

*The comment period is open until December 30<sup>th</sup> 2020, on Vopak Pacific Canada's terminal application for:*

- 240 rail cars of liquid propane, diesel, methanol, and other petroleum products passing BC northern communities along CN rail from Prince George to Ridley Island each day,
- a pipeline over the water in the estuary to load these hazardous products and
- 171 Medium Range, Very Large and Panamax tankers carrying these hazardous products in the Skeena Estuary each year.

*Go to <http://gov.bc.ca/eao> to comment on these following  
or other concerns you may have:*



#### ***Propeller wash and contaminated sediments***

- ❖ Tankers may disturb sediments from their propeller wash. Sediments around the proposed facility are contaminated with dioxins and furans from the old pulp mill. Vopak has provided no information on how they will stop propeller wash from disturbing sediments and contaminating local seafood.

#### ***Toxic fuel spills in estuary habitat***

Vopak brings the risk of a spill of highly toxic diesel oil and gasoline into the estuary and nearby critical habitats like Flora Bank. Such spills can happen at the offloading facility and with tanker accidents.

- ❖ Four large vessels had grounding accidents in the estuary since 2000, yet no navigational risk assessment is provided to the public. With only about 450 vessel visits now and no oil tankers, what is the likelihood the addition of 171 Medium Range, Very Large and Panamax tankers will result in a catastrophic diesel cargo spill or bunker fuel spill impacting our salmon?
- ❖ Vopak has not undertaken to keep anchoring of loaded vessels to an absolute minimum despite the known high incidence of anchor dragging in the estuary.

- Contractual arrangements between Vopak and the vessel/product owner would be needed prior to loading. Without a contract, common law allows large vessels to anchor<sup>1</sup> and in times of glut, international Industry, on the instructions of the owners, leaves hazardous petroleum product to sit in vessels at anchor.
- Vessels should not be loaded when storm force winds are forecast as imminent, then anchored laden through the storm/hurricane. (As Vopak did with LPG in concert with Altagas in 2020)
- ❖ Vopak has not provided other details of how the risks of spills are minimized.
- ❖ Vopak has not provided any information on the effectiveness of spill response measures at cleaning up diesel oil, gasoline and other toxic products in the estuary, and the potential impacts to the marine environment and nearby eel grass habitats from a fuel spill.

### ***Rail safety***

- ❖ Citizens from Prince Rupert to Prince George want hazardous rail cargo addressed: speed limits, other safety measures and emergency response.

### ***Noise Impact on Fish and Marine Life***

- ❖ To our knowledge, the Proponent has not provided information on baseline noise levels within the Project marine footprint area, nor has the Proponent assessed the projected noise that will occur in marine waters during construction, operation, or decommission of the Project (including noise generated from vessels), and what effect this increase in noise will have on fish and other marine life.

### ***Enforcement provisions***

- ❖ Vopak has not provided for air quality, waste water, noise level standards and all conditions of permitting to be monitored and legally enforced by someone trusted, accessible locally and accountable to the public. A Vopak project in Texas violated the law repeatedly releasing dangerous chemicals, until EPA stepped in and ordered strict monitoring.

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<sup>1</sup> Our understanding from remarks made by Transport Canada's Alain Paquet at the November 22nd 2018 OPP meeting in Prince Rupert