

# Puget Sound Clean Air Agency

Notice of  
Construction No.

11265

## HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 13828  
Date 2/7/2018

Modification of 4 storage tanks (T-208H, T-209H, T-210H, T-211H) to enable storage of gasoline, isooctane, denatured ethanol, and natural gasoline. The project includes marine loading of natural gasoline (151,500,000 gal/yr).

### APPLICANT

**Matthew Kolata**  
**Targa Sound Terminal LLC**  
**3140 E 11th St**  
**Tacoma, WA 98421**

### OWNER

**Targa Sound Terminal LLC**  
**3140 E 11th St**  
**Tacoma, WA 98421**

### INSTALLATION ADDRESS

**Targa Sound Terminal LLC, 2628 Marine View Dr, Tacoma, WA 98422**

### THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. Tanks T-208H, T-209H, T-210H, and T-211H are subject to 40 CFR Part 60, Subparts Kb and A.
4. The adjustable roof legs on these tanks shall be fitted with vapor seal boots or equivalent.
5. The slotted guidepoles on these tanks shall be equipped with a pole float with either a pole sleeve or a pole wiper. If a pole sleeve isn't employed, the seal of the pole float shall be higher than the pole wiper. The top of the guidepole shall be equipped with a gasketed cap which shall be closed at all times except when gauging or taking liquid samples.
6. The secondary seals on these tanks shall extend from the roof to the tank shell and shall not be attached to the primary seal.
7. The entire circumference of each primary and secondary seal on these tanks shall be inspected for compliance with the requirements of Section 3.02 of Regulation II during hydrotesting of the tanks. The time between inspections shall not exceed 10 years. If a new primary or secondary seal is installed, or if a primary or secondary seal is repaired, both seals shall be inspected at the time of the seal installation or repair. Flexible wiper seals shall be inspected when the outer edge of the seal is curved upward.
8. The concentration of organic vapor in the vapor space above the internal floating roof on these tanks shall not exceed 30% of its lower explosive limit (LEL).
9. The emissions from degassing of these storage tanks shall be vented to a control device.
10. The Reid Vapor Pressure (RVP) of the natural gasoline received shall not exceed 16.5 psi.

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11. The sulfur content of each batch of natural gasoline received shall not exceed 330 ppm, as documented by product transfer documents in accordance with 40 CFR 80.1611.
12. The benzene content of each batch of natural gasoline received shall not exceed 1.3% by weight. This condition shall be verified with a Record of Certificate of Analysis (COA), Safety Data Sheets (SDS) or an equivalent material information sheet indicating the maximum benzene content by weight.
13. Marine loading of each of the following products shall be performed in accordance with Conditions 3-9 of Order of Approval No. 11069 (outlined below as 13.1 – 13.8):
  - 13.1 The Marine Vapor Combustion Unit (MVCU) shall be used for all marine loading of natural gasoline, crude oil, gasoline, ethanol, and isooctane. The following conditions shall not apply to the loading of products with a true vapor pressure <0.5 psia.
    - 13.2 The destruction efficiency of the MVCU shall be at least 99.0%, as determined by the procedures in 40 CFR 63.565(d)(1)-(4) and (6)-(8), except as follows:
      - i) EPA Method 25A may be used to determine the VOC concentration;
      - ii) EPA Method 19 may be used to determine the exhaust flowrate; and
      - iii) All testing shall be performed during the last 50% of loading of a tank or compartment.
    - 13.3 Targa Sound Terminal shall conduct a performance test for determining compliance with Condition 13.2 (Condition 4 in OA 11069) of this Order within 60 days of initial startup of the MVCU.
    - 13.4 Targa Sound Terminal shall maintain the loading cycle average MVCU combustion chamber temperature at or above the average temperature established during the performance test. Targa Sound Terminal shall continuously monitor and record the MVCU combustion chamber temperature during each loading cycle. The continuous temperature monitoring device shall meet the requirements in 40 CFR 63.564(e)(4).
    - 13.5 For control of fugitive emissions, Targa Sound Terminal shall comply with the following provisions of 40 CFR Part 63, Subpart Y:
      - i) The standards for ship-to-shore compatibility in §63.562(b)(1)(ii) and vapor-tightness of marine vessels in §63.562(b)(1)(iii), as determined by the procedures in §63.563(a)(2), (a)(3) and (a)(4), and (c), §63.564(c), and (d), and §63.565(b) and (c); and
      - ii) The recordkeeping requirements in §63.567(h), (i)(1)-(3) and (i)(5)-(8), and (k).
    - 13.6 Targa Sound Terminal shall capture 99.8% of the emissions from inert vessels during loading operations for treatment by the MVCU. If the Agency ordered testing to demonstrate compliance with this requirement, it shall be performed using methods approved by the Agency prior to commencing the test. For the purpose of determining compliance with §63.563(a)(4)(iv) and §63.567(h), Targa Sound Terminal shall document a vacuum of at least 1.5 inches water column during the loading of all non-inert vessels.
    - 13.7 The natural gasoline, crude oil, gasoline, ethanol, and isooctane loading rates shall not exceed the MVCU processing capacity of 7,000 bbl/hr. For loading of these products, Targa shall only utilize pumps that, used individually or in combination, have a maximum rated capacity below 7,000 bbl/hr.
    - 13.8 The natural gasoline marine loading throughput shall not exceed 3,607,100 bbl/yr (151,500,000 gal/yr) during any consecutive 12-month period. The crude oil marine loading throughput shall not exceed 14,601,600 bbl/yr (613,267,200 gal/yr) during any consecutive 12-month period. The gasoline and ethanol marine loading throughputs shall not exceed 2,555,000 bbl/yr (107,310,000 gal/yr) during any consecutive 12-month period. The isooctane marine loading throughput shall not exceed 3,000,000 bbl/yr (126,000,000 gal/yr) during any consecutive 12-month period. Targa Sound Terminal shall record the monthly and 12-month rolling total throughput within 30 days of the end of each month.
  14. Marine loading of natural gasoline not exceed 151,500,000 gallons during any consecutive 12-month period. Targa Sound Terminal shall record the monthly and 12-month rolling total throughput within 30 days

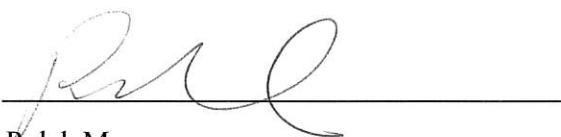
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of the end of each month.

15. Targa Sound Terminal shall implement the leak detection and repair program required under 40 CFR 63.11089 for all products covered by this permit.

### APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, 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 Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.



Ralph Munoz  
Reviewing Engineer



Carole Cenci  
Compliance Manager

# Notice of Construction (NOC) Worksheet



<b>Applicant:</b> Targa Sound Terminal	<b>NOC Number:</b> 11265
<b>Project Location:</b> 4130 E 11 <sup>th</sup> St, Tacoma, WA 98421	<b>Registration Number:</b> 13828
<b>Applicant Name and Phone:</b> Matthew Kolata, (253) 272-9348	<b>NAICS:</b> 424710
<b>Engineer:</b> Gerry Pade/Ralph Munoz	<b>Inspector:</b> Rick Hess

## A. DESCRIPTION

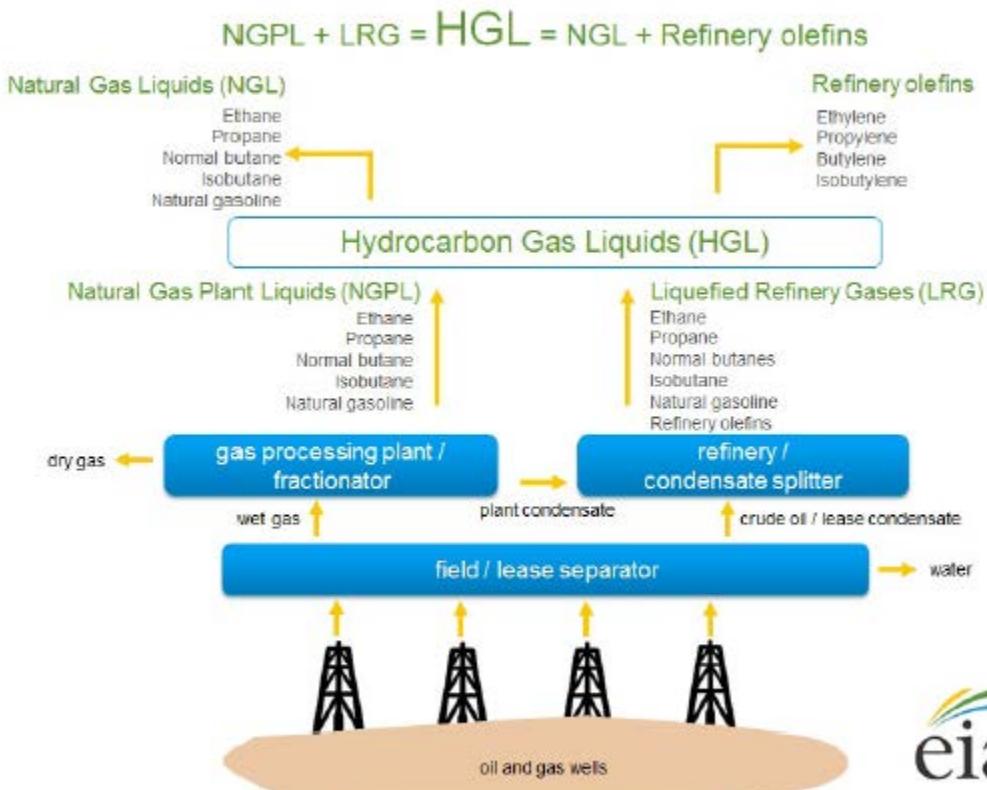
Modification of 4 storage tanks (T-208H, T-209H, T-210H, T-211H) to enable storage of gasoline, iso-octane, denatured ethanol, and natural gasoline. The project includes marine loading of natural gasoline (151,500,000 gal/yr).

## Additional Information:

This NOC application seeks to modify the four tanks listed above. Historically, these tanks have been exempt from NOC requirements since they only store distillate products such as diesel and fuel oil so they did not have floating roof tanks installed. This NOC seeks to install internal floating roof tanks on these tanks along with new associated fugitive components such as valves and flanges. The addition of the Internal floating roof tanks will enable these tanks to store higher vapor pressure products such as gasoline, natural gasoline, iso-octane, and ethanol. Marine loading of natural gasoline does not require any modification to the current air permitting requirements for loading operations since the natural gasoline does not increase the total existing throughput limit.

The term 'natural gasoline' can refer to: 1) stabilized lease condensates from oil and gas wells; 2) processing plant condensates; 3) bottoms from the debutanizer or final distillation column in a natural gas liquids fractionation facility; or 4) light naphtha from an oil refinery (or splitter). Though natural gasoline consists primarily of pentane and hexane ('pentanes +'), its chemical composition differs dramatically depending upon how much it has been processed.

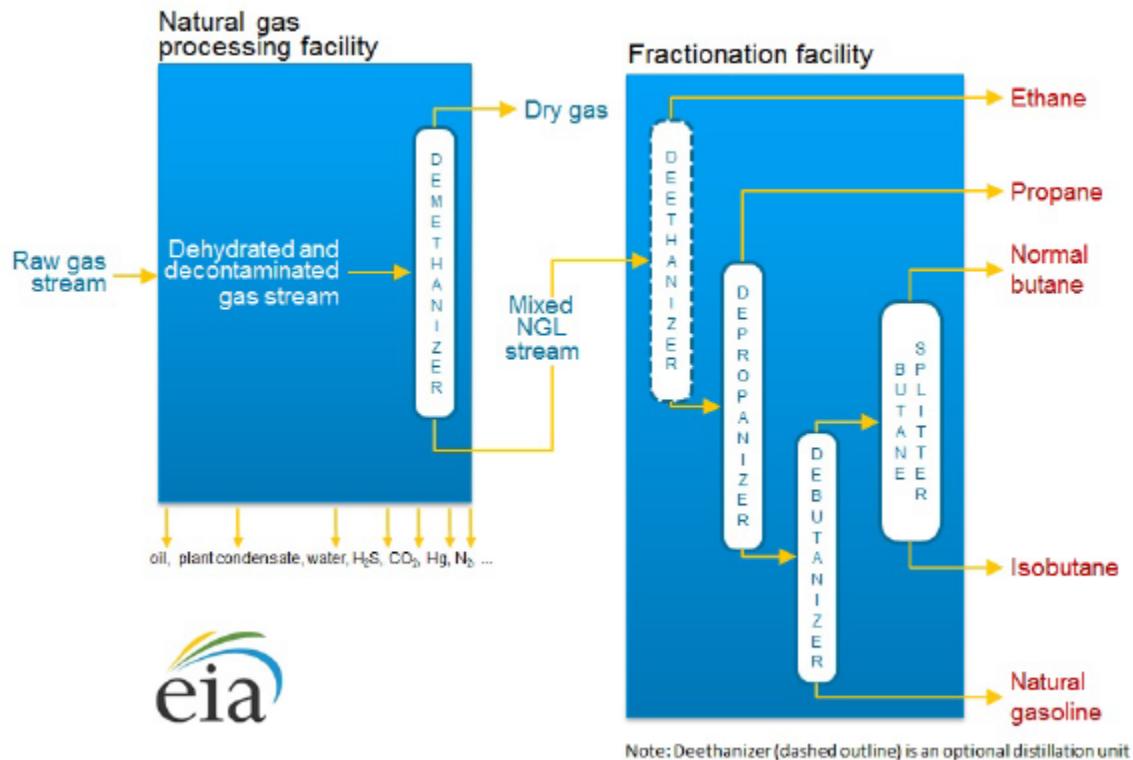
Figure 1. HGL taxonomy, simplified



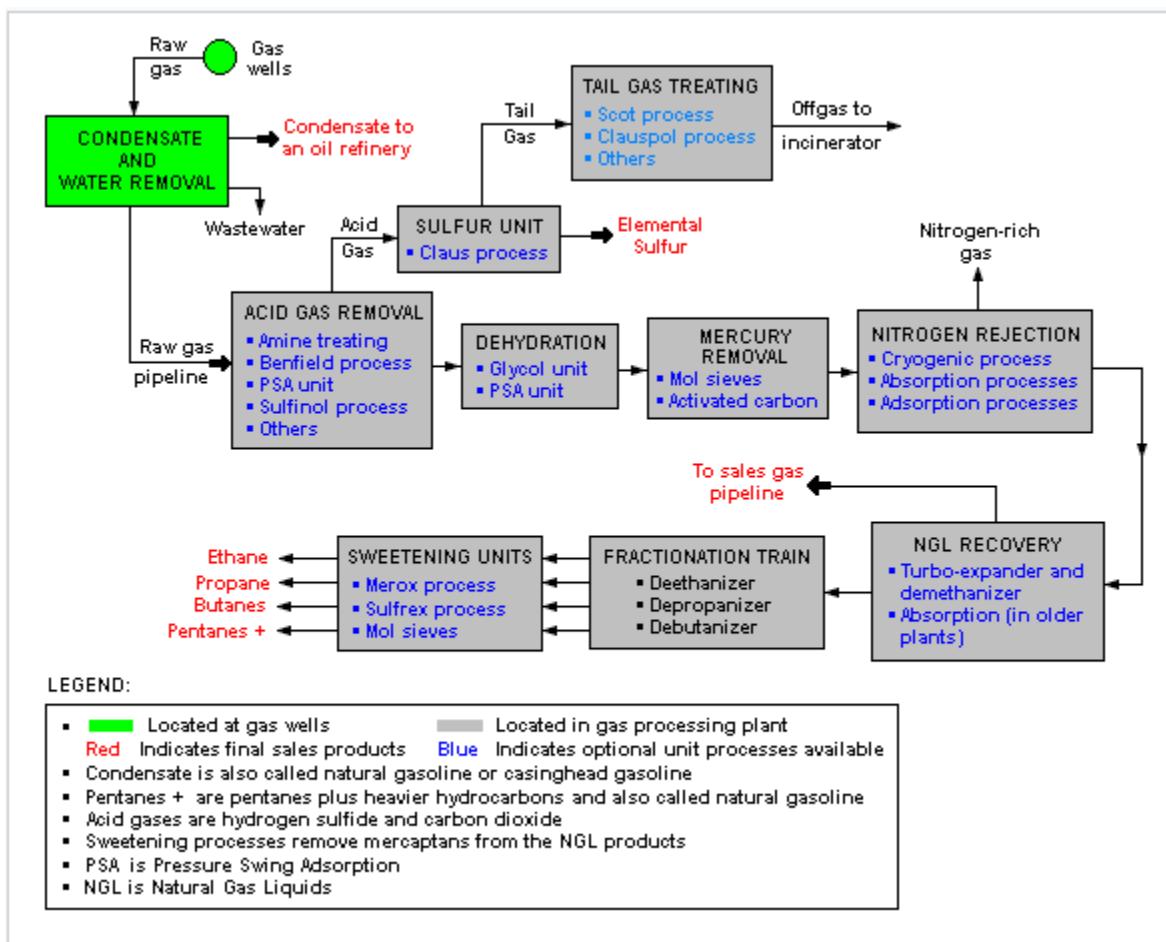
Source: U.S. Energy Information Administration.



Figure 4. Natural gas processing and fractionation schematic



Source: U.S. Energy Information Administration.



The primary purpose of a natural gas processing plant is to produce pipeline-quality natural gas from raw or wet gas, removing NGPL, carbon dioxide, sulfur, and other contaminants in the process. Depending on economics, a processing plant may be co-located with a fractionation facility to further separate the mixed NGPL stream using distillation techniques (fractionation) into separate streams of marketable ethane, propane, normal butane, isobutane, and natural gasoline. However, more often fractionation plants receive a mixed NGL stream (sometimes referred to as a “Y-grade” stream) from one or more gas processing plants (see Figure 4 above).

## B. DATABASE INFORMATION

Targa Sound Termi...	38	11265	62 - storage tank...	2017	1	3700.00	BBL	T-208H (gasoline, isooctane, denatured ethanol, and natural gasoline); NSPS Subpart Kb
Targa Sound Termi...	39	11265	62 - storage tank...	2017	2	42100.00	BBL	T-209H & T-211H (gasoline, isooctane, denatured ethanol, and natural gasoline); NSPS Subpart Kb
Targa Sound Termi...	40	11265	62 - storage tank...	2017	1	67200.00	BBL	T-210H (gasoline, isooctane, denatured ethanol, and natural gasoline); NSPS Subpart Kb
Targa Sound Termi...	41	11265	62 - storage tank...	2017	1	42400.00	BBL	T-211H (gasoline, isooctane, denatured ethanol, and natural gasoline); NSPS Subpart Kb

<b>NSPS</b>	<b>Yes</b>	<b>Applicable NSPS: Subpart Kb</b>	<b>Delegated? Yes</b>
<b>NESHAP</b>	<b>Yes</b>	<b>Applicable NESHAP: Subpart BBBB</b> (applies only to gasoline storage and truck loading)	<b>Delegated? Yes</b>
<b>Synthetic Minor</b>	<b>Yes</b>		

### C. NOC FEES AND ANNUAL REGISTRATION FEES

#### NOC Fees:

Fee Description	Cost	Amount Received (Date)
Filing Fee	\$1,150	
Equipment (modify 4 storage tanks)	4x\$600=\$2,400	
NSPS Surcharge	\$1,000	
Refined Dispersion Modeling Analysis Review	\$1,000	
Public Notice	\$700	
Filing received		\$1,150 (10/25/16)
Additional fee received		\$5,100 (5/25/17)
<b>Total</b>	<b>\$8819.53</b>	\$ 2569.53 (publication costs)

**Publication costs paid** \$ 2569.53, receipt number 99033

#### Registration Fees:

Issuance of this permit will not change the facility's registration fees.



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### D. STATE ENVIRONMENTAL POLICY ACT (SEPA) REVIEW

The City of Tacoma issued an MDNS on 3/20/12 by for the new tank farm (which includes tanks T-208H, T-209H, T-210H, & T-211H) and a DNS on 12/5/13 for the railcar unloading facility and equipment for marine loading of light products. On 11/4/16 I sent an email to Shirley Schultz at the City of Tacoma to see if she believed they adequately address the current proposal. She hadn't responded as of 11/21/16 so I called to follow-up. Ryan Erickson, a Fire Code Official with the Tacoma Fire Dept. has been involved. Ultimately, the city determined no need for additional review.



RE City of Tacoma  
Notice of Decision - S

Accordingly, these threshold determinations and documents adequately assess the probable environmental impacts.

### E. BEST AVAILABLE CONTROL TECHNOLOGY REVIEW

#### Similar Permits

Recent permits for storage vessels at Targa Sound Terminal include isooctane (NOC 11069), ethanol (NOC 10688), crude oil (NOC 10554), and gasoline (NOC 10582, 10325). Marine loading of crude oil, gasoline, ethanol, and isooctane at Targa Sound Terminal was covered under NOC 11069. A

similar permit covered marine loading of crude oil, gasoline and gasoline blend stocks at US Oil (NOC 10620). None have involved natural gasoline.



### **Other Regulatory Agencies BACT - Storage Tanks**

Bay Area AQMD Reg. 8, Rule 5 (see <http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/reg-08/rg0805.pdf?la=en>) applies to existing storage vessels. For products with a true vapor pressure  $\geq 11$  psia, Section 301 requires a pressure tank or an approved emission control system and Section 306 requires  $\geq 95\%$  control relative to a fixed roof tank without an approved emission control system. For other products, Section 301 requires a floating roof and Section 305 requires a metallic shoe seal that meets Section 321 and a secondary seal that meets Section 322 and deck fittings that meet Section 320. The BAAQMD BACT guidance for new or modified internal floating roof organic liquid storage tanks  $\geq 20,000$  gal is either a vapor recovery system with an overall efficiency  $\geq 98\%$  or an internal floating roof that complies with this rule and is equipped with a zero gap secondary seal, controls for any slotted guidepole, and vapor seal boots on the roof legs.

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT**  
**Best Available Control Technology (BACT) Guideline**

**Source Category**

Source:	Storage Tank - Internal Floating Roof, Organic Liquids	Revision:	2
Class:	All	Document #:	167.4.1
		Date:	03/03/95

**Determination**

POLLUTANT	BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice	TYPICAL TECHNOLOGY
POC	1. Vapor recovery system w/ an overall system efficiency $\geq 98\%$ <sup>a,T</sup> 2. BAAQMD Approved roof w/ liquid mounted primary seal and zero gap secondary seal, all meeting design criteria of Reg. 8, Rule 5. Also, no ungasketed roof penetrations, no slotted pipe guide pole unless equipped with float and wiper seals, and no adjustable roof legs unless fitted w/ vapor seal boots or equivalent <sup>a,T</sup>	1. Thermal Incinerator; or Carbon Adsorber; or Refrigerated Condenser; or BAAQMD approved equivalent <sup>a,T</sup> 2. BAAQMD Approved Roof and Seal Design <sup>a,T</sup>
	1. n/a 2. n/a	1. n/a 2. n/a
NOx	1. n/a 2. n/a	1. n/a 2. n/a
SO <sub>2</sub>	1. n/a 2. n/a	1. n/a 2. n/a
CO	1. n/a 2. n/a	1. n/a 2. n/a
PM <sub>10</sub>	1. n/a 2. n/a	1. n/a 2. n/a
NPOC	1. Vapor recovery system w/ an overall system efficiency $\geq 98\%$ <sup>a,T</sup> 2. Same as for POC above	1. Carbon Adsorber; or Refrigerated Condenser; or BAAQMD approved equivalent <sup>a,T</sup> 2. BAAQMD Approved Roof and Seal Design <sup>a,T</sup>

The California Air Resource Board's BACT Clearinghouse shows a couple internal floating roof gasoline storage tanks recently permitted by the San Diego APCD with both mechanical shoe primary seals and secondary seals (<https://www.arb.ca.gov/bact/bactnew/query.php>).

The Oklahoma DEQ recently permitted a storage tank for natural gasoline. Because of the volatility of natural gasoline being permitted at that facility, a closed-vent system and control device (VCU) was required. A similar finding was made by the West Virginia DEP (see <http://docplayer.net/19272272-Engineering-evaluation-fact-sheet.html>).



The Texas DEP issued an operating permit to Plains LPG Services that included pressure vessels for storage of natural gasoline  
(see [https://yosemite.epa.gov/r5/in\\_permt.nsf/932df6c77d85e1b48625763f00510c78/d00ae1569f11e2be86257fed00574430/\\$FILE/05090038.pdf](https://yosemite.epa.gov/r5/in_permt.nsf/932df6c77d85e1b48625763f00510c78/d00ae1569f11e2be86257fed00574430/$FILE/05090038.pdf)).

### **Other Regulatory Agencies BACT - Marine Loading**

Bay Area AQMD Reg. 8, Rule 44 (<http://data.baaqmd.gov/dst/regulations/rg0844.pdf>) applies to existing marine tank vessel operations. The control requirements in Section 304 of this rule are less stringent than MACT Subpart Y (see the worksheet for NOC 11069). The BAAQMD BACT guidance for new or modified marine loading operations is a vapor recovery with an overall efficiency  $\geq 98\%$ .

#### ***BAY AREA AIR QUALITY MANAGEMENT DISTRICT Best Available Control Technology (BACT) Guideline***

##### *Source Category*

Source:	<i>Liquid Transfer &amp; Handling - Marine Loading</i>	Revision:	1
Class:	<i>All</i>	Document #:	107.1
		Date:	10/28/91

##### *Determination*

POLLUTANT	BACT 1. Technologically Feasible/ Cost Effective 2. Achieved in Practice	TYPICAL TECHNOLOGY
POC	1. <i>n/d</i> 2. <i>Vapor recovery and control system: compressor, condenser, and thermal incinerator w/ a destruction efficiency <math>\geq 98.5\%</math></i> <sup>b</sup>	1. <i>n/d</i> 2. <i>BAAQMD Approved Design and Operation</i> <sup>b</sup>
NOx	1. <i>n/a</i> 2. <i>n/a</i>	1. <i>n/a</i> 2. <i>n/a</i>
SO <sub>2</sub>	1. <i>n/a</i> 2. <i>n/a</i>	1. <i>n/a</i> 2. <i>n/a</i>
CO	1. <i>n/a</i> 2. <i>n/a</i>	1. <i>n/a</i> 2. <i>n/a</i>
PM <sub>10</sub>	1. <i>n/a</i> 2. <i>n/a</i>	1. <i>n/a</i> 2. <i>n/a</i>
NPOC	1. <i>n/d</i> 2. <i>Vapor recovery system w/ an overall system efficiency <math>\geq 95\%</math></i> <sup>b</sup>	1. <i>n/d</i> 2. <i>Vapor Balance; or Refrigerated Condenser; or Carbon Adsorber; or BAAQMD Approved Equivalent</i> <sup>b</sup>

### **Analysis**

This is our first permit application involving natural gasoline. The Agency has recently issued permits for similar light products including gasoline, crude oil, isoctane, and denatured ethanol. Proposed restrictions on the vapor pressure, sulfur content and benzene content of the natural gasoline to be handled will ensure that the natural gasoline to be terminaled is similar to the other light products previously permitted.

Our permits for marine loading of light products included the use of a John Zink Marine Vapor Combustion Unit (MVCU) which is warranted to  $\geq 99.0\%$  destruction efficiency for VOC. This is more stringent than MACT Subpart Y ( $\geq 98\%$  destruction) and the BAAQMD BACT guidance ( $\geq 98.5\%$  destruction). No increase in marine loading of gasoline, ethanol or isooctane is being proposed, only natural gasoline ( $\leq 151,500,000$  gal/yr). Loading is to be accomplished using the existing MVCU meeting the same emission limitations previously imposed for other light products.

Our permits for equipment leaks (e.g., pumps, valves, flanges) at gasoline loading terminals relied on the monthly visual inspections required under the Gasoline Distribution GACT standard under Subpart BBBB and, for US Oil & Refining, the LDAR program under NSPS Subpart GGGa. The fugitive emissions from equipment leaks associated with this project were estimated to be  $< 0.23$  ton/yr of VOC, primarily from the railyard across the Hylebos Waterway. Except for components in gasoline service, there are no federal leak detection and repair requirements at Targa Sound Terminal. The previous permit required Targa to comply with the Subpart BBBB leak detection and repair requirements for all light products, which will be extended to include natural gasoline.

Our permits for light product storage tanks have largely followed the Bay Area AQMD BACT guidance, which goes well beyond NSPS Subpart Kb (adopted in 1987) and other, more recent, federal standards, including Subpart C of 40 CFR Part 65 and Subpart WW of 40 CFR Part 63. Subpart C is referenced as an alternative compliance option under Subpart Kb. Subpart WW is referenced as an alternative to Subpart Kb under the Gasoline Distribution GACT standard. It's the only one that specifically addresses slotted guidepoles and is the only one with a numerical gap limit for gaskets, seals and wipers. None of these subparts require a secondary seal for the internal floating roof, vapor seal boots for roof legs, or monitoring of the VOC concentration above the floating roof.

Targa's proposal to modify 4 existing tanks to store light products would comply with the most stringent provisions in these standards as well as the Bay Area AQMD rule and BACT guidance and is consistent with our previous permits.

Proposed restrictions on the vapor pressure, sulfur content and benzene content of the natural gasoline will assure the natural gasoline ensure the required control technology will be consistent with our previous permits. As described below, natural gasoline properties vary widely, depending upon the well field and the degree to which it's processed/refined.

**VAPOR PRESSURE.** Processing has a dramatic impact on the vapor pressure of natural gasoline, as reflected in the Gas Processors Association (GPA) specifications -

### GPA Natural Gasoline Specifications and Test Methods

**Scope:** These specifications state the required properties of Natural Gasoline. Natural gasoline is a mixture of liquid hydrocarbons extracted from natural gas, composed principally of pentanes and heavier hydrocarbons, although varying amounts of butanes may be included, depending on the commercial grade.

Natural gasoline is defined further for commercial purposes by the following:

Product Characteristic	Specification	Test Method
Reid Vapor Pressure	10-34 pounds	ASTM D-323
Percentage evaporated at 140°F	25-85	ASTM D-216
Percentage evaporated at 275°F	Not less than 90	ASTM D-216
End Point	Not more than 375°F	ASTM D-216
Corrosion	Not more than classification 1	ASTM D-130 (modified)
Color	Not less than plus 25 (Saybolt)	ASTM D-156
Reactive Sulfur	Negative, "sweet"	GPA 1138

In addition to the above general specifications, natural gasoline shall be divided into 24 possible grades on the basis of Reid vapor pressure and percentage evaporated at 140°F. Each grade shall have a range in vapor pressure of four pounds, and a range in the percentage evaporated at 140°F of 15%. The maximum Reid vapor pressure of the various grades shall be 14, 18, 22, 26, 30, and 34 pounds, respectively. The minimum percentage evaporated at 140°F shall be 25, 40, 55, and 70, respectively. Each grade shall be designated by its maximum vapor pressure and its minimum percentage evaporated at 140°F, as shown in the following table:

Grades of Natural Gasoline Percentage Evaporated at 140°F				
	34 25%	40%	55%	70% 85%
Reid Vapor Pressure, psi	Grade 34-25	Grade 34-40	Grade 34-55	Grade 34-70
34	Grade 34-25	Grade 34-40	Grade 34-55	Grade 34-70
30	Grade 30-25	Grade 30-40	Grade 30-55	Grade 30-70
26	Grade 26-25	Grade 26-40	Grade 26-55	Grade 26-70
22	Grade 22-25	Grade 22-40	Grade 22-55	Grade 22-70
18	Grade 18-25	Grade 18-40	Grade 18-55	Grade 18-70
14	Grade 14-25	Grade 14-40	Grade 14-55	Grade 14-70
10				

Reid Vapor Pressure (RVP) is the absolute vapor pressure in pounds per square inch at 100°F. For comparison, motor vehicle gasoline has a maximum RVP of 15 in the winter and 9 in the summer. Most GPA grades of natural gasoline are too volatile to be stored in floating roof tanks. NSPS Subpart Kb imposes a true vapor pressure limit of 11.1 psia at the maximum monthly average storage temperature. The maximum monthly average temperature reported by the National Weather Service for SeaTac airport is 71.1°F.



Warmest Augs at Sea-Tac (Average temp in °F):

1. 71.1 (1967)
2. 69.4 (2013)
3. 69.1 (2014)
4. 68.7 (2016)
5. 68.7 (2015) #wawx

3:09 PM - 1 Sep 2016 · Grace, WA, United States

◀ ▶ 9 ❤ 5

Methods for determining the true vapor pressure from the Reid Vapor Pressure (RVP) are available (<http://www.jmcampbell.com/tip-of-the-month/2016/02/correlations-for-conversion-between-true->

[and-reid-vapor-pressures-tvp-and-rvp/](#)). I used equations 1b through 3b and the parameters in Table 1 to calculate an RVP equivalent of 16.8 for natural gasoline with a true vapor pressure of 11.1 psia @71.1°F. The BAAQMD rule prohibits storage of product with a true vapor pressure  $\geq$ 11 psia in floating roof tanks, which corresponds to an RVP of  $\geq$ 16.6.

The Safety Data Sheet from UEO Buckeye supplied with this permit application showed an RVP of 11.8 psi, which is comparable to gasoline. Because the Olympic Pipeline prohibits transmission of gasoline with an  $>$ 15 psi, I proposed this as a limit. Targa requested maximum flexibility with an RVP limit of 16.5. They proposed documenting compliance by either a Certificate of Analysis (COA) or Safety Data Sheet (SDS). However, SDS don't specify either the actual or maximum value of each shipment.

