain Pipeline withdrew the OAC 1002b application (May 29, 2025).

## **F. Basis for New Source Review Applicability**

N/A, administrative revision.

## **G. Criteria Air Pollutant Emissions and Impacts**

N/A, administrative revision.

## **H. Toxic Air Pollutant Emissions and Impacts**

N/A, administrative revision.

## **I. NWCAA Compliance Database (Stratus)**

The **NWCAA Stratus database has been updated** to include the emission unit(s) approved by this OAC.

## **J. Confidential Business Information (CBI)**

The NOC application does not contain any information deemed by the applicant to be CBI.

## **K. Applicable/Inapplicable Regulations**

N/A

## **L. Modified OAC Conditions**

Deleted Condition 3

Renumbered Conditions

Modified Condition 4

Submit semiannual leak detection and repair (LDAR) reports to NWCAA or through [CEDRI using the appropriate electronic template on the CEDRI website \(https://www.epa.gov/electronic-reporting-air-emissions/cedri\)](https://www.epa.gov/electronic-reporting-air-emissions/cedri) ~~NWCAA on the enclosed "VOC Leak Detection and Repair Program, Semiannual Report" form.~~ Submit reports by August 1 for monitoring during the period of January 1 – June 30, and by February 1 for the monitoring during the period of July 1 – December 31.

New Condition 9

Limit total emissions of VOC to less than 23 tons per year (20.9 metric tons), combined, from Tanks 170 and 180, and from fugitive equipment leaks, combined, during any 12-month rolling period.

New Condition 10

Within 30 days after the end of each calendar month, for that month and the previous 12-month period, calculate total VOC emissions from:

- (A) Both breakout tanks using EPA TANKS Version 5.1 (or more recent version) software, or other software approved in advance by NWCAA to account for working losses and standing losses, from using both tanks, plus
- (B) Fugitive equipment components using EPA AP-42 emission factors, or site-specific emission factors, if approved in advance by NWCAA.

Report total VOC emissions annually to NWCAA, in accordance with NWCAA Section 320.2.

**M. Correspondence**

1/23/2026 - 2/3/26 Call Matthew Ducharme, TMP & Svend Brandt-Erichsen, NWCAA  
Discussion about switching request for OAC revision from a breakout tank volume throughput change used to demonstrate that usage of the tanks meets the original project

specifications to an emission calculation, performed monthly, to demonstrate that emissions meet the original project specifications.

12/2/25 Email re: future project (2-5 years) project to increase Puget Sound pipeline throughput from Lovell Pratt, FOSJ to Crystal Rau and Agata McIntyre, NWCAA

9/23/25 Email re: status of permit application to Magali Cota, FOSJ from Agata McIntyre, NWCAA

9/3/25 - 9/19/25 Emailed Brooke Coburn for background info on environmental documents for Canadian pipeline expansion

7/10/25 Email requests for copy of application from Lovel Pratt, FOSJ; Carl Weimer, PS Trust

7/18/25 Email request for copy of application, public comment period & public hearing from Eddy Ury, RE Sources followed by request on 7/24/25 for technical support document & withdrawal of request for public hearing

7/23/25 Email request for a public comment period from Lovel Pratt, FOSJ

7/24/25 Email request for public comment period from Keith Curl-Dove, WA Conservation Action

7/31/25 Email request for additional information to Brooke Coburn & Katherine Bibby, TMP-PS LS; Response received 8/5/25

8/15/25 – Telephone conference with FOSJ staff (Lovel Pratt, Magali Cota & Kristen Kane) & NWCAA (Agata McIntyre & myself) project details

8/19/25 – Telephone call with Brooke Coburn, TMP-PS LS re: SEPA



**WHATCOM COUNTY  
PLANNING &  
DEVELOPMENT SERVICES**  
5280 Northwest Drive  
Bellingham, WA 98226



**J.E. "Sam" Ryan, C.B.O.**  
Interim Director

**Robert C. Martin, A.I.C.P.**  
Land Use & Natural Resources  
Division Manager

**MITIGATED DETERMINATION OF NONSIGNIFICANCE (MDNS)**

**File:** SEP2007-00065

**Project Description:** Modifications and improvements for the reactivation of the Laurel Station

**Proponent:** Trans Mountain Pipeline (Puget Sound) LLC

**Location:** APN# 390333-168480, 390333-237410, 390333-167408, located at 1009 East Smith Road Bellingham, WA

**Lead Agency:** Whatcom County Planning and Development Services

**Zoning:** R5A **Comp Plan:** Rural

The lead agency for this proposal has determined that with proper mitigation, no significant adverse environmental impacts are likely. Pursuant to RCW 43.21C.030(2)(c), an environmental impact statement (EIS) is not required. This decision was made following review of a completed SEPA environmental checklist and other information on file with the lead agency. This information is available to the public on request.

