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Innovating renewables for the future www.imperiumrenewables.com

March 22, 2013

Attn: Brian Shay, City Administrator  
City of Hoquiam  
609 8<sup>th</sup> Street  
Hoquiam, WA 98550

**RE: Imperium Terminal Services, LLC. Imperium Bulk Liquid Terminal Facility Project Proposal Environmental Checklist Clarifications**

Dear Mr. Shay:

On February 21, 2013, Imperium Renewables submitted a State Environmental Policy Act (SEPA) checklist for the construction of new storage tanks, rail infrastructure and office space within the Port of Grays Harbor and adjacent to the existing Imperium biodiesel plant and the Port's T-1 marine terminal. This letter is a response to a request for clarification on our SEPA checklist.

**Description of Proposal:**

The correct site location description is provided in the SEPA checklist Legal Description, Appendix A. Imperium confirms that the site is located adjacent to the Chehalis River in the City of Hoquiam at Section 7, Township 17 North, Range 9 West W.M.

**I. Proposal Description:**

Via the SEPA checklist, Imperium is applying for permits to expand their existing facility to construct new storage tanks to contain the following materials: vegetable oil, biodiesel, methanol, petroleum diesel, petroleum products, used cooking oil, waste vegetable oil, animal fats, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, crude oil, renewable diesel, and renewable jet fuel.

Imperium is currently permitted to store vegetable oil, biodiesel, methanol, diesel, and petroleum products in their existing tanks. Via the SEPA checklist, Imperium is applying for permits to store the following additional liquids in the existing tanks: used cooking oil, waste vegetable oil, animal fats, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, crude oil, renewable diesel, and renewable jet fuel.

With respect to the new tanks to be constructed, each tank would be 95 feet in diameter and 64 feet in height (not 62 feet).

### **1. EARTH:**

In reference to the Phase Two Environmental Site Assessment, Imperium Renewables has completed a further site assessment to identify the type and concentration of petrochemical contaminants and the extent of the area covered. The development of the site will include a cleanup plan development and implementation in accordance with WAC 173-340-745.

### **3. WATER:**

The project site does not lie within a 100-year floodplain, per FEMA Flood Insurance Rates Maps. The project area is mapped as being in Flood Zone C, which is classified as “Areas outside the 1 percent annual chance floodplain, areas of 1 percent annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1 percent annual chance stream flooding where the contributing drainage areas is less than 1 square mile, or areas protected from the 1 percent annual chance flood by levees” (FEMA 1997). The FEMA Flood Insurance Rate Map is for the Cities of Aberdeen, and Hoquiam, WA (map panel #5300580003B). (Reference Imperium’s SEPA Checklist page 11 section B.3.a.5)

### **7. ENVIRONMENTAL HEALTH:**

Imperium Renewables’ existing tanks sit on grout driven piles driven to an approximate depth of 75’. Liquid densities and tank heights for the new tanks will be very similar to the existing tanks/liquids stored so a similar piling depth is expected. In the existing tanks, there is no evidence of differential settling or settling beyond what was predicted by the geotechnical engineers. In June of 2006, an analysis of the site was performed by a geotechnical engineer, GeoEngineers of Tacoma, WA, on soil suitability for the project in general accordance with the 2003 International Building Code (IBC) and American Society of Civil Engineers (ASCE) 7-02. GeoEngineers will perform an additional analysis to confirm soil suitability for the project but no significant change is expected due to the material being uniform fill across the entire site (the fill occurred in 1983). This report will be furnished when it becomes available. Civil design and construction of the production facility will comply with the recommendations of the geotechnical engineering report and will be approved by a Washington Registered Professional Engineer. (Reference Imperium’s SEPA Checklist page 5 section B.1.c)

Imperium will provide WSMC and Ecology advance notice of arrival and departure of all outbound vessels containing bulk liquids.

Imperium will provide two tugs to accompany all loaded inbound and outbound crude vessels to/from the terminal to three nautical miles offshore and provide assistance as needed. A third tug shall also be available.

### **8. LAND AND SHORELINE USE:**

Imperium clarifies that the new tanks will be 64 feet tall. (Reference Imperium’s CUP supporting letter page 1, 2<sup>nd</sup> paragraph).

The new storage tanks will be painted white or insulated with aluminum jacketing and periodically

pressure washed to remove staining.

#### 10. AESTHETICS

The new storage tanks will be painted white or insulated with aluminum jacketing and periodically pressure washed to remove staining

#### 14. TRANSPORTATION:

Truck traffic is not expected to be substantial enough to create traffic hazards or congestion. The vast majority of the facility's product will be delivered or carried away by train and marine transport, so truck trips will be minimal. (Reference Imperium's CUP supporting letter top of page 10). Consistent with the Imperium Renewables SEPA Checklist for the existing facility, Imperium's current operations require up to 10 truck and trailer loads per day. The expansion is expected to add less than an additional 10 truck and trailer loads per day.

All inbound and outbound loaded crude vessels shall have tug escorts to/from the terminal to the three nautical mile limit.

Please contact me at 206-254-0203 with any questions.

Sincerely,



Steve Drennan  
Vice President of Engineering, Imperium Terminal Services, LLC

cc: Diane Butorac, Department of Ecology  
Sally Toteff, Department of Ecology