Most natural gasoline that's been processed at a liquids fractionation facility is used as a denaturant for ethanol, which is then used as an oxygenate for motor vehicle gasoline. Cargill's standard ethanol marketing agreement (<https://www.sec.gov/Archives/edgar/data/1370183/000119312506191648/dex108.htm>) contains the following natural gasoline denaturant specifications, including an RVP $<$ 14.0, total sulfur content  $<$ 50 ppm, and a benzene content  $\leq$ 1.1%.

**EXHIBIT E**

**Natural Gasoline Denaturant Specifications**

Parameter	Specification	Test Method
RVP	less than 14.0	ASTM D323
Total Sulfur	Less than 50.0 ppm	ASTM D5453
Benzene	1.1 % vol max	ASTM D5580
Total Aromatics	35 % vol max (including benzene)	ASTM D5580
Olefins	10 % vol max	ASTM D6550
Distillation End Point	43°F (225 C) max	ASTM D86
Additives	None allowed	

The above specifications parameters must be tested and reported on a Certificate of Analysis for each lot of product received and a copy must accompany each load. All rail cars must be sealed to ensure product quality. The Certification of Analysis results for natural gasoline denaturant shall be used to calculate benzene, aromatics and olefins content in the finished fuel grade ethanol for reporting on Certificates of Analysis for California delivery.

SULFUR. Processing also has a dramatic impact on the sulfur content of natural gasoline. Lease condensate can contain  $>$ 0.5% ( $>$ 5000 ppm) sulfur by weight. Processing plants remove sulfur (e.g., hydrogen sulfide) and convert mercaptans to disulfides. The resulting sulfur content is typically 100-200 parts per million by weight (<https://www.aiche.org/academy/videos/conference-presentations/tier-3-processing-options-natural-gasoline-nlg-fractionation>) but can be further lowered, as evidenced by Cargill's specification. The Safety Data Sheet (SDS) from UEO Buckeye supplied with this permit application didn't specify the sulfur content.

Effective 1/1/17, motor vehicle gasoline is subject to the Tier 3 sulfur limits (10 ppm annual avg., 80 ppm max per gal) under 40 CFR Part 80, Subpart O. This includes the sulfur in denatured ethanol added to the gasoline, which has to meet a 10 ppm (max per gal) sulfur limit per §80.1610. The denaturant (natural gasoline) can't exceed 3% by volume of the denatured ethanol and can't contain  $>$ 330 ppm sulfur per §80.1611. A product transfer document must be included with each batch either specifying its sulfur content or simply that it's  $<$ 330 ppm sulfur per §80.1611.

The GPA specifications require natural gasoline to be 'sweetened' in order to prevent corrosion of pipes and tanks. The EPA's new Tier 3 sulfur limits are designed to protect automobile catalytic convertors. Reduced sulfur compounds are also highly malodorous, with odor thresholds around a part per billion by volume. Some are also highly toxic.

The following paper from John Zink's website describes a marine crude oil loading terminal in Burnaby BC that was causing odor complaints. The terminal receives a blend of sour (tar sands) crude and lease condensate (natural gasoline) via the Trans Mountain Pipeline from Alberta. A Marine Vapor Combustion Unit was installed to combust the gases displaced during ship loading. These gases, which contained about 2600 ppmv of reduced sulfur compounds, were combusted with an efficiency >99.5%, resulting in stack gas concentrations of 0.4 ppm of mercaptan, 1.8 ppm of H<sub>2</sub>S, and 0.1 ppm of carbonyl sulfide. Although these concentrations were still around 1000 times their odor thresholds, they were low enough to where atmospheric dispersion downwind of the stack could reduce them to near or below their odor thresholds.



tp\_What'sThatSmell.  
pdf

Targa Sound Terminal uses a nearly identical MVCU. If off-gases containing 330 ppm of sulfur (e.g., carbon disulfide) were destructed with ≥99.0% efficiency, the exhaust would contain <33 ppb of carbon disulfide and <33 ppm of SO<sub>2</sub>, which would not be detectable downwind of the stack. This wouldn't necessarily be the case for high sulfur natural gasoline (e.g., lease condensate). If the sulfur concentrations are high enough, its combustion could conceivably exceed the SO<sub>2</sub> emission limit of 1000 ppmv, which cannot be permitted.

Targa proposed that their contracts require that customer provide a Certificate Of Analysis for each product from a new or different source. Upon receipt of a COA with a sulfur level > 0.5% sulfur, they would either test the sample or conduct a stack test on the MVCU for the product to ensure the product is in compliance with Reg I, Section 9.07.

**BENZENE.** Processing probably has little impact on the benzene content of natural gasoline, since its vapor pressure is less than that of hexane. The benzene content is probably more related to the well field from which it came. A natural gasoline Safety Data Sheet (SDS) from ConocoPhillips showed values as high as 5% by weight. The SDS from UEO Buckeye supplied with this permit application specified a benzene content in the range of 0-1% by weight, which is consistent with that of Bakken crude oil and motor vehicle gasoline (≤1.3% by volume per sample, ≤0.62% annual avg).

This is important because benzene is thought to be the most toxic hydrocarbon in natural gasoline. Based on the dispersion modeling initially submitted with this permit application, I recommended a limit ≤1.0% by weight. Targa subsequently remodeled with a benzene content of 1.3% to demonstrate compliance with the Acceptable Source Impact Level in WAC 173-460-150 (see Section H of this worksheet).

According to the Energy Information Administration, almost half of the natural gasoline produced is exported to western Canada as diluent for heavy crude, enabling its movement in pipelines (30% diluent) and railcars (15% diluent). Natural gasoline is also used as a denaturant for ethanol (≤2.5% by volume), making the alcohol unfit for drinking. Denatured ethanol is blended with gasoline to meet octane specifications, the Clean Air Act requirement for oxygenated gasoline, and the Energy Independence and Security Act requirement for renewable fuel use.

The natural gasoline to be terminaled by Targa is not going to be exported to Canada as a diluent for tar sands crude. Theoretically it could be exported to other countries for this purpose or even as a feedstock for ethylene production. However, the shallow berth of Targa's dock significantly restricts the draft of vessels that can be loaded. Theoretically, it could be sent to US Oil or one of the

refineries at March Point or Cherry Point. However, these refineries (except for Shell, which can receive oil from Tesoro) already have rail access and haven't historically handled natural gasoline. Accordingly, it will most likely be subject to motor vehicle gasoline regulations, including the 330 ppm sulfur limit as well as restrictions on vapor pressure (as evidenced in Cargill's specifications) and benzene content.

### **BACT Recommendations**

BACT for VOC and organic TAC emissions from storage of natural gasoline, gasoline, denatured ethanol, and isooctane and is the same as specified in the recent permits issued to Targa Sound Terminal shown above. It includes compliance with NSPS Subpart Kb, boots for the roof legs, seals for any slotted guidepoles, floating roof mounted secondary seals, a 30% VOC limit for the space above the float (inspected semiannually), a 10 year maximum seal gap inspection frequency for Section 3.02, and emission controls for tank degassing. The RVP of any natural gasoline stored shall not exceed 16.5 psi, as documented by the product transfer documents (bill of lading or certificate of analysis).

BACT for TAC includes a limit on the benzene content of  $\leq 1.3\%$  by weight.

BACT for VOC from marine loading of natural gasoline is the same as specified in the recent permit issued to Targa Sound Terminal (NOC No. 10620) and includes a Marine Vapor Combustion Unit with  $\geq 99.0\%$  destruction efficiency for VOC.

BACT for SO<sub>2</sub> and H<sub>2</sub>S from marine loading is the Part 80, Subpart O sulfur limit of 330 ppm, as documented by the product transfer documents (bill of lading or certificate of analysis) in accordance with 40 CFR 80.1611.

BACT for VOC from equipment leaks is compliance with the gasoline leak detection and repair program under 40 CFR 63.11089, even when storing natural gasoline, isooctane, and denatured ethanol.

## **F. EMISSION ESTIMATES**

### **Proposed Project Emissions**

#### Actual Emissions

The permit application included the following estimates -

Table 3-3. Emission Summary

Emission Unit	Maximum Hourly VOC Emission Rate (lb/hr)	Annual VOC Emission Rate (tpy)
Tank 208H <sup>a</sup>	17.84	1.88
Tank 209H <sup>a</sup>	18.64	1.96
Tank 210H <sup>a</sup>	30.72	3.23
Tank 211H <sup>a</sup>	18.64	1.96
Tanks Fugitives <sup>a</sup>	0.01	0.04
MVCU <sup>b</sup>	54.27	14.62
Marine Barge Loading Fugitives <sup>b</sup>	1.48E-03	6.47E-03
Rail Fugitives <sup>b</sup>	0.04	0.18
<b>Total VOC</b>	<b>140.17</b>	<b>23.87</b>

<sup>a</sup> Tanks emissions (including Tanks 208H, 209H, 210H and 211H) are evaluated for the worst-case for storing diesel, gasoline, natural gasoline and iso octane. Ethanol is not expected to have VOC emissions higher than any of these products; therefore, emissions for storing ethanol are not evaluated.

<sup>b</sup> Permitting Tanks 208H-211H to have the capability to store gasoline, ethanol and iso octane does not affect current throughput limits, nor cause additional VOC emissions at the marine dock and rail unloading. Therefore, emissions for MVCU and rail unloading are only evaluated for natural gasoline.

Their emission calculations are shown below –



Targa Sound Terminal NOC Application Response



Targa Tank Modification Response

The tank emission calculations were made with proprietary software that could not be independently verified with this permit action. I asked Harold Laurence of Trinity Consultants why they did it this way and he said that it's because EPA is no longer supporting the TANKS4.09D software (<https://www3.epa.gov/ttnchie1/software/tanks/>). However, it's still available and its errors are known mostly around heated tank emission calculations (The tanks used in this permit application were not heated). The calculations and equations used by these programs are in AP-42 and can be done manually or set them up in a spreadsheet as Trinity Consultants did. In order to verify the accuracy of the emission calculations without using the software, a few of the tank emissions were randomly verified by hand to determine if the correct methods were used:

#### 7.1.3.2.1 Normal Operation

Total losses from floating roof tanks may be written as:

$$L_T = L_R + L_{WD} + L_F + L_D \quad (2-1)$$

where:

$L_T$  = total loss, lb/yr

$L_R$  = rim seal loss, lb/yr; see Equation 2-2

$L_{WD}$  = withdrawal loss, lb/yr; see Equation 2-4

$L_F$  = deck fitting loss, lb/yr; see Equation 2-5

$L_D$  = deck seam loss (internal floating roof tanks only), lb/yr; see Equation 2-9

Loss factors may be estimated for deck fitting configurations that are not listed in Table 1-12, at the zero miles-per-hour wind speed condition (IFRTs and CFRTs), from the following equation:

$$K_{fit} = 0.27(A_{fit})^{0.86}$$

Where:

$K_{fit}$  = zero-wind-speed loss factor for a particular type of deck fitting, in pound-moles per year.

$A_{fit}$  = liquid surface area within a particular type of deck fitting, in square inches. The liquid surface area is the area inside the deck fitting well or leg sleeve, less any area occupied by an obstruction in the deck fitting well or leg sleeve (such as a fixed-roof support column, unslotted guidepole, guidepole float, or deck support leg).

A spot check on Rim Seal Losses for example, on Tank 209H and 211H was done to make sure it was done correctly:

Rim Seal Loss - Rim seal loss from floating roof tanks can be estimated using the following equation:

$$L_R = (K_{RA} + K_{RB} v^n) DP^* M_V K_C \quad (2-2)$$

where:

$L_R$  = rim seal loss, lb/yr

$K_{RA}$  = zero wind speed rim seal loss factor, lb-mole/ft·yr; see Table 7.1-8

$K_{RB}$  = wind speed dependent rim seal loss factor, lb-mole/(mph)<sup>n</sup>·ft·yr; see Table 7.1-8

$v$  = average ambient wind speed at tank site, mph; see Note 1

$n$  = seal-related wind speed exponent, dimensionless; see Table 7.1-8

$P^*$  = vapor pressure function, dimensionless; see Note 2

$$P^* = \frac{\frac{P_{VA}}{P_A}}{\left[ 1 + \left( 1 - \frac{P_{VA}}{P_A} \right)^{0.5} \right]^2} \quad (2-3)$$

where:

$P_{VA}$  = vapor pressure at daily average liquid surface temperature, psia;

See Notes 1 and 2 to Equation 1-21 and Note 3 below

$P_A$  = atmospheric pressure, psia

$D$  = tank diameter, ft

$M_V$  = average vapor molecular weight, lb/lb-mole; see Note 1 to Equation 1-21,

$K_C$  = product factor;

$K_C = 0.4$  for crude oils;

$K_C = 1$  for all other organic liquids.

Using equation 2-2 outlined above, and taking into account the actual number of days that the tank will be In Service (Labeled  $T_{is}/T_{yr}$  In the application spreadsheet) Targa LLC gets 0.55 lbs of VOC/Month.

Zero wind speed rim seal loss factor	AP-42 Table 7.1-8	$K_{RA}$	lb-mole/ft·yr	1.6
Wind speed dependent rim seal loss factor	AP-42 Table 7.1-8	$K_{RB}$	lb-mole/(mph) <sup>n</sup> ·ft·yr	0.3

The  $v^n$  goes to zero for Internal floating roof tanks and domed external floating roof tanks

Vapor Pressure Function was found used Equation 2-3 as noted above.

$P_a$  , the average ambient pressure was 14.515 for the location of the tanks.

$P_{va}$  is a more complex analysis. Targa used the following notes from AP-42 to calculate vapor pressure:

Notes:

1. The molecular weight of the vapor,  $M_v$ , can be determined from Table 7.1-2 and 7.1-3 for selected petroleum liquids and volatile organic liquids, respectively, or by analyzing vapor samples. Where mixtures of organic liquids are stored in a tank,  $M_v$  can be calculated from the liquid composition. The molecular weight of the vapor,  $M_v$ , is equal to the sum of the molecular weight,  $M_i$ , multiplied by the vapor mole fraction,  $y_i$ , for each component. The vapor mole fraction is equal to the partial pressure of component  $i$  divided by the total vapor pressure. The partial pressure of component  $i$  is equal to the true vapor pressure of component  $i$  ( $P$ ) multiplied by the liquid mole fraction, ( $x_i$ ). Therefore,

$$M_v = \sum M_i y_i = \sum M_i \left( \frac{P x_i}{P_{VA}} \right) \quad (1-22)$$

where:

$P_{VA}$ , total vapor pressure of the stored liquid, by Raoult's Law, is:

$$P_{VA} = \sum P x_i \quad (1-23)$$

For more detailed information, please refer to Section 7.1.4.

For a partial speciation profile, Targa found this value to be 0.0085.

-The Vapor Molecular weight  $M_v$ , was found to be 190.0 lbs/lb-mole based on equation 1-22 for partial speciation.

-Product factor,  $K_c$  was 1.0 for all other volatile organic liquids since this is not crude oil

These values were placed in Equation 2-2 outlined above and verified to be 0.55. Each value was analyzed within the formula for accuracy.

Potential Emissions

See actual emissions above, which are calculated using worst case (maximum emission) scenarios. For example, throughputs were at the proposed limits.

**Facility-wide Emissions**

Actual Emissions

Reporting Source? Possibly

The emissions from the facility are capped via throughput limits and emission standards. The Agency requires an annual emission report if emissions exceed 25 ton/yr of VOC,  $SO_2$ ,  $NO_x$ ,  $CO$  or  $PM$ , 6.25 ton/yr of total HAP, or 2.5 ton/yr of any individual HAP. For calendar years 2014 and 2015, Targa reported that the facility was below emission reporting thresholds but it might exceed a reporting threshold in 2016.

Potential Emissions

The permit application included the following estimates for potential emissions -

Table 3-4. Facility-Wide Emissions Summary

	VOC <sup>a</sup> (tpy)	Individual HAP <sup>b</sup> (tpy)	Total HAPs (tpy)
Post-Project Facility-Wide Emissions	89.27	6.18	11.43
PSD Threshold	250	N/A	N/A
Title V Threshold	100	10	25

<sup>a</sup> This project only has VOC and HAP emission increase. Therefore, other criteria pollutants are not listed. The post-project facility-wide VOC emission rate includes fugitives.

<sup>b</sup> The individual HAP with highest emissions is 2,2,4-trimethylpentane.

## G. OPERATING PERMIT or PSD

N/A

## H. AMBIENT IMPACT ANALYSIS

The permit application included dispersion modeling with AERMOD for benzene and hexane and indicating compliance with the Acceptable Source Impact Levels. All other TAC emissions were below the Small Quantity Emission Rates for which modeling is required.



Targa Sound  
Terminal NOC Applica

Table 2. Modeling Results

Pollutant	Averaging Period	October 2016	February 2017	ASIL ( $\mu\text{g}/\text{m}^3$ )	Below ASIL?
		Modeling Results ( $\mu\text{g}/\text{m}^3$ )	Modeling Results ( $\mu\text{g}/\text{m}^3$ )		
Benzene	Annual	0.0260	0.0340	0.0345	Yes

Benzene isopleths for highest annual average (2009) -



Natural gasoline not certified for blending with motor vehicle gasoline may contain high amounts of sulfur (>5000 ppm). If, in the future, Targa wants to terminal natural gasoline containing >330 ppm of sulfur, Targa would need to file another permit application demonstrating compliance with the Acceptable Source Impact Level for reduced sulfur compounds including, but not limited to, hydrogen sulfide (1.4 ppb, 24-hr avg) and carbon disulfide (257 ppb, 24-hr avg), and compliance with the SO<sub>2</sub> emission limit for the MVCU (1000 ppm, 1-hr avg).

## I. APPLICABLE RULES & REGULATIONS

### 1. PUGET SOUND CLEAN AIR AGENCY

#### REGULATION I

##### **Section 5.05 Registration Requirements**

(c) The owner or operator of a registered source shall develop and implement an operation and maintenance plan to ensure continuous compliance with Regulations I, II, and III. A copy of the plan shall be filed with the Control Officer upon request. The plan shall reflect good industrial practice and shall include, but not be limited to, the following:

- (1) Periodic inspection of all equipment and control equipment;
- (2) Monitoring and recording of equipment and control equipment performance;
- (3) Prompt repair of any defective equipment or control equipment;
- (4) Procedures for start up, shut down, and normal operation;
- (5) The control measures to be employed to ensure compliance with Section 9.15 of this regulation; and
- (6) A record of all actions required by the plan.

*The plan shall be reviewed by the source owner or operator at least annually and updated to reflect any changes in good industrial practice.*

### **Section 9.11 Detriment to Person or Property**

(a) *It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property.*

### **Section 9.07 Sulfur Dioxide Emission Standard**

*It shall be unlawful for any person to cause or allow the emission of sulfur dioxide from any source in excess of 1,000 parts per million by volume on a dry basis, 1-hour average (~~corrected to 7% oxygen for fuel burning equipment and refuse burning equipment~~).*

### **Section 9.20 Maintenance of Equipment**

(a) *It shall be unlawful for any person to cause or allow the operation of any features, machines or devices constituting parts of or called for by plans, specifications, or other information submitted pursuant to Article 6 of Regulation I unless such features, machines or devices are maintained in good working order.*

(b) *It shall be unlawful for any person to cause or allow the operation of any equipment as defined in Section 1.07 or control equipment not subject to Section 9.20(a) unless the equipment or control equipment is maintained in good working order.*

## REGULATION II

### **Section 3.02 VOC Storage Tanks**

(a) *This section shall apply to all stationary storage tanks with a capacity of 40,000 gallons (151,400 liters) or greater storing volatile organic compounds with a true vapor pressure of 1.5 pounds per square inch (10.5 kPa) or greater at actual monthly average storage temperatures.*

(b) *It shall be unlawful for any person to cause or allow such storage unless the storage tank is a pressure tank maintaining working pressures sufficient at all times to prevent organic vapor loss to the atmosphere, or is designed and equipped with one of the following vapor loss control devices:*  
\*\*\*

(2) *A fixed roof with an internal floating-type cover that rests on the surface of the liquid contents at all times and is equipped with a closure device. The closure device shall prevent the emission of organic vapors such that the concentration of such vapors in the vapor space above the internal floating roof does not exceed 50% of the lower explosive limit (LEL) measured as propane; or*

(3) *A fixed roof tank with control equipment that reduces emissions by 95% or greater.*

(c) *All primary seals or closure devices shall meet the following requirements:*

(1) *The primary seal shall contain no visible holes, tears, or other openings.*

(2) *No gap between the tank shell and the primary seal shall exceed 1½ inches (3.8 cm). No continuous gap greater than ⅛ inch (0.32 cm) shall exceed 10% of the circumference of the tank. The cumulative length of all primary seal gaps exceeding ½ inch (1.3 cm) shall not be more than 10% of the circumference; and the cumulative length of all primary seal gaps exceeding ⅛ inch (0.32 cm) shall not be more than 40% of the circumference.*

(d) *All secondary seals or closure devices shall meet the following requirements:*

(1) *There shall be no visible holes, tears, or other openings in the secondary seal or seal fabric;*

(2) *The secondary seal shall be intact and uniformly in place around the circumference of the floating roof between the roof and the tank wall; and*

- (3) No gap between the tank shell and the secondary seal shall exceed  $\frac{1}{2}$  inch (1.3 cm). The cumulative length of all gaps exceeding  $\frac{1}{8}$  inch (0.32 cm) in width between the secondary seal and the tank wall shall not exceed 5% of the circumference of the tank.
- (e) All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves shall be:
  - (1) Equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and
  - (2) Equipped with projections into the tank that remain below the liquid surface at all times.
- (f) Automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
- (g) Rim vents shall be set to open when the roof is being floated off the leg supports or at the manufacturer's recommended setting.
- (h) Emergency roof drains shall be provided with slotted membrane fabric covers or equivalent that cover at least 90% of the area of the opening.
- (i) Routine inspections shall be performed by the owner or operator as follows:
  - (1) For external floating roof tanks, conduct a semiannual visual inspection of all seals and closure devices and measure the primary and secondary seal gap annually;
  - (2) For internal floating roof tanks, visually inspect all seals and measure the concentration of VOC in the vapor space above the internal floating roof semiannually; and
  - (3) Maintain records of the results of any inspections performed for a period of 2 years after the date on which the record was made.

## **Section 2.05 Gasoline Loading Terminals**

- (a) Section 2.05 shall apply to all gasoline loading terminals with an annual gasoline throughput greater than 7,200,000 gallons.
- (b) It shall be unlawful for any person to cause or allow the loading of gasoline into any transport tank unless all the following conditions are met:
  - (1) The loading terminal shall employ bottom loading and be equipped with a vapor recovery system;
  - (2) All loading lines and vapor lines shall be equipped with vapor-tight fittings that close automatically upon disconnect;
  - (3) All vapor return lines shall be connected between the transport tank and the vapor recovery system such that all displaced volatile organic compounds are vented to the vapor recovery system; and
  - (4) The back-pressure in the vapor lines shall not exceed 4.5 kPa (18 inches) of water pressure.
- (c) The vapor recovery system required by this section shall prevent the emission of at least 90% by weight of the volatile organic compounds and shall limit the emission of volatile organic compounds to no more than 35 milligrams per liter (mg/l) of gasoline transferred.
- (d) The vapor recovery system required by Section 2.05(b) shall be equipped with a continuous emission monitoring system meeting the requirements of Article 12 of Regulation I.

## **2. WASHINGTON STATE ADMINISTRATIVE CODE**

### **WAC 173-400-040 General standards for maximum emissions.**

- (5) **Odors.** Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of his property must use recognized good practice and procedures to reduce these odors to a reasonable minimum.

(6) **Emissions detrimental to persons or property.** No person shall cause or allow the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.

**RCW 70.94.040 Causing or permitting air pollution unlawful—Exception.**

Except where specified in a variance permit, as provided in RCW 70.94.181, it shall be unlawful for any person to cause air pollution or permit it to be caused in violation of this chapter, or of any ordinance, resolution, rule or regulation validly promulgated hereunder.

**RCW 70.94.030 Definitions.**

(2) "Air pollution" is presence in the outdoor atmosphere of one or more air contaminants in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interfere with enjoyment of life and property. For the purpose of this chapter, air pollution shall not include air contaminants emitted in compliance with chapter 17.21 RCW.

**WAC 173-491-040 Gasoline vapor control requirements.**

(1) **Fixed-roof gasoline storage tanks.**

(a) All fixed-roof gasoline storage tanks having a nominal capacity greater than forty thousand gallons shall comply with one of the following:

- (i) Meet the equipment specifications and maintenance requirements of the federal standards of performance for new stationary sources - Storage Vessels for Petroleum Liquids (40 C.F.R. 60, subparts K, KA and KB).
- (ii) Be retrofitted with a floating roof or internal floating cover using a metallic seal or a nonmetallic resilient seal at least meeting the equipment specifications of the federal standards referred to in (a)(i) of this subsection or its equivalent.
- (iii) Be fitted with a floating roof or internal floating cover meeting the manufacturer's equipment specifications in effect when it was installed.

(b) All seals used in (a)(ii) and (iii) of this subsection are to be maintained in good operating condition and the seal fabric shall contain no visible holes, tears, or other openings.

(c) All openings not related to safety are to be sealed with suitable closures.

\* \* \*

(2) **Gasoline loading terminals.**

(a) This chapter shall apply to all gasoline loading terminals with an average annual gasoline throughput greater than 7.2 million gallons.

(b) **Loading facilities.** Facilities for the purpose of loading gasoline into any transport tank shall be equipped with a vapor control system (VCS) as described in (c) of this subsection and comply with the following conditions:

- (i) The loading facility shall employ submerged or bottom loading for all transport tanks.
- (ii) The VCS shall be connected during the entire loading of all transport tanks.
- (iii) The loading of all transport tanks shall be performed such that the transfer is at all times vapor tight. Emissions from pressure relief valves shall not be included in the controlled emissions when the back pressure in the VRS collection lines is lower than the relief pressure setting of the transport tank's relief valves.
- (iv) All loading lines and vapor lines shall be equipped to close automatically when disconnected. The point of closure shall be on the tank side of any hose or intermediate connecting line.

(c) **Vapor control system (VCS).** The VCS shall be designed and built according to accepted industrial practices and meet the following conditions:

- (i) The VCS shall not allow organic vapors emitted to the ambient air to exceed thirty-five milligrams per liter (three hundred twenty-two milligrams per gallon) of gasoline loaded.
- (ii) The VCS shall be equipped with a device to monitor the system while the VCS is in operation.
- (iii) The back pressure in the VCS collection lines shall not exceed the transport tank's pressure relief settings.

\*\*\*

(6) Equipment or systems failures.

(a) Specific applicability. This section shall apply to all gasoline transport tanks equipped for gasoline vapor collection and all vapor collection systems at gasoline loading terminals, bulk gasoline plants, and gasoline dispensing facilities as described in subsections (2) through (5) of this section.

During the months of May, June, July, August, and September any failure of a vapor collection system at a bulk gasoline plant or gasoline loading terminal to comply with this section requires the discontinuation of gasoline transfer operations for the failed part of the system. Other transfer points that can continue to operate in compliance may be used. The loading or unloading of the transport tank connected to the failed part of the vapor collection system may be completed during the other months of the year.

(b) Provisions for specific processes.

(i) The owner or operator of a gasoline loading terminal or bulk gasoline plant shall only allow the transfer of gasoline between the facility and a transport tank if a current leak test certification for the transport tank is on file with the facility or a valid inspection sticker is displayed on the vehicle. Certification is required annually.

\*\*\*

(iii) The owner or operator of a vapor collection system shall:

(A) Operate the vapor collection system and the gasoline loading equipment during all loadings and unloadings of transport tanks equipped for emission control such that:

(I) The tank pressure will not exceed a pressure of eighteen inches of water or a vacuum of six inches of water;

(II) The concentration of gasoline vapors is below the lower explosive limit (LEL, measured as propane) at all points a distance of one inch from potential leak sources; and

(III) There are no visible liquid leaks except for a liquid leak of less than four drops per minute at the product loading connection during delivery.

(IV) Upon disconnecting transfer fittings, liquid leaks do not exceed ten milliliters (0.34 fluid ounces) per disconnect averaged over three disconnects.

(B) Repair and retest a vapor collection system that exceeds the limits of

(b)(iii)(A) of this subsection within fifteen days.

(iv) The department or local air authority may, at any time, monitor a gasoline transport tank and vapor collection system during loading or unloading operations by the procedure in (c) of this subsection to confirm continuing compliance with this section.

(c) Testing and monitoring.

(i) The owner or operator of a gasoline transport tank or vapor collection system shall, at his own expense, demonstrate compliance with (a) and (b) of this subsection, respectively. All tests shall be made by, or under the direction of, a person qualified to perform the tests and approved by the department.

- (ii) Testing to determine compliance with this section shall use procedures approved by the department.
- (iii) Monitoring to confirm continuing leak tight conditions shall use procedures approved by the department.
- (d) Recordkeeping.
  - (i) The owner or operator of a gasoline transport tank or vapor collection system shall maintain records of all certification tests and repairs for at least two years after the test or repair is completed.
  - (ii) The records of certification tests required by this section shall, as a minimum, contain:
    - (A) The transport tank identification number;
    - (B) The initial test pressure and the time of the reading;
    - (C) The final test pressure and the time of the reading;
    - (D) The initial test vacuum and the time of the reading;
    - (E) The final test vacuum and the time of the reading;
    - (F) At the top of each report page the company name, date, and location of the tests on that page; and
    - (G) Name and title of the person conducting the test.
  - (iii) The owner or operator of a gasoline transport tank shall annually certify that the transport tank passed the required tests.
  - (iv) Copies of all records required under this section shall immediately be made available to the department, upon written request, at any reasonable time.
- (e) Preventing evaporation. All persons shall take reasonable measures to prevent the spilling, discarding in sewers, storing in open containers, or handling of gasoline in a manner that will result in evaporation to the ambient air.

### 3. FEDERAL

40 CFR Part 63, Subpart BBBB (Gasoline Distribution GACT standard) doesn't apply to natural gasoline before it's blended into gasoline, since it doesn't meet the definition of gasoline (*any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals [4.0 psi] or greater, which is used as a fuel for internal combustion engines.*) This was EPA's position on denatured ethanol in the final rulemaking (76 FR 4155).

40 CFR Part 63, Subpart EEEE (Organic Liquids Distribution, Non-Gasoline), R (Bulk Gasoline Terminals And Pipeline Breakout Stations), and Y (Marine Tank Vessel Loading Operations) don't apply to Targa, since it's not a major source of HAP.

NSPS Subpart Kb (below) applies to these tanks.

#### **Subpart Kb §60.111b Definitions.**

Terms used in this subpart are defined in the Act, in subpart A of this part, or in this subpart as follows:

\* \* \*

*Condensate means hydrocarbon liquid separated from natural gas that condenses due to changes in the temperature or pressure, or both, and remains liquid at standard conditions.*

*Fill means the introduction of VOL into a storage vessel but not necessarily to complete capacity.*

*Maximum true vapor pressure means the equilibrium partial pressure exerted by the volatile organic compounds (as defined in 40 CFR 51.100) in the stored VOL at the temperature equal to the highest calendar-month average of the VOL storage temperature for VOL's stored above or below the ambient*

temperature or at the local maximum monthly average temperature as reported by the National Weather Service for VOL's stored at the ambient temperature, as determined:

- (1) In accordance with methods described in American Petroleum Institute Bulletin 2517, *Evaporation Loss From External Floating Roof Tanks*, (incorporated by reference—see §60.17); or
- (2) As obtained from standard reference texts; or
- (3) As determined by ASTM D2879-83, 96, or 97 (incorporated by reference—see §60.17);
- (4) Any other method approved by the Administrator.

*Petroleum* means the crude oil removed from the earth and the oils derived from tar sands, shale, and coal.

*Petroleum liquids* means petroleum, condensate, and any finished or intermediate products manufactured in a petroleum refinery.

\*\*\*

*Reid vapor pressure* means the absolute vapor pressure of volatile crude oil and volatile nonviscous petroleum liquids except liquified petroleum gases, as determined by ASTM D323-82 or 94 (incorporated by reference—see §60.17).

*Storage vessel* means each tank, reservoir, or container used for the storage of volatile organic liquids but does not include:

- (1) Frames, housing, auxiliary supports, or other components that are not directly involved in the containment of liquids or vapors;

\*\*\*

*Volatile organic liquid (VOL)* means any organic liquid which can emit volatile organic compounds (as defined in 40 CFR 51.100) into the atmosphere.

\*\*\*

#### **§60.112b Standard for volatile organic compounds (VOC).**

(a) The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, shall equip each storage vessel with one of the following:

- (1) A fixed roof in combination with an internal floating roof meeting the following specifications:
  - (i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
  - (ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
    - (A) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
    - (B) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel

*and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.*

(C) *A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.*

(iii) *Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.*

(iv) *Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.*

(v) *Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.*

(vi) *Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.*

(vii) *Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.*

(viii) *Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.*

(ix) *Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.*

\* \* \*

(3) *A closed vent system and control device meeting the following specifications:*

(i) *The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined in part 60, subpart VV, §60.485(b).*

(ii) *The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. If a flare is used as the control device, it shall meet the specifications described in the general control device requirements (§60.18) of the General Provisions.*

(4) *A system equivalent to those described in paragraphs (a)(1), (a)(2), or (a)(3) of this section as provided in §60.114b of this subpart.*

(b) *The owner or operator of each storage vessel with a design capacity greater than or equal to 75 m<sup>3</sup> which contains a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa [11.1 psia] shall equip each storage vessel with one of the following:*

(1) *A closed vent system and control device as specified in §60.112b(a)(3).*

(2) *A system equivalent to that described in paragraph (b)(1) as provided in §60.114b of this subpart.*

**§60.113b Testing and procedures.**

The owner or operator of each storage vessel as specified in §60.112b(a) shall meet the requirements of paragraph (a), (b), or (c) of this section. The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of §60.112b.