There is no comment period for this MDNS.

Pursuant to WAC 197-11-340(2), the lead agency will not act on this proposal for 14 days from the date of issuance indicated below. Comments must be received by August 14, 2007 and should be sent to:

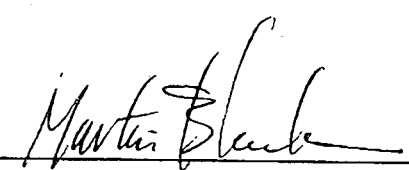
**Responsible Official:** Martin Blackman, AICP

**Title:** Land Use Supervisor - SEPA

**Telephone:** 360.676.6907

**Address:** 5280 Northwest Drive  
Bellingham, WA 98226

**Date of Issuance:** June 31, 2007

**Signature:** 

An aggrieved agency or person may appeal this determination to the Whatcom County Hearing Examiner. Application for appeal must be filed on a form provided by and submitted to the Whatcom County Land Use Division located at 5280 Northwest Drive, Bellingham, WA 98226, no later than the end of the business day on August 24, 2007.

You should be prepared to make a specific factual objection. Contact Whatcom County Land Use Division for information about the procedures for SEPA appeals.



**WHATCOM COUNTY**  
**PLANNING &**  
**DEVELOPMENT SERVICES**  
5280 Northwest Drive  
Bellingham, WA 98226

**J. E. "Sam" Ryan, CBO**  
Interim Director  
**Robert C. Martin, AICP**  
Land Use & Natural Resource Division  
Manager

**SEPA 2007-00065**  
**Trans Mountain Pipeline-1009 East Smith Road**  
**Mitigated Determination of Non-significance (MDNS)**

**Mitigating Conditions:**

In addition to conditions of any associated permits to be issued by Whatcom County, the following SEPA mitigating conditions shall be done to ensure avoiding otherwise probable significant environmental impacts.

1. Prior to permit issuance, applicant will obtain an NPDES Permit from the Washington State Department of Ecology.
2. During construction, best management practices will be used.

These include but are not limited to the following:

- A. Impacts of on-site development activities to be minimized through watering of exposed soils as needed to control dust, and
  - B. Stormwater discharge will be minimized.
3. Construction hours to be limited to weekdays from 7 AM to 6 PM.

**WHATCOM COUNTY  
PLANNING &  
DEVELOPMENT SERVICES**  
5280 Northwest Drive  
Bellingham, WA 98226



**J.E. "Sam" Ryan, C.B.O.**  
Interim Director  
**Robert C. Martin, A.I.C.P.**  
Land Use & Natural Resource  
Division Manager

**Distribution List – SEP2007-00065**

Please review this determination. If you have further comments, questions or would like a copy of the SEPA checklist, phone the responsible official at (360) 676-6907. Please submit your response by the comment date noted on the attached notice of determination.

SEPA UNIT, WA State Department of Ecology, Olympia

SEPA REVIEW, WA State Department of Ecology, Bellingham

Northwest Clean Air Agency

WA Dept of Archaeology & Historic Preservation

Whatcom County Fire District #4

Nooksack Tribe

Lummi Tribe

Trans Mountain Pipeline (Applicant)  
Agent/Rep: Pete Hellstrom, Anvil Corporation



Whatcom County Planning & Development Services  
5280 Northwest Drive, Bellingham, WA 98226  
Tel. 360-676-6907 / Fax 360-738-2525

# FAX

## Transmittal Cover Sheet

To: Dan Mahar NWCAA

Fax #: (360)428-1620

From: Martin Blackman

Date: 8/2/07

Subject: Trans Mt. Pipeline SEPA

# of Pages 22 (including cover sheet)

Client requested that we send you copy  
of threshold determinations, You may  
have already received this but I am  
including the SEPA checklist as well

