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**Subject:** Amendment to proposed coal transfer facility, Fraser Surrey Docks  
**Date:** August-21-15 1:27:00 PM

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I am writing to comment on the application to Amend Permit No. 2012 – 072 Direct Transfer Coal Facility.

I live in Gibsons, BC. Professionally, I am an environmental consultant with 25 years of experience with the assessment environmental impacts from proposed industrial developments and the development of remedial solutions for pollution problems.

I reviewed the following documents in support of this application:

- [Environmental Impact Assessment \(EIA\) \(November 2013\)](#)
- [Water Management Plan Addendum](#)
- [Marine Risk Assessment](#) (original and updated)
- Appendix 10- EIA Addendum
- Phase 2 Engagement Summary Report

In a previous submission, I identified the potential environmental impacts from coal dust released during barge transport to Texada Island as an issue that was not addressed in the Environmental Impact Assessment. I note that this potential impacts has not been evaluated in this new application. Additionally, I note that the Sechelt First Nation, on whose territory the barges will travel and the potential impacts may occur, has not been consulted. Both these omissions need to be properly addressed.

I am not satisfied with the design of the water treatment facility described in the Water Management Plan (FSD DTB WMP Final August 2014.pdf). A valid engineering design for any wastewater treatment facility requires that design flows be identified through a site water balance (i.e., a model that quantifies the volumes and fluxes of all sources of water flowing in and out of the site), but such a water balance has not been provided. Additionally, the basis for treatment needs to be validated through test with the material expected to be treated. In this case, it is assumed that all the coal dust collected at the site will settle by gravity, but it is possible that a fraction will not settle this way and that a supplementary process (e.g., Dissolved Air Flootation) will be required. Finally, results of the leach tests presented in the report are unsatisfactory. The methods for conducting and analyzing these tests are not presented and it is impossible to determine if these tests were conducted properly. For example, the low pH of local rainwater may cause substantial leaching of metal contaminants, but such a finding would be obscured by the use of water with a neutral pH in this test. In my view, these flaws invalidate the conclusions of the report and it should be revised to account for these deficiencies.

I identified a few other deficiencies in the abovementioned documents, but they are minor compared with those identified above.

I urge you to require the proponent to correct the above deficiencies and revise its application accordingly.

Respectfully,

**CLEAR  
COAST  
CONSULTING**

**André Sobolewski, Ph.D**

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