(a) After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:

- (1) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (2) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (3) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
  - (i) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or
  - (ii) Visually inspect the vessel as specified in paragraph (a)(2) of this section.
- (4) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section.
- (5) Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.

\* \* \*

(c) *The owner or operator of each source that is equipped with a closed vent system and control device as required in §60.112b (a)(3) or (b)(2) (other than a flare) is exempt from §60.8 of the General Provisions and shall meet the following requirements.*

(1) *Submit for approval by the Administrator as an attachment to the notification required by §60.7(a)(1) or, if the facility is exempt from §60.7(a)(1), as an attachment to the notification required by §60.7(a)(2), an operating plan containing the information listed below.*

(i) *Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed vent capture system receives vapors, gases, or liquids other than fuels from sources that are not designated sources under this subpart, the efficiency demonstration is to include consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. If an enclosed combustion device with a minimum residence time of 0.75 seconds and a minimum temperature of 816 °C is used to meet the 95 percent requirement, documentation that those conditions will exist is sufficient to meet the requirements of this paragraph.*

(ii) *A description of the parameter or parameters to be monitored to ensure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter (or parameters).*

(2) *Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Administrator in accordance with paragraph (c)(1) of this section, unless the plan was modified by the Administrator during the review process. In this case, the modified plan applies.*

(d) *The owner or operator of each source that is equipped with a closed vent system and a flare to meet the requirements in §60.112b (a)(3) or (b)(2) shall meet the requirements as specified in the general control device requirements, §60.18 (e) and (f).*

**§60.115b Reporting and recordkeeping requirements.**

*The owner or operator of each storage vessel as specified in §60.112b(a) shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of §60.112b. The owner or operator shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 2 years. The record required by (c)(1) will be kept for the life of the control equipment.*

(a) *After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements.*

(1) *Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3).*

(2) *Keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).*

(3) *If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of*

the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.

(4) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §61.112b(a)(1) or §60.113b(a)(3) and list each repair made.

\* \* \*

(c) After installing control equipment in accordance with §60.112b (a)(3) or (b)(1) (closed vent system and control device other than a flare), the owner or operator shall keep the following records.

- (1) A copy of the operating plan.
- (2) A record of the measured values of the parameters monitored in accordance with §60.113b(c)(2).

(d) After installing a closed vent system and flare to comply with §60.112b, the owner or operator shall meet the following requirements.

- (1) A report containing the measurements required by §60.18(f) (1), (2), (3), (4), (5), and (6) shall be furnished to the Administrator as required by §60.8 of the General Provisions. This report shall be submitted within 6 months of the initial start-up date.
- (2) Records shall be kept of all periods of operation during which the flare pilot flame is absent.
- (3) Semiannual reports of all periods recorded under §60.115b(d)(2) in which the pilot flame was absent shall be furnished to the Administrator.

#### **§60.116b Monitoring of operations.**

(a) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.

(b) The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

(c) Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa ~~or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa~~ shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.

(d) Except as provided in paragraph (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 5.2 kPa ~~or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa~~ shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.

(e) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below.

- (1) ~~For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar month average of the storage temperature.~~ For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

(2) For ~~erude oil~~ or refined petroleum products the vapor pressure may be obtained by the following:

(i) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

\* \* \*

(3) For other liquids, the vapor pressure:

(i) May be obtained from standard reference texts, or  
(ii) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference—see §60.17); or  
(iii) Measured by an appropriate method approved by the Administrator; or  
(iv) Calculated by an appropriate method approved by the Administrator.

\* \* \*

(g) The owner or operator of each vessel equipped with a closed vent system and control device meeting the specification of §60.112b or with emissions reductions equipment as specified in 40 CFR 65.42(b)(4), (b)(5), (b)(6), or (c) is exempt from the requirements of paragraphs (c) and (d) of this section.

**§60.7 Notification and record keeping.**

(a) Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:

(1) A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.

\* \* \*

(3) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

**J. PUBLIC NOTICE**

A notice of application was posted on the Agency's website for 15 days. No requests for public comment or responses were received during this time. However, the Northeast Tacoma Community Council has expressed concerns about petroleum odors from the Tideflats and Targa Sound Terminal is the nearest source of such odors. Therefore, there was substantial public interest in this project, making it subject to a mandatory public notice process under WAC 173-400-171(3)(n).

The Agency held a public information meeting on April 26<sup>th</sup>, 2017 to help answer questions about the Targa project before going to public notice. The public information meeting was posted on numerous social media sites such as facebook, Twitter, and the News Tribune. Emails were also sent to interested parties as well as an Agency list of people who signed up to be informed.

The Targa permit went to public notice from [Date] to [Date] where an email and a mailing address was supplied to people who wanted to submit formal comments. There were numerous requests for a public hearing throughout all the comments received. As such, a formal public hearing was held on Sept 14,

2017 at 6:30pm at the Norpoint center in Tacoma, WA. All written, electronic and verbal comments were considered as part of this process and answered by the Agency. As a result of the comments received, this worksheet was updated from the original draft sent out during the formal public comment period:

- Tank Emissions were updated to show verification of emission calculations.
- An update to permit condition 12 for Benzene content of the natural gasoline to better show compliance. This update was not

*12. The benzene content of each batch of natural gasoline received shall not exceed 1.3% by weight. This condition shall be verified with a Record of Certificate of Analysis (COA), Safety Data Sheets (SDS) or an equivalent material information sheet indicating the maximum benzene content by weight.*

- Additional Information section updated to better describe the project

All original comments are included at the end of this worksheet, with the response from the agency summarized below:

- 1) One was concerned about **sulfur dioxide** emissions from trucks (Davis).

*RESPONSE - The sulfur content of motor vehicle diesel fuel is limited to no more than 15 parts per million under the federal requirement 40 CFR Part 80, Section 80.520. Therefore; the sulfur dioxide from vehicles is lower than it has been in the past and this standard helps ensure sulfur dioxides are kept to a minimum.*

- 2) One asked about **greenhouse gas emissions** from the project and many were opposed to the project due to the potential climate change impact of subsequently burning fossil fuels. (Hay).

*RESPONSE - Greenhouse gas emissions were evaluated and submitted with NOC 10554 for the marine vapor combustion unit. Emissions of GHG from NOC 10554 were estimated to be 16,071 tpy CO<sub>2</sub>e from the MVCU. This NOC does not seek to increase the total capacity of the MVCU, therefore; Greenhouse Gas emissions did not increase with this project. Natural gasoline is produced by removing lighter compounds from natural gas; therefore, is not expected to contain methane (25 times higher global warming potential than carbon dioxide). WAC 174-441 does require a facility to report emissions of greenhouse gases if they are above 10,000 metric tons of carbon dioxide equivalents or more.*

- 3) One asked about **2016 emissions** from the existing facility (Hay) and another asked about why emissions haven't been reported since 2010 (Deford).

*RESPONSE - The Agency's emission reporting thresholds are found in Regulation 1, Article 5, Section 5.05(c) for registration sources. The facility is not required to report if their emissions are below these reporting thresholds (25 ton/yr for VOC, SO<sub>x</sub>, NO<sub>x</sub>, CO, PM10 or PM2.5, 6.25 ton/yr of total HAP, 2.5 ton/yr of individual HAP, or 0.5 ton/yr Lead).*

- 4) One asked about **monitoring of sulfur content** of natural gasoline shipments (Hay).

*RESPONSE – Targa would not be allowed to unload railcars containing natural gasoline with higher sulfur levels than those allowed in the permit. Condition 11 of the permit states that “The sulfur content of each batch of natural gasoline received shall not exceed 330 ppm, as documented by product transfer documents in accordance with 40 CFR 80.1611, which applies to natural gasoline used as a denaturant for ethanol.” Paragraph (c)(2) of that section states “The PTD (Product Transfer Document) must state the sulfur content is 330 ppm or less, or if the certified ethanol denaturant manufacturer represents a batch of denaturant as having a maximum sulfur content lower than 330 ppm the PTD must state that lower sulfur maximum (e.g., has a sulfur content of 120 ppm or less).”*

5) One asked about **monitoring of benzene content** of natural gasoline shipments (Hay).

*RESPONSE – Condition 12 of the permit states that “The benzene content of each batch of natural gasoline received shall not exceed 1.3% by weight.” This condition would be verified with a Record of Certificate of Analysis (COA), Safety Data Sheets (SDS) or an equivalent material information sheet indicating the maximum benzene content by weight. Permit Condition 12 was updated to include the following “This condition shall be verified with a Record of Certificate of Analysis (COA), Safety Data Sheets (SDS) or an equivalent material information sheet indicating the maximum benzene content by weight.”*

6) One asked whether or not the permit affects the **maximum petroleum throughput** of the facility (Hay).

*RESPONSE – The handling of natural gasoline will correspondingly reduce Targa’s capacity to handle Bakken crude oil, which is limited by the capacity of the railcar unloading facility. Targa will also have permit conditions that limit overall production to further ensure maximum petroleum input does not increase. (See Permit Condition 13.8 and 14)*

7) At least a few were under the impression Targa would be handling **natural gas or liquefied natural gas** or manufacturing methanol (Herbert, Samyn, Stewart, Langhans, Gaspar, Gyncild, Andrews, McLeod, Wade, Hill, Robertson).

*RESPONSE – Targa is proposing to store and transfer natural gasoline, which is similar to gasoline, used in motor vehicles but not the same as natural gas or liquefied natural gas. Natural gas and/or LNG both contain large amounts of methane gas that can be chilled or pressurized to make it liquid. Natural gasoline is produced by processing natural gas and separating the lighter compounds from the heavier ones). The heavier hydrocarbons (typically between 5 to 10 carbon atoms) make up what is known as natural gasoline.*

8) One asked if PSCAA ever denied any industry air permit (Riedener, Shimeall).

*RESPONSE – Yes. The most recent were NOC 10755 and 10903.*

9) One requested that Targa be required to install **benzene monitors** around the perimeter of their facility (Locsin).

*RESPONSE - Targa's modeled ambient benzene concentrations for this project are below the acceptable source impact levels (ASIL) set by WAC 173-460-150 which is the standard the facility must meet. Modeling generally overestimates ambient impacts and allows you to review the worst-case impact. Ambient monitoring is extremely rare and is not warranted in this case due to the low expected impacts from this project. . There is an ambient benzene monitoring program for oil refineries that requires they sample benzene at the fence line for 2-weeks and then analyze the results in a laboratory to determine if the 14-day average concentration exceeds an "action level" of 9 micrograms per cubic meter (excluding background). If they do, the refinery is required to conduct a root cause analysis to determine the cause and take appropriate corrective action. Targa's modeled ambient concentration for this project were well below the "action level" of 9 micrograms per cubic meter. Oil refineries have a much higher potential to emit benzene than Targa which is not an oil refinery.*

10) A few asked what **testing & monitoring** is required to ensure compliance with permit limits (Villa, Valdez, McCarty, Thompson).

*RESPONSE - Targa was required to test the destruction efficiency of the marine vapor control unit (fume incinerator). This testing was conducted on 6/1/17 and 6/2/17 and demonstrated compliance with the 99.0% minimum destruction requirement. Targa is required continuously monitor the combustion chamber temperature and to maintain the loading-cycle average temperature at or above the average temperature established during this test. This parametric monitoring is a way to ensure continuous compliance with the destruction efficiency.*

*Additionally, Targa is required to visually inspect all tank seals and measure the concentration of VOC in the vapor space above the internal floating roof from the fixed roof hatch semiannually. They must thoroughly inspect the tank seals from the inside of the tanks prior to initial fill and at intervals not to exceed 10 years.*

*Targa is required to inspect pumps, valves, etc. for leaks at least monthly. According to Targa, all operators routinely look for leaks as part of their job, as this is a safety consideration as well.*

11) Others were concerned about **water pollution** (Higbee-Robinson, Speelpenning, Murray, Herbert, Tokgoz, Kupinse, Holm, England, Moore, Hale, Bean, Johnson), rail traffic (Fultz), and water supply (Fultz).

*RESPONSE - The potential impact of spills was evaluated by the City of Tacoma in their SEPA review for the railcar unloading facility and equipment for marine loading of light product prior to the City of Tacoma issuing a Determination of Non Significance on 12/5/13. They also evaluated the storage tanks. Although these four tanks were slated to store distillate fuels with lower flammability and material classification, other tanks were reviewed that had the same flammability and material classification. These tanks were equipped with the same types of emission controls to prevent evaporation as Targa is now proposing. Water pollution impacts are not within the scope of this air permitting. The Agency found the existing SEPA review was adequate to support this permit review.*

12) Many expressed concern about **public endangerment** in the event of an rail or marine accident or natural disaster (earthquakes, tsunami and volcanic eruption) and either didn't know of or questioned the adequacy of the City's previous SEPA review (Sierra Club, Fultz, Miller, Hewitt, Olsen, Villa, Lysne, Burke, Murray, Herbert, Keeley, Peaphon, Tokgoz, Wood, Braaten, Holm, Valdez, England, Ryan, Kupinse, Hale, Moore, Ghiringhelli, Wright, Freeman, MacBain, Riedener, Thompson, Litts, Kelley,

Bickel, Samyn, Reetz, Ferguson, Stewart, Storms, Doyle, Ligosky, Simms, Shimeall, Elias, Hay, White, Stair, Horiuchi, Woodruffligo, Johnston, Becker, Harmon, Weinstein, Epstein, Watt, Ritter, Airoldi, Gyncild, Eggen, Wildman, Prentice, Lafferty, Kavage, Frederiksen, Crabill, Steele, Andrews, Rogers, Westbrook, Scheuer, Lowe, Bozied, Hughes, Johnson, Hill).

*RESPONSE - The Puget Sound Clean Air Agency conferred with the City of Tacoma in November and December of 2015 regarding the City's previous SEPA review. Natural gasoline has the same flammability and material classification (1A) as Bakken crude oil. Additionally, the permit would restrict the benzene content of natural gasoline to values consistent with Bakken crude oil and the federal limit for motor vehicle gasoline. The previous SEPA review considered the maximum capacity of the terminal, which is limited by the railcar unloading capacity. Handling natural gasoline would reduce Targa's ability to handle Bakken crude. Therefore, the agency found the existing SEPA review was adequate and permit conditions will limit the overall throughput of the facility. (See Permit Condition 13.8 and 14)*

*Subsequent to the previous SEPA review, the legislature passed the Oil Transportation Safety Act (ESHB 1449) to help protect Washington State from the risks associated with transporting oil. This bill directed Ecology to undertake 5 policy initiatives to help address these new risks:*

- Advance notice of oil movement*
- Railroad contingency planning*
- Geographic response plans*
- Vessel traffic safety evaluation and assessment*
- Equipment cache grants*

*Resources were provided to Ecology to perform an update to the Puget Sound Vessel Traffic Risk Assessment, which was completed in 2015. For additional information, see <http://www.ecy.wa.gov/programs/spills/OilMovement/OilTransportationSafetyAct.html>*

13) Two stated that the permit would violate the **Puyallup Tribe**'s rights under the Medicine Creek Treaty. (Murray, Keeley).

*RESPONSE – PSCAA has reviewed the treaty language and did not identify any specific links to air quality emissions or any of its other provisions of the treaty that would be violated if Targa proceeds with this project. See below for a copy of the Medicine Creek Treaty in its entirety.*

[https://www.fws.gov/pacific/ea/tribal/treaties/Nisqualli\\_Puyallup.pdf](https://www.fws.gov/pacific/ea/tribal/treaties/Nisqualli_Puyallup.pdf)

14) One asked if we had a close working relationship with the **Tacoma-Pierce County Health Department** and if we collect data on cancer rates and reproductive health issues (Riedener, Shimeall). They also asked if PSCAA will create an exposure baseline before issuing permits.

*RESPONSE – PSCAA has worked closely with the TPCHD on other issues, but we don't collect data on cancer rates or reproductive health issues. We do have a copy of the Washington State Dept. of Health cancer cluster evaluation for NE Tacoma, which referenced the monitoring data from the 2010 Air Toxics Study. It did not find increased rates of lung and bronchus cancer in census tract 53053940005 or zip code 98422 compared to the Pierce County or Washington State. The 2010 study is the closest baseline data for the pollutants of concern from this project. No additional studies are proposed at this time. The conclusions of the TPCHD evaluation were:*

### **Conclusions**

*The most recently available rates of all cancers combined are elevated in zip code 98422, but not in census tract 53053940005, compared to Pierce County and Washington State. We explored whether the rate of lung and bronchus cancer was elevated; we would expect exposure to airborne carcinogens to be most likely to show up in these cancer types. We did not see increased rates of lung and bronchus cancer in census tract 53053940005 or zip code 98422 compared to the Pierce County or Washington State.*

*Our review of the air toxics data from 2009 suggests that the general sources of greatest concern near zip code 98422 for airborne carcinogens are motor vehicle traffic, residential wood burning and carbon tetrachloride (with unclear sources due to historic uses). The excess cancer risk associated with these sources was assessed at that time to pose a public health concern. Unfortunately, we do not have more recent data.*

*PM2.5 is one indicator of general air pollution levels that is available for a longer time period (starting in 2000) than air toxics, though PM2.5 levels are not expected to correlate perfectly with levels of airborne carcinogens. Near zip code 98422, PM2.5 concentrations generally declined between 2000 and 2015.*



DOH\_Locsin\_cancer\_evaluation\_2017 (2).|

(For a copy of this document, please check the version of this worksheet sent out by email with the embedded file or submit a public records request to get a written or electronic copy)

15) Some commenters expressed their opposition to issuing the permit (Gormley, Al, Copeland, Boyd, Marshall, Leberg, Speelpenning, Sackman, Tankiewicz, Fortt, Findley, Gannon, Treat, McLeod, Storms, Stewart, Matron, Way).

*RESPONSE - These comments are acknowledged.*

16) Some commenters expressed their support of the project and permit (Smith, Celski, Bronson, Pierson, Cooke, Cole, Janulek, Gammell, Teel, Hoffman, Nordlund, Philp, Brown, Adrien, Kendall, Seley, Thurlow, Ostrowski, Joseph, Ranes, Baune, McBride, Smith, Fox, Lileyblade, Lucas, Boyle, McCann, Michelet, Murray, Pierson, Horst, Watson, Perry, Young, Nigretto, Hildebrandt, Bacas, Brannon, Tucci, Walrath)

*RESPONSE - These comments are acknowledged.*

17) Several were concerned about worsening existing petroleum **odors** (Murphy, Strub, Kopetzky, Olsen, Villa, Locsin, Long, Wood, Andreeva).

*RESPONSE - The Agency has responded to odor complaints to date, and has issued Notices of Violation. The Agency will continue to respond to odor complaints as they are received. Targa also has a monthly leak inspection for all equipment that is in gasoline service which includes smell as a detection method for leaks. (Permit Condition 14)*

18) Many expressed concern about the potential **health effects** of the air emissions (Sierra Club, Kopetzky, Murphy, Miller, Takahashi, Hewitt, Davis, Fultz, Church, Phinney, Matthewman, Locsin, Lysne, Burke, Feist, Peaphon, Tokgoz, Barzar, Bailey, Kupinse, Holm, Valdez, McCarty, England, Moore, Hale, Riedener, Mlekarov, Thompson, Reetz, Ferguson, Doyle, Simms, Garrity, Shimeall, Brooke, Hay, Woodruff, Johnston, Howe, Harmon, Weinstein, Epstein, Watt, Ritter, Airoldi, Gyncild, Eggen, Wildman, Prentice, Lafferty, Kavage, Frederiksen, Crabill, Steele, Andrews, Rogers, Westbrook, Scheuer, Wade, Bozied, Hughes, Church, Johnson, Hill).

*RESPONSE – The project meets all of the permitting criteria in Chapter 173-460 WAC (Controls for new sources of toxic air pollutants) <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460>, which are intended to protect public health. As mentioned above in the benzene monitoring response, dispersion modeling was conducted with this permit application that demonstrated that the additional benzene and N-Hexane increases with this project are expected to be less than the “acceptable source impact levels” outlined in Chapter 173-460 WAC. The other toxic air contaminants associated with the project were also compared to the thresholds in Chapter 173-460 WAC known as the “small quantity emission rates” and they were below these values. The modeling was based on the worst case assumption of maximum natural gasoline throughput every year with the maximum allowable benzene content. It was performed using the EPA’s latest refined model and in accordance with EPA’s and Ecology’s modeling guidelines.*

*The risk associated with air toxics in Tacoma was evaluated by the Agency and the UW in an ambient air toxics monitoring study in 2010. The report concluded that residential wood smoke and diesel exhaust are the main drivers of risk in the area. The executive summary and full report are available on our website <http://www.pscleanair.org/documentcenter/view/2297>  
<http://www.pscleanair.org/documentcenter/view/145>*

*No additional studies are proposed in the near future for the Tacoma area.*

19) The Agency received the following comments from Shirley Schultz of the City of Tacoma Development Services department.



4-62962 Targa  
Sound Terminal Decisi



4-162964 MDNS  
Cover Memo.pdf

(For a copy of these documents, please check the version of this worksheet sent out by email with the embedded file or submit a public records request to get a written or electronic copy)

Thank you for offering the opportunity to comment on the above-noted Notice of Construction for Targa Sound Terminals. (<http://www.pscleanair.org/business/Permitting/Pages/AOPForComment.aspx>) The City’s comments follow; they largely reiterate the consultation and comments from late 2016.

Targa Sound Terminal is operating under several Shoreline Substantial Development permits (SSDPs) from the City of Tacoma, based on its location within the S-10 Shoreline District – Port Maritime Industrial. In most cases, the environmental (SEPA) review for the facility is completed concurrently with the relevant SSDP. For the current application, the relevant permits are SHR2011-40000162602

(expansion of the tank farm and extension of pipeline under 11<sup>th</sup> Street) and SHR2013-40000203722 (rail car unloading facility). Both SSDPs had concurrent SEPA review.

- *SHR2011-40000162962 and SEP2011-40000162964*: SSDP for a “renewable fuels project” including a new underground pipeline and expansion of the existing tank farm. This included the construction and installation of eleven new fuel storage tanks near Marine View Drive and 11<sup>th</sup>. At that time the review was conducted based on a description of “petroleum products” and delivery via the Olympic Pipeline. I have included that shoreline permit, SEPA MDNS, and a cover memo for your information. The SEPA cover memo provides context for the MDNS. This permit was issued April 3, 2012.
- *SHR2013-40000203722 and SEP2013-40000203723*: SSDP for modification to a rail car unloading facility at Taylor Way, as well as tank installation and installation of a Marine Vapor Combustion Unit that has an associated Dock Safety Unit (DSU) to be installed on the existing marine loading dock on Marine View Drive. In some respects this permit modified the above permit. The project description references “crude oil, petroleum products, and renewable fuels”. (I will send that decision in a separate email due to its size.) There was a great deal of discussion between PSCAA and the City of Tacoma at that time related to air quality impacts and Targa’s performance related to air quality permitting.

In November of 2016 you contacted the City of Tacoma (as usual) to review the initial NOC application and discuss SEPA lead status. At that time, your correspondence included myself and Ryan Erickson, Fire Code Official. Because the City of Tacoma had already reviewed for multiple types of petroleum products (including crude oil), the concern was whether natural gasoline presented any significant difference in terms of environmental impacts over the already-reviewed products being handled (or potentially handled) at the site. Since you have already posted that email correspondence in your file, I won’t reiterate it here except to quote Mr. Erickson’s final statement: “Based on your assessment below, there is no initial trigger for TFD to request additional environmental review of shipping natural gasoline (NGL) by rail due to the similar flammability and material classification (Class IA) to the Bakken crude oil already reviewed for this site.”

The permits that Targa will need from the City of Tacoma to change the tank configuration will not, in and of themselves, trigger a SEPA review. Therefore, the main concern for the City of Tacoma would be whether or not the change in product handled at the site presented a significantly different safety concern for the City under SEPA. Under the SEPA regulations (WAC197-11-600), additional environmental review may be required by a jurisdiction in the following cases:

- (i) Substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts (or lack of significant adverse impacts, if a DS is being withdrawn); or
- (ii) New information indicating a proposal's probable significant adverse environmental impacts. (This includes discovery of misrepresentation or lack of material disclosure.) A new threshold determination or SEIS is not required if probable significant adverse environmental impacts are covered by the range of alternatives and impacts analyzed in the existing environmental documents.

Our initial review did not show either to be the case. However, the applicant will still need to provide detailed permit drawings and information to the City to change the tank configuration. At that time it’s expected that the applicant will submit evidence of all safety and spill plan compliance, as well as all relevant safety and hazard information to the City’s public safety experts. A full review may or may not result in the same conclusion related to public safety concerns (e.g., spills, fire).

The City will rely on PSCAA's review for air quality impacts. A review of your analysis of the permit (a non-technical review) appears to show careful review of the proposal under applicable regulations as well as an understanding of the neighborhood concerns related to this and other businesses in the vicinity.

As you know, the residents in the vicinity of Targa are concerned with air emissions from this site and others, as well as with public safety in the vicinity of the Port as a whole. The City of Tacoma is engaging in a subarea plan to establish baseline conditions as well as goals and policies for the Port over time. PSCAA will be consulted and invited to participate in the subarea plan.

Please let me know if you have follow up questions or need clarification regarding my comments.

-Ms. Schultz also provided the following email (and pdf attachment) under separate cover.

For your files/reference, here is the permit decision for *SHR2013-40000203722 and SEP2013-40000203723*: SSDP for modification to a rail car unloading facility at Taylor Way, as well as tank installation and installation of a Marine Vapor Combustion Unit that has an associated Dock Safety Unit (DSU) to be installed on the existing marine loading dock on Marine View Drive. In some respects this permit modified the above permit. The project description references "crude oil, petroleum products, and renewable fuels". There was a great deal of discussion between PSCAA and the City of Tacoma at that time related to air quality impacts and Targa's performance related to air quality permitting.



4-203723 Decision  
and Attachments.pdf

<https://fortress.wa.gov/ecy/separ/Main/SEPA/Record.aspx?SEPANumber=201306167>

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*RESPONSE - These comments are acknowledged and the applicant was made aware of the requirement to provide detailed permit drawings to the city*

#### **Public Hearing Comments:**

Commenter 1 (Tokgoz )

Will PSCAA be liable for medical bills or for any damage to marine line and the environment resulting from this project?

*RESPONSE: The liability for any damages directly caused by Targa or any other entity is not covered by PSCAA.*

How will the marine life and environment be impacted by these pollutants?

*RESPONSE: See the "Marine Buffer" and "Hylebos and Blair Waterways" section of the MDNS issued by City of Tacoma for Targa.*

What are the risks of receiving and storing natural gas?

***RESPONSE:** The SEPA documents below outline some of the risks associated with transporting and storing oil (which as discussed in the SEPA response above in 19), is similar to storing natural gasoline). Department of Ecology has a spill prevention, preparedness & response program. This information can be found on their website at <http://www.ecy.wa.gov/programs/spills/oilmovement/index.html>. The products received by Targa are also monitored by the Federal Railroad Administration (FRA) to prevent and respond to oil spills.*

*In addition to the transportation risks, the risks from storing natural gasoline include spills. Targa has a Spill Prevention Control and Countermeasure (SPCC) Plan and a Facility Oil Spill contingency plan. Copies of these plans were submitted with the original SEPA review and were sent to the Washington State department of Ecology and US Coast Guard for review and approval. These plans were approved by the Washington Department of Ecology on November 26, 2012 and the US Coast Guard on April 17, 2013. For more details about the plans and what they cover please see the attached SEPA documents.*



City of Tacoma  
DNS.pdf



City of Tacoma  
MDNS.pdf



4-203723 Decision  
and Attachments.pdf

(For a copy of these documents, please check the version of this worksheet sent out by email with the embedded file or submit a public records request to get a written or electronic copy)

One commenter asked if facilities that store natural gas are leak proof.

***RESPONSE:** Natural Gas storage tanks will have some loss in product associated when loading and unloading. To keep these losses to a minimum, Targa will be required to implement a leak detection and repair (LDAR) program under 40 CFR 63.11089. In addition to the LDAR, Targa will use a marine vapor combustion unit to capture any natural gasoline vapors that escape during transfer operations.*

Commenter 2 (Kindt)

I am not a chemical engineer but am able to read the summary written by PSCAA itself: "The emissions associated with this project could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene."

I am also able to read the Public Health and Safety section of the report prepared by the Puyallup Tribe of Indians with the Cascadia Consulting Firm and published in 2016: In the second paragraph of this subsection, beginning "In the last decade . . ." the report states, "This threat is especially critical in Pierce County, where asthma is already a concern; studies have shown a 1 to 7% increase in asthma diagnoses between 2002 and 2012, with 30% of children in Pierce County public schools experiencing an asthma attack in 2012 (citing Washington State Healthy Youth Survey Fact Sheet: Asthma for Pierce County, 2014.)"

These two facts, presented together, would be enough to give pause on permitting yet another use by Targa, even if its states it is simply the modification of four existing storage tanks to enable storage of these products, (i.e., natural gasoline).

The Tacoma planning commission last night held a public comment hearing on proposed interim regulations regarding the Tacoma subarea plan commonly referred to as the Tidelands. It was apparent from this hearing and from the previous evening's Tacoma City Council meeting, that there is a substantial opposition to any expansion of heavy industrial projects city-wide, which require a SEPA determination or discretionary permit.

The residents of Tacoma do not want any expanded operations involving fossil fuels or any variation or derivative therefrom, to continue unabated within the Port of Tacoma or within the City of Tacoma limits.

There were also people throughout Pierce County, as well as the City of Tacoma, who spoke out last evening. There were tribal members, and a member of the Tribal Council of the Puyallup Tribe, who spoke last evening. There are people who are willing to be arrested, and who have been arrested, to keep this city from returning to its toxic waste legacy, which it endured for well over 100 years, due in full to the lack of comprehensive regulations pertaining to companies who used this city as a smelting center, a pulp mill, and other toxic uses.

For almost 100 years, the Asarco Company operated a copper smelter in Tacoma. Air pollution from the smelter settled on the surface soil over more than 1,000 square miles of the Puget Sound basin. Arsenic, lead, and other heavy metals are still in the soil as a result of this pollution.

It has taken hundreds of millions of dollars to clean up the superfund sites designated by the EPA, dollars which ultimately were spent by taxpayers when these companies filed bankruptcies and fled this city, leaving their trash behind. Those costs don't take into account the money spent by parents taking their children to the doctor for respiratory illnesses. They don't count the school days or work days missed by those same families. They don't take into account the medical histories of the people who have long-term respiratory ailments as a direct result of living in this municipality.

The people in this city experienced a noticeable decrease in air quality this summer from forest fires which burned hundreds of miles from the ash and soot which blanketed the area. They experienced the noxious smell of the infamous Tacoma Aroma from pulp mills for decades.

If there is ever going to be an opportunity for Tacoma to attract businesses other than heavy industrial, fossil fuel companies, and begin to convert to renewable energy projects, it must begin with the agencies responsible for regulating these companies. PSCAA is tasked with regulating air quality in this region. If there is ever going to be an opportunity for Pierce County to recover from its toxic air quality, it must start here. PSCAA does not have the ability to monitor any emissions other than PM 2.5. How many other people need to suffer due to insufficient air monitoring?

I ask that PSCAA not issue a permit expanding Targa's existing fossil fuel uses, whether it be to receive, store, or ship any new fossil fuels not already permitted. Gasoline, isoctane, Bakken crude oil and denatured ethanol are already quite toxic enough for one city.

*RESPONSE: These comments are noted and taken into consideration. The monitor in the Tacoma Tideflats area monitors PM2.5 primarily because, as mentioned in the toxic study response, residential wood smoke and diesel exhaust are the main drivers of risk in the area.*

Commenter 3 (McCarty)

1. Is there anything more official documenting the reasons for deciding that SEPA review was not required for this application (other than the email string between you and Shirley Shultz)? I strongly object to the rationale that because Bakken crude oil and natural gasoline share a hazardous material classification, that this new proposal should not be reviewed independently. Additionally, the previous review was years ago, and I contend that regulations, requirements, best practices could have evolved in that timeframe. I also contend that the natural environment and surrounding residential/commercial/industrial areas have changed as well. I couldn't find any reference to an agency allowing a previous study for a similar product to be an acceptable replacement for new review in the SEPA handbook. Can you please point me to that reference?

*RESPONSE: The discussion between the City of Tacoma and PSCAA was included in this worksheet and shows the discussion between Fire Code Official Ryan Erickson and PSCAA. Mr. Erickson commented "Based on your assessment below, there is no initial trigger for TFD to request additional environmental review of shipping natural gasoline (NGL) by rail due to the similar flammability and material classification (Class IA) to the Bakken crude oil already reviewed for this site." Also see further information provided by the City of Tacoma in Shirley Shultz's comment above in 19).*

2. I also am concerned about the strategy of working to restrict the chemical properties (vapor pressure, sulfur content, and benzene) allowed on this permit, so that it will be similar to the crude oil already permitted (allowing the SEPA review to be skipped). Please explain how that will work with Targa's customers. If Targa tells its customers what these restrictions are, who is ensuring compliance with these standards before the product is shipped to our city? Shouldn't you look at what the chemical properties are of the natural gasoline product line coming from the most likely customers, and evaluate whether their products will meet the standards that PSCAA follows?

*RESPONSE: PSCAA does not have the authority to regulate non stationary sources, and source that are not on the Targa facility through this permit review. The chemical properties are verified by Targa and will be written into all contracts for natural gasoline shipments received at the site.*

3. How will PSCAA ensure that emissions as a result of product transfer and storage will be within allowable limits? You do not currently have a way to continuously monitor for toxic air pollutants, including cancer causing benzene.