**WHATCOM COUNTY  
PLANNING &  
DEVELOPMENT SERVICES**  
5280 Northwest Drive  
Bellingham, WA 98226 Manager



**Hal H. Hart, A.I.C.P.**  
Director  
**Robert C. Martin, A.I.C.P.**  
Land Use & Natural Resource Division

**WHATCOM COUNTY PLANNING AND DEVELOPMENT SERVICES  
LAND USE DIVISION**

**SEPA ENVIRONMENTAL CHECKLIST**

**MAY 4 2007**

*JCB*

**RECEIVED**

*Purpose of checklist:*

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

*Instructions for applicants:*

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

*Use of checklist for nonproject proposals:*

Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

(Updated 8/7/2006)

TO BE COMPLETED  
BY APPLICANT

EVALUATION FOR  
AGENCY USE ONLY

**A. BACKGROUND**

1. Name of proposed project, if applicable: Laurel Station Reactivation

2. Name of applicant: Trans Mountain Pipeline (Puget Sound) LLC

3. Address and phone number of applicant and contact person:

Rob Hadden, Project Manager  
7815 Shellmont Street  
Burnaby, BC, Canada  
V5A 4S9  
(604) 268-3000  
Fax (604) 238-3001

Patrick Davis (on-site contact)  
1009 East Smith  
Bellingham, WA 98226  
(360) 398-1541  
Fax (360) 398-7432

4. Date checklist prepared: May 2, 2007

5. Agency requesting checklist:

Whatcom County, NWCAA, Ecology

6. Proposed timing or schedule (including phasing, if applicable):

Start Date: October 2007 Completion Date: September 2008

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Soils Analysis and Geotechnical Report  
Wetlands Assessment Report  
Air Quality Emission Calculations

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Associated but separate permitting and construction action by Puget Sound Energy (PSE) will upgrade the electrical power from 12 kV to 115 kV feed. The line will connect to the new PSE Substation shown on the drawing UL00-SK-BE9333-CD-0013.

08/02/2007 13:29 FAX 360 738 2525

WHATCOM COUNTY PDS

☑ 004/019

TO BE COMPLETED  
BY APPLICANTEVALUATION FOR  
AGENCY USE ONLY

10. List any government approvals or permits that will be needed for your proposal, if known.

Fill & Grade Permit – Whatcom County  
SEPA checklist – Whatcom County  
Building Permit – Whatcom County  
Notice of Construction (Air) – NWCAA  
Construction NOI & NPDES -SWPPP - Whatcom County and Ecology

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

After completion of planned modifications and improvements to the facility the Laurel Station will have greater pipeline operational flexibility and pumping throughput capacity. Station reactivation includes a main pipeline backflow check valve, reinstallation of pumps (2 shipping & 1 booster), tank storage capacity for light and heavy crude and new buildings. When all work is completed, the Station will have the flexibility to split the pipeline stream to either of the on-site tanks or pump to two delivery locations simultaneously.

Most of these changes will not be detectable from Smith Road. Some visual changes will be the installation of the new pump and electrical protection buildings and PSE substation near the existing manifold area. There will also be modification of the existing on-site piping and electrical systems.

A bulleted list of activities that will occur to complete the Laurel Station Reactivation follows:

- A new mainline pipeline check-valve will be added.
- Two new mainline pumps and a booster pump with associated buildings will be installed.
- The two existing tanks will be reactivated for temporary break-out storage of light and heavy crude oils.
- The new buildings, manifold locations and existing facilities will be constructed or modified, as necessary, to meet existing code requirements, facilitate maintenance activities and lifting of installed heavy equipment (pumps, motors, valves, etc.).
- Various piping and valve changes will be made but the pig launching portion of the facility will not be modified.
- Two tank lines will connect the pipeline to existing tanks.
- The existing surge protection system will be modified.
- The existing underground doubled walled oily waste sump will not be modified but connecting pipes and alarm sensor wiring will be added or improved.
- New on-site pipes, valves and manifolds will be added and several portions of the existing piping may be modified to make connections needed and some pipe may be abandoned in-place.

