

Responses from Port of Anacortes to Public Comments on SEPA Checklist for Pier 2 Prilled Sulfur Shipments

Checklist B.2, 7a Air, Environmental Health

Comment	Response
A City-Port MOA needs to outline potential use of funding for fire department hazardous material training and associated equipment purchases. A-1	<i>At the City of Anacortes Fire Chief's request, the Port has agreed to retain an independent fire protection engineer to conduct a hazardous materials inventory statement and management plan for the Pier 2 bulk terminal loading facility including an analysis of any changes specific to sulfur. Operations at the terminal will incorporate the recommendations of the plan.</i>
The Marsulex MSDS for prilled sulfur indicates that breathing of dust may aggravate acute or chronic asthma and chronic pulmonary disease. C-1	<i>The MSDS provides information about <u>occupational</u> exposures and hazards, and not about <u>environmental</u> exposures. Like any other dust, sulfur dust could aggravate chronic respiratory conditions when experienced in an <u>occupational</u> setting. Dust control, such as the use of water misters, is incorporated in the proposed sulfur loading operation, and dust concentrations would not approach levels requiring OSHA controls. Control of dust is also an element of the NWCAA permit.</i>
The MSDS also states that prilled sulfur dust in the air ignites easily and can cause an explosion in confined areas. C-2	<i>The MSDS provides information about <u>occupational</u> exposures and hazards. OSHA generally advises that dust explosions may occur where there is a sufficient quantity and concentration of dust particles, a confined space, and a combustion source. Within such a confined industrial setting, sulfur dust has the potential to produce a "weak explosion" comparable to sugar or powdered milk. Although in theory a combustion source such as a spark could occur during loading at Pier 2, neither of the other conditions could occur. There is no confined space at Pier 2. The prills in the ship hold are damp and there is no ignition source. The door to the hold is closed when the hold is full. The sulfur prills are too large to produce an explosive atmosphere, and small quantities of dust that may occur will be controlled by water misting during loading operations. (Source: OSHA Advisory 2271-08 (2009). In addition, prilled sulfur has a flash point of 335°F and is not easily ignited.</i>
There have been rail car fires at Sulex plants located in Canada C-3	<i>The example fires involved rail car fires, and occurred at 11 separate industrial production and rail transportation facilities in Canada where locomotive sparks caused minor and easily extinguished fires. No rail operations are proposed at Pier 2, and the scenarios cited here are not applicable.</i>
What if the handling of prilled sulfur produces an unacceptable odor and/or there is a dangerous fire or other issues? C-4	<i>At the City of Anacortes Fire Chief's request, the Port has agreed to retain an independent fire protection engineer to conduct a hazardous materials inventory statement and management plan for the Pier 2 bulk terminal loading facility, including an analysis of any changes specific to sulfur. Operations at the terminal will incorporate the recommendations of the plan. Odor issues are not anticipated, but would be addressed if necessary by requirements of the NWCAA permit requirements.</i>
This smell and this danger and this wear and tear on our streets is not what we want. E-1	<i>Comment noted.</i>