*RESPONSE: Targa will be required to calculate and record all product throughputs at the end of every month to ensure the 12-month rolling total is not exceeded. Records will be required during an inspection to verify the limits.*

4. What notification of this public comment opportunity have you given to property owners along the rail line that the tanker train will travel weekly from its origination location to its destination in Tacoma? With the recent local train derailments in Mosier and in Steilacoom, I contend that the property owners that are within a certain radius of the rail tracks should have been notified of

the opportunity to comment. I have a friend who lives really close to the derailment in Steilacoom, and had no idea that there was a proposal to allow natural gasoline to travel by rail. These property owners are most definitely impacted, when allowing a net increase of highly dangerous rail traffic on the tracks through their communities.

*RESPONSE: PSCAA published public notifications in local newspapers as well as email notifications to interested parties. The rail travel is not reviewed under the air permit.*

5. What outside expertise did you engage and how much benchmarking did you complete when reviewing this proposal? I believe that I read that you have never had to permit for natural gasoline before, so I'd like to see the safety studies, environment impact studies, other projects you benchmarked, etc. in the completion of your analysis. One of my main concerns is protecting the health and safety of my community. I am very concerned that a highly toxic and extremely volatile/flammable product such as natural gasoline, would be allowed to be handled and stored so close to residents (and right next to a highly traveled main arterial - SR509). What examples can you provide of companies who terminal natural gasoline as close to residential areas (less than .5 mile) as this one is? Have you talked to your peer agencies to see what their experience is with monitoring and controlling emissions? Have you seen the results of their health and safety studies? I consider all of this due diligence as you role as lead agency for this project. Please advise what you have done.

*RESPONSE: The technical support document (also called the worksheet) prepared for this permit documents research conducted on similar facilities for the BACT determination and the previously conducted SEPA determination which discusses the different types of agencies that regulate railcar oil transportation. PSCAA does not regulate mobile sources such as rail cars through this permit review so they are not covered under this air permit.*

6. Finally, I have attached an email that I sent to the City of Tacoma back in April. I'm still waiting for answers to these questions in red. As the lead agency for this proposal, can you please ensure that I receive timely answers to those questions.

*RESPONSE: Shirley Shultz responded to these and explained why SEPA was not done again on April 2, 2017. See attached email*



RE Tacoma Tideflats  
Fossil Fuel Additions.t

(For a copy of this email, please check the version of this worksheet sent out by email with the embedded file or submit a public records request to get a written or electronic copy)

Commenter 4 (Lockson)

Comments regarding odors and benzene monitors around the Targa facility

*RESPONSE: See response 9) in the section above regarding benzene monitors.*

Commenter 5 (Nenette Reetz)

Why does the agency let PSE LNG operate without a permit?

*RESPONSE: The agency has issued a notice of violation to PSE LNG for constructing without a permit. This permit action is unrelated to the PSE LNG facility.*

Commenter 6 (Daford-Eden)

I SUPPORT the PSCAA filling important advisory council seats including Environmental Justice and Tribal Nations and hiring additional employees to realistically monitor industry emissions. If additional employees cannot be hired, then additional permits in areas of cumulative industry should not be accepted or approved.

*RESPONSE: The previous members for these positions have resigned and the agency has been and will continue working to fill these vacancies.*

**Regarding Cumulative Emissions:** The chemical and fuel odors due to cumulative emissions in the Port of Tacoma, NE Tacoma, Browns Point, Fife and along Marine View Drive, Taylor Way and Alexander Avenue are alarmingly strong. Those responsible for that odor, ought to be ashamed of themselves. Our beautiful city; the City of Destiny just a few years ago was filled with the embarrassing Aroma of Tacoma. To avoid this regression and protect the health and wellbeing of our citizen's cumulative must be taken into consideration when reviewing permits. Permits should NOT be issued on a case by case basis without regard to the overall emissions and cumulative air quality of the area. (Ferguson)

*RESPONSE: The monitors around the Tacoma area are meant to show cumulative impacts from all sources including mobile sources as well as residential burning. Cumulative impact monitoring and modeling for toxic air contaminants is not supported by rules or regulations under the Washington State Clean Air Act. Cumulative impacts for the criteria pollutants are protected under the National Ambient Air quality primary and secondary standards, which is the reason that most monitors only include these pollutants.*

**Regarding Monitoring and Regulating Industry Air Quality:** The Puget Sound Clean Air Agency has failed to monitor the industry in the port and assure that those current approved/permited industries are compliant and factual in their predicted and reported emissions. I was in complete disbelief when I learned that the PSCAA relies on industries to self-report their emissions. Relying on self-reporting is untrustworthy and it fails to provide a base line or real-time measurements of pollutants or overall compliance. Targa for example has no record of emissions since at least 2010.

*RESPONSE: PSCAA inspectors conduct routine inspections on facilities in the port of Tacoma to ensure that they are meeting all their permit requirements. Records of emissions are reviewed for accuracy and inspectors confer with engineers as well to make sure the data is accurate and complete.*

**Regarding New Applications and Permit Approvals/Staffing:** It's deeply concerning that the PSCAA is grossly understaffed with only 11 inspectors to oversee 13,695 businesses. That is 1245 businesses to monitor per employee; the client ratio is unbelievable. Permit approving should be put on hold until additional inspectors are hired and vacant seats on the Advisory Council are filled for both Environmental Justice and Tribal Nations. Once adequate staff is hired for the PSCAA to monitor and regulate existing business then they may review new permitting applications. In business, I don't give a waitress more tables or more hours if she is not performing or keeping up with the customers she has. The PSCAA should not be approving or reviewing the permits they have until they can keep up with monitoring

existing industries and existing scopes of industry. They are failing and change needs to happen now, before something dreadful happens to the community they were established to protect.

*RESPONSE: Comment acknowledged.*

Commenter 10 (Storms)

Mr Storms had comments regarding fracking of natural gas.

*RESPONSE: Targa does not conduct fracking on site which makes it outside the scope of the air permit for this project.*

Commenter 12 (Hay)

The worksheet indicates that “The tank emission calculations were made with proprietary software that has not been independently verified.” Has any attempt been made to independently validate the TARGA emissions estimates? This permit should not be approved until such time. Mr. Hay asked that this information be posted for the public to verify.

*RESPONSE: The Agency has updated this worksheet to discuss how emissions from tanks were calculated and did conduct an independent review of two random tanks (Tank 209H and 211H in worksheet) to verify the accuracy of the emissions submitted by Targa. Due to the complex nature of tank emission calculations and the Agency not having access to the proprietary software mentioned, randomly only two tank emissions were verified. This verification was done to ensure that Targa conducted all other tank calculations correctly.*

Commenter 13 (Carole Sue Braaton)

Comment Summary: This commenter had questions about the various catastrophic failures of the tanks being reviewed: how far the released materials would go and what would they be; what would the cumulative effects of this project be when added to the contamination from the Tacoma smelter; how long it would take to evacuate and how far would they need to go; is there a notification alarm for catastrophic failure; what would be the impacts and who will pay for them. The commenter believes that a study of cumulative effects from all facilities in the Port of Tacoma industrial needs to be completed. The commenter believes the project requires an environmental impact statement to be prepared.

*RESPONSE: The Washington Clean Air Act, the Department of Ecology rules and the PSCAA rules require that an air quality permit be issued if the proposed project meets certain requirements. Review of catastrophic failures and cumulative effects are not requirements covered by any of the regulations. The SEPA review performed by the City of Tacoma covered the expected emergencies and covers the proposed project and the Agency found the existing SEPA review was adequate to support this permit review.*

## **K. RECOMMENDED APPROVAL CONDITIONS**

**Standard Conditions:**

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the installation address in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

**Specific Conditions:**

3. Tanks T-208H, T-209H, T-210H, and T-211H are subject to 40 CFR Part 60, Subparts Kb and A.
4. The adjustable roof legs on these tanks shall be fitted with vapor seal boots or equivalent.
5. The slotted guidepoles on these tanks shall be equipped with a pole float with either a pole sleeve or a pole wiper. If a pole sleeve isn't employed, the seal of the pole float shall be higher than the pole wiper. The top of the guidepole shall be equipped with a gasketed cap which shall be closed at all times except when gauging or taking liquid samples.
6. The secondary seals on these tanks shall extend from the roof to the tank shell and shall not be attached to the primary seal.
7. The entire circumference of each primary and secondary seal on these tanks shall be inspected for compliance with the requirements of Section 3.02 of Regulation II during hydrotesting of the tanks. The time between inspections shall not exceed 10 years. If a new primary or secondary seal is installed, or if a primary or secondary seal is repaired, both seals shall be inspected at the time of the seal installation or repair. Flexible wiper seals shall be inspected when the outer edge of the seal is curved upward.
8. The concentration of organic vapor in the vapor space above the internal floating roof on these tanks shall not exceed 30% of its lower explosive limit (LEL).
9. The emissions from degassing of these storage tanks shall be vented to a control device.
10. The Reid Vapor Pressure (RVP) of the natural gasoline received shall not exceed 16.5 psi.
11. The sulfur content of each batch of natural gasoline received shall not exceed 330 ppm, as documented by product transfer documents in accordance with 40 CFR 80.1611.
12. The benzene content of each batch of natural gasoline received shall not exceed 1.3% by weight. This condition shall be verified with a Record of Certificate of Analysis (COA), Safety Data Sheets (SDS) or an equivalent material information sheet indicating the maximum benzene content by weight.
13. Marine loading of each of the following products shall be performed in accordance with Conditions 3-9 of Order of Approval No. 11069 (outlined below as 13.1 – 13.8):
  - 13.1 The Marine Vapor Combustion Unit (MVCU) shall be used for all marine loading of natural gasoline, crude oil, gasoline, ethanol, and isooctane. The following conditions shall not apply to the loading of products with a true vapor pressure <0.5 psia.
    - i) EPA Method 25A may be used to determine the VOC concentration;
    - ii) EPA Method 19 may be used to determine the exhaust flowrate; and
    - iii) All testing shall be performed during the last 50% of loading of a tank or compartment.
  - 13.2 The destruction efficiency of the MVCU shall be at least 99.0%, as determined by the procedures in 40 CFR 63.565(d)(1)-(4) and (6)-(8), except as follows:
    - i) EPA Method 25A may be used to determine the VOC concentration;
    - ii) EPA Method 19 may be used to determine the exhaust flowrate; and
    - iii) All testing shall be performed during the last 50% of loading of a tank or compartment.
  - 13.3 Targa Sound Terminal shall conduct a performance test for determining compliance with Condition 13.2 (Condition 4 in OA 11069) of this Order within 60 days of initial startup of the MVCU.

13.4 Targa Sound Terminal shall maintain the loading cycle average MVCU combustion chamber temperature at or above the average temperature established during the performance test. Targa Sound Terminal shall continuously monitor and record the MVCU combustion chamber temperature during each loading cycle. The continuous temperature monitoring device shall meet the requirements in 40 CFR 63.564(e)(4).

13.5 For control of fugitive emissions, Targa Sound Terminal shall comply with the following provisions of 40 CFR Part 63, Subpart Y:

- i) The standards for ship-to-shore compatibility in §63.562(b)(1)(ii) and vapor-tightness of marine vessels in §63.562(b)(1)(iii), as determined by the procedures in §63.563(a)(2), (a)(3) and (a)(4), and (c), §63.564(c), and (d), and §63.565(b) and (c); and
- ii) The recordkeeping requirements in §63.567(h), (i)(1)-(3) and (i)(5)-(8), and (k).

13.6 Targa Sound Terminal shall capture 99.8% of the emissions from inert vessels during loading operations for treatment by the MVCU. If the Agency ordered testing to demonstrate compliance with this requirement, it shall be performed using methods approved by the Agency prior to commencing the test. For the purpose of determining compliance with §63.563(a)(4)(iv) and §63.567(h), Targa Sound Terminal shall document a vacuum of at least 1.5 inches water column during the loading of all non-inert vessels.

13.7 The natural gasoline, crude oil, gasoline, ethanol, and isooctane loading rates shall not exceed the MVCU processing capacity of 7,000 bbl/hr. For loading of these products, Targa shall only utilize pumps that, used individually or in combination, have a maximum rated capacity below 7,000 bbl/hr.

13.8 The natural gasoline marine loading throughput shall not exceed 3,607,100 bbl/yr (151,500,000 gal/yr) during any consecutive 12-month period. The crude oil marine loading throughput shall not exceed 14,601,600 bbl/yr (613,267,200 gal/yr) during any consecutive 12-month period. The gasoline and ethanol marine loading throughputs shall not exceed 2,555,000 bbl/yr (107,310,000 gal/yr) during any consecutive 12-month period. The isooctane marine loading throughput shall not exceed 3,000,000 bbl/yr (126,000,000 gal/yr) during any consecutive 12-month period. Targa Sound Terminal shall record the monthly and 12-month rolling total throughput within 30 days of the end of each month.

14. Marine loading of natural gasoline not exceed 151,500,000 gallons during any consecutive 12-month period. Targa Sound Terminal shall record the monthly and 12-month rolling total throughput within 30 days of the end of each month.

15. Targa Sound Terminal shall implement the leak detection and repair program required under 40 CFR 63.11089 for all products covered by this permit.

## L. CORRESPONDENCE AND SUPPORTING DOCUMENTS

### LIST OF ALL COMMENTER NAMES:

Sierra Club (Dorothy Walker)

Ann Locsin

Nancy Horiuchi

Nancy Lee Farrell

Laura Woodruff

Summer Takahashi

Kathleen Hewitt

Janet Higbee-Robinson

Magi Speelpenning

John Cooke

Austin Bacas

Deneise Kopetzky

Tina Kuckkahn-Miller

Patrick Gormley

Eric Olsen

Noah Davis

Tom WALrath Jr.

Paul Watson

Jerita Young

Candy Nigretto

Renee Sims

Roxanne Copeland

Mia King Mlekarov

Emily Johnston

Carey Findley

Susan Helf

Jared Howe

Richard Becker

Kitty Harmon

Tom Erker

Elyette Weinstein

Ellen Epstein

Mary Watt

Vicky Gannon

Matt Perry

Sue Langhans

Ted lileyblade

Larry Gaspar

Phil Ritter

Sara Airoldi

Laura Fox

Brie Gyncild

Carol Eggen

Ben Wildman

Selden Prentice

Carrie Lafferty

Sarah Kavage

Ryan Frederiksen

Julianna Martinson

Ryan Treat

Robert Treat

Emily Crabbill

Bob Kutter

Lisa Steele

L.T Murray  
Rose Andrews  
Joel Rogers  
Barry Westbrook  
Steven Brannon  
Dianna McLeod  
Christy Scheuer  
Mike Pierson  
Bett Lucas  
Casey Lowe  
Megan Wade  
Craig Cole  
Shary Bozied  
Kevin Hughes  
Barbara Church  
Deborah Hill  
Sally Johnson  
Al n Donna (Al from Tacoma)  
Daniel Villa  
Barbara Church  
William Boyles Fultz  
Chris and Cheryl Murphy  
Karen Strub  
Barbara and Jim Church  
Eric Boyd  
Robert Matthewman  
Cathy Lysne  
Sally Burke  
Roxann Murray  
Lisa Anderson  
Pat Herbert  
Debby Herbert  
Cindy Feist  
Pamela Keeley  
Valarie Peaphon  
Ozgu Tokgoz  
Mel and Suzanna Berglund  
Mary Jane Long  
Sara Wood  
Margaret Barzar  
Scott Bailey  
Carlo Voli  
Linda Studley  
William Kupinse  
Liz Marshall  
Sue Braaten

Mojgan Holm  
Heather Valdez  
Lana Reda  
Gayle Leberg  
Jeff & Susan Ryan  
Sydney England  
Benita Moore  
Darren Moore  
Alison Hale  
Rachel DeMotts  
Douglas Sackman  
Vince Ghiringhelli  
Dave Wright  
Sara Freeman  
Tiffany MacBain  
Claudia Riedener  
Sarah Morken  
Elizabeth Kleint  
Margarita Andreeva  
Mia King Mlekarov  
Bradley Thompson  
Georgiana Alice Bean (Anna Bean)  
Susie Litts  
LaDonna Robertson  
Sabrina Kelley  
Ann Bickel  
Ken Baune  
Rick Samyn  
Nanette Reetz  
Jose Michelet  
Judy Ferguson  
Mary Stewart  
Sandy Tankiewicz  
Steven Storms  
Hallie Fortt  
Victoria Doyle  
Joshua Ligosky  
Renee Simms  
Kevin McBride  
Michael Garrity  
Nancy Shimeall  
Jay Elias  
Phil Brooke  
Todd Hay  
Heather White  
Ruchi Stair

Barbara Phinney  
Bonnie Miller  
Carole Kindt  
Yvonne Mccarty  
Anne Lockson  
Carolyn Daford-Eden  
Barbara Abegglen  
Kathy Lawhorne  
Kyle Jolibois  
Janna Stewart  
Carole Sue Braaton  
Adam Smith  
L.E Bronson (Bud Bronson)  
Ben Wildmands  
Anne Goodenburg  
Amy Hoyt  
Bob Celski  
Roberta Campbell  
Marilyn Boyd  
Christina Scheuer  
Danny Janulek  
Don Gammell  
Faye Teel  
Gary Nordlund  
James B Philp  
Jean Brown  
Jenn Adrien  
Bruce Kendall  
James Seley  
John Ostrowski  
Meghan Mcwain  
Jeff Horst

**Adam Smith:**

Dear Gerry,

We wish to express our support for the proposed Targa Sound Terminal Project 11265. As long-time Tacoma businesspersons, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

Sincerely,

**Al n Donna in Tacoma:**

The expected emissions from this project are completely unacceptable. And to put it near the LNG storage tank is insane!

**Alison Tracy Hale:**

Dear Puget Sound Clean Air Agency:

As a homeowner and resident of Tacoma, I write to request that TARGA Sound Terminal's request to "terminal (receive, store & ship) up to 151,500,000 gallons per year of natural gasoline" be denied. (<http://www.pscleanair.org/business/Permitting/AOPDocumentsForComment/11265-Targa%20Public%20Notice.pdf>)

Natural gasoline is an explosive substance sourced from natural gas extraction which is often added to commercial gasoline. Natural gasoline is more volatile than commercial gasoline. According to ConocoPhillips' safety data sheet, natural gasoline presents many health hazards. Natural gasoline's vapors are of particular concern, and it is listed as a probable carcinogen. It is "toxic to aquatic life with long lasting effects," which is especially troubling given the location of TARGA Sound Terminal.

See [http://www.conocophillips.com/sustainable-development/Documents/SMID\\_213\\_Natural%20Gasoline%20HTAG.pdf](http://www.conocophillips.com/sustainable-development/Documents/SMID_213_Natural%20Gasoline%20HTAG.pdf)

TARGA should not be allowed to receive, store and ship 151,500,000 gallons of this hazardous material annually without a full and comprehensive review to examine health and environmental risks, which includes a public hearing.

**Amy Hoyte:**

Dear Gerry,

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Ann Bickel:**

To who it concerns.

I am very concerned about the 'natural gas' shipments planned for the Port of Tacoma.

I ask that the request be DENIED and that there be a full, comprehensive review of health and environmental risks, part of which must be a PUBLIC HEARING

An consequences of an environmental accident has not been effectively included in this plan and it is imperative the concerns of the local citizens be included in this decision

I beg that a public hearing is scheduled.

**Anne Goodenberger:**

It has come to my attention that proposed order 11265 will allow Targa refinery to add to the toxins they put in the air, land and sea. Keep in mind that those of us living in NE Tacoma had a road, 11th St, that took us directly to the city in which we pay taxes until it was closed and we had to go around on highway 509. Now we are forced to go by Targa refinery every trip to our city, exposing us to many hazards not present when we purchased our home 28years ago. Please do not let them skip the EIS to add more toxins to our atmosphere. Thank you for your consideration.

**Ann Locsin:**

I am writing to provide public comments regarding the Targa application to terminal natural gas.

I am asking PS Clean Air to NOT allow this permit to move forward without mitigation.

As residents who live very nearby, we already face very strong petrochemical odors from this facility to the point that we can not leave our windows open or enjoy our outdoor spaces. I personally have filed numerous complaints with your agency about these odors. I have only received one follow up contact in all that time from your inspector. This is an unacceptable response to an issue that could be impacting human health.

According to the application, we will be exposed to additional VOC's and benzene, known to cause cancer. I find it unacceptable that the current law does not take cumulative impacts into account when writing air permits for benzene. The more permits you write, the greater the exposure to residents, yet that is not taken into consideration according to the current laws. Additionally, the Tideflats is not currently monitored for benzene so there is no way to know what the cumulative impact actually is.

One idea is to require Targa to install benzene monitors around the perimeter of their facility or ask them to do it voluntarily. They chose to develop a property located next door to residential neighborhoods and as such have a responsibility to ensure that they are not exposing us to cancer causing agents.

I forgot to ask for a public hearing regarding the TARGA natural gas permit application for the NE Tacoma community.

Thanks for considering

Thank you for the answers that you posted on your website related to the Tacoma Tideflats meeting.

Could I please have the following questions answered? I submitted it once before but did not receive a reply.

Our neighborhood has tested dust and it came back as primarily Asphalt emissions. There are 3 facilities nearby that I know of that deal with Asphalt.....Targa, Emerald, and Gardner Fields. My question is threefold :

- 1: what emission devices do each of these facilities use and how do they benchmark against best in class?
- 2: Can you require a business to upgrade their emissions control if it can be proven that it is harming nearby residents?
- 3: what are the possible health implications to exposure to Asphalt particulates?

**Anna Bean:**

I am a citizen of the Tacoma area and a Puyallup Tribal Member. I would like a public hearing to discuss the expansion of Targa.

We are currently in opposition of the LNG facility and expanding another site on the Tacoma tide flats is absolutely a concern. Right next to the Hylebos bridge and open water way is a danger to an already polluted water way.

Why are we even considering this expansion? There is no good to come from this. There is no positive spin or outcome for Tacoma residents.

Thanks for consideration of my request in advance.

**Barbara and Jim Church:**

1. I am requesting a formal public hearing to further discuss issues related to this permit.
2. I'd like to see some formal data showing the full impact of the increased volatile organic compounds and hazardous air pollutants that will be added as a result of this project.
3. Given the increased hazardous air pollutants, is there a plan to combine these pollutants with existing ones and still be in compliance with the Paris Climate Agreement's emissions target?
4. Given that Pierce County already has the highest cancer rate in the state, I would like to see carcinogens like benzene levels measured and then include that level of increased benzene with this project.
5. I am requesting a health EIS with this project.

Thank you for reviewing and responding to these questions and requests.

Targa would like to expand its permit to allow more liquid gasoline to go through the Port of Tacoma. I was surprised to hear that during this permitting review process, Puget Sound Clean Air Agency would not consider how this increase impacts the overall pollutant levels. It really seems like testing air quality is your job. The emissions associated with this project could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene. We are residents of NE Tacoma and don't want more hazard air pollutants in the air that we and our children and grandchildren breathe. Benzene is a known carcinogen. Pierce County already has the highest cancer rate in the State. I don't want Targa's permit to expand. I would like to see industry that promotes good jobs and health.

Barbara and Jim Church

**Barbara Phinney**

Tacoma already has a toxic level of emissions in the Port. Please do not let Targa bring by rail an estimated 24 tons/year of volatile organic compound 'natural gasoline' plus benzene, a known carcinogen. Please do the right thing for the people and environment, for now and the future. Money and profit are not more valuable than clean air and water.

**Barry Westbrook:**

I am writing to voice my opposition to Targa Sound Terminal's request to receive, store, and ship natural gasoline in Tacoma. I'm asking that you deny their permit and hold a public hearing to determine the safety and air quality risks to the community.

**Ben Wildmans:**

I am a 35+ year resident of Washington and am writing to request that a comprehensive health and safety analysis of the proposed terminal be conducted prior to a decision about its acceptability.

**Benita Moore:**

I object to PSCAA issuing a permit to allow Targa to terminal natural gasoline until the following points are addressed. Additionally, I request that a public hearing be held to get answers to these and any additional concerns from the community:

- 1) Unacceptable to allow a product with the emissions quoted on the PSCAA website (see above - including cancer causing benzene) to be handled and stored less than a half mile from dense residential neighborhoods.
- 2) Unacceptable that a hazardous material with such extreme volatility would be allowed on our rail system - directly through our city and that of nearby cities - when we know how catastrophic a derailment would be.
- 3) Unacceptable that a safety study won't be done, because the City of Tacoma believes a study done years ago on a different hazardous material is sufficient.

- 4) Unacceptable that the environmental impacts of a potential spill of this highly toxic material in our fragile Puget Sound won't be studied.
- 5) Unacceptable that the current environmental laws don't account for the cumulative health impacts of adding new sources of toxic air pollutants (including cancer causing benzene), such as the additional pollutants this project will introduce.
- 6) Unacceptable that the PSCAA doesn't have the ability to measure and enforce compliance for emissions of toxic air pollutants.

There should be a cumulative risk exposure threshold. As a community, we've been asked to shoulder all of the risk without any benefit. Project after project, we keep getting additional safety risks and more toxic emissions. There must be a tipping point. What is the practical limit for what our community is asked to shoulder? Targa is just too close to NE Tacoma to be expanding into these extremely dangerous hazardous materials.

**Bill Fultz:**

I oppose the granting of permits to Targa, due to the unsustainable water demands it will make, the pollution it will create, as documented in the proposal itself, the further degradation to the region posed by the enemy increased rail traffic and the lack of any benefit to the economic well being to the port, tribes and surrounding communities. I urge you not to permit this facility to be allowed to go forward and further degrade our precious water supply, and the air we all need to sustain life.

**Bob Celski**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a longtime resident of Federal Way – a neighbor just uphill from the Targa plant, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community. This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

**Bob Kutter:**

Please deny Targa's request for a natural gasoline terminal. Instead let's have a public forum to get input from the electorate.

**Roberta Campbell**

In response to the public notice in The News Tribune: Please say NO to the permit for Targa Sound Terminal's proposal to receive, store and ship gallons of natural gasoline. NO more trains carrying dangerous substances.

Our air is cleaner. Why agree to hazardous air pollutants? Just say NO to proposal order # 11265!

**Bonnie Miller:**

I am very concerned about the effect of permitting Project #11265 that would allow emissions associated with the project to contribute 24 tons per year of Volatile Organic Compounds that include 2.8 tons per year of Hazardous Air Pollutants, 1.3 tons per year of Toxic Air Pollutants, and 186 pounds per year of benzene. We cannot allow the Puget Sound residents to be exposed to these incredibly damaging emissions in the places where we work, play and live. There are no public benefits to the project and only public endangerment.

As we move to more sustainable energy, we must protect our air and water. This permit will do nothing to protect us and the project should not be permitted.

**Marilyn Boyd:**

As a retired nurse, I'm very familiar with symptoms, diseases and treatments.

The best-case scenario for treatment is early intervention, however, many times patients will ignore symptoms out of fear, denial, or lack of access to healthcare.

Global warming has made our planet is very ill, and it needs immediate intervention. Allowing continued extraction, transport, storage and use of fossil fuels, will be akin to ignoring a terminal illness. The safety issues of transporting LNG per rail have not been adequately studied. The only area experimenting with this is rural Alaska. Targa's plan is to rail 107 LNG laden train cars through a populated area weekly and to receive, store and ship 151,500,000 gallons per year.

As we know, coal and oil transport by train has not had a stellar track record, with many derailments, spills and catastrophic explosions, thus diminishing the trustworthiness of BNSF and Union Pacific.

Storage facilities have also had their share of leaks tank failure and explosions.

<http://www.sightline.org/2016/02/08/how-industry-and-regulators-kept-public-in-the-dark-after-2014-lng-explosion-in-washington/>

Locating more fossil fuel storage in an already existing tank farm is asking for trouble. Loading the LNG on to marine vessels is also hazardous, and Targa is requesting more sulfur dioxide emissions to be allowed during the loading process.

The standard is less than 1,000 parts per million on a dry basis, 1- hour average.

Targa is requesting the removal terminology '1- hour average'. How long does it take to load a marine vessel with LNG? How much excess sulfur dioxide be released during this process?

According to ATSDR (Agency for Toxic Substances & Disease Registry),

"Short term exposure to high levels of sulfur dioxide can be life threatening. Exposure to 100 ppm of sulfur dioxide is considered immediately dangerous to life and health."

The Targa project should not be allowed, and emphasis should be on safe, job creating and non- toxic sustainable energy sources.

**Bradley Thompson:**

1. I formally request a public hearing on this permit.
2. I formally request that the public comment period be extended, until the SEPA review documents from the applicant's previous permit requests (from 2012/2013) are publicly posted - including all health, safety, and environmental reviews that the City of Tacoma is using as justification for their recommendation of not having to do SEPA review for this proposal.
3. I formally request that a health impact study be completed before a decision on this permit request. I would like the study to review what health impacts are associated with potential emissions of up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year

of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of cancer causing benzene.

4. I formally request that a new toxic air pollutants study be completed before a decision on this permit request. I am extremely concerned that the cumulative impacts of the Port's toxic air pollutants are not being taken into consideration when permitting proposals such as these. The community has a right to know the current public exposure to toxic air pollutants before commenting on the project that will introduce an additional 24 tons of VOCs per year. I also request that the public have an opportunity to make comments on the scope and approach of the study prior to it being conducted.
5. How will PSCAA ensure that emissions as a result of product transfer and storage be within allowable limits? You do not currently have a way to continuously monitor for toxic air pollutants, including cancer causing benzene.
6. Lastly, I question why PSCAA doesn't have an easier way to submit public comments than via direct email. Other regulatory agencies have an easy-to-complete form on a website that confirms receipt. I have heard from more than one person who attempted to submit comments via email, that they were unsuccessful. Holding a public hearing on this permit would ensure that the public - who will ultimately bear the brunt of this project's impact - be well informed and have a chance to make formal public comment.

**Brie Gyncild**

I expect you're getting a lot of email about this, so I'll keep it short. I understand the arguments that natural gas is a bridge fuel as we make our way to fully renewable, sustainable energy, but creating new infrastructure for natural gas only lengthens our dependence on this fossil fuel -- and on fracking, which has demonstrably harmed communities, water quality, and land stability in many places in the country.

"Natural gasoline" is no more natural than regular gasoline -- it's all from fossil fuels. It's all toxic. We need to reduce the number of oil trains traveling through our communities, not add to them.

If you don't deny the permit outright, please a hold a public hearing to examine the safety and air quality risks to the community.

Thank you for your time and consideration.

**Bud Bronson:**

This is to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time resident of this area: it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region.

We moved to the Tacoma area in 1973. My employment history includes Tacoma Boatbuilding Co., J. M. Martinac Shipbuilding, and The Youth Marine Foundation.

Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

This proposal conforms to the following Container Port Goals contained in the 2015 Comprehensive Plan:

CP-3 Promote the continued growth and vitality of the port and port related industrial activity.  
CP-5 Provide, protect, and preserve the capital facilities and essential public services needed to support activities within and beyond the Core area.

Thank you for the opportunity to provide public comment on the economic, environmental, and safety benefits of this project.

**Carey Olson Findley**

Please do the right thing for all our children. Move forward, not downward.

**Carlo Voli:**

Just found out about the proposed project for Targa to terminal "natural gasoline" at the Port of Tacoma and I'm completely opposed to this.

I am requesting that you convene a public hearing so folks can really express their opinions and we have more of an opportunity to examine safety and air quality risks to our community.

**Carole Eggen:**

I am writing to express my opposition to Targa's request to terminal fossil fuel. Their proposed activity would endanger our air quality and our safety, not to mention lock our region into future decades of fossil fuel dependence - the wrong direction we should be heading!! Fuel trains should be a thing of the past.

Please deny their request for a permit, and hold a public hearing on the public health risks of their proposed action.

**Carole Sue Bratton:**

Under catastrophic events in the port of Tacoma and TARGA plant that will and can effect the air quality form damage to the buidings structures and tanks is Flooding events.

1. The most Historic event in the port is that it flooded the tops of the Puyallup River Levy at 34 ft high flooding the enter port and all of the Puyallup valley. The second most historic happened again in the 1930' as my mother now 92, my grandfather a longshoreman and my uncles watched the port flood.
2. The flooding moves cargo and debris....whether the Puyallup River, and incoming Storm Surge, a Seiche (caused by a landslide the larges known one in the states happened in 1950's the water rise was displaced and rose over 1600 feet ), Tsunami all can cause movement of shipping containers, boats, ships, building and debris....this sticking the tanks and causing the chemical and natural gas to be releases into the water and air.
3. The air quality will become dangerous to humans and a mass evacuation is necessary.
4. How far will people have to evacuate ? For how long in in any, all and each and every catastrophic event? How many people must be evacuated? For How long? How many will die? What burdens on the hospital?
5. Where do they evacuate to ?
6. What are the escape routes?
7. What are the danger levels?
8. Who will order the mass evacuation?

Figuring Catastrophic structural failure of TARGA plant tanks from 2 to any, all and each and every single tanks and pipes failing including the main line for TARGA pipeline crossing the Port of Tacoma completely simultaneously at the same time . Using from 2 then showing each added tank in the complete structural failure each releasing total and full contents of all chemicals and gas into the air at once.