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- Electrical upgrades including: the new PSE high voltage power line (12 kV to 115 kV feed) and substation.
- The existing fire water system will be modified to allow tie-in of a new "top-of-tank" foam injection system that will be installed on both tanks.
- A new fire pump protection building will be added near the water storage tank.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The Trans Mountain Pipeline (Puget Sound) Laurel Station is located at 1009 East Smith Road. It is just east of the Hannegan and Smith intersection. Located in Township 39N, Range 3E, and Section 33, Whatcom County. Lat/Long: 48.49.08 N, 122.26.03 W. See enclosed aerial photograph and drawing UL00-SK-BE9333-CD-0013 for the Station location, existing on-site facilities and planned construction locations. Topographical data is included. The existing facilities drawing in the enclosed facility Storm Water Pollution Prevention Plan (SWPPP) shows the storm water flow directions.

A legal description for the property is on file with Whatcom County. The lands that may be affected by Station reactivation are within three parcels (390333 – 168480, 237410, and 167408).

**B. ENVIRONMENTAL ELEMENTS****1. Earth**

- a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other . . . . .

Some areas are naturally rolling, but building sites have been terraced progressively. Some areas are almost "flat" others have a slight rolling grade, less than 10-percent. The new buildings will be sited in areas that are basically flat. There is an elevation change from Smith Road to the existing office area. There is a second elevation change from the valve manifold site to the water tank, and additional elevation increase from the water tank to the existing breakout tanks.

- b. What is the steepest slope on the site (approximate percent slope)?

10-14%.

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- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

The Department of Agriculture, Soil Conservation report "Soil Survey of Whatcom County Area, Washington", 1992 indicates the soils are primarily Whatcom-Labounty silt loams with 0 to 8 degree slopes. The three parcels are not considered farmland and have not been used for farmland during the past 50 years. Additional soils information is contained in the Wetland/Fish & Wildlife Study, March 2007 report, attached.

- d. Are there storm indications or history of unstable soils in the immediate vicinity? If so, describe.

There are no apparent indications of unstable soils. Three soils studies have been conducted and the reports are enclosed with this application.

- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

The final amount and types of fill that may be required has not been established. The estimated amount is approximately 4,550 cu. yds. All fill that may be used will be either associated with project excavations or obtained from existing commercial sources.

The areas to be excavated or disturbed include the foundations for the new buildings, supports that will be used for valve or pipe stability, and trenches to bury pipe and electrical lines. The maximum estimated area of disturbed soil is less than four (4) acres.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Yes, depending on the excavation locations and location of other soil disturbance, and the amount of rain, erosion is possible. However, the areas that will be disturbed during construction are relatively flat and will be treated, as necessary, to minimize the erosion potential. An existing facility SWPPP is maintained on site. A Construction SWPPP supplement, addressing specific Best Management Practices (BMPs) that may be used during construction, will be developed. The construction National Pollution Discharge Elimination System (NPDES) SWPPP will address erosion mitigation for the Station area and may be applied to any pipe installation or trenching work.

- g. About what percent of the site will be covered with impervious storms after project construction (for example, asphalt or buildings)?

If one considers the property within parcels 390333 - 168480, 167408 and 237410 that is directly associated with the existing Station, the amount of impervious soil is less than 5 percent. The reactivation effort will add new buildings and containment for equipment and

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manifold areas, no additional areas will be made impervious. After construction completion the resulting percent of impervious soil will remain less than 7 percent.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

The Station is operating under "The Industrial Stormwater General Permit" and maintains a facility SWPPP that is site specific to the Station. A construction SWPPP will be used, as necessary, to control potential erosion run-off. A change to the facility SWPPP is not anticipated but any long term change detected will be added into the facility SWPPP when it is revised.

## 2. Air

- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

The reactivated break-out tanks and piping component fugitive emissions will result in a potential to emit approximately 23 t/y of VOC. The reactivated tanks will use new primary and secondary seals as well as new geodesic dome roofs to minimize emissions and odors.

During construction, some dust is likely. However, existing roads and paved areas will be used and, therefore, the potential for dust to travel off-site is extremely low. Because of the temporary increase in mobile source traffic, there will be an increase in combustion exhaust emissions during construction. The only emission increase would be vapors from controlled tanks.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No,

The only off-site work related to the station reactivation is associated with the PSE electrical power line upgrade. We are not aware of off-site emissions that have or will affect the site.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

API 650 and 40 CFR 60, Subpart Kb, "Primary and Secondary Seal" criteria will be followed during breakout tank reactivation.

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Should construction dust become a problem, water will be applied only as necessary to control it. The equipment to be used meets known emission control requirements and the tanks will be upgraded to meet "new tank" requirements (The breakout tanks will satisfy the integrity and emission control requirements of API 650, and WAC 480-75 prior to re-use).