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This material is classified as hazardous under OSHA regulations for breathing of dust, breathing of vapors, and the danger of fire with associated risks of toxic smoke and possible explosion. F-2	<i>The MSDS provides information about <u>occupational</u> exposures and hazards, and not about <u>environmental</u> exposures. Like any other dust, sulfur dust could aggravate chronic respiratory conditions when experienced in an <u>occupational</u> setting. Dust control, such as the use of water misters, is incorporated in the proposed sulfur loading operation, and dust concentrations would not approach levels requiring OSHA controls. Control of dust is also an element of the NWCAA permit. No significant community exposures are anticipated.</i>
The inventory and management plan being required by the Fire Chief to address the specific hazards of the operation must include provisions for ongoing monitoring to be sure that safety measures are continually complied with. F-3	<i>At the Fire Chief's request, the Port has agreed to retain an independent fire protection engineer to conduct a hazardous materials inventory statement and management plan for the Pier 2 bulk terminal loading facility, including an analysis of any changes specific to sulfur. Operations at the terminal will incorporate the recommendations of the plan. Pier 2 will be available to the fire department for fire inspections. The fire department currently uses the terminal for training purposes and the Port will continue to make the facility available for these activities as well.</i>
Fugitive dust could affect nearby workers and residents. It is critical that sulfur dust be contained.F-4	<i>Dust control is incorporated in the proposed sulfur loading operation, and dust concentrations would not approach levels requiring OSHA controls. Control of dust is also an element of the NWCAA permit.</i>
Any prilled sulfur coming into Anacortes should be de-gassed at least to the Canadian standards or better.F-5	<i>The Canadian standards for de-gassing apply to on-terminal storage of large quantities of sulfur, and the potential for nuisance odors related to such storage. No storage of sulfur will occur at Pier 2, and significant odors are not anticipated.</i>
Reduction of emissions from truck traffic should be investigated. F-6	<i>NWCAA monitors regional air quality, including vehicle emissions. Truck traffic generated by the sulfur loading operations would not cause a significant impact on air quality in Anacortes.</i>
We don't have to transport toxic waste to improve our economy. G-2	<i>Prilled sulfur is an industrial commodity, valued for its use in pulp and paper, fertilizer, chemical processing, and related industries. Elemental sulfur is not defined as a toxic waste or a toxic substance by the EPA, Department of Ecology, or state/federal departments of transportation. Transport of prilled sulfur is not required to carry US Department of Transportation hazardous material labels or placards.</i>
Prilled sulfur is a hazardous chemical under OSHA regulations. We don't want this hazardous material in our city. H-1	<i>Like many commonly used substances, OSHA regulations characterize prilled sulfur as a potentially hazardous material in <u>occupational</u> settings due to direct contact or inhalation of dust.</i>
There was some spillage and odor during the test loading operation. H-2	<i>Comment noted. The test run was valuable in determining truck hold modifications that will be made to reduce spillage. Operations at the terminal will include prompt cleanup of any spilled sulfur prills. The Port has a new regenerative vacuum sweeper that will be used during and after loading to assure complete clean up of any spills.</i>

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We are very concerned about accidents, big spills, mistakes, fire, and evacuations. H-3	<i>As with any trucked material, there is a potential that an accident could occur. The sulfur prills are damp when loaded into the trucks and the trucks are covered during transport. A scenario requiring an evacuation due to toxic gasses is highly unlikely. A sulfur fire requires enough heat for the prills to become molten, and even then would smolder slowly; sulfur does not burn like wood. Sulfur fires are easily suppressed, and suppression by the Fire Department would consist of applying a water mist, or of covering the fire.</i>
A potential spill of prilled sulfur from a truck accident presents serious environmental and health risks. I-1	<i>Comment noted. See response above.</i>
There will be health risks to residents, workers, and customers in downtown, DCI, boaters, and visitors. I-2	<i>Dust control is incorporated in the proposed sulfur loading operation, and dust concentrations would not approach levels requiring OSHA controls. Control of dust is also an element of the NWCAA permit. No significant community exposures are anticipated.</i>
Due to high winds, airborne particulates could be transported into the adjacent shipyard, commercial areas, and residential areas presenting a health risk. I-4	<i>Comment noted. See response above.</i>
The idling freighters at the dock will deteriorate the air quality in the surrounding area. I-5	<i>At the maximum potential loading capacity, the Port anticipates that up to 15 loading events would occur per year. Ship generators may be running during some portions of each loading event, but it is unlikely that this would have a significant adverse effect on air quality in Anacortes.</i>
Increased truck traffic, smells of diesel exhaust and sulfur will adversely impact the area. I-8	<i>NWCAA monitors regional air quality, including vehicle emissions. The Pier 2 operation will comply with permit requirements imposed by NWCAA. Truck traffic generated by the sulfur loading operations would not cause a significant impact on air quality in Anacortes.</i>
Why are hazardous materials being allowed within the city limits? J-1	<i>This is a misinterpretation of “hazardous” under OSHA standards. OSHA regulates <u>occupational</u> exposures, and defines a hazardous chemical as any liquid, solid, or gas that could present a potential physical or health hazard to an employee. Examples of hazardous chemicals include cleaning agents, degreasers, flammables, greases, paints, pesticides, aerosols and compressed gases. Many of these chemicals are present in industrial, commercial, and residential settings within Anacortes.</i>
The air quality in Anacortes is poor, and sulfur pollution will make it worse. J-2	<i>NWCAA monitors regional air quality, including vehicle emissions. The Pier 2 operation will comply with permit requirements imposed by NWCAA. Truck traffic generated by the sulfur loading operations would not cause a significant impact on air quality in Anacortes.</i>