1. How far will the chemicals and gas reach using wind speeds in increments of 5mph, 10mph, 15mph up to 75mph then add the top wind speeds from the Columbus Day Storm in Oct. in the 1960' which hit maximum wind speeds recorded for this are?
2. What are the names and chemical formulas of all the chemical that will be released? What chemicals can they combine with and what is the toxicity rating in air quality? When it is raining what will happen when the toxic chemicals fall from the air on to surrounding soil, water, humans, animals, plant life list any, all and each and every single one? What will be the long term effect meaning 1 year, 5years, 10 years 20, 30, a life time of 90 or more year?
3. The Tacoma Smelter contaminated the air quality for the humans/ people, animal, soil, water the environment in several counties what is any, all and each accumulative effects of each of the chemicals in the air being breathed over a life time, what are the known generation effects of breath the air contaminated type of cancers, diseases, etc. ? What are the effects Eating the food produced from the gardens of people trying to grow organic?
4. Using National Oceanic and Atmospheric wind data how far will evacuation have to be in order to be safe?
5. How far can and will the contaminated air travel figuring wind speeds of 5mph to Columbus Day Storm level?
6. What is the expected evacuation and escape times for surrounding businesses and residents homes because air quality will be to dangerous to stay Evacuation will be mandatory?
7. What distance is a safe evacuation distance for any , all and each and every catastrophic event that can happen effecting the air quality? How are you Notifying the people in the area of mass evacuation is necessary? What alarm system is set up? What is the expected burned impacts to all types of first responders? What will be the cost of controlling release of gases and chemicals into the air by Emergency management?
8. Who is paying the cost of the evacuation center, food housing, restrooms? how do you plan to evacuate people who can not drive, handicapped , injuries from breathing contaminated air?/ Will any medical faculties need to be evacuated?
9. With the time of the incident occurring during rush hours between 3pm- 6:30pm how will all the people be safely evacuated?
10. What are the effects on the human body

This permit Requires and Mandates a Environmental Impact Statement under R.C.W. 36.70. A, R.C.W. 36.70A. 030, W.A.C. 365-190, 195, 196 and R.C.W. 43.21.C....The permit can not be allowed to precede because it is SIGNIFANCT under the laws of Washington State because of Geological Hazards that will effect air quality. During any of the possible disasters. Known by Washington State Emergency Management and others.....

PLEASE NOTE...There is only 1 known building structure of any type in the United States of America made to withstand a Tsunami. It is located in Washington State on the Coast it is a mass evacuation building built to save over 2000 people who can not out run a Tsunami. I have been to the TARGA facility

it is missing both a tsunami wall and even a landslide hazard wall. None of the building will hold so massive amounts of chemicals will be released in any of these events.

1. The entire Port of Tacoma area is located in multiple Critical Areas as designated by Washington State Department of Natural Resource Geological Department. These Critical Areas are Defined in R.C.W. 36.70A.030....one of the Categories of Critical Areas is Geological Hazards...Name any all and each and every single one? What are the mass human casualties expected to die and be killed by asphyxiation from theses events from complete structural failure of all the tanks collapsing and releasing all the gas and chemical and the entire TARGA pipeline going across the port being severed in a number of place releasing toxic chemicals and gas into the air? What type of chemical burns and lung problems will happen name any, all and each and every single one?

The entire Port of Tacoma is located in multiple Geological Hazards therefore the location according to Washington State no siting of commercial, residential or industrial can be built on the site location according to Washington State Laws it is unsuitable because of safety....

1. Is the TARGA plant facility in a Tsunami Area yes or no? Can a Tsunami cause structural failure of the TARGA Tanks and pipeline yes or no? Will this release toxic chemical in the air how much? How far? What are the known effects on humans name them all
2. Is the TARGA facility in a LAHAR area yes or no? Can the LAHAR /mudflow move then tanks breaking them from their foundation releasing chemicals and gas from the Tanks ? what about any pipes in the plant?
3. Is the TARGA facility in High Liquefaction areas? Does high liquefaction cause buildings to sink and settle to the ground? Can High Liquefaction cause building failure causing catastrophic building and structural failure to the TARAG plant causing release of all the gas and chemicals into the air?

National Oceanic and Atmospheric (NOAA) has the historic records of the wind speeds from the well known Columbus Day Storm of the 1960's ( which I personally lived through )clocked at over 100 mph through Pierce County, Washington and Oregon and set a national record for winds until recent years.

Washington State Department of Natural Resources Geological Department Geologist are the determining Authority of Geological Hazards in Washington State any area designated by them as a Geological Hazard Area is also designated unsuitable to build commercial, residential and industrial. No other agency has the authority to change this. The Washington State Geological Department has not changed its designation of the Port of Tacoma .

...no Qualified Engineer licensed by the State of Washington Licensing Dept. as a Engineering Geologist and Engineering Hydrologist has put their Washington State Seal and License engineering seal and signed off on this building. No petition of change of hazardous zoning are designation has been summit and granted using Best Available Scientific information to has been put to the Washington State geological department removing it from hazardous status say that the site is located out side of the dangerous and hazardous area has been granted. Has this site been by Washington State Department of Natural Resources Geological Department.

All air quality for human being and animals because of the hazards will be severely jeopardized for miles around during any of these catastrophic events some which can happen within minute of one another. Causing massive structural damage that will allow all the tanks to release the gas, possible sparking fires causing smoke with multiple types of chemical contaminates. This area is

Can the air quality be guaranteed to be absolutely safe to breath no human evacuation of close by homes and residents, business ever needed? and that if needed evacuation can be done and completed totally with in the more then 4 mile radius that will be required. How long will it take?

How many people will die from asphyxiation in total structural failure of all he combined TARGA plant from chemicals in the air and natural gas? What are the accumulative effects of

The Geological Hazards that effect the Port of Tacoma are:

1. Volcanic Eruption Zone Mount Rainer- There is no known possibility of engineering mitigation. Only open space. Full destruction of all buildings of all building knocking them completely off of there foundations causing the mass release of all gases and chemical into the air at once. Winds of 35- to gusts of 65 mph will carry chemicals and effect air quality for mile around making the air to dangerous to breath and possible death, injuries to those humans and animals that do. ...Rain causing the pollute air to rain damaging chemical down into the surrounding water...Can a LAHAR mudflow cause total structural failure releasing massive quantities of chemicals
2. LAHAR/Mudflow cause by volcanic eruption or a fast known glacial snow melt. This is a historic event that has happened already. A massive wall of water and mud moving at over 30 miles per hour down the mountain into the valley and port tidef lats. There is no known engineer mitigation for the building and structures all buildings and structures and holding tanks would be moved off their foundations by mudflow and swiping debris being carried down the Puyallup River Valley. This would cause mass release and escape of all chemicals and gas in the air. Wind speeds can carry the chemical and effect the air for miles around requiring mass immediate evacuation. Mostly on foot due to traffic congestion. Winds of 35- to gusts of 65 mph will carry chemicals and effect air quality for mile around making the air to dangerous to breath and possible death, injuries to those humans and animals that do. ...Rain causing the pollute air to rain damaging chemical down into the surrounding water
3. This is threaten by numerous earthquake fault line one in the Port of Tacoma that come close to the TARGA plant tanks these fault line have the capability of dropping 10 or more feet at once or moving 30 or more feet. This would cause the severing of the pipeline the TARGA pipeline runs directly over the top of the second Major Tacoma Fault line ( Tim Walsh Washington State Dept. of Natural Resources Geological Dept. Assistant Geologist has published numerous documents sent to all local lead agency's per state laws requirement and numerous United States Geological Survey Experts). This fault is over due for a 7.0 magnitude earth quake there is absolutely no known engineering mitigation for a moving fault line and no known manmade structure can with stand the fault movement. The fault will severe the pipeline causing the gas to escape contaminating surround air quality with the gas. This gas will cause massive asphyxiation of people in the surrounding areas making the air quality unbreathable for any human beings or animals.
4. Tsunami Hazard Zone Area- TARGA lies with in the Cascadia Subduction, Tacoma Fault, Seattle Fault Tsunami area. ....There is ONLY ONE building and structure in the entire United Stated of America that is built to with stand a Tsunami it is built in Washington State. The building is built on the Pacific coast of Washington State as a Tsunami Evacuation building it will hold over 2000 people to safely evacuate an area.
5. Liquefaction causes building during and earthquake shaking event to turn to liquid and cause the structure to sink have massive structural failure again the tanks would fail effecting air quality damage to even one tank can cause others to fail releasing toxic chemicals into the area for miles around.

1. Landslide Hazard/Steep slope Area that raise above 400 feet high the run out of the landslide can strike any of the TARGA facility tanks knocking them off there foundation is next to a landslide hazard. Causing a massive structural failure and release into the air.

The endangerment to humans from toxic and deadly air quality causing death to those who can not escape, breath poisonous and toxic chemicals.

Also no permit is allowed to be issued because Washington State laws will not allow and has not allowed and issuance of any

permit to supersede Washington State laws since Sept. 1990 clearly stating that:

R.C.W. 36.70A.030 (9) "Geologically hazardous areas" means areas that because of their susceptibility to erosion, sliding, earthquake, or other geological events, are not suited to the siting of commercial, residential, or industrial development consistent with public health or safety concerns.

Because of the severe, catastrophic, dangerous, perilous and adverse Environmental Impacts this will have on the surrounding air quality. Catastrophic and complete and total structural failure can be expected in these events. Total building and structure failure with worse possible scenarios needs to be calculated. Not average, mean, median events with minimal to mild structural damage. Caused from numerous geological hazardous and other events that will and can effect the TARGA plant that are over due and are a imminent threat, peril and danger to public safety of air quality ready to happen at any moment. Each one of the events requires and other possible events not mentioned and mandates adequate Environmental Impacts Statements of these events that can only be calculated by qualified government agencies in any, all and each and every area, at colleges and universities that have the highly specialized equipment their disposal to do the test and highly qualified experts in that field that particular area of expertise, that have:

1. High experience with any, all, and each everyone of these event the local lead agency and their contactors do not and are not sufficiently, adequately and properly qualified to access the actual and true damage, destruction, peril, safety and health of the air quality during any, all and each and everyone these event. ....The contractors have only been capable of doing the positive financial Who are the Experts in the filed of catastrophic building and structural failure of natural gas and chemicals
2. Knowledge, expertise, the qualifying computer imaging and programs that will properly and correctly calculate the events and the actual and true information of the type of damage to be expeted.
3. Accurate historical knowledge of the massive damage each event has the potential of doing and the true and real damage that will be done.
4. Any, all and each and every one of these agency and experts and others they recommend need to be to be contacted and do the work for the local lead agency. They are the only ones qualified the their field of expertise to say if the permit should be allowed to go forward or be denied because of being to dangerous and hazardous. Before any permit is allowed or permit. The local lead agency and their hired contractor are not nor have been qualify to access the danger, hazards, peril, destruction, death count, massive injuries, escape and evacuation times for humans in the areas, health concerns of air quality during and after these events. ....These are a partial list of the government agency's that should be allowed to review and comment on any all of the TARGA permit and if the past local lead agency in any way shape or for permit was actually adequately and correctly done or if the contractor mislead the local lead agency.

The Washington State laws also Require and Mandate a Accumulative effects be calculated this will and does add any, all and each and every signal one of the industries on the Port of Tacoma and

surrounding areas to be all add together combined at maximum capacity of out put at the same time during full production....As stated in the Washington State Heirst case decision ..

Also all having catastrophic and complete failure of the structures of all buildings on the Port of Tacoma and all railroad train tankers all at once or within a few minutes of out to all areas of Port of Tacoma. another caused by any of the below known events. ....Each of these events repeatedly happen in Washington State and the Port of Tacoma is historically known to be SIGNIFACNTLY and ADVERSERLY effected by any, all and each and every signal one of these events. Washington State laws clearly states that because of these things the land is Unsuitable and Incompatible use land for any industrial, commercial and urban development

Any, all and each one of these hazards poses life threatening air quality events. For miles around Each and

Cascadia Subduction earthquake fault line running the length from southern British Columbia to Northern California it historical has known event that produce 9 magnitude earthquakes with a 5 minute shaking time like that of the well known Japan earthquake of March 2011 of the same magnitude and time length. This fault line goes off about every 300 years with the magnitude 9. Jan. 26, 1700 was the last known date (Bryan Atwater United States Geological Survey).

This produces in the Port of Tacoma

Volcanic Eruption Zone from Mount Rainer -there is absolutely no known engineering mitigation capable of with standing any volcano eruption zone .....mitigation is done by open space or agriculture. The TAGRA plant is located in the volcano eruption zone. Washington State laws do not permit any commercial and industrial buildings to be built in volcano eruption zone in a volcano after May 18, 1980. Pierce County Volcano Eruption Map /LAHAR/Mudflow Area extends TARGA plant holding tanks would have catastrophic structural failure releasing all chemicals and gases from all the tanks all at once. Causing the immediate need for massive evacuation of all surrounding homes

Volcanos Causes

LAHAR/Mudflows (also caused by fast glacial melt) - There is no known structure to withstand a LAHAR.

Tsunamis, landslides.....All of these can cause massive failure to the TARGA facility....Air Quality can be for miles around be effected, escaping and evacuation times when the air is to toxic to breath need to be correctly calculated this is a residential population .



Tacoma fault line ger\_ofr2009-9\_tsun Cascadia Subduction pamphlet fs2010-302ami\_hazard\_tacoma.jzone ger\_ic116\_csz\_s

#### **Mike Pierson:**

Beckwith & Kuffel wishes to express our support for the proposed Targa Sound Terminal Project 11265. We have worked with Targa Sound Terminal for many years and know from personal experience how much they care about safety and the environment. This terminal has been a part of the community for over 50 years and has a long history of working responsibly. The terminal has been in business for and currently provides 50 full time, family-wage jobs in our community.

Targa has extensive experience in handling the products contained within the terminal in an environmentally safe way. They look at technologies that exceed the recommendations to limit VOC emissions. This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the

quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Carolyn DeFord-Eden:**

My name is Carolyn DeFord, I am a resident, mother, business owner, representative of the Puyallup Water Warrior Council, and an enrolled member of the Puyallup Tribe. My people have lived on this land since time immemorial. My grandparents are buried here for generations and generations back. This is my ancestral land. You are guests here, in colonized territory.

Please see my comments and questions below. I hope that you take into consideration the many likeminded individuals, tribal members, animals and future generations who breathe this air. I understand that PSCAA was created to regulate the source of air pollution, monitor air quality and assure the safety of nearly four million lives in the Puget Sound

- I SUPPORT the PSCAA filling important advisory council seats including Environmental Justice and Tribal Nations and hiring additional employees to realistically monitor industry emissions. If additional employees cannot be hired, then additional permits in areas of cumulative industry should not be accepted or approved.
- I SUPPORT the revision of the PSCAAs permitting process to require consideration of cumulative emissions from all sources within close proximity to each other.
- I SUPPORT additional air quality sensors to monitor additional toxic emissions including benzene in areas of high risk heavy industry, areas with cumulative emissions, and residential areas near high risk heavy industry lands.
- I SUPPORT requiring the PSCAA to verify all actual emissions and provide public notice
- I SUPPORT a Full Environmental Impact Study and Toxic Air Study on TARGA Sound Terminal
- I OPPOSE the request submitted by TARGA Sound Terminal to RECEIVE, STORE and DISTRIBUTE natural gas because risk to public safety, health and the environment need to be made priority. Additionally I oppose the added terminal traffic via rail cars through our community due to their contribution to this risk. Finally, TARGA has failed to report current and historical emissions records and for this should be DENIED any new permits AND required to provide historical data.

Regarding Air Quality Sensors: There are only three air quality sensors in Tacoma.... Three in all of TACOMA.... These three monitors only monitor 3 harmful chemicals; nitric oxide, nitrogen dioxide and particulate matter 2.5... Three out of over a hundred other harmful airborne chemicals emitted by Port industries. When it comes to the safety of the nearly four million lives currently living here and the countless future generations to come it's clear that 3/100 is unacceptable... an F, a complete fail.

Regarding Cumulative Emissions: The chemical and fuel odors due to cumulative emissions in the Port of Tacoma, NE Tacoma, Browns Point, Fife and along Marine View Drive, Taylor Way and Alexander Avenue are alarmingly strong. Those responsible for that odor, ought to be ashamed of themselves. Our beautiful city; the City of Destiny just a few years ago was filled with the embarrassing Aroma of Tacoma. To avoid this regression and protect the health and wellbeing of our citizen's cumulative must be taken into consideration when reviewing permits. Permits should NOT be issued on a case by case basis without regard to the overall emissions and cumulative air quality of the area.

Regarding Monitoring and Regulating Industry Air Quality: The Puget Sound Clean Air Agency has failed to monitor the industry in the port and assure that those current approved/permited industries are

compliant and factual in their predicted and reported emissions. I was in complete disbelief when I learned that the PSCAA relies on industries to self-report their emissions. Relying on self-reporting is untrustworthy and it fails to provide a base line or real-time measurements of pollutants or overall compliance. Targa for example has no record of emissions since at least 2010.

Regarding New Applications and Permit Approvals/Staffing: It's deeply concerning that the PSCAA is grossly understaffed with only 11 inspectors to oversee 13,695 businesses. That is 1245 businesses to monitor per employee; the client ratio is unbelievable. Permit approving should be put on hold until additional inspectors are hired and vacant seats on the Advisory Council are filled for both Environmental Justice and Tribal Nations. Once adequate staff is hired for the PSCAA to monitor and regulate existing business then they may review new permitting applications. In business, I don't give a waitress more tables or more hours if she is not performing or keeping up with the customers she has. The PSCAA should not be approving or reviewing the permits they have until they can keep up with monitoring existing industries and existing scopes of industry. They are failing and change needs to happen now, before something dreadful happens to the community they were established to protect.

In closing, the Puget Sound Clean Air Agency has successfully lost the trust of the citizens it was established to protect. Their performance has been inadequate in regulating and monitoring air pollution resulting a failure to protect the quality of life and air in Tacoma and our surrounding communities. I hope that you will take the time to consider the statements made at the 9/14 public hearing and answer my questions below.

1. Question: What is the PSCAA doing to assure industry air quality reporting accountability?
2. Question: What are the consequences to industries who are non-compliant in providing reports?
3. Question: What are the consequences to industries who are non-compliant in air quality standards?
4. Question: What is the PSCAA doing to assure that advisory council seats are filled and that the Environmental Justice and Tribal Nations are represented? What is the deadline for having these two seats filled?

Thank you

**Carrie Lafferty:**

I am a Seattle resident and am writing to voice y strong opposition to Targa's request for a natural gasoline terminal in Tacoma. I urge PSCAA to deny Targa's permit request. I also request a public hearing to examine the safety and air quality risks to our community.

**Casey Lowe:**

I would like to request a public hearing to examine the air quality effects and request the project not go forth at this juncture. I am not strictly against these types of projects but I against them near population centers. The people who are profiting from these projects are in no danger should there be a problem but we are. I speak with industrial and engineering knowledge when I say this as a consultant. Please force these project away form population centers like Tacoma. May not be today but one day something will go wrong and it will not be pretty.

**Cathy Lysne:**

**The permit to terminal natural gasoline would allow an annual average of one unit train per week (107 railcars) to be offloaded from railcars and loaded onto marine vessels.**

**The emissions associated with this project could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene.**

This is unacceptable, more carcinogens in the air for NE Tacoma? Why would you permit this? Please take a second look at the harm being done to the environment. I'm battling stage 4 lung cancer and don't want my relatives and friends subjected to this tragic death. Please deny this permit, Targa has done enough damage. Please for God's sake, they don't need any more money from this dirty fossil fuel. The area below 20,000+ residents is already a ticking time bomb, we don't want this. Look at all the recent train derailments, this could be a disaster of the century for Tacoma.

Why, Why, Why more dirty air? Why more rail cars full of dirty fossil fuel?

**Christina Scheuer:**

Please reject Targa's application to receive, store, and ship up to 151.5 million gallons of natural gasoline. If they are allowed to do this, Tacoma would be exposed to more toxic emissions and the added risk of another oil train. Please protect our communities and our clean energy future by refusing this application. We need to be moving to clean energy as quickly as possible!

**Cindy Feist:**

> I am a Tacoma resident and writing you concerning the request TARGA has to convert four of its holding tanks to Natural Gasoline. This is so distressing because our area is being inundated with more fossil fuels, which produce more air quality and hazardous issues. Natural Gasoline will produce more and more Benzene which is known to cause cancer. It's time for Tacoma to stop the expansion and look at what other cities and states are doing to create green jobs and sustainable infrastructure. Please let's just say NO.

I'd like to add to my previous comments. I'd like to ask for a public comment period.

**Claudia Riedener:**

This is public comment regarding the air emissions permit for Targa.

I understand it's not PSCAA's function to look at safety risks. However, in this case there are no public hearings or other permits scheduled as far as I understand for this volatile and hazardous hydrocarbon addition traversing the second largest city on the Sound. Stacking more very volatile "natural gasoline" very near the PSE LNG refinery is not a reasonable or safe thing to do. There is no government agency that is responsible for cumulative air, environmental or safety issues in regards to the many fossil fuel installations in our dense urban center on the Salish Sea. We just had an Amtrak train derail next to the shoreline. We can't possibly have several 107 train cars of "natural gasoline" run along our shores. I urge you to hold a public hearing on this issue which affects the public very much. I would also urge an extension of the public comment period since previous Targa applications are not available to us for proper research.

PSCAA is not measuring air emissions that would increase from this Targa application. We would like to think applicant data would suffice, but we have learned how fracking and fossil fuel industries are operating and there is no trust that industry data would be complete, accurate or honest. How would

sensitive people like the elderly, children and people with immune deficiencies be able to view real-time air data to protect themselves?

Is PSCAA in close working relations with the Pierce County Health Department? Are you collecting data on cancer rates and reproductive health issues? Will you create an exposure baseline before you issue any permits so that residents have data and can make fact-based decisions if they want their families to be exposed to more?

Natural gasoline is very volatile. Isopentane N-pentane, Isohexane, N-hexane, Cyclohexane, Toulene, N-heptane, Dimethylpentanes, Dimethylcyclo-heptanes, Methyl heptanes are toxic and some are endocrine disruptors. In combination the vapors act as anesthetic and can lead to death. How would PSCAA prevent fumes from reaching the public during a spill and what are concentrations in the air people have to be concerned about? How do you plan to protect tanker drivers or machine operators from the anesthetic effects while at work? Several of these chemicals don't have established OSHA occupational exposure limits. What are the scientific data you are using in your determination of permit application? How does PSCAA plan to monitor air pollution not only at tank site, but also along train routes or at train stops?

Without real-time data on any of the air pollutants in question, how will PSCAA alert nearby workers and residents in case of high concentrations? Given the anesthetic effects of natural gas, what is your experience in determining safety of drivers on roads nearby? What are safe driving/operating recommendation in case of exposure?

How is PSCAA prepared to monitor unintended combinations of a variety of air pollutants due to the many nearby volatile and petrochemical facilities?

Given the detrimental health impacts of these volatile fossil fuels & fumes, did PSCAA reach out to schools, kindergartens, nursing homes and hospitals nearby for comment? Were port workers notified?

With the relative new addition of natural gasoline, what is your experience level in permitting such a facility and are there other natural gasoline processors, storage, transportation or other facilities in the port already?

Has PSCAA ever denied any industry air permits? Please direct me to appropriate documents if that is the case.

**Yvonne McCarty:**

Please consider this email a summary of my public comments regarding Targa Sound Terminal's permit application (Permit No: 11265) to terminal natural gasoline.

1. I formally request a public hearing on this permit.
2. I formally request that the public comment period be extended, until the SEPA review documents from the Applicant's previous permit requests (from 2012/2013) are publically posted - including all health, safety, and environmental reviews (that the City of Tacoma is using as justification for their recommendation of not having to do SEPA review for this

proposal). These documents are not available on the project page under the PSCAA website, and I am requesting an additional 30 day review period once these documents are posted.

3. Is there anything more official documenting the reasons for deciding that SEPA review was not required for this application (other than the email string between you and Shirley Shultz)? I strongly object to the rationale that because Bakken crude oil and natural gasoline share a hazardous material classification, that this new proposal should not be reviewed independently. Additionally, the previous review was years ago, and I contend that regulations, requirements, best practices could have evolved in that timeframe. I also contend that the natural environment and surrounding residential/commercial/industrial areas have changed as well. I couldn't find any reference to an agency allowing a previous study for a similar product to be an acceptable replacement for new review in the SEPA handbook. Can you please point me to that reference?
4. I also am concerned about the strategy of working to restrict the chemical properties (vapor pressure, sulfur content, and benzene) allowed on this permit, so that it will be similar to the crude oil already permitted (allowing the SEPA review to be skipped). Please explain how that will work with Targa's customers. If Targa tells its customers what these restrictions are, who is ensuring compliance with these standards before the product is shipped to our city? Shouldn't you look at what the chemical properties are of the natural gasoline product line coming from the most likely customers, and evaluate whether their products will meet the standards that PSCAA follows?
5. I formally request that a health impact study be completed before a decision on this permit request. I would like the study to review what health impacts are associated with potential emissions of up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of cancer causing benzene.
6. I formally request that a new toxic air pollutants study be completed before a decision on this permit request. I am extremely concerned that the cumulative impacts of the toxic air pollutants are not being taken into consideration when permitting proposals such as these. The community has a right to know the current public exposure to toxic air pollutants before commenting on the project that will introduce an additional 24 tons per year of VOCs. I believe that the last study was done in 2009, and that is too long ago to be considered relevant. I also request that the public has an opportunity to make comments on the scope and approach of the study prior to it being conducted.
7. How will PSCAA ensure that emissions as a result of product transfer and storage will be within allowable limits? You do not currently have a way to continuously monitor for toxic air pollutants, including cancer causing benzene.
8. What notification of this public comment opportunity have you given to property owners along the rail line that the tanker train will travel weekly from its origination location to its destination in Tacoma? With the recent local train derailments in Mosier and in Steilacoom, I contend that the property owners that are within a certain radius of the rail tracks should have been notified of the opportunity to comment. I have a friend who lives really close to the derailment in Steilacoom, and had no idea that there was a proposal to allow natural gasoline to travel by rail. These property owners are most definitely impacted, when allowing a net increase of highly dangerous rail traffic on the tracks through their communities.
9. What outside expertise did you engage and how much benchmarking did you complete when reviewing this proposal? I believe that I read that you have never had to permit for natural

gasoline before, so I'd like to see the safety studies, environment impact studies, other projects you benchmarked, etc. in the completion of your analysis. One of my main concerns is protecting the health and safety of my community. I am very concerned that a highly toxic and extremely volatile/flammable product such as natural gasoline, would be allowed to be handled and stored so close to residents (and right next to a highly traveled main arterial - SR509). What examples can you provide of companies who terminal natural gasoline as close to residential areas (less than .5 mile) as this one is? Have you talked to your peer agencies to see what their experience is with monitoring and controlling emissions? Have you seen the results of their health and safety studies? I consider all of this due diligence as you role as lead agency for this project. Please advise what you have done.

10. Finally, I have attached an email that I sent to the City of Tacoma back in April. I'm still waiting for answers to these questions in red. As the lead agency for this proposal, can you please ensure that I receive timely answers to those questions.

I received the PSCAA email notification yesterday that PSCAA has made a preliminary decision to approve Targa's permit to terminal natural gasoline:

<http://www.pscleanair.org/business/Permitting/AOPDocumentsForComment/11265-Public%20Hearing.pdf>

I'm resubmitting the public comments that I've previously sent you. The only question/request that I've asked that you have addressed is the request for a public meeting (which I appreciate).

I've been waiting for almost four months for the City and PSCAA to address my long list of questions and concerns (see attached). Targa is proposing to transport via rail, terminal, and distribute via our waterways 151,000,000 gallons annually of highly toxic and extremely flammable natural gasoline, that will emit 24 tons of cancer causing volatile organic compounds into my community's air, and I can't get answers to my questions after four months?

I propose that we schedule a separate meeting between members of my neighborhood council, City staff, and PSCAA to go over each question/request that I've asked. Can you please suggest a few dates and times that we can meet?

I must remind you of my primary point from the public hearing last week. PSCAA is the lead agency for this request, and you deferred the decision on whether to conduct an environmental analysis of this proposal to the City of Tacoma. The City Planning & Development Services department decided that the only question that deserved any discussion was the potential fire risk. After a string of informal emails, an engineer with Tacoma Fire decided that the hazardous classification of natural gasoline is similar to a previously studied material (from 5 years ago). This elusive study has never been made public on your project page, and the public has not had an opportunity to review it. This is unacceptable.

As the lead agency, ultimately you are accountable to ensure that this proposal has been adequately studied for any and all environmental impacts. Your deferral to the City of Tacoma, and subsequently

the City's inaction to properly analyze this proposal independently and thoroughly, puts your agency squarely responsible for any impacts from minor to catastrophic.

Finally, I ask you to deny this permit, until such time as your agency and/or the City of Tacoma can meet all of the requests below for formally analyzing the impacts (including cumulative impacts) of this proposal, and until such time as your agency has the ability to adequately monitor, control, and enforce compliance of toxic air emissions standards.

The health and safety of the public you are entrusted to protect is very much at risk, and we need you to do the right thing and fully analyze this proposal. We deserve nothing less.

**John Cooke:**

I am writing to request your support for our project. Targa Sound Terminal is seeking approval from the Puget Sound Clean Air Agency to add emission control equipment to four existing storage tanks. The added equipment would allow us to store existing products plus natural gasoline. Natural gasoline is similar to the gasoline we currently handle. The Agency has completed a review of our application and made a preliminary determination that our proposal complies with regulations and should be approved.

**Craig Cole:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. I believe the project would provide Targa with additional flexibility and infrastructure to meet the local communities growing energy demands without increasing emissions. Targa has a long history of working responsibly with our community and is the leading renewable fuels supplier in the state of Washington. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

**Danny Janulek:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Daniel Villa:**

I am writing to ask that you deny Targa Sound Terminal its permit to further pollute our air.

For the past twelve years I have been essentially rootless, working at sea on ocean conservation issues and staying with friends and family in the months between voyages. I longed for a place to call home for years and, as of January this year, it became a reality when I bought a house in Tacoma's Hilltop

neighborhood. Growing up to the north in Bellevue, I remember well the “Tacoma aroma” but had noticed over the years that Tacoma seemed to be moving away from its toxic industrial past. I was proud to set root here and begin learning more about this wonderful city.

So it came as a rude surprise when I opened the Tacoma Weekly and began learning just how much was still going on in the Port of Tacoma. And how, according to the Sightline Institute, the citizens of Tacoma are at risk from the fossil fuel industry that plans to push many hazardous, polluting projects into the port. I noticed it myself while driving through the port - the noxious smell in the air reminds me of the dirty water, oil and diesel that would collect in the bilge of the ships on which I served. I worry for the thousands of workers who are forced to breathe that air every day. Walking around my own neighborhood at night I have smelled that horrible stench, miles from its source, permeating the usually crisp air.

While attending a rally for healthcare earlier this year I learned that the citizens of Tacoma living closest to the port have an average life span five to ten years shorter than in the rest of the city.

In short, I do not want more toxins spewed into the air of my new home city. I do not want “24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene” added to my air.

In addition, I have learned that there is just one particulate matter sensor near the port and its readings are, oddly, not available at night when many say the smell is at its worst. What measures would be in place to ensure that Targa does not exceed the emissions outlined above (which is already too much)?

I’m also shocked that an additional environmental impact statement is not needed to allow Targa to take on so-called “natural” gasoline which is just another product from the highly destructive fracking industry. An EIS should be required to take into account the increased train traffic, these additional toxic emissions, the cost to public health, and the environmental damage inherent in fossil fuel extraction. The City of Tacoma has already joined the Compact of Mayors vowing to combat climate change, and allowing this shift to “natural” fracked gasoline is not in line with that mission.

I do not want my new home city to be a “sacrifice zone” for the fossil fuel industry. Instead, I want the Port of Tacoma to embrace the possibilities of a carbon-free economy, and all the jobs it would bring, so that we are not left behind when wind, solar and other renewable energy and industry inevitably replace the fossil fuel industry.

Thanks for your time.

**Dave Wright:**

Having reviewed various materials about the current recommendation to approve TARGA's terminal use per Approval No. 11265, I am writing to strongly encourage that the request be denied and that there be a full, comprehensive review of health and environmental risks specific to this project. A key portion of this would be a requirement for one or more public hearings, rather than focusing on written-only feedback.

**Debbie Hill:**

I am writing to ask you to deny Targa's request for a natural gas permit. I believe it is premature to be talking of granting Targa a permit when there has yet to be a public hearing on the safety issues related to more natural gas in our area and on the air quality risks associated with it. We here in Tacoma are suddenly the target for the petrochemical industry and that is the last thing we want or need.

In this case, there has been no public discussion of the effects of the pollution to the air quality here in Tacoma. We need to have the specifics of current air quality measurements and acceptable levels of pollution made public. We need to assess what and how much of it Targa's natural gas will add to the problem here in Tacoma and overall. And we need to have a public discussion on how we can improve the current air quality, not make it worse.

We also need to have a hearing on how Targa's plans will affect safety in the area surrounding the planned location of any natural gas infrastructure. How will the air quality be affected by receiving the fossil fuel products by pipeline? By rail? What happens to our air quality if there is a train derailment and fire? What happens if one or more of the storage tanks explodes? What happens to the infrastructure when the demand for gasoline, isoctane, Bakken crude oil, and denatured ethanol decreases due to fewer gas-only cars being made?

We need to have a public discussion on why, when the rest of the world is moving rapidly to renewable, sustainable, truly green energy, when some companies will not even be making gas-only cars in the next year or two, when other countries already have high speed rail and other public transportation in place, we here in the US, and now specifically in the Pacific Northwest, are behaving as if we still live in the 20th century. There are even plans for electric, pilotless shipping now. Why would we be putting in natural gas infrastructure now? This makes no economic sense, and no climate sense whatsoever.

Our community is on the front lines now and it is affecting the quality of life here. The few jobs that may result from any fossil fuel infrastructure do not justify this push to install natural gas infrastructure here or anywhere.

I urge you to deny the permit Targa is seeking.

I would like to send you an additional comment in the form of a very short video that says exactly why you must not grant Targa the permit they are requesting. We here in Tacoma, in the Pacific Northwest, and in the world, do not want to contribute to the dumping of the equivalent of 5 (FIVE) Keystone Pipelines worth of carbon into the atmosphere from the Targa pipelines, trains, and storage tanks.