### 3. Water

#### a. Storm:

- 1) Is there any storm water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

A Wetlands Assessment for the developed area has been completed. The planned reactivation construction will not affect wetlands. Therefore, the site activities are and will be compatible with Critical Area Ordinance requirements that apply. (See attached Wetlands Assessment Report.)

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No over water work will occur. All construction activities will be inside a security fence on lands that have been disturbed previously.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from storm water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None

- 4) Will the proposal require storm water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

None

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

No, the 2006, Article IV - Frequently Flood Areas map of the Critical Area Ordinance for Whatcom County indicates all Station parcels are not within a 100-year floodplain or areas frequently flooded.

- 6) Does the proposal involve any discharges of waste materials to storm waters? If so, describe the type of waste and anticipated volume of discharge.

No, a waste water discharge to land is not planned.

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b. Ground:

- 1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

Water for construction will most likely be obtained from existing sources, which are the a) on-site water well and b) Victor Water Association potable water.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

The existing on-site septic system will not be impacted or changed by this project.

c. Water runoff (including storm water):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The storm water from the northern portion of the facility flows toward the north, into a central collection point on-site. It passes through an oil detection/separator and is discharged into the County ditch on the south side of East Smith Road. All storm water in the ditch flows westward for a short distance, northward under Smith Road, then easterly back along Smith Road until it reaches a point near the Laurel Station access gate. It then flows northerly to a property pond that is also owned by Trans Mountain Pipeline (Puget Sound) LLC. Overflow from the pond migrates northward and eventually joins Deer Creek. Storm water from the tank bays will pass through an oil water separator that includes an oil detector probe and travels northward in an existing ditch. The water co-mingles with the Smith Road ditch upstream of the facility outfall.

The storm water flow on the undeveloped land on the southern portion of the property is not well defined. It migrates southerly or south-westerly until it eventually reaches Baker Creek. See the Whatcom County, Critical Area Ordinance, Article VII for additional details.

- 2) Could waste materials enter ground or storm waters? If so, generally describe.

It is unlikely that waste material from the Station would reach ground water or Baker Creek.

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Waste materials could flow with storm water northward but oil will be controlled on-site and silts flowing off-site will settle in the retention pond.

Storm water monitoring to date has not detected a storm water quality problem.

- d. Proposed measures to reduce or control storm, ground, and runoff water impacts, if any:

It is unlikely that storm or runoff water will become contaminated by project construction activities. However, the procedures contained in the facility SWPPP will be followed. Additional Best Management Practices (BMP) may be applied during construction that will be defined in the Construction SWPPP, which will basically become a supplement to the facility plan. The facility storm water system will experience only minor change because of construction. If detected, a change will be incorporated into the next update to the facility plan.

#### 4. Plants

- a. Check or circle types of vegetation found on the site:

On-site vegetation is typical for partially developed woodlands in the area. The on-site vegetation types include: mowed lawn, small pastures, and forests composed of big leaf maple, sitka spruce, cottonwood, western red cedar, salmon berry and blackberry. Additional vegetation information is included in the Wetland Assessment Report.

- b. What kind and amount of vegetation will be removed or altered?

The predominant vegetation type growing on lands that may be disturbed is lawn grass. Land will be disturbed for building foundations, buried pipe and electrical line installation and valve or pipe supports, as need. The maximum amount of disturbed vegetation that could be disturbed by this project is less than four (4) acres.

- c. List threatened or endangered species known to be on or near the site.

Threatened or endangered species habitat of concern has not been defined on-site. Bald eagles are known to be in the area and Deer and Baker creeks are designated salmon habitat.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

The majority of the areas that have a disturbance potential are not easily seen from East Smith Road. The electrical power lines and new transformer will be seen from Smith Road. Because the areas to be disturbed are within the existing developed area, the landscaping will follow the existing site grades and re-seed lawn areas.

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**5. Animals**

- a. Circle any birds and animals, which have been observed on or near the site or are known to be on or near the site:

Hawks, eagles, water fowl, coyotes, deer, opossum, and songbirds are at times "on-site" and often observed near the site.

- b. List any threatened or endangered species known to be on or near the site.