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Checklist B.3, 5 Water Quality, Animals

Comment	Response
Prilled sulfur could easily enter waters of Puget Sound from an accidental spill or inadequate storm water practices and impact the federally listed species in the Guemes Channel. I-3	<i>Prilled elemental sulfur is not considered a toxic or hazardous substance under environmental regulations, and does not represent a risk to water quality. Any spilled sulfur would be promptly swept up. The Port has a new regenerative vacuum sweeper that will be used to assure complete clean up of any spills. Pier 2 has storm and process water detention and treatment facilities which are being upgraded extensively prior to commencement of sulfur loading operations. These upgrades will reduce or eliminate stormwater flow to the Guemes Channel.</i>
No mitigation measures have been proposed for adverse impacts to eagles. I-6	<i>Comment noted. No impacts to eagles are anticipated, and therefore mitigation measures are not necessary.</i>
The MDNS did not mention the 2009 NPDES industrial stormwater permit. K-1	<i>The Port has clarified with the Department of Ecology that these project elements are discussed in the SEPA environmental checklist for the proposed action. NPDES permits for storm water and process water at Pier 2 are being revised and upgraded facilities will be evaluated as a separate SEPA action.</i>
The MDNS did not address the fate of stormwater and process water.K-2	<i>See response above.</i>

Checklist B.7 b, 11 Noise, Light and Glare

There is an ongoing problem with noise and glare at the existing terminal from shipboard operations. Shipboard fixtures should be directed downward, and at night large work lights should be shut off. F-7	<i>At the maximum potential loading capacity, the Port anticipates that up to 15 loading events would occur per year. A variety of ships will call at the terminal, and they will have varied lighting situations. Some nighttime lighting is necessary in order to provide safe working conditions on the ship and pier during loading.</i>
Noise and glare will significantly increase. I-7	<i>See response above.</i>

Checklist B.8 Land Use

Becoming a center for shipping toxic products is not consistent with the goals of either the Port or City Comprehensive Plans. F-1	<i>Prilled sulfur is not defined by any regulatory agency as a "toxic product". Shipping of bulk commodities such as prilled sulfur is consistent with both the city and port comprehensive plans. Pier 2 is located within the Manufacturing and Shipping Zone, the highest intensity zoning in Anacortes. The Pier 2 facility is an existing permitted use with deep water moorage and infrastructure for bulk shipping. Under the City Comprehensive Plan's Goals for Manufacturing areas, Goal 2 states: "In shoreline areas with deep water access, encourage and support water dependent and water related uses such as manufacturing, shipping, moorage, navigation, cargo handling and storage, fish processing, and ship/boat construction and repair." The Port's 2008 Comprehensive Plan envisions use of the existing Pier 2 infrastructure for "increased volumes of coke or additional cargos".</i>
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Checklist B.14 Transportation

Comment	Response
A memorandum of understanding will need to be entered into between the City and the Port regarding proposed funding for regular road maintenance of Q and R Avenues mitigating the impacts of increased truck traffic. A-2	<i>Comment noted. As previously noted in the environmental checklist, funding for ongoing maintenance of existing truck routes will be provided through an interlocal agreement between the City and the Port.</i>
This smell and this danger and this wear and tear on our streets is not what we want. E-1	<i>Comment noted. See response above, and below.</i>
The prospect of 266 truckloads a day of sulfur being loaded and transported through town really concerns me. G-1	<p><i>To ship approximately 130,000 metric tons of sulfur prills per year (typical amount to be shipped) approximately 6.5 loading events would be required per year. Each loading event would take about 5 days for a total of 32 loading days per year. Every event would require approximately 133 loaded truck/trailers with pup trailer to come through Anacortes per day for 5 days. Including the return trips with empty trailers, the total number of one-way trips would be 266.</i></p> <p><i>To ship a maximum of 300,000 metric tons per year, about 15 loading events (less than 1.5 times per month) would be required for a total of 75 days per year. This is the worst-case scenario assumption because the Port wants to obtain the air quality permit for the maximum amount in the event that we ever ship that amount. The number of trips per day would stay the same.</i></p>
General comments	
I urge you to not use Anacortes to truck sulfur. D-1	<i>Comment noted.</i>