<http://www.sightline.org/research/thin-green-line/>

If we really want clean air in the Puget Sound area, please deny this permit!

**Deneise Kopetzky:**

I respectfully request that you deny Targa's requested application noted below. We are currently living with poor air quality in NE Tacoma and do not want any additional pollutants added to our environment. There is currently a SubArea plan request under review and the Port businesses should not be allowed to expand or add business new until the plan has been completed. Please help us return to the good air quality we once had as a start by denying this application.

I'm writing as a concerned Tacoma resident who resides in the Pointe Woodworth Community to ask that you please do NOT permit Targa additional storage of Natural Gasoline. The smells in our air are already so overpowering in our neighborhood that many nights I cannot leave my home to go to for routine evening walk or run. My cats, who love to go outside to romp, play and hunt critters, refuse to leave the house when I open the door due to the overwhelming odor. Now that the summer has arrived and we are experiencing warmer weather we want to have our windows open to enjoy the fresh air along with the breeze (we do not have air conditioning) however we have to keep the house closed due to the smell and suffer during the hot days. I ask that you take this request seriously as I don't normally write these letters or make these requests but am concerned for our health and well being.

**Diana Mcleod:**

I am writing to opposition Targa's application for a natural gas terminal and in the hopes that you will deny the permit to build that terminal.

**Don Gammell**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Dorothy Walker**

The Sierra Club Tatoosh Group represents about 2100 members in Pierce County.

We request that TARGA Sound Terminal's request to "terminal (receive, store & ship) up to 151,500,000 gallons per year of natural gasoline" be denied.

Adding the emissions of up to 24 tons per year of Volatile Organic Compounds (including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene) to the already unhealthy air of the tide flats would seriously affect the many who live and work in proximity to Targa. EPA has classified benzene as a Group A, known human carcinogen

Additionally, natural gasoline is toxic to aquatic life with long lasting effects and should not be stored or transferred in this location.

We also request that a public hearing be held on the Proposed Order of Approval No. 11265. The public should be able to voice concerns at a public hearing on a project producing the toxic emissions, the large increase in rail traffic and the pipeline emissions associated with this permit.

**Douglas Sackman:**

Please deny this request. The dangers are too great, the consultation with the Puyallup is insufficient, and the negative impact to our community outweighs any economic benefit.

thank you for your consideration

**Mary Stewart:**

To Whom it May Concern:

I oppose Targa's request for a natural gas terminal in the Tacoma Port. I respectfully ask that you deny the permit. I live in NE Tacoma, in Browns Point and it is NOT in the best interest for the community here. We have 7 schools in NE Tacoma and thousands of children and homes. It is not safe to store this amount of natural gas so close to our families and citizens! On top of that, we don't have a high school in NE Tacoma, so our teenage children have to drive around the port every day, at least twice, past this terminal, and all the trucks, just to go to high school. WHAT ARE YOU THINKING!!!! Please give a little consideration for the safety of our children and families. Please make the right decision and deny this permit. Enough is enough!

**Elizabeth Klein**

I drive behind the Targa truck tanks each morning. I have called many times to report their constant and toxic spilling of fossil fuels that pour directly into the BAY where fishing, kayaking, and residents are impacted in negative ways. EVERY DAY they spill on the roads, into the drainage, and into the bay. And now you want to add more??

I was horrified when the new tanks were added last year without any public hearings, tripling the amount of traffic, spills, and quality of life. And now they want to use the existing tanks for natural gasoline? What will happen if there is a huge spill?

Where is the EIS impact report?

Where is the public announcements?

Our neighborhood is the most beautiful in WA and it is being continually overrun by the PORT's terrible programs which pollute our waters, devalue our homes, and impact us with the highest rates of MS in the WORLD!

I understand there was a recent hearing of which we were not told, to add additional tanks are fuels. PLEASE DO NOT ALLOW ANY GROWTH OF PETROCHEMICALS to our WATERS!

We ALL hate what is happened and want it not only to stop, but to remove the toxin producers in our neighborhood.

Thank you for your consideration,

**Ellen Epstein:**

I oppose Targa's request for a natural gasoline terminal.

I urge PSCAA to deny Targa's permit.

I request a public hearing be held to examine the safety and air quality risks to our community.

**Elyette Weinstein:**

If this application is approved, Tacoma would get an additional mile-long oil train every week and an unknown quantity of toxic emissions would poison the area. As we have learned from the Mosier, OR derailment, and with the oil car accident in Portland (December 2015), oil trains derail and pose a threat to public safety, not to mention the environment. Is it worth it?

Can't you even hold a hearing to give the public a voice? Please uphold the time honored tradition of government transparency and fair dealing.

**Emily Ann Crabill**

Greetings,

As a Washington State resident, I'm emailing to voice my opposition to Targa's request for a natural gasoline terminal. Please oppose this request and deny Targa's permit!

This is not in the best interest of our community and our environment.

Please request a public hearing to examine the safety and air quality risks to our community.

Thank you for your time.

**Emily Johnson:**

Please DENY the permit for this terminal--"natural" gas (fracked gas) should have no place in Washington's future. At a minimum, it must go through a full public hearing process to determine the impacts on air quality for Tacoma, and the safety concerns around additional oil trains.

**Eric Boyd:**

We don't need more fossil fuel infrastructure in Tacoma, those jobs aren't future-proofed at all and they pollute.

**Eric Olsen:**

I along with, what I would guess, the majority of households in NE Tacoma, are very concerned not only with the expansion of Targa, but with the smell that is omitted from the facility.

I have had discussions with your representative in a neighborhood setting only to walk away saying your organization is a straw man. You won't operate during off hours, you will not let others use equipment to obtain air samples during off hours and I bet you can guess when most of the smell/odor is released of smelly gasoline fumes ...during off hours. I have noticed the odor usually occurs over a weekend. I am wondering if these odors come from transferring product to/from storage tanks.

That being said, would you be concerned to have one of these facilities close to where you live? Storage tanks filled with highly volatile gasoline used to fill tanker trucks. I think you too would be concerned. My guess is you don't live in NE Tacoma.

**Faye Teel:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time resident of Northeast Tacoma, a current Northeast Tacoma Community Council Board Member, and an employee of Targa Sound Terminal for over 23 years, it is encouraging to see my company continue to

invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Jay Elias:**

We the people oppose targas request to use the purposed terminal for Natural gasoline.

I urge you to deny the permit on behalf of the citizens of Tacoma.

Any additional suggestions to allow any and all such possible high risk safety and air quality should be held in a public hearing and should be thoroughly examined by a independent third party who is not tied to any port employees or port commissioners or other business related or who could benefit from such purposals. These risks to our community need to be nullified before such is approved. Your community is watching make the right decision and deny this use permit.

How about allowing clean and safe use of our port. In case you have forgotten there are already 3 superfund clean up sites in Tacoma. Let's not continue the mistakes of the previous generations. Keep Tacoma clean.

**Gary Hoffman:**

I would like to support the proposed Targa Sound Terminal Project #11265. As a business in the Tideflats for 25 years, it is encouraging to see other companies continuing to invest in projects that provide economic stimulus to the region. Improvements at their facility will mean addition family wage jobs for our region that are vital for our growth.

This project will allow Targa to add additional equipment providing them with greater flexibility in the products they handle as well as protecting the environment. We need companies like Targa, to maintain both a consistent price, and volume of products to keep our region competitive.

Thank you for the opportunity to provide public comment on the benefits of this project.

**Gary Nordlund:**

I wish to express my support for the proposed Targa Sound Terminal Project #11265. As a long time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community. This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project..

**Gayle Leberg:**

Please add my name to the list of Washington residents opposed to the use of a terminal in Tacoma to store and ship natural gas products.

Targa Sound Terminal in Tacoma has filed an application to (receive, store & ship) up to 151,500,000 gallons per year of natural gasoline, a liquid that comes from natural gas wells.

If approved, this would lead to one additional unit oil train coming into Tacoma and further poison our waterways. Washington state is an important area for turning the tide against fossil fuel production and use. Please stand firm with its citizens and deny this permit outright or at least hold public hearings on the matter.

**Karen Strub:**

Due to the heat yesterday, we kept our windows closed all day. When the air finally started to cool in the evening, we opened all windows only to smell the refinery below our Pt Woodworth home. It was prevalent for over an hour before it started to abate.

Please consider the health and welfare of the NE Tacoma residents who are regularly exposed to these emissions, as you determine how to work with Targa.

Thank you.

**Hallie Fortt:**

I am strongly opposed to allowing Targa's permit request for a natural gas pipeline in the Tacoma Tide Flats/surrounding area. Please deny their permit and listen to the voice of a community who does not want it here. Let's work together to create a Tacoma that is built on truly green technology such as solar or other innovation that doesn't do harm to the surrounding citizens and environment. Also, keep in mind that there are already three superfund clean-up sites in this area, and we don't need another one!

**Heather White:**

I am writing to ask that the request be DENIED. There should be a full, comprehensive review of healthy and environmental risks, part of which must be a public hearing.

Thank you for your concern about Tacoma residents.

**Heather Valdez:**

1. I formally request a public hearing on this permit.
2. I formally request that the public comment period be extended, until the SEPA review documents from the Applicant's previous permit requests (from 2012/2013) are publically posted - including all health, safety, and environmental reviews (that the City of Tacoma is using as justification for their recommendation of not having to do SEPA review for this proposal). These documents are not available on the project page under the PSCAA website, and I am requesting an additional 30 day review period once these documents are posted.
3. Is there anything more official documenting the reasons for deciding that SEPA review was not required for this application (other than the email string between you and Shirley Shultz)? I strongly

object to the rationale that because Bakken crude oil and natural gasoline share a hazardous material classification, that this new proposal should not be reviewed independently. Additionally, the previous review was years ago, and I contend that regulations, requirements, best practices could have evolved in that timeframe. I also contend that the natural environment and surrounding residential/commercial/industrial areas have changed as well. I couldn't find any reference to an agency allowing a previous study for a similar product to be an acceptable replacement for new review in the SEPA handbook. Can you please point me to that reference?

4. I also am concerned about the strategy of working to restrict the chemical properties (vapor pressure, sulfur content, and benzene) allowed on this permit, so that it will be similar to the crude oil already permitted (allowing the SEPA review to be skipped). Please explain how that will work with Targa's customers. If Targa tells its customers what these restrictions are, who is ensuring compliance with these standards before the product is shipped to our city? Shouldn't you look at what the chemical properties are of the natural gasoline product line coming from the most likely customers, and evaluate whether their products will meet the standards that PSCAA follows?

5. I formally request that a health impact study be completed before a decision on this permit request. I would like the study to review what health impacts are associated with potential emissions of up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of cancer causing benzene.

6. I formally request that a new toxic air pollutants study be completed before a decision on this permit request. I am extremely concerned that the cumulative impacts of the toxic air pollutants are not being taken into consideration when permitting proposals such as these. The community has a right to know the current public exposure to toxic air pollutants before commenting on the project that will introduce an additional 24 tons per year of VOCs. I believe that the last study was done in 2009, and that is too long ago to be considered relevant. I also request that the public has an opportunity to make comments on the scope and approach of the study prior to it being conducted.

7. How will PSCAA ensure that emissions as a result of product transfer and storage will be within allowable limits? You do not currently have a way to continuously monitor for toxic air pollutants, including cancer causing benzene.

8. What notification of this public comment opportunity have you given to property owners along the rail line that the tanker train will travel weekly from its origination location to its destination in Tacoma? With the recent local train derailments in Mosier and in Steilacoom, I contend that the property owners that are within a certain radius of the rail tracks should have been notified of the opportunity to comment. I have a friend who lives really close to the derailment in Steilacoom, and had no idea that there was a proposal to allow natural gasoline to travel by rail. These property owners are most definitely impacted, when allowing a net increase of highly dangerous rail traffic on the tracks through their communities.

9. What outside expertise did you engage and how much benchmarking did you complete when reviewing this proposal? I believe that I read that you have never had to permit for natural gasoline before, so I'd like to see the safety studies, environment impact studies, other projects you benchmarked, etc. in the completion of your analysis. One of my main concerns is protecting the health and safety of my community. I am very concerned that a highly toxic and extremely volatileflammable product such as natural gasoline, would be allowed to be handled and stored so close to residents (and right next to a highly traveled main arterial - SR509). What examples can you provide of companies who terminal natural gasoline as close to residential areas (less than .5 mile) as this one is? Have you talked to your peer agencies to see what their experience is with monitoring and controlling emissions? Have

you seen the results of their health and safety studies? I consider all of this due diligence as you role as lead agency for this project. Please advise what you have done

**James B Philp:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Northeast Tacoma resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Targa is a very responsible and environmentally conscience company and neighbor.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Janet Higbee-Robinson:**

The time of fossil fuel dependence must change!

Please stop Tagra and promote restoration to sustain fishing into the future for our Tide Flats and Sound. As well, promote sustainable energy, including solar, wind and tide. The Sound is under assault, as are most waterways of earth. We must live differently!

**Jarred Howe:**

I am emailing to voice opposition to Targa's request for a natural gasoline terminal, and I urge PSCAA to deny Targa's permit.

I also am request a public hearing to examine the safety and air quality risks to our community.

**Jean Brown:**

I wish to express my support for the proposed Targa Sound Terminal Project #11265. As a long time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Jenn Adrien:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a lifelong Tacoma resident who has seen the tremendous improvements to our marine environment over the past 40 years, I am encouraged to see companies like Targa continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community, both on its site in the Tideflats and in its philanthropic outreach to the community. The terminal has been in business for over 50 years and currently provides 50 full-time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles, while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Targa has been the subject of countless smear campaigns rife with hyperbole and disinformation. The RedLine Tacoma members demonstrate little understanding of Targa's strict adherence to stringent safety regulations, environmental rules, and air quality controls. The loud voices of a handful of misinformed residents should not be permitted to shut down the actions of a company that is meeting and exceeding some of the strictest environmental regulations in the country.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Bruce Kendall:**

I wish to express my support for the proposed Targa Sound Terminal Project #11265. As a long time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**James Soley:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County business owner and resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Joel Rogers:**

I voice opposition to Targa's request for a natural gasoline terminal.

I urge PSCAA to deny Targa's permit.

I request a public hearing to examine the safety and air quality risks to our community.

**John Ostrowski:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma / Pierce County businessperson and resident, it is encouraging to see companies like Targa making significant investiture in best industry practices that help protect of our environment, while at the same time contributing to the economic stability of our region.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to help protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Notably, Targa has a long history of working very responsibly with our community. The facility has been in business for over 50 years and currently provides 50 full time, family-wage earning jobs in our community. I cannot emphasize enough as to how important it is that we support companies like Targa. They collaterally support many additional family wage jobs at other companies operating in our region, including my business that employs an additional 10 personnel.

Thank you for the opportunity to provide public comment on the economic, environmental health and safety benefits of this project.

**John Thurlow:**

I support the construction and operation application for the proposed Targa Sound Terminal Project 11265. As a 17-year resident of the Dash and Browns Points area, mostly in Northeast Tacoma, I accept the notion of Targa's added "natural gasoline" business, consistent with Targa's current management's history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community, safely handling potentially-toxic petroleum-related materials vital to the economic life of the Puget Sound region.

This project adds emission control equipment to existing storage tanks at the facility, providing Targa with the flexibility to safely handle more volatile products, while continuing to protect the quality of the environment.

**Samantha Joseph:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma / Pierce County businessperson and resident, it is encouraging to see companies like Targa making significant investiture in best industry practices that help protect of our environment, while at the same time contributing to the economic stability of our region.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to help protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

**Joshua Ligosky:**

I request that the TARGA's application to terminal additional natural gas at the port of Tacoma be denied until there is a full review of environmental risks, and public hearings on the application.

**Justin Ranes:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Kathleen Hewitt**

"The emissions associated with this project could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air pollutants, 1.3 tony of Toxic Air Pollutants, and 186 pounds per year of benzene."

The above statement taken from the applicant's own proposal is enough to tell me this is not the solution to cleaner air, water and land. Tacoma has been inundated with dirty proposal after dirty proposal. It is time to put an end to greed and start thinking of the safety of our citizens. My understanding is that benzene is not monitored daily at the port. I'm alarmed by this as it's a known fact that benzene causes cancer. We need to start drastically reducing the dirty pollution at the port. As citizens, we have a right to breath clean air, drink clean water and live on land that isn't contaminated. The economics of this proposal does not outweigh the safety of our citizens. From what I've read about "natural gasoline," it is highly volatile and unstable. This presents the scenario of a catastrophic event at the port and surrounding areas, especially with all the other flammable tanks within the port. There are people working the port, detained at the port and neighborhoods living not that far from the port. The Puyallup tribe territory is adjacent to the Port of Tacoma and it's high time they were given a break from

contaminating what little property they have left. This is not the answer to what the Port of Tacoma should be doing. The time is now to stop further modifications or installations involving fossil fuels. We need to be pushing forward toward renewable resources before it's too late.

**Ken Baune:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Kevin Hughes:**

As a resident of Washington I'm urging the PSCAA to deny Targa's permit. I'm strongly against their or any natural gas terminal.

I'm also requesting a public hearing to examine the safety and air quality risks to our community.

Thanks for allowing me to express my opinion.

**Kevin McBride:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Kitty Harmon:**

Dear PSCAA representative,

I am writing in opposition to Targa's request for a natural gasoline terminal.

I urge PSCAA to deny Targa's permit, and to hold a public hearing to examine the safety and air quality risks to our community.

**Kristen Smith:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Ladonna Robertson:**

SUBJECT: REQUEST: I am asking for a public hearing for Targa's new natural gasoline permit!!  
Written comments with respect to proposed Order No. 11265.

Please visit what our Tacoma Scientists have to say:

<http://redlinetacoma.org/scientistslng/>

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LNG: Not So

“Natural” Gas

In Tacoma

[www.redlinetacoma.org](http://www.redlinetacoma.org) • 2602 S. 38th St. #204, Tacoma, WA 98409 • [redlinetacoma@gmail.com](mailto:redlinetacoma@gmail.com)

RedLine Tacoma is a grassroots movement of concerned community members from all walks of life. We are neighbors volunteering

our time and energy to stop the selling off of our precious resources and to end further degradation of our fragile Pacific Northwest

environment. RedLine Tacoma is building and mobilizing our community. We aim to alert, educate, inform and advocate.

What is the Tacoma LNG project?

Tenant:

Puget Sound Energy (PSE), a PRIVATE investment arm of Australia’s Macquarie Group

Proposal:

A \$275 million LNG facility at the Port of Tacoma (Alexander Ave E).

Facility:

The 18-story LNG facility will produce, store and distribute natural gas.

LNG production projection:

87 million gallons per year with 24/7 operation

Infrastructure needed:

Five miles of new pipeline through the City of Fife and unincorporated Pierce County

PSE’s job projections:

250 temporary construction jobs and 18 permanent jobs.

Natural gas source:

Apparently fracked gas from Canada or the Rocky Mountains.

3

August 2014:

Port of Tacoma approved a property lease.

November 2015:

City of Tacoma issued FEIS.

December 2015:

The Puyallup Tribe filed a lawsuit.

Early 2019:

PSE’s expected completion/production date

“The Project would be one of the nation’s first marine vessel bunkering facilities,

with on-site LNG liquefaction  
and storage (bunkering)  
at the Port of Tacoma.”

4

What is Natural Gas/Liquefied Natural Gas?

Natural gas is a fossil fuel predominantly composed of methane. It is found deep underground in rock formations.

1

Liquefied natural gas (LNG) is natural gas that has been converted to liquid by cooling it to -260 degrees F. This is advantageous because LNG then takes up 1/600th the volume of natural gas making it easier to store and transport.

2

Why does PSE want this?

According to the FEIS (Final Environmental Impact Statement):

- To fuel ships that run on natural gas (for two Tote ships that will make a weekly round trip from Tacoma to Alaska);
- To sell LNG to “other industry merchants” (it is unclear what this means exactly); and
- To operate as a peak shaving facility.

Peak-shaving facilities allow gas companies to purchase LNG when demand and prices are lower and store it for sale when demand is high. Customers are still charged the same high “peak” price, thus providing high profits to the gas company.

10

Peak-shaving plants are typically small plants that do not operate continuously throughout the year.

5

What does PSE have to hide?

Although PSE has said LNG is safe, when a citizen filed a public information request that would reveal the safety risks, PSE filed an injunction to prevent public disclosure.

9

What are the risks?

Potential breaches

at an LNG facility could result in significant destruction of property, bodily harm and loss of life.

Natural gas is combustible.

LNG is not explosive in its liquid form. However, if it's spilled it can evaporate, forming a vapor cloud, which can ignite and burn.

6

Accidents

and/or malfeasance in operating could have catastrophic effects. This poses an obvious danger to

people who live in close proximity (i.e. neighborhoods located near the Port) as well as the ICE detention center. For example: On March 31, 2014, an explosion at the Williams Northwest Pipeline LNG peak shaving facility occurred in Plymouth, WA, injuring 5 workers and causing the evacuation of 400 people. An investigation named the leading cause of the explosion as inadequate procedures that allowed oxygen to remain in the system. The combined oxygen and gas ignited, causing the failure and explosion during the startup process.

7

Terrorism.

LNG facilities have been identified as ideal targets for terrorism. On May 15, 2016, ISIS claimed responsibility for an attack on a natural gas plant in Iraq, killing 10 and injuring dozens more.

8

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Why is fracking dangerous?

There is always the possibility of leaks, spills and explosions when fracking. But just as importantly, fracking damages the land and pollutes water and air. This is demonstrated by faucets in Pennsylvania and rivers in Australia catching fire and earthquakes in Oklahoma, so here's what you need to know:

Land:

Research shows fracking causes earth tremors. Fracking can induce earthquakes

through the injection of fluid into deep rock formations near fault lines and through the disposal of fracking wastewater via underground injection. “A handful of oil and gas waste disposal wells with names like ‘Deep Throat’ and ‘Flower Power’ have been linked by seismologists to an increasingly strong earthquake swarm around Oklahoma City.”

4

Steps are being taken in several states, namely Oklahoma and Texas, to restrict fracking wells in earthquake-prone areas.

Water:

Each fracking well uses an inordinate amount of water (millions of gallons). This in and of itself is a huge cost to the environment. The fracking process also produces an abundance of wastewater. The majority of the fracking cocktail (water, chemicals and sand) used to blast the rock remains underground. It grows increasingly toxic and can contaminate aquifers when well casings age and/or fail. Also, a percentage of the fracking cocktail returns to the surface.

8

Air:

Pollution is of course caused by known sources like diesel generators, truck traffic and gas venting /flaring but fracking wells also leak air pollutants. In fact, “Oil and gas operations in the Barnett Shale area of Texas produced more smog during the summer of 2009 than all the motor vehicles in the Dallas-Fort Worth area. Rural Sublette County in Wyoming, the scene of 27,000 gas wells, has recorded higher levels of ozone than Houston and Los Angeles.”

5

Climate:

Natural gas is deceptively touted as a clean alternative to coal. But when comparing coal and natural gas, greenhouse gas emissions are practically the same. Methane is the primary component of natural gas. “Because here’s the unhappy fact about methane: Though it produces only half as much carbon as coal when you burn it, if you don’t—if it escapes into the air before it can be captured in a pipeline, or anywhere else along its route to a power plant or your stove—then it traps heat in the atmosphere much more efficiently than CO<sub>2</sub>.”

6

Is natural gas a good transition or bridge fuel?

The simple fact is, if we focus on natural gas, we become dependent on it and thus continue our reliance on fossil fuels. This distracts the market from moving to sustainable, cleaner energy sources. We cannot transition from one fossil fuel to another and expect to see significant benefits. It’s time to move the conversation beyond natural gas to renewable energy. The continued use of fossil fuels accelerates global warming. Natural gas is a false solution!

What is fracking?

Hydraulic fracturing (fracking) is an extraction method used to obtain gas and oil from the earth’s

shale rock. This industrial process creates a well, drills down either vertically or horizontally into deep rock formations and injects a high-pressure mixture of water, sand and chemicals. This creates fissures in the rock that releases fossil fuels (natural gas).

What chemicals are used?

Most companies don't want to share their proprietary blends of fracking chemicals but it's well known that hundreds of toxic cocktails are used including but not limited to lead, uranium, mercury, radium, methanol and formaldehyde.

3

What are the environmental, safety and health hazards?

The process contaminates drinking water, triggers earthquakes, generates air pollution and contributes to climate change through greenhouse gas emissions.

1

051816

REQUEST: I am asking for a public hearing for Targa's new natural gasoline permit!!

The Puyallup Indian Tribe and Redline Tacoma Forum Community definitely support what the Tacoma Weekly just promulgated on July 5, 2017:

<http://www.tacomaweekly.com/news/article/gas-plant-protests-paused-over-health-concerns-vow-to-continue>

PLEASE PROFOUNDLY RESPOND TO CLAUDIA RIEDENER'S QUESTIONS BELOW:

Claudia Riedener My comment RE Targa:

I understand it's not PSCAA's function to look at safety risks. However, in this case there are no public hearings or other permits scheduled as far as I understand for this volatile and hazardous hydrocarbon addition traversing the second largest city on the Sound. Stacking more very volatile "natural gasoline" very near the PSE LNG refinery is not a reasonable or safe thing to do. There is no government agency that is responsible for cumulative air, environmental or safety issues in regards to the many fossil fuel installations in our dense urban center on the Salish Sea. We just had an Amtrak train derail next to the shoreline. We can't possibly have several 107 train cars of "natural gasoline" run along our shores. I urge you to hold a public hearing on this issue which affects the public very much. I would also urge an extension of the public comment period since previous Targa applications are not available to us for proper research.

PSCAA is not measuring air emissions that would increase from this Targa application. We would like to think applicant data would suffice, but we have learned how fracking and fossil fuel industries are operating and there is no trust that industry data would be complete, accurate or honest. How would sensitive people like the elderly, children and people with immune deficiencies be able to view real-time air data to protect themselves?

Is PSCAA in close working relations with the Pierce County Health Department? Are you collecting data on cancer rates and reproductive health issues? Will you create an exposure baseline before you issue any permits so that residents have data and can make fact-based decisions if they want their families to be exposed to more?

Natural gasoline is very volatile. Isopentane N-pentane, Isohexane, N-hexane, Cyclohexane, Toulene, N-heptane, Dimethylpentanes, Dimethylcyclo-heptanes, Methyl heptanes are toxic and some are endocrine disruptors. In combination the vapors act as anesthetic and can lead to death. How would PSCAA prevent fumes from reaching the public during a spill and what are concentrations in the air people have to be concerned about? How do you plan to protect tanker drivers or machine operators from the anesthetic effects while at work? Several of these chemicals don't have established OSHA occupational exposure limits. What are the scientific data you are using in your determination of permit application? How does PSCAA plan to monitor air pollution not only at tank site, but also along train routes or at train stops?

Without real-time data on any of the air pollutants in question, how will PSCAA alert nearby workers and residents in case of high concentrations? Given the anesthetic effects of natural gas, what is your experience in determining safety of drivers on roads nearby? What are safe driving/operating recommendation in case of exposure?

How is PSCAA prepared to monitor intended combinations of a variety of air pollutants due to the many nearby volatile and petrochemical facilities?

Given the detrimental health impacts of these volatile fossil fuels & fumes, did PSCAA reach out to schools, kindergartens, nursing homes and hospitals nearby for comment? Were port workers notified?

With the relative new addition of natural gasoline, what is your experience level in permitting such a facility and are there other natural gasoline processors, storage, transportation or other facilities in the port already?

Has PSCAA ever denied any industry air permits? Please direct me to appropriate documents if that is the case.

And I additionally believe in what the ports of Los Angeles and Long Beach is doing -- NOT in Tacoma by PSE LNG which is being defunded by the Macquarie Group in Sydney, Australia. Why is our area being so regressive with a 30-year contact of FOSSIL FUEL?

From Bradley Thompson and I TOTALLY agree:

"You'll hear the argument that the LNG plant cleans up our local air & water, and leads to a cleaner/safer environment for port workers and residential neighbors! That's actually just bullshit greenwashing. Yes, fracked gas burns cleaner than diesel at the point of ignition, but so do biofuels and LFO. There's no net reduction in greenhouse gases once you include resource extraction/fracking, supply chain fugitive emissions, processing, plant construction, etc. in fact, fracked gas is likely worse than burning coal. TOTE ships currently plug into clean, electric shorepower while at berth, so they're not idling and emitting diesel fumes. Meanwhile, the LNG plant will be pumping out tons of VOCs and other toxic emissions in our local environment 24/7!

If the Port, City of Tacoma, TOTE, Puget Sound Energy, etc, REALLY cared about the health and welfare of Port workers and our local environment, they would mandate use of shorepower at berth and invest in electric trucks & cargo handling equipment to eliminate toxic diesel emissions. Other ports - Long Beach and Los Angeles - are committing to be Zero Emission ports by 2035. NW Seaport Alliance and Port of Tacoma should be leaders in the green ports movement. Instead, they're greenwashing us, tying up valuable land, and using our taxpayer & utility ratepayer \$\$ to prop up the dying fossil fuel industry for another 50 years. Our climate can't wait!"

**Lana Reda:**

To Whom It May Concern:

I am requesting a public hearing of Targa's new natural gasoline permit.

Thank you.

**Larry Gaspar:**

There is no need for a plant to convert gas to methane that is shipped to China or other overseas destinations. We need renewable energy not a terminal for natural gas, especially if it is from fracked gas. A public hearing is absolutely necessary to document the safety risks to WA state citizens.

**Laura Fox:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma business person and resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of

the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Laura Woodruff:**

I am writing to ask that Puget Sound Clean Air deny the expansion permits for Targa and the Natural Gas. AS a resident of NE Tacoma, we are already exposed to too much polluted air, industry is encroaching into our neighborhoods and we have no government agency that is protecting us; not even the City of Tacoma elected officials. Your own sights states they will release an additional 24 tons of VOC a year plus benzene, a known carcinogenic. Your agency has stated that they don't even monitor for benzene! Please do what your agency's name indicates and stand for Clean Air and deny the expansion permits.

At the very least, hold off on any decisions and offer a public forum on this matter.

Even people that don't consider themselves environmentalists, like my husband, are concerned about the expansion of Targa and it's safety and health impacts in our community and neighborhood.

**Ted lileyblade:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma business person and resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

As a longtime employee of the petroleum industry in the Tacoma tideflats area I know the amount of work and training that is put into the safe and compliant handling of products and the pride that we have in the jobs that we do.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Linda Studley:**

I am writing in response to Permit Number 11265, Targa Sound Terminal's application to Terminal natural gasoline.

Washington State needs to move away from fossil fuels to clean renewable energy. An approval of this permit will bind us to many more years of dirty fuel. Natural gas contributes to greenhouse gas concentrations in our atmosphere which contribute to long lasting changes in our climate, including

rising temperatures and sea level, weather and precipitation changes and changes in the ecosystems habits and species diversity.

Governor Inslee has lead the way for Washington State to support the Paris Climate Accords. Approving this permit, will lead Washington residents and consequently the world further down the road the wrong way. It is time to commit to change, and not just verbally, but a firm affirmation to make our world a place our grandchildren can live in. Please consider the consequences of more petro chemicals in our atmosphere. Thank you

**Lisa Anderson:**

I am the environmental attorney for the Puyallup Tribe. Just a short time ago, I was contacted regarding this permit application from a citizen. The Tribe did not receive any notice of this permit application and would like to not only review the details as it is located within the Tribe's 1873 Survey Boundary to the Tribe's reservation, but initiate a consultation on this project. It is puzzling why the Tribe does not have record of being notified of this permit application nor was any contact made regarding consultation for this matter. Perhaps the Tribe and Puget Sound Clean Air Agency should endeavor to work on a system of earlier notice to ensure timely consultation that doesn't result in last minute attempts to exchange information and discuss projects.

However, with regard to this permit in particular, it is impossible for the Tribe's staff to meaningfully comment by the public comment deadline today, and requests consultation on this project to discuss the technical details, and then brief our leadership, with a potential for leadership consultation or follow up comments.

Please let me know that you have received this request and the best means to efficiently schedule consultation for this permit, and we will work to schedule items as quickly as possible - any additional documents other than those that are on the website that can be provided for our technical staff to review could help expedite the process.

**Lisa Steele:**

I am writing in opposition to Targa Sound Terminal's request for a "natural" gas terminal.  
I urge PSCAA to DENY the permit and would also request a public hearing to examine the safety and air quality risks to the community.

If approved I worry about the dangers of an unknown quantity of toxic emissions poisoning the area  
Thank you

**Liz Marshall:**

I was a volunteer for the Hylebos in the 90s. I am appalled at the destructiveness of endeavors such as Targa proposes. Please deny their application.

**Bett Lucas:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As an employee who has worked for Targa for over 10 years I am proud of all that Targa has accomplished. As a Pierce County resident and one who lived in Tacoma for over 7 years, I have seen the tremendous improvements to our marine environment over the past 40 years, I am encouraged to see companies like Targa continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community, both on its site in the

Tideflats and in its philanthropic outreach to the community. The terminal has been in business for over 50 years and currently provides 50 full-time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles, while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

As PSCAA has noted Targa's emission control equipment exceeds all Federal emission standards and Bay area standards. The RedLine Tacoma members demonstrate little understanding of Targa's strict adherence to stringent safety regulations, environmental rules, and air quality controls. The loud voices of a handful of misinformed residents should not be permitted to shut down the actions of a company that is meeting and exceeding some of the strictest environmental regulations in the country.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Magi Speelpenning:**

Respectfully Mr Page, we spent the last ten plus years cleaning our waterways. Tacoma and Commencement Bay are becoming pristine and healthy. The natural, safe beauty attracts many locals and tourists to our area. Our salmon are thriving. For these efforts I thank you.