No threatened or endangered species of concern or their habitat have been identified on site. Salmon habitat has been identified in the off-site Deer and Baker Creeks. Bald eagles are known to be in the area but a critical habitat or protection zone has not been designated for the site.

- c. Is the site part of a migration route? If so, explain.

Yes, the facility is located in the Pacific Flyway for migratory waterfowl. A special habitat value level for the facility lands has not been assigned.

- d. Proposed measures to preserve or enhance wildlife, if any:

None, the developed areas are considered "industrial" and wildlife attraction is not desired. The existing undeveloped woodland areas will not be affected by this project.

**6. Energy and natural resources**

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The existing on-site propane usage and water requirements will not be modified by Station reactivation. Additional electrical power will be used by the new pumps, when operational. The amount will be dependent on the Station's demand on the shipping pumps. If both shipping pumps and the booster pump are operated at maximum capacity the usage will increase by approximately 3,500 Kw/hr. The monthly electricity increase associated with this project is pump usage dependent and will change as the crude demand fluctuates. Discussions with PSE indicated the anticipated amount needed at maximum anticipated use rates is or will be available. There may be a diesel fuel use increase assignable to emergency generators for buildings and fire pump support. The amount of fuel increase is dependent on the electrical power outage(s) frequency and duration and resulting run time for emergency generators.

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b. Would your project affect the potential use of solar energy by adjacent properties?  
If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal?  
List other proposed measures to reduce or control energy impacts, if any:

The new electric motors have been selected based on power requirement, startup and shutdown requirements and overall electrical demand. The largest facility change will be associated with electrical power usage. Energy conservation was part of the selection criteria for the two (2)- 2,500 hp pipeline pumps and Single- 350 hp booster pump. The new electrical controls and monitoring devices are also "state of the art" and lower electrical consumption is also a design or selection consideration.

**7. Environmental health**

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

No additional hazards will be created by this project. The risks of a spill will not increase but the facility will be shipping larger volumes.

1) Describe special emergency services that might be required.

The existing emergency services (medical, fire fighting, spill response, etc.) use will not change because of the construction or reactivation effort.

2) Proposed measures to reduce or control environmental health hazards, if any:

Measures to reduce or control environmental health hazards in the proposed facility include the construction of secondary containment under all new process equipment and valves. Instrumentation probes for detecting hydrocarbon liquid and vapor are included to quickly detect and alarm the presence of a leak. Other probes which monitor for flow and pressure provide real time information to the control center which is manned 24 hours a day. Alarms in the control centre will provide notification if conditions deviate from normal operational conditions.

Administrative controls as described in existing documents such as the operating manuals, maintenance manuals and emergency response manuals are used by operating personnel both on-site and in the control center. These manuals will be updated to incorporate facility reactivation changes.

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Tank air emissions will be minimized by following regulatory and industry standards (API, ASME, etc.) and by complying with federal, state and local requirements.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Off-site noise is not expected to impact this project or Pump Station operations.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

There will be a short-term increase in on-site construction related noise. Normal work hours for construction will be 7:30 AM to 5:30 PM week days unless an unexpected delay requires extended hours to meet an on-site operational requirement or a completion deadline. Construction noise will comply with Whatcom County regulations. On a long term basis, limited operational noise will be generated by the electric shipping pumps and PSE transformer.

- 3) Proposed measures to reduce or control noise impacts, if any:

The buildings for the new electric pumps, controls and switches will contain or mitigate any on-site noise potential for impacts beyond the fence line.

On-site alarms have a high potential for being heard off-site. However, this project does not change the existing alarm systems or expected testing frequency.

**8. Land and shoreline use**

- a. What is the current use of the site and adjacent properties?

The site is currently used for liquid petroleum pipeline transportation operations. The changes resulting from reactivation will reinstall on-site pumping and allow safe reuse of existing breakout tanks.

Some adjacent properties are owned by Trans Mountain Pipeline (Puget Sound) LLC and others are used for equestrian or small farms operations. The lands in the immediate area are all R5A and have a potential for residential use.

- b. Has the site been used for agriculture? If so, describe.

The land was undeveloped in 1956 and has not been used for agriculture during the past fifty years.

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c. Describe any structures on the site.

The location for existing structures is depicted in drawing UL00-SK-BE9333-CD-0013. The buildings have an industrial appearance and are maintained to create a clean, uniform appearance. Existing structures include:

Maintenance building,  
Office/Control Room,  
Electrical building,  
Storage building,  
Breakout tanks,  
Water tank,  
Storage tanks (170 & 180),  
Pressure Relief tank (120), and  
Helicopter Landing Pad.

d. Will any structures be demolished? If so, what?

No building demolition work is planned. The existing foundations may be modified and pipe and electrical systems may be relocated to prevent conflict between the new buildings and existing facilities.

e. What is the current zoning classification of the site?

The facility property and much of the immediate area is classified as Rural 5A.

f. What is the current comprehensive plan designation of the site?

The Whatcom County, Title 20, Comprehensive plan dated July 19, 2006 indicates a R5A designation.

g. If applicable, what is the current shoreline master program designation of the site?

N/A

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

An "environmentally sensitive" area classification has not been assigned to the property.

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- i. Approximately how many people would reside or work in the completed project?

Currently eight (8) employees are based at Laurel Station. After project completion, 1 or 2 additional employees will be required.

- j. Approximately how many people would the completed project displace?

Personnel displacement will not occur.

- k. Proposed measures to avoid or reduce displacement impacts, if any:

N/A

- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Records review and discussion with Whatcom County personnel indicate the existing and planned Pump Station is compatible with the existing land use classification.

## 9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

No housing will be created nor is it provided at the existing facility.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle; or low-income housing.

N/A

- c. Proposed measures to reduce or control housing impacts, if any:

N/A

## 10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The tallest estimated height of the any new building will be 31 feet. The exteriors will have a steel or metallic appearance and be compatible with existing structure and fire code requirements.

The proposed geodesic dome roofs for the existing tanks will add approximately 20 feet to the height of the existing tanks which are currently 48 feet tall.

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b. What views in the immediate vicinity would be altered or obstructed?

Area views will not be altered by this project.

c. Proposed measures to reduce or control aesthetic impacts, if any:

N/A

**11. Light and glare**

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Additional exterior building lights may be installed to ensure safe building access during low light conditions. Considering the new or to be modified facility locations and on-site distance areas, glare should not become a problem. During construction, there is a low level potential for night work but it would only be necessary to maintain the overall project schedule or avoid conflict with critical pipeline operations. The facility will continue to operate when pipeline shipments are required. There is a potential to operate 24 hours per day and 7 days a week.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

Buildings are metal and the exteriors are not considered reflective. Glare might reflect from installed windows. Existing area lighting will not be changed by the reactivation. New buildings will include lights to allow safe access at night. After completion, any unsafe or hazardous lighting condition will be corrected.

c. What existing off-site sources of light or glare may affect your proposal?

None at this time.

d. Proposed measures to reduce or control light and glare impacts, if any:

None, the design and location for new buildings will not create a "glare" concern.

**12. Recreation**

a. What designated and informal recreational opportunities are in the immediate vicinity?

These properties are fenced and access is limited.

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Area recreation includes the equestrian center, two golf courses, one is about 1.5-miles north-east and the second is about 2.2-miles to the east. A Gossamer Glass museum is about 2-miles to the north.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

N/A

### 13. Historic and cultural preservation

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

The museum, located to the north is the only known archaeological, cultural or historic site within a three-mile radius.

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

There is no evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

- c. Proposed measures to reduce or control impacts, if any:

N/A

### 14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Public streets and highway used by the Pump Station include the I-5 Highway, Guide Meridian, Hannegan, and East and West Smith Roads.

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

Whatcom Transit Authority does not provide regular transit service to the Hannegan/Smith intersection. The closest public transportation point would be routes 26 and 71X that stop at the Guide Meridian/W. Smith intersection, approximately two miles to the west.

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- c. How many parking spaces would the completed project have? How many would the project eliminate?

Currently, the Station has adequate on-site parking. The reactivation effort will not create or affect available parking.

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

Existing area roads will not be affected or improved by the project.

- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

The maximum anticipated round trip vehicular increase to the site is estimated to be one per day. Use of existing public roads will remain "as necessary" to address pipeline operations or normal shift schedule work.

- g. Proposed measures to reduce or control transportation impacts, if any:

No transportation impacts are anticipated.

#### 15. Public services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

The overall risk or potential need for public services will not change because of Station reactivation activities. There will be greater potential risk during construction but this potential will return to "normal" during long-term pipeline operations

- b. Proposed measures to reduce or control direct impacts on public services, if any.

N/A