I am against the project--from the government site:

The emissions associated with this project could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene.

Why would we derail all the work we put in to restore the health and vitality of our community and water quality? Please vote NO!

**Margaret Barzar:**

I'm a novice at how this permitting review works and protesting the expansion of Targa's bringing more fossil fuel to Tacoma Commencement Bay so have some questions regarding this process.

How will the addition of more fossil fuel effect the citizens of the area?

What are the health hazards associated w/the increase of 24 tons of Volatile Organic Compounds including 2.8 tons/year of Hazardous Air Pollutants and 186 pounds per year of Benzene?

How will be residents especially children and the elderly be affected from breathing in these pollutants?

What miles radius is most susceptible to these hazards? Was there a study done for this impact on residents?

How will marine life & environment be impacted by these pollutants? Will Puget Sound Clean Air be liable for any damage to marine life & environment?

Who will pay for clean-up if there is a spill in Commencement Bay?

What are the risks associated with receiving, storing & shipping up to 151.5M gallons/year natural gasoline?

How will the facilities be secured? Can Puget Sound Clean Air guarantee that there will be not be an explosions that might harm nearby residents?

Can Puget Sound Clean Air guarantee 100% Safety?

Are the facilities that will store natural gasoline leak proof? Can you 100% guarantee that?  
How much money will the Port of Tacoma make with its permit for this project?  
How many permanent jobs will be created in the region due to this project?  
What is the average annual salary for these permanent jobs that will be created?

The process for permitting seems to have a very short window. I am concerned about Tacoma becoming the terminous for fossil fuel & polluting out beautiful Puget Sound. Thank you for your time.

It is my understanding Targo would like to expand it's permit to allow more liquid gasoline to go through the Port of Tacoma. It surprises me to hear that during the permitting review process, Puget Sound Clean Air Agency would not consider how this expansion increases and impacts the overall pollutant levels. It really seems like the testing of air quality is your job. The emissions associated with this project could total up the 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene.

I'm a resident of North Tacoma, Stadium District, and I don't want more hazardous air pollutants in the air that my children and grandchildren breathe. Benzene is a known carcinogen. Pierce County already has the highest cancer rate in the State. I don't want Targo's permit to expand. I would like to see industry that promotes good jobs and health to come to Tacoma.

**Mary Jane Long:**

The Hylebos is already such a cess pool and the increasing noxious smells only get worse. I live in NE Tacoma and have for 16 years. These offensive smells have not been an issue that whole time.

Living here for 16 years has taken a toll on my health. I had to spend thousands of dollars for a filtration system and air conditioner

So I never have to open my windows. Move you say???? Easier said than done.

Rather than expand why not move them somewhere else? Somewhere where they won't be so dangerous to the health of the community.

This email will probably join all the others in the "trash" box but this is still a free country---for the time being---so here is my plea.

Please make the well being of people more important than money.

**Mary Watt:**

I am AGAINST Targa's application. We do NOT need more fossil fuels anywhere in the world. Of course, we need energy for our homes and businesses but we need RENEWABLE ENERGY.

I only have a decade or two left, at age 64, but I want us to leave the planet cleaner and better. We should not be encouraging and allowing the shipment of more gas. This about profit and greed and we must not let this happen. More deadly air pollution will automatically occur. And what about train derailments? We all know our infrastructure is in bad shape. It's an accident waiting to happen with 107 rail cars every week in our lovely Northwest.

**Matthew Boyle:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma Business owner, it is encouraging to see companies continue to invest in projects that provide

economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Kelli McCann:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community. I have personally been employed with Targa for a little over 3 years, have worked in the industry for 13 years and have been a lifelong Pierce County resident.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Judy Ferguson:**

Please accept my email as opposition to Targa's request to terminal natural gasoline. I not only urge you to deny Targa's permit, but also request a public hearing to examine the safety and air quality risks to both the NE Tacoma community and workers in the Port of Tacoma.

As you saw at the Centre at Norpoint meeting a few months ago, community members have serious concerns about the cumulative effects of emissions from the Port's many businesses. Equally concerning is the use of the rail system to transfer this volatile material through Tacoma and nearby cities. Last year's empty rail car derailment in the Port should certainly have been a wake up call when traffic was gridlocked for hours. Last weekend's Chambers Bay derailment was equally troubling -- both regarding worker error, as well as the failsafe systems that may be put into play, but at a price.

The Port is not the Port of the past, nor is today's often heavy traffic that skirts the Port via Marine View Drive. The Targa facility abuts Marine View Drive at a heavily traveled intersection that is often congested. Adding another toxic fuel into the mix, both stored and in transit, requires both study and citizen input.

At the time that the City of Tacoma opted to zone a Residential area above Marine View Drive, the nature of Port activities that affect residents' health and safety must change. At this point, it's my belief that citizens have become stakeholders in Port activities due to their proximity. In this circumstance, I believe that the City and your Agency have an obligation to provide not only timely notice, but also community hearings regarding proposed changes for those that are paying property taxes on land proximate to the site. Both the LNG plant and the Targa facility are requesting permits for 'new' additions in the Port that have the potential of causing catastrophic damage in the event of an accident. Input from the community must be accepted and questions answered before permitting is allowed. If questions can't be answered, then a 'fast track' permit should not be issued.

I appreciate your consideration of my comments and concerns. Every issue has two sides -- it is your duty to carefully and judiciously listen to all of them, with decision making tending toward the cautious.

I was unable to attend the Thursday, September 14, 2017 Public Hearing on the Targa expansion due to the unexpected early delivery of my new granddaughter that has come with some maternal health complications. The last 5 days have been filled with worry for Mom and keeping 3 year old big sister's routine as normal as possible with Dad full time at the hospital. Despite this upheaval, I feel I would be remiss if I didn't share my very real concerns with you regarding the Targa expansion to add the storage of Natural Gasoline, including receiving and shipping.

As a Browns Point resident, I pass by the Targa site coming and going on a regular basis. I have also attended your other recent PSCAA public meetings where I have shared my written concerns that the PSCAA permitting process be revised to require consideration of cumulative emissions from all Tideflats sources that are in close proximity to each other. More air quality sensors also need to be included to monitor toxic emissions, such as benzene, that are currently not being considered. Emissions are changing on the Tideflats and monitoring is not keeping pace with either their individual or cumulative negative environmental effects. It seems a 'no brainer' that PSCAA would monitor and verify all actual Tideflats emissions and provide public notice. Further, EIS studies should be required for the expansion of any existing facilities, such as the Targa Terminal.

The expansion of the Targa Terminal to store Natural Gasoline poses a number of concerns on both public safety and environmental levels and I oppose their request. Targa has not been forthcoming in reporting emissions, both currently and in the past. Relying on 'Self Reporting' in this day and age is a ridiculous notion. Self reporting must go hand in hand with Agency monitoring. That, in and of itself, would be an easy determination of Self Reporting accuracy and truthfulness. There are currently only 3 air quality sensors in the area that monitor only 3 of the hundred or more harmful airborne chemicals currently emitted by Port businesses. This is woefully inadequate and certainly enough reason to put a moratorium on expansions and new 'emitters' until additional monitoring is added.

During the recent 'hot weather' inversion that brought in wildfire smoke to the Tacoma and Port areas, residents were able to physically see, smell and feel the effects of our 'toxic mix' air. On rainy days like today, although we can't 'see' the air, it can still do harm and negatively impact the health of young and old, hale and infirm. Children at NE Tacoma Elementary go outside for recess. Neighbors exercise as

they run, walk their pets or do yard work. No one's health should not be put at risk by toxins inhaled as they go about living their daily lives.

In this day and age, it's time for PSCAA to cumulative monitor emissions on the Tideflats. As you know, there are Tideflat business violators that choose to output late at night or on the weekends to avoid detection. The Port is no longer the Port of the '60s or even the '90s. Much has been learned about greenhouse gases and their negative impacts and businesss may not pretend that what they've always done is A-OK now. One need only look at the toxic soup in the Tideflats' waterways to know how destructive old practices were and how the damage remains ongoing and unabated. Our 'invisible' air that is now often visible, is no different.

Additionally, this Targa expansion will bring more rail and tractor-trailer traffic through the area -- an area that we know can become gridlocked with just a small emergency incident. Last summer's Tideflats' derailed 'empty' tank cars and the I5 Semi rollover, as well as this summer's Amtrak derailment at Chambers Bay, scream out as scenarios that every Port authority and agency should take to heart. All could have had catastrophic outcomes both environmentally and in human life had the circumstances been just a bit different.

I regret that I was unable to attend the Sept. 14th Public Hearing, but urge you to consider the statements made there by those that voiced their concerns. The 'Status Quo' boat in the Port sailed long ago in regard to environmental monitoring and Public Health and Safety. Denial doesn't change what is currently being allowed to happen. Your stance in making permitting decisions can begin to make small positive changes. At the least, please take a 'step back' action by extending the Public Comment Period for the Targa expansion. Better yet, please deny the Permit. Please do not permit Targa's Natural Gas expansion at this time.

Thank you for reading my concerns. Now I return to focusing on my new granddaughter and her Mommy.

**Meg Wade:**

I am writing to ask you to oppose the permit application (11265) for Targa Sound Terminal.

My parents live less than 15 minutes away from the terminal. When I visit them, the difference in air quality from where I live in Seattle is easily noticeable. And it has effects: I leave their house with headaches. The residents of Tacoma deserve to have the many industrial sites along Puget Sound cleaned up, not expanded. We should be preventing further processing and storage of toxic materials there.

Furthermore, the additional rail travel through the area has other negative consequences for the region. Every time we add new freight rail, we put literal roadblocks in the way of fast and reliable passenger rail. As someone who relies on Amtrak to travel the region, this means my ability to get where I need to go suffers. The unreliability of passenger train schedules is a key disincentive to getting people out of their cars, out of I-5 congestion, out of the habit of producing more air pollution by solo driving.

For my sake and my family's sake both, I hope that you will deny the permit for Targa to increase its facilities to process natural gas. Projects like this do not provide a healthy future for our region.

**Meghan McSwain:**

I hope that you take into consideration the many like-minded individuals, tribal members, animals and future generations who breathe this air. I understand that PSCAA was created to regulate the source of air pollution, monitor air quality and assure the safety of nearly four million lives in the Puget Sound

- I SUPPORT the PSCAA filling important advisory council seats including Environmental Justice and Tribal Nations and hiring additional employees to realistically monitor industry emissions. If additional employees cannot be hired, then additional permits in areas of cumulative industry should not be accepted or approved.
- I SUPPORT the revision of the PSCAAs permitting process to require consideration of cumulative emissions from all sources within close proximity to each other.
- I SUPPORT additional air quality sensors to monitor additional toxic emissions including benzene in areas of high risk heavy industry, areas with cumulative emissions, and residential areas near high risk heavy industry lands.
- I SUPPORT requiring the PSCAA to verify all actual emissions and provide public notice
- I SUPPORT a Full Environmental Impact Study and Toxic Air Study on TARGA Sound Terminal
- I OPPOSE the request submitted by TARGA Sound Terminal to RECEIVE, STORE and DISTRIBUTE natural gas because risk to public safety, health and the environment need to be made priority. Additionally I oppose the added terminal traffic via rail cars through our community due to their contribution to this risk. Finally, TARGA has failed to report current and historical emissions records and for this should be DENIED any new permits AND required to provide historical data.

Regarding Air Quality Sensors: There are only three air quality sensors in Tacoma.... Three in all of TACOMA.... These three monitors only monitor 3 harmful chemicals; nitric oxide, nitrogen dioxide and particulate matter 2.5... Three out of over a hundred other harmful airborne chemicals emitted by Port industries. When it comes to the safety of the nearly four million lives currently living here and the countless future generations to come it's clear that 3/100 is unacceptable... an F, a complete fail.

Regarding Cumulative Emissions: The chemical and fuel odors due to cumulative emissions in the Port of Tacoma, NE Tacoma, Browns Point, Fife and along Marine View Drive, Taylor Way and Alexander Avenue are alarmingly strong. Those responsible for that odor, ought to be ashamed of themselves. Our beautiful city; the City of Destiny just a few years ago was filled with the embarrassing Aroma of Tacoma. To avoid this regression and protect the health and wellbeing of our citizen's cumulative must be taken into consideration when reviewing permits. Permits should NOT be issued on a case by case basis without regard to the overall emissions and cumulative air quality of the area.

Regarding Monitoring and Regulating Industry Air Quality: The Puget Sound Clean Air Agency has failed to monitor the industry in the port and assure that those current approved/permited industries are compliant and factual in their predicted and reported emissions. I was in complete disbelief when I learned that the PSCAA relies on industries to self-report their emissions. Relying on self-reporting is untrustworthy and it fails to provide a base line or real-time measurements of pollutants or overall compliance. Targa for example has no record of emissions since at least 2010.

Regarding New Applications and Permit Approvals/Staffing: It's deeply concerning that the PSCAA is grossly understaffed with only 11 inspectors to oversee 13,695 businesses. That is 1245 businesses to monitor per employee; the client ratio is unbelievable. Permit approving should be put on hold until additional inspectors are hired and vacant seats on the Advisory Council are filled for both Environmental Justice and Tribal Nations. Once adequate staff is hired for the PSCAA to monitor and regulate existing business then they may review new permitting applications. In business, I don't give a waitress more tables or more hours if she is not performing or keeping up with the customers she has.

The PSCAA should not be approving or reviewing the permits they have until they can keep up with monitoring existing industries and existing scopes of industry. They are failing and change needs to happen now, before something dreadful happens to the community they were established to protect.

**Mel and Suzanna Berglund:**

Targa Sound Terminal has filed an application with the Puget Sound Clean Air Agency to terminal (receive, store & ship) up to 151,500,000 gallons per year of natural gasoline.

I'm asking that this application be rejected and that additionally there be a public hearing on this request.

The citizens of Northeast Tacoma have been battling the industrial growth along our waterfront for the past several years and this request by Targa needs to be rejected for multiple reasons not the least being a consideration the current proposals and issues already being reviewed by multiple agencies.

I don't feel the need to list all the reasons as there will be multiple letters sent to your inbox on this I'm sure.

This is the wrong request, for the wrong location at the wrong time.

The time has come that the Northeast Tacoma waterfront be reconsidered as something other than an industrial dumping ground and sacrifice zone.

**Mia King Mlekarov:**

To whom it may concern: I am writing to oppose the Targa Sound Terminal expansion. This fuel is highly flammable and very toxic. Benzene, one of the many toxic air emissions that will be released causes cancer, specifically Leukemia.

The emissions associated with this project could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene.

This is not safe in our community and not the future we need in South Sound.

**Michael Garrity:**

Please deny Targa's permit for a natural gasoline terminal in the Port of Tacoma. It will further exacerbate air quality and toxics problem in an area that diverse neighboring communities are fighting hard to clean up.

**Michael Jackson:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time employee of several companies that do work in the Tacoma area, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility that help prevent fumes from entering the atmosphere thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Michael Lafreniere:**

I write in opposition to the request by Targa.

Did you know that this area has high rates of asthma and breast cancer relative to other parts of the state? Does that even matter to the PSCAA? And now you want to add additional tons of benzene to the air? What are you people smoking?

I think we have enough contaminants in the air in the Tacoma tideflats, we don't need more. Given that PSCAA is not properly monitoring air quality there as it is now, we don't need to make it worse. There should be a formal public hearing held in Tacoma regarding this application.

**Jose Michelet:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**L.T. Murray:**

I am writing to express my strong support for the proposed Targa Sound Terminal Project 11265. My family's company, Murray Pacific Corporation, is 106 years old. We operated a log export business at the Port of Tacoma from 1970-2001. We were one of the lead companies in the lawsuit against Asarco, achieving a settlement that resulted in the cleanup of many properties containing Asarco slag. In addition, our 104-year-old tree farm (sold in 2015) was the second timber company in the nation to negotiate a Habitat Conservation Plan for the Northern Spotted Owl (1993) and the only timber company in the world to negotiate an All-Species Habitat Conservation Plan (1995).

I mention the above to illustrate Murray Pacific's long term commitment to protecting our environment and thus our commitment to responsible and sustainable management practices. Targa shares this commitment as they continue to invest in projects that provide economic and environmental benefits to our region. Targa has been in business for more than half a century and currently provides 50 full time, family wage jobs in our community.

The purpose of this project is to add emission control equipment to existing storage tanks at their facility, allowing Targa to be flexible in the types of products it handles while continuing to protect the quality of the environment. In addition, the project will allow Targa to ensure a continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment for this important project. The economic, environmental and safety benefits of this project are substantial.

**Mike Pierson**

Beckwith & Kuffel wishes to express our support for the proposed Targa Sound Terminal Project 11265. We have worked with Targa Sound Terminal for many years and know from personal experience how much they care about safety and the environment. This terminal has been a part of the community for over 50 years and has a long history of working responsibly. The terminal has been in business for and currently provides 50 full time, family-wage jobs in our community.

Targa has extensive experience in handling the products contained within the terminal in an environmentally safe way. They look at technologies that exceed the recommendations to limit VOC emissions. This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Mojgan Holm:**

I am writing to object PSCAA to allow Targa's expansion of storing natural gasoline until such time that the following items are addressed by the applicant:

- 1- A new public safety must be done regardless of City of Tacoma's opinion since the previous study was on different type of hazardous material on this site.
- 2- An addendum to the existing EIS must be done to evaluate the impact of handling and storing new material such as benzene in close proximity of residential neighborhoods. When the original environmental review was done for this project, there were not as many single-family residences within close proximity (less than one mile) of this site.
- 3- A study must be done to determine the proposed project will not have a probable significant adverse impact to our fragile shoreline of Puget Sound.
- 4- A cumulative health impacts of adding new sources of toxins air pollutants must be analyzed prior to approval of this project.
- 5- PSCAA shall have ability to measure and enforce compliance for emission of toxic air pollutants.
6. Our existing rail system must be examined to avoid possible derailment causing catastrophic issues for our cities and towns.

Targa is too close to NE Tacoma, the community that has grown extensively in the past few years. Expanding Targa and allowing them to introduce new products without additional studies would not be productive for our community.

**Jeff Horst:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time employee of several companies that do work in the Tacoma area, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility that help prevent fumes from entering the atmosphere thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Nanette Reetz**

I am writing to you to request that you deny the permit order no.11265 for Targa Sound Terminal to receive, store and ship natural gasoline.

When I moved to NE Tacoma in 1991 the city was moving away from the heavy polluting industry at the Port of Tacoma. Since that time we have seen a beautiful restoration of the Ruston Way Waterfront and the Thea Foss Waterway. This has been a wonderful addition to Tacoma. Unfortunately no effort has ever been made to clean up the NE side of Commencement Bay and create a waterfront for the NE Tacoma residents and others to safely enjoy. In fact quite the opposite has taken place, really to the point of negligence by those setting policy and also those not enforcing safety standards and common sense regulations for industry polluters. I have continued to be disappointed by the decisions of our Tacoma city leaders and the agencies put in place to protect us. Targa was allowed to expand in 2013 without adequate public notification and with limited over site. There have been little restrictions put on Targa and they have been allowed to expand into what is now a very large and dangerous petrochemical tank farm. There have not been health risk assessments or other studies done to protect nearby at risk residents. I am gravely concerned about these health risks as well as the health risk to our environment, specifically the Hylebos Waterway, if highly volatile natural gasoline is allowed at Targa.

I would also like to request that a public hearing be held for this permit to examine the safety and air quality risks to Tacoma, Fife and surrounding communities.

**Nancy Lee Farrell:**

If the hurricanes that have devastated so many have taught one thing: it's that global warming is caused by fossil fuels. The oceans are warmer, and the hurricanes fiercer. Please look into wind, tidal, and solar power imported from sunnier states.

**Nancy Shimeall:**

I am writing in opposition to Targa's request to terminal natural gasoline, and to urge PSCAA to deny Targa's permit.

I am also writing to request a public hearing to examine safety and air quality risks to our community.

I understand it's not PSCAA's function to look at safety risks. However, in this case there are no public hearings or other permits scheduled for this volatile and hazardous hydrocarbon addition traversing the second largest city on the Sound. Stacking more very volatile "natural gasoline" very near the PSE LNG refinery is not a reasonable or safe thing to do. There is no government agency that is responsible for cumulative air, environmental or safety issues in regards to the many fossil fuel installations in our dense urban center on the Salish Sea. We just had an Amtrak train derail next to the shoreline. We can't possibly have several 107 train cars of "natural gasoline" run along our shores. I urge you to hold a public hearing on this issue which affects the public very much. I would also urge an extension of the public comment period since previous Targa applications are not available to us for proper research.

PSCAA is not measuring air emissions that would increase from this Targa application. The applicant's data does not suffice, as we have learned how fracking and fossil fuel industries are operating for profit only and there is no trust that industry data would be complete, accurate or honest. How would sensitive people like the elderly, children and people with immune deficiencies be able to view real-time air data to protect themselves?

Is PSCAA in close working relations with the Pierce County Health Department? Are you collecting data on cancer rates and reproductive health issues? Will you create an exposure baseline before you issue any permits so that residents have data and can make fact-based decisions if they want their families to be exposed to more?

Natural gasoline is very volatile. Isopentane N-pentane, Isohexane, N-hexane, Cyclohexane, Toulene, N-heptane, Dimethylpentanes, Dimethylcyclo-heptanes, Methyl heptanes are toxic and some are endocrine disruptors. In combination the vapors act as anesthetic and can lead to death. How would PSCAA prevent fumes from reaching the public during a spill and what are concentrations in the air people have to be concerned about? How do you plan to protect tanker drivers or machine operators from the anesthetic effects while at work? Several of these chemicals don't have established OSHA occupational exposure limits. What are the scientific data you are using in your determination of permit application? How does PSCAA plan to monitor air pollution not only at tank site, but also along train routes or at train stops?

Without real-time data on any of the air pollutants in question, how will PSCAA alert nearby workers and residents in case of high concentrations? Given the anesthetic effects of natural gas, what is your experience in determining safety of drivers on roads nearby? What are safe driving/operating recommendation in case of exposure?

How is PSCAA prepared to monitor intended combinations of a variety of air pollutants due to the many nearby volatile and petrochemical facilities?

Given the detrimental health impacts of these volatile fossil fuels & fumes, did PSCAA reach out to schools, kindergartens, nursing homes and hospitals nearby for comment? Were port workers notified?

With the relative new addition of natural gasoline, what is your experience level in permitting such a facility and are there other natural gasoline processors, storage, transportation or other facilities in the port already?

Has PSCAA ever denied any industry air permits? Please direct me to appropriate documents if that is the case.

Considering the above, please deny the permit and schedule a public hearing.

**Nancy Horiuchi**

I am strongly opposed to the expansion of natural gas operations in the Port of Tacoma.

The Port of Tacoma is located in the middle of a large metropolitan community.

We need to protect the citizens of Tacoma and protect the air quality for our residents.

I am opposed to Targa's request to terminal natural gasoline.

I urge PSCAA to deny Targa's permit.

The residents of Tacoma deserve a public hearing to examine safety and air quality risks to our community.

Please protect the residents of Tacoma.

**Noah Davis:**

As a resident of NE Tacoma living approximately 1 mile from TARGA, I'm utterly opposed to any TARGA expansion or new use for that massive tank farm is already dangerous to the community and brings in seemingly hundreds of trucks daily that pollute our air share the roadways with our residents, pass school buses and engage in near miss traffic accidents on a constant basis. What are the effects and dangers of a new volatile gas in the already existing volatile farm? Aren't we just playing roulette?

In addition, , there should be no more fossil fuels added to the port or a single new contaminant introduced into the air we breathe (especially if that means MORE diesel trucks coming in and out of the Port). Those sulfur based diesel fuels are simply killing us.

And, what of the schools, the three elementary schools within 2 miles of TARGA? What is the effect on our 2000 schoolchildren?

I really think Puget Sound Air needs to be monitoring the cumulative effects of the air we breathe and putting a HALT on any new pollutants. And, someone has to be addressing the dangers of adding any more volatile gasses to our neighborhoods.

What is wrong with us? Enough is enough and we can and should be doing better for our families, our neighbors and our communities. Please stand up for us, PS Clean Air.

**Ozgu Tokguz:**

What are the health hazards associated with the 24 tons of Volatile Organic Compounds including 2.8 tons/year Hazardous Air Pollutants, 1.3 ton/year Toxic Air Pollutants and 186 pounds per year Benzene?

How will the residents especially children and elderly be affected from breathing in these pollutants? Will Puget Sound Clean Air be liable for medical bills resulting from this Project?

Has there been a study done for this impact on the residents? What mile radius is most susceptible to these hazards?

How will the marine life and environment be impacted by these pollutants? Will Puget Sound Clean Air be liable for any damage to marine life and environment?

What are the risks associated with receiving , storing and shipping up to 151.5M gallons/year natural gasoline?

Can Puget Sound Clean Air guarantee 100% Safety?

How will the facilities be secured ? Can Puget Sound Clean Air guarantee that there will not be any explosions that might harm nearby residents?

Are the facilities that will store natural gasoline leak proof? Can you 100% guarantee that?

How much money will the Port make with its permit for this Project?

What is the number of actual permanent jobs that will be created in the region due to this project?

What is the average annual salary for these permanent jobs that will be created?

**Pamela Keeley**

I'm writing about the proposed Targa natural gas operation on the Tacoma Tide Flats. This must not be allowed. After 150 years of heavy industrial use the site is already thoroughly polluted and a designated Superfund Cleanup site. Acres adjacent to Taylor Street are fenced off and covered with large signs warning, "INORGANIC ARSENIC - CANCER HAZARD". The whole area sits on a known earthquake fault line and Targa fuels, to be transported via railcars and pipelines, are extremely volatile. The proposed site lies within a mile of Fife businesses and residences and about 2 miles from the downtown Tacoma core. Citizens now live within a half mile of it and Brown's Point overlooks the area from the ridge above. A major catastrophe, including a chain reaction event from the various refiners and processors located there, would bring heavy damage and casualties to the entire area and beyond, including Vashon Island, Gig Harbor, and other nearby populated areas. A new fire station is planned for the Tide Flats, but that is only one small facility which, in all probability, would also be disabled in the event of a disaster. Evacuation routes are few and hospital resources are limited - serious concerns to this nurse of 45 years and long time disaster responder.

The time has come to say no to dangerous and toxic fossil fuels and move as quickly as possible to safer and healthier forms of energy. Other states and countries have done so and Washington, which has always prided itself on being "green" and an environmental leader, must join them. Finally, these toxic industries sit adjacent to tribal lands and waters of the Puyallup people, whose treaty rights are being completely disregarded - this cannot be. It is your legal responsibility to recognize the sovereign rights of Native people.

I implore you, do not add more toxins and risks to the Port of Tacoma and Tide Flats. Do the right and moral thing and respect treaty rights of the Puyallup people.

**Pat Herbert**

I'm totally against granting thus permit. Store and ship 151,500,000 gallons per year by pipeline and railcar and storing in four existing tanks? All of this happening in and around a major population center?

Are you mad? Control of an accident could never be accomplished by anyone. And how long before the storage tanks begin leaking-- into the sound?

**Patrick Gormley:**

Stop rubber-stamping petrochemical permits. This will result in more pollution not less. DO YOUR JOB! Puget Sound Clean Air; its right there in the title. Stop taking a big petrochemical dump in our front yard.!

**Paul Watson:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

Its very upsetting to me how social media can be so corrosive. Very unfortunate sometimes! Targa is one of the many "Good Guys" in business in the Port of Tacoma!

**Matt Perry:**

Puget Sound Energy supports the proposed Targa Sound Terminal Project 11265. As you know, the P011 of Tacoma is a major economic engine in the South Sound area that creates and sustains many well-paying, family wage jobs. Puget Sound Energy has been encouraged to see Targa make significant investments in its facilities in recent years. As a neighboring business in the port, we appreciate the economic vitality that Targa brings to the Port of Tacoma and Pierce County. Targa's communication with other businesses in the p011 to detail their plans has been very thorough, which we have also appreciated.

Thank you for your consideration and for the opportunity to provide comment on this matter.

**Phil Brooke:**

Hi PSCAA:

I wanted to urge you to deny then study and hold public meetings on Targa's request to terminal Natural Gasoline at the Port of Tacoma.

We know very very little about this product, or the cancer-causing and hazardous chemicals it will be off-gassing into my neighborhood.

What I can see from review of the SDS, is that it's extremely flammable and volatile, which points back to significant emissions. It also has hazardous cancer-causing stuff in it, which will emit on my neighborhood.

NE Tacoma has been absolutely inundated with these fracked fuel terminal projects. Cancer alleys are called that for good reason.

Enough is enough!! Deny this permit!

**Phil Ritter:**

Dear Sirs ...

I oppose the Targa Sound Terminal in Tacoma which will receive, store & ship) up to 151.5 million gallons per year of "natural gasoline," a natural gas derivative often blended into regular gasoline.

If approved, Tacoma would get an additional mile-long oil train every week and an unknown quantity of toxic emissions would poison the area.

I urge PSCAA to deny Targa's permit and to hold a public hearing to examine the safety and air quality risks to our community.

Every dollar invested in infrastructure for fossil fuels will make it harder for us to transition to renewables in the time frame we have to work with.

To have a 50% chance of keeping global warming within 2 degrees centigrade we need to cut fossil fuel use by half in 13 years.

**Chris and Cheryl Murphy:**

Dear Puget Sound Clean Air:

Please do not allow Targa to expand their operation further until current air pollution issues are resolved. We already are unable to open our windows on these beautiful summer days without experiencing that petroleum odor wafting in our windows from Targa allowing these fumes to escape. We have other examples but as one example last week we were returning home from dinner at Cliff House restaurant on Marine View Drive and we stopped at the light there in front of Targa and it took our breath away it was so strong. We closed up our car and turned on the AC full blast to try to counter act it. It is unbelievable that this day and age we are suffering with this issue. We seem to be concerned about the petroleum escaping into our waterways but what about the air?

We are considering moving because we are very concerned about our respiratory health. I love living here because there is really so much beauty still around us however we need to be able to open our windows and enjoy our yard and patio without that smell putting a damper on our enjoyment. I need to be able to open my windows while in doors and not use AC all of the time.

Please let Targa know that they need to address their current air pollution issues before we can allow them to expand their operation further.

Your support is much appreciated. Thank you for the opportunity to allow our voice to be heard. We feel very small with all that is happening to us these days.

**Jerita Young:**

I am writing this letter regarding the Targa Sound Terminal project 11265. I am a business owner here in the Pierce County area, servicing Pierce County for the past 19 years. Targa has invested in my company and helping with employment with several employees. Supplying work for families in the Puget Sound area.

I sincerely agree with the project in hand. It would help missions storage tanks at the facility providing flexibility and types of products as well as protection for the environment

I personally thank you for this great opportunity to provide feedback on the environment and safety of benefits of this project.

**Rachel DeMotts:**

I'm writing to express deep concern that this order could possibly be approved without a full and careful assessment of human health and environmental impacts. This order should be denied without an open public discussion of such an assessment - the public hearing which is indicated in the public notice that the city will hold if there is enough interest. A simple statement that this proposal has already been reviewed is totally inadequate to protect the citizens of Tacoma and Commencement Bay.

**Renee Sims:**

I am asking that the request for the proposed order be DENIED and that there be a full, comprehensive review of health and environmental risks, part of which must be a PUBLIC HEARING.

This is a serious issue that will affect millions and due diligence in determining health and environmental risks is required.

**Richard Becker:**

I am writing to express my strong opposition to Taga's application to receive so called "natural gasoline." Approving the permit would mean that there would be an additional mile-long train coming into Tacoma every week carrying the gasoline. Adding this train would increase the danger to Tacoma and the surrounding communities in a number of ways. First, it would increase the risk of a derailment and the extreme hazard that poses. Also, there are the health risks from toxins that would be emitted during the transport of the gasoline. Additionally, in this time when we are already seeing the devastating effects of the continuing use of fossil fuels, it is wrong to approve applications that support the increased use of fossil fuels.

For these reasons I am requesting that PSCAA deny Targa's permit application. I am also requesting that PSCAA hold a public hearing to investigate the safety and air quality risks to the communities that will be affected by allowing this permit.

Thank you for your consideration.

**Rick Samyn:**

I am writing you in regard to Targa Sound Terminal's application to receive/store/ship LNG product up to 151,500,000 gallons annually.

As per Puget Sound Clean Air notice on this permit request it states that an additional emission from the LNG proposal will add up to 24 tons per year of VOCs that includes 2.8 tons of hazardous air pollutants including the release of 186 pounds of Benzene. I am not a chemist and not familiar with how these toxins will be released into our environment, but nonetheless an additional release of 24 tons of VOCs from this project seems very backwards in the overall approach of promoting clean energy technology and moving forward in addressing the legion of environmental issues that we face. I am particularly concerned as the additional release of toxic VOC, including benzene will do more harm to the fragile eco-system of the Puget Sound and our fishing industry.

What studies have been done regarding this proposal in relationship to its effects on human health and that of the Puget Sound? If this project is permitted to move forward, who will be liable if there are adverse effects on human health and that of the Puget Sound and its fisheries? What is the emergency response plan that addresses this additional product of LNG associated with other products now being handled by Targa Sound Terminal?

I am not aware of any statements from Targa Sound Terminal regarding permanent jobs created by this proposal but should not the efforts of industry focus on long-term sustainability and the production of clean energy technology jobs? I would think the push for LNG is based on short-term outcomes and not gear as any "bridge fuel" for a cleaner energy future.

In closing, I hope that there will be an opportunity to have a public forum on this permit.

Thank you sir for your time and effort on this issue.

**Margarita Andreeva:**

Please reject Targa's application! There are too many flammable things in the Port of Tacoma, as well as a huge detention center housing 1,500 people. The danger to so many people is unacceptable. The air pollution in Tacoma is already much too high, so we can not have any more facilities polluting the air.

Please reject Targa's application.

The port of tacoma has too much foul smells already and too many things that can blow up. Please do not add anything else. Please reject the application.

**Robert Matthewman:**

Hello, I live in the South Sound and I am particularly sensitive to airborne pollution such as volatile organic compounds and benzene. I hear the expansion of the Targa terminal would result in an increase in such pollution, and I am very concerned about the health effects on myself and others.

**Robert Treat:**

Hello, and thank you for your work. I am opposed to the terminal , totally .

**Candy Nigretto:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a life-long Tacoma resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly

with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment, which is extremely important to me. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Ronald Hildebrandt:**

Trident Seafoods Corp, a neighboring facility to Targa Sound Terminals in Tacoma, expresses support for the proposed Targa Sound Terminal Project 11265. Targa is a vital link to the Alaska fishing industry, ocean container fleet, as well as JBLM. It is important that Targa be allowed to modify its equipment and storage facilities to reflect the changes in source materials. Targa has a long history of working responsibly with our community, providing family wage jobs to the Tacoma and Pierce County region. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

This project adds new emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. We believe that Targa is committed to using the best environmental control technology available to make their operation the best in the state. Targa has a history of being a good neighbor and is committed to our Tacoma community.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Rose Andrews:**

I find it alarming to hear about Targa's permit request to ship, receive, and store an abundance of natural gas here in our beautiful Puget Sound area.

Fossil fuel emissions are dangerously high and with further environmental protections being eroded away at the hands of our irresponsible federal government, we need to take every opportunity to protect the fragile environment from here on out.

The emissions associated with this project that could total up to 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene is entirely too high. It's time to keep fossil fuels in the ground and start supporting renewable energies.

I would request a public hearing to examine the safety and air quality risks to our community, but the facts alone speak for themselves that the allowance of said permit would have devastating consequences should there be any minor accident.

Please deny the Permit put forth by Targa.

**Roxann Murray:**

It seems citizens have to keep fighting these new dirty fossil fuel projects. I shouldn't have to list off the reasons why the Puget Sound Clean Air Agency should reject Targa's application for Proposed Order No. 11265. But I will anyway.

Let's start with the Amtrak derailment that happened on Chambers Bay on Sunday July 2nd. What if that had been a natural gas rail car? What if there is a leak an explosion? There are houses less than half a mile away from the Targa terminal. I know you are a permitting agency and can't really approve or reject applications based on future disasters. So let me write about the health and safety risks of everyday operations.

"Natural" gas comes from fracking. Fracking is detrimental to the health of people, animals, and the Earth. It causes earthquakes and poisons water and soil. We may not be fracking the gas here, but someone else is suffering for Targa's profit.

Emissions will include 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene. Benzene causes cancer, specifically leukemia. These emissions will damage marine life, which will affect Puyallup tribal members' sustenance and way of life, therefore violating the Medicine Creek Treaty of 1854.

Targa Oil is already dangerous and toxic to the residents of Northeast Tacoma and the wildlife and marine life in the area. Just last week, I saw dead ducks and dying bumble bees at the Port of Tacoma. It has already poisoned the air in the port. People cannot even go to the area without becoming ill with sore throats, headaches, burning and itchy eyes, and fatigue.

I ask that you reject Targa's application to receive, store, and ship "natural" gas.

**Roxanne Copeland:**

Please use good sense  
Cease going forward on this endeavor  
We Safe options that don't pollute air , waterways, and combust

**Ruchi Stair:**

I oppose the Targa Sound Terminal in Tacoma. I am concerned about public safety and the environmental impact of the proposed terminal because of flammability, and because putting more carbon into the atmosphere is pushing us to climate disaster. We must stop fossil fuel expansion and redirect our energy to renewables--without delay.

Please schedule public hearings to examine safety and air quality risks to our community.

**Ryan Frederiksen:**

My name is Ryan Frederiksen and I wanted to send you an email urging you to deny Targa's permit to receive 151.5 million gallons of gas per year. The inevitable strain on our environment in the Puget Sound would be terrible. I think a public hearing to examine the safety and air quality risks to OUR community is more than fair. I look forward to your reply. Thank you for your time

**Sabrina Kelley:**

I ask that the request please be DENIED and that there be a full, comprehensive review of health and environmental risks, part of which must be a PUBLIC HEARING.

Thank you for taking the time to read this.

**Sally Burke:**

My husband and I have been citizens of Tacoma for about two decades now. It has come to my attention that Targa, which is a company that already has some locations planted nearby, is applying for a permit application. In their situation, they apparently are able to bypass several EIS because of their prior presence. As you well know, there is grave concern among people in Tacoma and elsewhere that the use and transfer of 151,500,000 gallons a year of "natural gasoline" in our area is considered to be a threat not only to the environment, but to the health of families around the Sound. The local government apparently does not hold citizens' concerns to be of much weight in making decisions, it seems, since we typically find out after-the-fact about industry coming to our area. There happen to be many proponents for a more healthy commercial arena, one which does not cause harm to the environment, and threatens humans' health and the health of future generations.

I have done some research on the effects of communities living close to the proposed natural gasoline facilities, and found comments made by NOAA which should be taken very seriously:

**"Health Hazard**

INHALATION causes irritation of upper respiratory tract; central nervous system stimulation followed by depression of varying degrees ranging from dizziness, headache, and incoordination to anesthesia, coma, and respiratory arrest; irregular heartbeat is dangerous complication. ASPIRATION causes severe lung irritation with coughing, gagging, dyspnea, substernal distress, and rapidly developing pulmonary edema; later, signs of bronchopneumonia and pneumonitis, acute onset of central nervous system excitement followed by depression. INGESTION causes irritation of mucous membranes of throat, esophagus, and stomach; stimulation followed by depression of central nervous system; irregular heartbeat. (USCG, 1999)"

Now we do not want this natural gasoline industry to produce this legacy among our communities so close to the designated site(s). It is a true threat to the health and lives of all of us! How can business decision-makers inflict such possible destruction on surrounding families, not to mention the high probability of an unthinkable disaster occurring?

Please consider our well-being here in Tacoma, and in other nearby affected communities. Do dollars really trump the welfare of families in choosing what businesses are selected? Is there no remedy when corporations dominate and harm local areas in which they set up shop? The danger is too great to embrace and then welcome the dirty fossil fuel industry, as they have dirtied up enough of our area. We need a greener approach, something compatible with humans and their environment--something safe. These communities around the Sound deserve a voice in their future, or, shame on us!

**Sally Johnson:**

I object to PSCAA issuing a permit to allow Targa to terminal natural gasoline until the following points are addressed. Additionally, I request that a public hearing be held to get answers to these and any additional concerns from the community:

- 1) Unacceptable to allow a product with the emissions quoted on the PSCAA website (see above - including cancer causing benzene) to be handled and stored less than a half mile from dense residential neighborhoods.
- 2) Unacceptable that a hazardous material with such extreme volatility would be allowed on our rail system - directly through our city and that of nearby cities - when we know how catastrophic a derailment would be.
- 3) Unacceptable that a safety study won't be done, because the City of Tacoma believes a study done years ago on a different hazardous material is sufficient.
- 4) Unacceptable that the environmental impacts of a potential spill of this highly toxic material in our fragile Puget Sound won't be studied.
- 5) Unacceptable that the current environmental laws don't account for the cumulative health impacts of adding new sources of toxic air pollutants (including cancer causing benzene), such as the additional pollutants this project will introduce.
- 6) Unacceptable that the PSCAA doesn't have the ability to measure and enforce compliance for emissions of toxic air pollutants.

There should be a cumulative risk exposure threshold. As a community, we've been asked to shoulder all of the risk without any benefit. Project after project, we keep getting additional safety risks and more toxic emissions. There must be a tipping point. What is the practical limit for what our community is asked to shoulder? Targa is just too close to NE Tacoma to be expanding into these extremely dangerous hazardous materials.

**Sandy Tankiewicz:**

Please give the community an opportunity to voice its concerns. We all have to live with the consequences of decisions made.

**Sara Aioldi:**

I heard that Targa Sound Terminal in Tacoma has filed an application with the Puget Sound Clean Air Agency to terminal (receive, store & ship) up to 151.5 million gallons per year of "natural gasoline," a natural gas derivative often blended into regular gasoline. And if approved, Tacoma would get an additional mile-long oil train every week and an unknown quantity of toxic emissions would poison the area.

I am specifically requesting:

- Please deny Targa's permit
- Please hold a public hearing to examine the safety and air quality risks to our community.

We--our community, can be a leader of clean energy, health, and vitality! We have the knowledge, talent, and motivation from all corners of our diversity! Let's invest in each other and our shared future!

**Sara Freeman:**

I am writing in regards to the TARGA Sound Terminal Proposed Order of Approval No. 11265

I am concerned about "natural gasoline" passing through the port; and about the environmental quality of the air and water in our area.

I ask that this request be denied and that there be a FULL comprehensive review of health and environmental risks, part of which must be a Public Hearing.

Conducting business like this without public hearings is unethical and undemocratic.

**Sara Wood:**

I hope I am not too late to comment on the Proposed Order No. 11265 for Targa.

I would like you to please think about the public's health and safety. As it is now, there are times when the fuel/Petrochemical smell is so bad

from Targa I can not go outside. It gives me headaches, and sometimes makes me feel sick. During this past summer I have had to close my windows on hot summer mornings, afternoons, evenings and nights. Without air conditioning it was horrible for myself and my family. I have had to either not go on walks or get home as soon as possible if the smell started while I was outside.

The Targa expansion will only make this worse.

PLEASE do not allow the expansion of Targa! My health and well-being are counting on you to do the right thing.

**Sarah Kavage:**

I got an email from 350 Seattle about the proposal to receive, store & ship "natural gasoline" at the Targa Sound Terminal in Tacoma. This proposal is not something our region should support, and I encourage you to deny this permit. I'm concerned that this would introduce a new source of toxins and pollutants into the surrounding area. There's also the concern of the additional trains required to transport it (which, as a Seattle, is an immediate and pressing concern for me...these potential impacts are not limited to Tacoma by any stretch).

I am also especially concerned about the urgency of climate change, which would indicate that we need to stop allowing new fossil fuel shipments and infrastructure, period, especially in the face of the US's retreat from the Paris Accord.

Please deny this permit, and schedule a public hearing where the community can voice their concerns and hear more about the potential risks to safety, air quality, and the climate (as well as to the water and the soil).

**Sara Morken:**

I oppose Targa's request to terminal natural gasoline.

Deny Targa's permit.

We want a public hearing..

**Scott Bailey:**

Mr. Pade, I am opposed to this permit.

I realize the Port of Tacoma is an industrial port, but it feels like we're at a crossroads where the citizens of Tacoma would like to see the Port head in a cleaner direction. With industries like natural gas and methanol wanting to expand or move into the port, it's more important than ever to consider the growing public health and safety risks associated with these toxic waste producing industries.

**Selden Prentice:**

Dear Sir:

I am writing to express opposition to express my opposition to Targa's request for a natural gasoline terminal, and to urge that the permit be denied. I also am requesting a public hearing to examine the safety and air quality risks to our community.

Thanks so much,

**Shary Bozied:**

Greetings Gerry,

I am writing to you to voice my opposition to Targa's request for a natural gasoline terminal. I would like to encourage the PSCCA to deny Targa's permit. This permit would allow Tacoma to get an additional mile-long oil train every week and an unknown quantity of toxic emissions that would poison the area. I would also like to request a public hearing to examine the safety and air quality risks to our community and fragile area.

Thank you for reading my letter.

**Shirley Low:**

Greetings Gerry,

I am writing to you to voice my opposition to Targa's request for a natural gasoline terminal. I would like to encourage the PSCCA to deny Targa's permit. This permit would allow Tacoma to get an additional mile-long oil train every week and an unknown quantity of toxic emissions that would poison the area. I would also like to request a public hearing to examine the safety and air quality risks to our community and fragile area.

Thank you for reading my letter.

**Austin Bacas:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long time Tacoma/pierce county businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment, which is extremely important to me. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Steven Storms:**

Please do not allow TARGA to bring unit trains of natural gasoline into the Port of Tacoma. Natural gasoline is a by-product of fracking wells. The full impact of fracking from the source to the end users must be determined. It is now a proven fact that fracking wells leak enough methane to make the use of natural gas worse than coal on a global warming basis. Any project that increases production from fracking wells should be thoroughly analyzed before being approved.

Natural gasoline is much more volatile than many other hydrocarbons and much more prone to fires or explosions. While TARGA claims to only be converting from one hydrocarbon to another, the difference in the properties should be thoroughly analyzed before being approved. Even the potential impact from the proximity to the proposed LNG facility should be analyzed. The potential for cascading fires has become very significant.

The ability to fight a natural gasoline fire is very limited even with the new fire station that is being reopened. A description of the differences when switching fuels at TARGA has not been described or discussed in any public document.

The 107 rail road cars per week traveling through the Tacoma tide flats is not desirable at all. Many communities are banning fossil fuels from traveling through their towns and residential areas. Why are we considering increasing the rail traffic of very dangerous fuels? I have not seen the proposed method of removing the natural gasoline, but assume that at least a portion of it will be trucked out through the port. TARGA already has thousands of truck per year driving up and down Marine View Drive and 509. One tire with a blow out or one reckless driver is all it takes to cause a colossal incident. There is a reason that most of the TARGA trucks are required to stop at all railroad crossings and are not allowed to drive through the I-90 tunnels. It is too dangerous. In the past year we have had both tanker truck and rail car accidents in the port area and were lucky that neither created a massive incident. It could have been front page news internationally.

From nearly every point of view that I can look at this project, it increases the safety risk. We should be looking at methods or projects to decrease any potential harm or danger. I hate to take one step forward and two steps back.

Please deny this request by TARGA to introduce natural gasoline into our neighborhood. A public hearing to determine the risks, problems and total impact on the surrounding community is definitely needed if the project is to be actually considered.

Thanks for your attention.

**Steven Brannon:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long time Tacoma/pierce county businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment, which is extremely important to me. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Sue/Judith Langhans:**

Natural with a bite! Renewable and pollution free is where we need to be heading not methanol and polluting natural gas.

Trans Alta, a Canadian company, has had a run on our environment while being the biggest polluters in Southern Washington. Time for all folks who care about clean air to breath refuse to allow these polluting forms of fuel. Give it up and take it to a new (renewable) and clean level. Tacoma shame on you to allow a Methanol plant.

**Summer Takahashi:**

I just read Targa Sound Terminal put in an application to receive, store and ship gas which is highly toxic and hazardous. I live in northeast Tacoma close to this area. I am totally against this application because I and surrounding community want to live in a safe environment free of chemicals. I am so tired of companies thinking Tacoma waterfront is a dumping ground and can build anything in this area without thinking of the people who live here or the effect it will cause on people, animals, the water and air around us. If there is anything you can do to help stop this, it would be greatly appreciated.

**Susan Helf:**

I am writing to state my opposition to Targa's request for a natural gasoline terminal. I urge you to deny Targa's permit. Further, I request a public hearing to examine the safety and air quality risks to our community.

Don't let greedy fossil-fuel companies destroy our Salish Sea.

**Jeff and Susan Ryan:**

As residents of the City of Tacoma we do not approve of Targa's recent permit application to terminal (receive, store & ship) up to 151,500,000 gallons per year of natural gasoline. We do not need to further

expand the export and distribution use of fossil fuels. The Port of Tacoma and I 5 corridor is already over taxed with congestion and ongoing clean up.

In addition we do not believe the City of Tacoma has the ability to evaluate and use proper judgement that supports the best interests of its residents.

**Susie Litts:**

I object to PSCAA issuing a permit to allow Targa to terminal natural gasoline without additional review and discussion related to public safety. There are too many questions related to local housing and transportation safety to not take additional steps for review.

Additionally, I request that a public hearing be held to get answers to these and any additional concerns from the community:

- 1) it is unacceptable to allow a product with the emissions quoted on the PSCAA website to be handled and stored less than a half mile from dense residential neighborhoods and schools.
- 2) it is unacceptable that a hazardous material with such extreme volatility would be allowed on our rail system - directly through our city and that of nearby cities - when we know how catastrophic a derailment would be.
- 3) It is unacceptable that a safety study won't be done, because the City of Tacoma believes a study done years ago on a different hazardous material is sufficient.
- 4) it is unacceptable that the environmental impacts of a potential spill of this highly toxic material in our waters, including Puget Sound, won't be studied.
- 5) it is unacceptable that the current environmental laws don't account for the cumulative health impacts of adding new sources of toxic air pollutants (including cancer causing benzene), such as the additional pollutants this project will introduce.
- 6) Unacceptable that the PSCAA doesn't have the ability to measure and enforce compliance for emissions of toxic air pollutants.

There should be a cumulative risk exposure threshold. As a community, we've been asked to shoulder all of the risk without any benefit. Project after project, we keep getting additional safety risks and more toxic emissions. There must be a tipping point. What is the practical limit for what our community is asked to shoulder? Targa is just too close to NE Tacoma to be expanding into these extremely dangerous hazardous materials.

There are too many issues with noise and odors today to proceed without addressing the concerns and impact of one more thing.

Thank you for your time and support,

**Sydney England:**

I object to PSCAA issuing a permit to allow Targa to terminal natural gasoline until the following points are addressed. Additionally, I request that a public hearing be held to get answers to these and any additional concerns from the community:

- 1) Unacceptable to allow a product with the emissions quoted on the PSCAA website (see above - including cancer causing benzene) to be handled and stored less than a half mile from dense residential neighborhoods.

- 2) Unacceptable that a hazardous material with such extreme volatility would be allowed on our rail system - directly through our city and that of nearby cities - when we know how catastrophic a derailment would be.
- 3) Unacceptable that a safety study won't be done, because the City of Tacoma believes a study done years ago on a different hazardous material is sufficient.
- 4) Unacceptable that the environmental impacts of a potential spill of this highly toxic material in our fragile Puget Sound won't be studied.
- 5) Unacceptable that the current environmental laws don't account for the cumulative health impacts of adding new sources of toxic air pollutants (including cancer causing benzene), such as the additional pollutants this project will introduce.
- 6) Unacceptable that the PSCAA doesn't have the ability to measure and enforce compliance for emissions of toxic air pollutants.

There should be a cumulative risk exposure threshold. As a community, we've been asked to shoulder all of the risk without any benefit. Project after project, we keep getting additional safety risks and more toxic emissions. There must be a tipping point. What is the practical limit for what our community is asked to shoulder? Targa is just too close to NE Tacoma to be expanding into these extremely dangerous hazardous materials.

**Debby Herbert:**

I am requesting a public hearing for Targa's new natural gasoline permit in the Port of Tacoma. The shipping and storage of LNG has well-known risks to the communities and environment with explosion hazards and methane gas leakage. This will be in the middle of a highly urbanized area and I believe is very inappropriate for that site. I am strongly opposed to the LNG permit being granted Targa.

**Tiffany McBain:**

I write to urge you to deny the TARGA Sound Terminal's request to "receive, store & ship up to 151,500,000 gallons per year of natural gasoline."

As you no doubt know, natural gasoline is an explosive substance more volatile than commercial gasoline. In addition, it presents health concerns to all who breathe the Tacoma air. Its vapors are a probable carcinogen and according to ConocoPhillips are "toxic to aquatic life with long lasting effects." Such a substance should be nowhere near Commencement Bay. Is the ASARCO plant already so dim a memory?

TARGA should not be allowed to receive, store and ship 151,500,000 gallons of this hazardous material annually without a full and comprehensive review to examine health and environmental risks, which includes a public hearing.

Thank you for considering my input.

**Timothy Tucci:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Tina Kuckkahn-Miller:**

I'm writing to add my voice to the many living beings who would be impacted by the request submitted by TARGA Sound Terminal to receive, store and distribute natural gas natural gas in Tacoma.

- I SUPPORT the PSCAA filling important advisory council seats including Environmental Justice and Tribal Nations and hiring additional employees to realistically monitor industry emissions. If additional employees cannot be hired, then additional permits in areas of cumulative industry should not be accepted or approved.
- I SUPPORT the revision of the PSCAAs permitting process to require consideration of cumulative emissions from all sources within close proximity to each other.
- I SUPPORT additional air quality sensors to monitor additional toxic emissions including benzene in areas of high risk heavy industry, areas with cumulative emissions, and residential areas near high risk heavy industry lands.
- I SUPPORT requiring the PSCAA to verify all actual emissions and provide public notice
- I SUPPORT a Full Environmental Impact Study and Toxic Air Study on TARGA Sound Terminal
- I OPPOSE the request submitted by TARGA Sound Terminal to RECEIVE, STORE and DISTRIBUTE natural gas because risk to public safety, health and the environment need to be made priority. Additionally I oppose the added terminal traffic via rail cars through our community due to their contribution to this risk. Finally, TARGA has failed to report current and historical emissions records and for this should be DENIED any new permits AND required to provide historical data.

**Todd Hay**

We are writing to provide comments to the TARGA Permit # 11265 for the modification of four storage tanks allowing the storage of natural gasoline. ACT is a local non-profit committed to improving the air, water, and soil quality of Tacoma. Our comments are as follows:

Request for a Public Hearing - We request a formal public hearing be held to discuss this important topic. The full impact of increasing volatile organic compounds and hazardous air pollutants should be fully understood by the community via a public hearing.

SEPA Determination - By allowing for the transport and storage of natural gasoline at the TARGA facility, the City of Tacoma should reevaluate the State Environmental Policy Act

(SEPA) determination and an Environmental Impact Statement (EIS) is warranted. An EIS is warranted due to the introduction of the highly volatile natural gasoline to the Port of Tacoma and its transportation via rail cars.

**Lack of Greenhouse Gas Emissions Accounting** - While the permit identifies the following pollutants that would be emitted (24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene), it does not state the potential increase in greenhouse gas emissions. Given the recent Port of Tacoma announcement to support the Paris Climate Afford emissions targets<sup>1</sup> and the city's greenhouse gas emissions targets as stated in the Tacoma Environmental Action Plan, Tacoma residents need a clear accounting of the greenhouse gas this TARGA proposal would impact those emissions.

**Cumulative Emissions Monitoring** - This project should not proceed until a better attempt to understand cumulative air monitoring in the Port of Tacoma is established. We understand that PSCAA currently analyzes requests on a permit-by-permit basis without an understanding of the potential cumulative effects. The last cumulative study was performed in 2010.<sup>3</sup> We would like to see a concerted effort to study all of the Environmental Protection Agency (EPA)-designated Urban Air Toxins<sup>4</sup> on a routine basis.

**Identified Emissions** - The permit application indicates that TARGA will emit 24 tons per year of Volatile Organic Compounds, including 2.8 tons per year of Hazardous Air Pollutants, 1.3 ton/yr of Toxic Air Pollutants, and 186 pounds per year of benzene, per the permit worksheet, "For calendar years 2014 and 2015, Targa reported that the facility was below emission reporting thresholds but it might exceed a reporting threshold in 2016." Given that it is now July 2017, what were the 2016 emissions levels and did these trigger emissions reporting? Also, please identify what sort of independent verification of the Targa emissions levels is accomplished to ensure compliance. The worksheet indicates that "The tank emission calculations were made with proprietary software that has not been independently verified." Has any attempt been made to independently validate the TARGA emissions estimates? This permit should not be approved until such time.

**Sulfur Levels** - With regard to controlling sulfur emissions, the PSCAA worksheet indicates:

"Targa proposed that their contracts require that customer provide a Certificate Of Analysis for each product from a new or different source. Upon receipt of a COA with a sulfur level > 0.5% sulfur, they would either test the sample or conduct a stack test on the MCVU for the product to ensure the product is in compliance with Reg I, Section 9.07. However, I believe once the product has been received by Targa, it would be too late to prevent the emissions. Also, this approach would fail to demonstrate compliance with the Acceptable Source Impact Levels for reduced sulfur compounds and to prevent odor impacts."

Given this concern that it would be too late to prevent the sulfur emissions, what is the solution for preventing this and how will PSCAA ensure this compliance?

**Benzene Levels** - We have concern over the proposed increase in benzene given its carcinogenic nature. PSCAA recommends that benzene should be restricted in the natural gasoline to less than or equal to 1.0% by weight. How will compliance with this recommended level be enforced?

**Health Impact Assessment** - We request that a Health Impact Assessment be performed by the Tacoma Pierce County Health Department or other appropriately qualified public agency to ensure that the impacts are not harmful to TARGA workers or nearby residents.

Overall Fossil Fuel Throughput Levels - The permit indicates that TARGA will introduce 151 million gallons of natural gasoline at the facility. Please indicate if this is greater than, equal to, or less than the existing capacity that is being replaced by this newer natural gasoline product.

Tide Flats Interim Regulations - Given the recent Tacoma City Council meeting and approval requesting the Tacoma Planning Commission develop interim tide flat regulations to halt the expansion or growth of certain industries (i.e. fossil fuels), no fossil fuel permits should be approved at this time as this would be counter to the Tacoma City Council's intent.

Thank you for considering these comments. We look forward to your response and a public hearing.

**Tom Walrath Jr.**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Linda Troeh:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time employee of Targa, President of the Tacoma Propeller Club, Board Member of Rebuilding Together South Sound and Tacoma Youth Marine Foundation, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Twylia Westling:**

I'm following up to a letter that was sent by another community member regarding these permits. She's done such a beautiful job calling out the issues that are really important, I would like to second her comments and questions. I have changed some of the language a bit, just so you know that I have read and critically considered her words.

- I SUPPORT the PSCAA filling important advisory council seats including Environmental Justice and Tribal Nations and hiring additional employees to realistically monitor industry emissions. If additional

employees cannot be hired, then additional permits in areas of cumulative industry should be put on moratorium.

- I SUPPORT the revision of the PSCAAs permitting process to require consideration of cumulative emissions from all sources within close proximity to each other.
- I SUPPORT additional air quality sensors to monitor additional toxic emissions including benzene in areas of high risk heavy industry, areas with cumulative emissions, and residential areas near high risk heavy industry lands.
- I SUPPORT requiring the PSCAA to verify all actual emissions and provide public notice
- I SUPPORT a Full Environmental Impact Study and Toxic Air Study on TARGA Sound Terminal
- I OPPOSE the request submitted by TARGA Sound Terminal to RECEIVE, STORE and DISTRIBUTE natural gas because risk to public safety, health and the environment need to be made priority. Additionally I oppose the added terminal traffic via rail cars through our community due to their contribution to this risk. Finally, TARGA has failed to report current and historical emissions records and for this should be DENIED any new permits AND required to provide historical data.

Regarding Air Quality Sensors: It is shocking to know that there are only three air quality sensors in Tacoma. These three monitors only monitor 3 harmful chemicals; nitric oxide, nitrogen dioxide and particulate matter 2.5... Three out of over a hundred other harmful airborne chemicals emitted by Port industries. When it comes to the safety of the nearly four million lives currently living here and the countless future generations to come it's clear that 3/100 is unacceptable... an F, a complete fail.

Regarding Cumulative Emissions: The chemical and fuel odors due to cumulative emissions in the Port of Tacoma, NE Tacoma, Browns Point, Fife and along Marine View Drive, Taylor Way and Alexander Avenue are alarmingly strong. Permits should NOT be issued on a case by case basis without regard to the overall emissions and cumulative air quality of the area.

Regarding Monitoring and Regulating Industry Air Quality: The Puget Sound Clean Air Agency is totally inefficient in monitoring these emissions in the port and assuring that those current approved/permited industries are compliant and factual in their predicted and reported emissions. Relying on self-reporting by industry is untrustworthy and it fails to provide a base line or real-time measurements of pollutants or overall compliance. Targa for example has no record of emissions since at least 2010 which we know can't be true, those of us who live in the vicinity and breathe that air.

Regarding New Applications and Permit Approvals/Staffing: I am very discouraged to learn that PSCAA is grossly understaffed with only 11 inspectors to oversee 13,695 businesses. That is 1245 businesses to monitor per employee; the client ratio is unbelievable. Permit approving should be put on hold until additional inspectors are hired and vacant seats on the Advisory Council are filled for both Environmental Justice and Tribal Nations. A moratorium on new permits is essential and critical until PSCAA can be staffed adequately, and provided with the right tools for monitoring existing industries and existing scopes of industry.

Below are my versions of Carolyn's questions and I look forward to hearing your answers.

1. Question: What can PSCAA be doing to assure industry air quality reporting accountability?
2. Question: What needs to be done, whether legislatively or politically, to assure that industry is no longer able to pollute with impunity?
3. Question: What can PSCAA do to assure that citizen voices are heard as loudly as industry voices?

4. Question: What is the PSCAA doing to assure that advisory council seats are filled and that the Environmental Justice and Tribal Nations are represented? What is the deadline for having these two seats filled?

**Valarie Peaphon**

I live in Tacoma and am writing to express my opposition to Targa's permit to terminal natural gasoline.

Our community needs to pivot away from dirty and dangerous fossil fuels toward clean, renewable energy. We can't do this by continually investing in new infrastructure for old industries.

The potential harm in carrying these substances in such high amounts (107 train cars) with such frequency (once per week on average) is too great a risk for our air, water, land and people. Look at the frequency of derailments, accidents, fires and explosions. How would Targa mediate this risk when the trains run through highly populated areas?

Also, the emissions will further pollute our air and choke all living things. Cancer is not an acceptable outcome in exchange for corporate profits. The local air quality is already often. It up to standard. Will the proposed changes to Targa's tanks create more or less toxic and hazardous air emissions?

The potential here for harm is not reasonable.

Simply, no. I mean, NO!

In addition to my earlier comments, I'd also like to formally request a public hearing be held to discuss Targa's permit request to terminal natural gasoline. I think the community deserves the opportunity to discuss the risks associated with this project (I.e. safety, air quality, increased train traffic, etc.).

**Tom Erker:**

I wish to express my support for the proposed Targa Sound Terminal Project 11265. As a long-time Tacoma/Pierce County businessperson/resident, it is encouraging to see companies continue to invest in projects that provide economic and environmental benefits for our region. Targa has a long history of working responsibly with our community. The terminal has been in business for over 50 years and currently provides 50 full time, family-wage jobs in our community.

This project adds emission control equipment to existing storage tanks at the facility, thereby providing Targa with flexibility in the types of products that it handles while continuing to protect the quality of the environment. The project will also allow Targa to ensure the continued supply of dependable energy service to our region.

Thank you for the opportunity to provide public comment on the economic, environmental and safety benefits of this project.

**Vicky Gannon:**

I am a Seattle resident and am opposed to the proposed natural gas terminal as it would be very bad for the environment in our area!

**Vincent Ghiringhelli:**

I am submitting my opinion, as a homeowner in North Tacoma, asking that the request to store up to 151,500,000 gallons per year of natural gasoline in the Port of Tacoma be denied until a full, comprehensive review of health and environmental risks is completed, part of which must be a public hearing.

**Victoria:**

As a citizen of NE Tacoma already affected by TARGA's damage to our air quality, I add my request for a public hearing to examine safety and air quality risks to our community.

Until then, please deny TARGA's request for a permit. I am in full opposition to TARGA's plan to terminal natural gasoline.

**William Kupinse:**

As a resident of Tacoma, I write to voice my request that TARGA Sound Terminal's request to "terminal (receive, store & ship) up to 151,500,000 gallons per year of natural gasoline" be denied. (<http://www.pscleanair.org/business/Permitting/AOPDocumentsForComment/11265-Targa%20Public%20Notice.pdf>)

Natural gasoline is an explosive substance sourced from natural gas extraction which is often added to commercial gasoline. Natural gasoline is more volatile than commercial gasoline. According to ConocoPhillips' safety data sheet, natural gasoline presents many health hazards. Natural gasoline's vapors are of particular concern, and it is listed as a probable carcinogen. It is "toxic to aquatic life with long lasting effects," which is especially troubling given the location of TARGA Sound Terminal. See [http://www.conocophillips.com/sustainable-development/Documents/SMID\\_213\\_Natural%20Gasoline%20HTAG.pdf](http://www.conocophillips.com/sustainable-development/Documents/SMID_213_Natural%20Gasoline%20HTAG.pdf)

TARGA should not be allowed to receive, store and ship 151,500,000 gallons of this hazardous material annually without a full and comprehensive review to examine health and environmental risks, which includes a public hearing.

**Julianna Martinson:**

I am writing to strongly oppose the permit for expansion of the Targa Sound Terminal for the following reasons:

This terminal is built on tideflats, susceptible to liquefaction shaking during an earthquake and totally vulnerable to a tsunami after such an event.

Many of the permits were granted quietly, without wide public notices, and a decently long period of public comment.

With sea level rising, this site is more vulnerable to erosion and damage.

The release of these several dangerous chemicals in the event of

an accident or earthquake endangers the surrounding communities as well as the waterways and sealife surrounding the site. As a release warms up, it forms a vapor cloud that's extremely vulnerable to any spark or flame and can blow in the direction of the prevailing winds, which is often towards land and the surrounding populations. Human health harmed by chemical exposure would be horrendous.

There are no current needs for expansion. By increasing current capacity, it almost guarantees the need for more marketing to fossil fuel companies to use the facility to justify the expense.

With increased capacity, Targa will likely justify the need for increased capacity of pipelines coming down from British Columbia through the State of Washington, with a planned expansion of a pipeline along the I-5 corridor, endangering the rivers and waterways all along the route, as well as the cities it passes through, and the commuters along I-5.

Pipelines have exploded, and accidents will continue to happen as more and more LNG is transported, whether by rail, truck, or pipeline.

We need to encourage and support truly green energies: solar, wind and tides, and not expand or support fossil fuel transportation and usage.

Thank you for this opportunity to comment. I will appreciate hearing the results of your decision.

## M. REVIEWS

Inspector Name		Date:
Source Name		Date: