

Appendix G

Crosswalk

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Earth	The addition of buildings, storage tanks, and related infrastructure carrying and storing petroleum oil could expose people to harm if damaged during a seismic event, such as an earthquake. Under the no-action alternative, the risk remains the same as current conditions.	<p>To minimize the potential for impacts at the project site related to unstable soils, the applicant will prepare the project site for construction as follows and as described in the applicant's geotechnical report (Hart Crowser 2013¹):</p> <ul style="list-style-type: none"> - Recompact and/or over-excavate and replace areas observed to be soft, loose, wet, or yielding with structural fill. - Install a geotextile stabilization fabric, additional clean gravel material, and/or a greater thickness of fill if areas larger than 0.5 acre of exposed ground are unusually soft or disturbed. - In all disturbed areas during construction, remove any soft, loose, or organic zones and replace with structural fill. The upper material provides lateral support for pile foundations. In areas with pile and structural slab systems, rigorous preparation of the subgrade is not required. <p>To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will install pile-supported foundations that extend to the necessary depths to embed in competent soil required to resist seismic forces and maintain stability if liquefaction, lateral spreading, and settlement of surface soils occurs.</p> <p>To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will develop final design specifications for proposed structures based on the following updated standards/information, including additional site-specific evaluation for the easternmost portion of the project site:</p> <ul style="list-style-type: none"> - U.S. Geological Survey ground-shaking report and maps released in July 2014 (Petersen et al. 2014²) - American Petroleum Institute Standard 650 (2012) - International Building Code 2012 <p>To minimize the potential for spills and leaks that could occur at storage tank connection points, the applicant will design and install flush-mounted or internal automatic shut-off valves that allow the tanks to remain isolated from pipe distribution systems that may shear off or be damaged during seismic-related events.</p>	No	<p>Potential for impact:</p> <p>Although the Contanda Terminals Expansion Project (proposed project) would not involve the storage of crude oil, it would involve the storage of other bulk liquids that could expose people to harm if damaged during a seismic event.</p> <p>Environmental commitment:</p> <p>In addition to meeting applicable regulations related to the design, construction, and operation of the storage tanks, Contanda will implement the mitigation measures as recommended in the Westway Environmental Impact Statement (EIS) to ensure the potential for this impact remains less than significant.</p>

¹ Hart Crowser, Inc., 2013. Geotechnical Engineering Report, Contanda Terminals Expansion. Port of Grays Harbor, Washington. February 2013.

² Petersen et al. (Petersen, M. D. et al.), 2014. Documentation for the update of the United States national seismic hazard maps. U.S. Geological Survey Open-File Report 2014-1091.

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Earth	<p>The proposed facility could expose workers at the project site to increased risks of harm from a tsunami. Although the likelihood of a tsunami would remain unchanged compared to existing conditions, the new facility would result in new infrastructure and additional workers that would be exposed to these risks. Under the no-action alternative, the risk remains the same as current conditions.</p>	<p>The applicant will ensure that a tsunami evacuation and emergency management plan is prepared prior to beginning project operations. This plan will consider evacuation planning, identification of safe havens, and identification of evacuation routes to natural high ground and will be developed in coordination with emergency management officials (City of Hoquiam, Grays Harbor County, Washington State, U.S. Coast Guard, ship captains, and pilots).</p>	No	<p>Potential for impact: As noted in the Westway EIS, the risk of a tsunami remains unchanged with the proposed project; however, the proposed project would similarly result in new infrastructure and additional workers that would be exposed to these risks.</p> <p>Environmental commitment: Contanda will implement the mitigation measures as recommended in the Westway EIS to ensure the potential for this impact remains less than significant.</p>
	<p>The new storage tanks and related infrastructure carrying and storing crude oil could rupture in the event of a tsunami and expose people and the environment to increased harm. Under the no-action alternative, the risk remains the same as current conditions</p>	<p>To reduce the potential for environmental damage related to a tsunami event, the applicant will build the terminal to the most currently adopted American Society of Civil Engineers (ASCE) design standards at the time of permit issuance.</p> <p>If ASCE 7 Standard, Minimum Design Loads for Buildings and Other Structures, Chapter 6 – Tsunami Loads and Effects is adopted by future Uniform Building Code updates before project design is completed and is more protective, the updated standards will be used.</p>	Yes	<p>Contanda agreed to this mitigation if the wording is changed to state that it would meet whatever building code was in effect at the time it submitted its building permit applications.</p> <p>Environmental commitment: Contanda will implement the measure as requested.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Air	Construction and operation of the proposed action would result in increased air emissions compared to the no-action alternative.	<p>The applicant will ensure that all engine-powered equipment and vehicles used in construction, operation, and maintenance at the facility are subject to a regular inspection and maintenance schedule in order to minimize air pollutant emissions, greenhouse gas emissions, and fuel consumption. Preventive maintenance activities will include but not be limited to the following actions:</p> <ul style="list-style-type: none"> - Replacing oil and oil filters as recommended by manufacturer instructions. - Maintaining proper tire pressure in on-road vehicles. - Replacing worn or end-of-life parts. - Scheduling routine equipment service checks. <p>The applicant will develop and implement an anti-idling policy for both construction and operation and ensure that equipment operators receive training on best practices for reducing fuel consumption in order to reduce project-related greenhouse gas emissions. The anti-idling policy will include required warmup periods for equipment and prohibit idling beyond these periods. The policy will define any exemptions where idling is permitted for safety or operational reasons, such as when ambient temperatures are below levels required for reliable operation. In addition, the use of technologies such as idle management systems or automatic shutdown features will be considered part of the policy.</p> <p>To minimize idling from trains and vessels and resulting emissions, the applicant will coordinate with the Port of Grays Harbor and Puget Sound & Pacific Railroad (PSAP) to manage waiting times for rail and vessel arrivals or departures.</p>	No	<p>Potential for impact: Construction and on-site operations would be similar to the Westway Expansion Project.</p> <p>Environmental commitment: In addition to meeting applicable regulations and obtaining the necessary permits from the Olympic Region Clean Air Agency, Contanda will implement the mitigation measures as recommended in the Westway EIS to ensure the potential for this impact remains less than significant.</p>
Plants/ Animals	Increased vessel traffic related to the proposed action could increase the risk of spread of invasive species compared to the no-action alternative.	Vessel operators are required to comply with state and federal law, which are intended in part to minimize the potential for this impact. All vessels entering US water are required to have a U.S. Coast Guard Ballast Water Management Plan. The applicant will ensure that all vessels received shall be certified.		Environmental commitment: Contanda will implement the measure as requested.
Energy	Construction and operation of the proposed action would result in increased energy consumption compared to the no-action alternative, although this would not be a significant impact.	<p>Voluntary Measure—To minimize energy use, the applicant will employ the most energy-efficient systems for all pumps, motors, electrical equipment, and process technology equipment as practicable.</p> <p>Voluntary Measure—To minimize energy use, the applicant will apply U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) Silver Standards to the design of new buildings.</p>	No	<p>Potential for impact: Construction and operation of the proposed project would also result in increased energy consumption although similarly, it would not be significant.</p> <p>Environmental commitment: Contanda commits to including these measures as part of the proposed project.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Noise and Vibration	Construction of the proposed action could result in short-term, temporary increase in low levels of noise at the project site.	To reduce construction noise at nearby sensitive receptors, the applicant will maintain construction and maintenance equipment in good working order with properly functioning mufflers to control noise.	No	<p>Potential for impact: . Low-levels of noise would occur during construction.</p> <p>Environmental commitment: Contanda commits to including these measures as part of the proposed project.</p>
Noise and Vibration	Increased rail traffic related to the proposed action would increase average noise levels for residents and other sensitive groups along the PSAP rail line.	<p>To address increased noise from rail traffic, the applicant will coordinate with PS&P and interested communities along the PS&P rail line on the creation of quiet zones, if requested. Elimination of locomotive horn sounding at the affected grade crossings would eliminate impacts from increased horn noise. Quiet zones can only be established by public agencies using a procedure established in Federal Railroad Administration (FRA) regulations. The quiet zone allows the installation of enhanced safety measures at grade crossings such that train horns would not be required to be used. Implementation of a quiet zone is subject to FRA approval. Quiet zones include measures to maintain the level of safety while reducing noise.</p>	Yes	<p>Potential for impact: As noted in the Westway EIS, the train noise associated with an individual passing event is required for safety purposes by federal law and would remain unchanged compared to existing conditions. In addition, the proposed project would involve fewer trains, which would result in a lower contribution to increased average noise along the PSAP rail line.</p> <p>Environmental commitment: Because the proposed project would involve fewer trains and because train horns are required safety measures on an existing rail line, Contanda will implement the mitigation on this topic as recommended from the Imperium Terminal Services Expansion Project Draft EIS.</p>
Aesthetics, Light, and Glare	The proposed action would result in new structures that would be visible from surrounding areas although the overall impact would not be significant.	<p>To reduce potential glare, the applicant will ensure the proposed storage tanks are of a tone that blends into the surrounding landscape and/or matches the existing facility tank paint or insulation, are appropriate to the existing design, and do not affect air emissions for the surrounding structures.</p> <p>To ensure that lighting at the project site does not conflict with other land uses, the applicant will coordinate with the Port of Grays Harbor to develop the proposal for project lighting.</p>	No	<p>Potential for impact: The proposed facilities would be similar to those considered in the Westway EIS and would similarly not result in a significant aesthetic impact.</p> <p>Environmental commitment: Contanda commits to including these measures as part of the proposed project.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Recreation	Increased vessel traffic related to the proposed action could disrupt recreational vessels although the overall impact would not be significant.	While fishing boats are required to follow the U.S. Coast Guard navigation rules to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project-related vessel traffic arrivals and departures over a designated very high frequency (VHF) marine radio channel at least 1 hour before arriving and departing.	No	<p>Potential for impact: The proposed project would result in fewer vessel calls compared to the Westway Expansion Project and is also not expected to result in a significant impact on recreation.</p> <p>Environmental commitment: Contanda commits to including this measure as part of the proposed project.</p>
Cultural Resources	There is a low but increased possibility that construction activities involving ground disturbance could result in impacts on otherwise unknown archaeological resources compared to the no-action alternative.	<p>To reduce the risk of disturbing undocumented cultural resources, the applicant will prepare an unanticipated discovery plan to address previously unidentified archaeological resources should any be discovered during the construction of the proposed action. The applicant will submit the plan to the Washington State Department of Archaeology and Historic Preservation before construction. The plan will contain provisions requiring that if archaeological resources are uncovered during excavations, construction activities will cease immediately and the applicant will notify the City of Hoquiam, the Washington State Department of Archaeology and Historic Preservation, the Quinault Indian Nation, and the Confederated Tribes of the Chehalis Reservation. In such cases, the applicant will provide for a site inspection and evaluation by a professional archaeologist to ensure that all possible valuable archaeological data are properly salvaged or mapped.</p> <p>The applicant will have a qualified professional archaeologist monitor ground-disturbing activities that would result in the excavation and exposure of subsurface deposits at depths greater than 15 feet below the current ground surface. If archaeological monitoring reveals fill deposits at greater depths, these results will be used to establish a 100-foot buffer around the location of the discovery in which no additional archaeological monitoring would be needed to the maximum depth at which fill deposits have been documented.</p>	No	<p>Potential for impact: Construction of the proposed project would be similar to the Westway Expansion Project and would similarly have a low potential to encounter unknown archaeological resources.</p> <p>Environmental commitment: Contanda commits to including this measure as part of the proposed project.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Tribal Resources	Increased vessel activity related to the proposed action would increase the potential for conflict with tribal fishing in Grays Harbor compared to the no-action alternative.	<p>To mitigate potential impacts on tribal fishing, the applicant will coordinate with the Quinault Indian Nation and Washington Department of Fish and Wildlife annually, as requested, to support review and possible adjustment of docking schedules to minimize conflict with fishing schedules negotiated pre-season by the state and tribe. Consultation will account for operations, including anticipated vessel movements related to the proposed action.</p> <p>While tribal fishing boats are required to follow the U.S. Coast Guard navigation rules to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project-related vessel traffic arrivals and departures over a designated VHF marine radio channel at least 1 hour before arriving or departing.</p> <p>To mitigate impacts on access to tribal treaty fishing areas, the applicant will initiate a process between stakeholders and Quinault Indian Nation tribal officials to discuss and identify additional mitigation measures. Initiation of the process between the parties will occur before vessel operations begin.</p>	Yes	<p>Potential for impact: The proposed project would result in fewer vessel calls compared to the Westway Expansion Project and is therefore, not anticipated to result in the same potential for impacts on tribal fishing.</p> <p>Environmental commitment: Contanda has initiated a process and is working directly with the Quinault Indian Nation to ensure that the potential for impacts on tribal resources is minimized. To mitigate impacts on access to tribal treaty fishing areas, the applicant will discuss between Contanda and Quinault Indian Nation tribal officials to identify additional mitigation measures and intends to implement the measures recommended in the Westway EIS.</p>
Hazardous Materials	Construction of the proposed action could increase the risk of exposing hazardous materials potentially present at the project site compared to the no-action alternative.	<p>If groundwater or odiferous, stained, or discolored soil is encountered during construction activities, or if groundwater encountered is suspected to be contaminated during construction activities, the following mitigation measures will be implemented:</p> <ul style="list-style-type: none"> - The applicant will seek the professional recommendation of a consultant specializing in the handling and identification of hazardous materials and contaminated media. - If deemed necessary, based on the aforementioned consultation, the applicant will conduct soil and/or groundwater testing for identification of possible hazardous materials. - Construction personnel will isolate and cover suspect soil until analytical results are reviewed by qualified personnel. - The consultant will compare analytical results to the applicable U.S. Environmental Protection Agency's regional screening levels, which address common environmental pollutants. If hazardous materials are discovered in the soils and/or groundwater at levels above the regional screening levels, the consultant will provide recommendations on the steps required for proper treatment and/or removal and disposal of the contaminated media. 	No	<p>Potential for impact: Construction of the proposed project would be similar to the Westway Expansion Project and the risk of exposing hazardous materials potentially present at the project site would be similar.</p> <p>Environmental commitment: Contanda commits to including this measure as part of the proposed project.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Vessel Traffic	Increased vessel activity related to routine operations of the proposed action could result in the need for increased coordination among stakeholders in the Port of Grays Harbor.	To improve vessel management and reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and participate as an active member of the Grays Harbor Safety Committee (https://www.portofgraysharbor.com/harbor-safety/index.php) and work to implement the recommendations for waterway management detailed in the recently completed Grays Harbor Vessel Traffic Risk Assessment (https://www.ezview.wa.gov/site/alias_1962/view_our_committees_grays_harbor_vtra/37194/grays_harbor_vtra.aspx).	No	<p>Potential for impact: The proposed project would result in fewer vessel calls compared to the Westway Expansion Project and is therefore, not anticipated to result in the same potential for vessel-related impacts. In addition, the proposed increase in vessel traffic is within the historical high levels that have been safely accommodated within the harbor.</p> <p>Environmental commitment: Contanda commits to including these measures as part of the proposed project</p>
Vessel Traffic	Increased vessel activity related to routine operations of the proposed action could result in the need for increased coordination among stakeholders in the Port of Grays Harbor.	To improve vessel management and situational awareness and to reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will coordinate with the Port of Grays Harbor and participate as an active member of the Grays Harbor Safety Committee (https://www.portofgraysharbor.com/harbor-safety/index.php) and work to implement the recommendations for waterway management detailed in the recently completed Grays Harbor Vessel Traffic Risk Assessment (https://www.ezview.wa.gov/site/alias_1962/view_our_committees_grays_harbor_vtra/37194/grays_harbor_vtra.aspx).	No	<p>Potential for impact: The proposed project would result in fewer vessel calls compared to the Westway Expansion Project and is therefore, not anticipated to result in the same potential for vessel-related impacts. In addition, the proposed increase in vessel traffic is within the historical high levels, that have been safely accommodated within the harbor.</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>
Vessel Traffic	Increased vessel traffic related to the proposed action could result in conflicts with commercial fishing vessels.	While commercial fishing boats are required to follow the U.S. Coast Guard navigation rules to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project-related vessel traffic arrivals and departures over a designated VHF marine radio channel at least 1 hour before arrival and departure.	No	<p>Potential for impact: The proposed project would result in fewer vessel calls compared to the Westway Expansion Project and is also not expected to result in a significant impact on recreation.</p> <p>Environmental commitment: Contanda commits to including this measure as part of the proposed project.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Vehicle Traffic and Safety	Increased rail traffic related to the proposed action would result in substantial increases in vehicle delay at the Olympic Gateway Plaza and between Poynor Yard and the project site compared to the no-action alternative.	<p>To mitigate vehicle traffic impacts associated with rail operations of the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PSAP to address vehicle delay between the project site and Poynor Yard. Washington State Department of Transportation (WSDOT), the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle delay. The applicant will ensure measures are in place prior to beginning the proposed operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.</p> <p>To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PSAP to address vehicle delays at PSAP grade crossings into and out of the Olympic Gateway Plaza. WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure acceptable measures are in place prior to beginning the proposed project operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.</p>	Yes	Environmental commitment: Contanda will implement the measure as requested.
Environmental Health Risks – Terminal (On-Site)	The proposed action would increase the potential for an incident involving a spill, fire, or explosion of petroleum oil during on-site operations compared to the no-action alternative.	<p>To improve petroleum oil recovery in the case of a spill during vessel loading at the dock, the applicant will retain a licensed engineer to perform an independent engineering analysis and feasibility study. The engineer will determine the number of days per year it is safe and effective to preboom its transfers and will identify site-specific improvements that could increase the number of days. The applicant will submit the study to Ecology for review and approval before operations begin. If approved, the applicant will implement improvements from the study.</p> <p>If the study identifies no feasible alternative to improve the number of days it is safe and effective to pre-boom, or until the changes are in place, the applicant will implement the following alternative measures during petroleum oil transfers in addition to those measures already required by regulation:</p> <ul style="list-style-type: none"> – One spill response vessel with crew, skimmer, and at least 1,000 feet of boom at the dock. – On-water tank barge storage devices (not including bladders) pre-staged at the dock with the skimmer to ensure a minimum of 450 barrels of recovery ready to be deployed. 	Yes	<p>Potential for impact: The potential for a spill to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids are generally less persistent in the environment.</p> <p>Environmental commitment: Contanda will implement the measure as requested.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Environmental Health Risks – Terminal (On-Site)	The proposed action would increase the potential for environmental damage from an incident involving the spill of petroleum oil during on-site operations compared to the no-action alternative. Potential impacts are described in general terms in Section 4.7, Impacts on Resources, and apply to the resources described in greater detail in Chapter 3, Affected Environment, Impacts, and Mitigation Measures.	<p>To improve recovery in the case of a spill, equipment required at hour 6 under WAC 173–182–355 must be resident in Grays Harbor. Additionally, the applicant must purchase and stage the following equipment in Grays Harbor:</p> <ul style="list-style-type: none"> – An additional 200 feet of boom and temporary storage of at least 196 barrels with the ability to collect, contain, and separate collected petroleum oil from water. The additional boom should be capable of encountering oil at advancing speeds of at least 2 knots in waves. This boom will be of a type appropriate for the operating environment. – An additional 1,000 feet of shore seal boom. <p>To reduce the impacts from a spill, the applicant will establish and implement a procedure for blocking all drains on the dock prior to oil transfers and observing the area for discharges before removal. This best practice will be documented in the facility operations manual for approval by Ecology.</p>	Yes	<p>Potential for impact: The potential for a spill to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids are generally less persistent in the environment and would not be likely to be contained or recovered in a manner similar to crude oil.</p> <p>Environmental commitment: Contanda will implement this mitigation measure as an environmental commitment.</p>
Environmental Health Risks – Terminal (On-Site)	The proposed action would result in increased need for local emergency service response services that could exceed capacity.	<p>Fire-fighting capability inside the terminal will be dramatically improved by installing the following on all new tanks:</p> <ul style="list-style-type: none"> • Automatic flame detection systems • Automatic self-expanding foam systems. (these automated systems will notify the Hoquiam Fire Departments upon activation.) • Internal floating roofs for vapor control <p>The existing automatic flame detection and foam fire-fighting systems on the truck and rail racks will be extended to any new truck and/or rail loading/unloading stations.</p>	Yes	<p>Potential for impact: The revised project is proposing 1,100,000 gallons of storage in smaller 100,000 and 150,000 gallons tanks. In the revised project, crude oil is being replaced by refined products such as biodiesel (an NFPA class IIIB combustible liquid), renewable diesel (an NFPA Class IIIA combustible Liquid), Ultra low sulfur diesel (an NFPA class II combustible liquid), and gasoline (an NFPA Class I flammable liquid).</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
<p>Environmental Health Risks – Terminal (On-Site)</p>	<p>The proposed action would result in increased need for local emergency service response services that could exceed capacity.</p>	<p>Voluntary Measure—Supply three totes of alcohol-resistant aqueous film-forming foam at the project site for use by local fire departments.</p> <p>To improve preparedness for incidents, including spills, explosions, and fires, the applicant will ensure an emergency preparedness workshop is conducted prior to beginning project operations. The applicant will coordinate the workshop with Ecology. The workshop will be no more than 1 day in length and will be held prior to beginning operations and thereafter will become part of the facility drill program. The initial workshop will focus on familiarizing local emergency responders, tribes, and communities with the contents of the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response</p> <p>To improve response times and communication in the event of an incident that could affect tribal resources, the applicant will include tribal contacts (names and/or phone numbers) in notification protocols in the spill contingency plan.</p> <p>To reduce risks related to an explosion or fire on-site, the applicant will meet with local emergency management officials including representatives from the City of Hoquiam and City of Aberdeen Fire Departments to identify training needs for local responders who will respond to an emergency on the project site. This effort will include development and execution of a training program for those responders to increase level of awareness and understanding of the hazards associated with a rail tank car incident or a storage tank incident on-site. The training will include identification of notification protocols, use of personal protective equipment, and equipment deployment procedures. This training will be completed before the applicant begins receiving trains and will be offered at least annually.</p>	<p>Yes</p>	<p>Potential for impact:</p> <p>The potential for a spill to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids generally do not require the use of specialized foam for fire-fighting purposes.</p> <p>Environmental commitment:</p> <p>Nonetheless, Contanda will implement these as environmental commitments.</p>
<p>Environmental Health Risks – Terminal (On-Site)</p>	<p>The proposed action would increase the potential for environmental damage from an incident involving the spill of petroleum oil during on-site operations compared to the no-action alternative. Potential impacts are described in general terms in Section 4.7, Impacts on Resources, and apply to the resources described in greater detail in Chapter 3, Affected Environment, Impacts, and Mitigation Measures.</p>	<p>To reduce the risks and impacts from a spill, prior to beginning the proposed operations the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of spills, natural resource damages, and costs to state and affected counties and cities for their response actions. The study should address the factors in RCW 88.40.025, Evidence of Financial Responsibility for Onshore or Offshore Facilities, including a reasonable worst-case spill volume; the cost of cleaning up the spilled petroleum oil; the frequency of operations at the facility; prevention measures employed by the facility that could reduce impacts through spill containment, immediate discovery, and shutoff times; and the damages that could result from the spill (including restoration). The study should identify any constraints related to the commercial availability and affordability of financial responsibility. Based on the study, Ecology will determine the appropriate level of financial responsibility and require the applicant to demonstrate their financial responsibility to the satisfaction of Ecology. Proof of financial responsibility will be included as documentation in the applicant’s contingency plan.</p>	<p>Yes</p>	<p>Potential for impact:</p> <p>The potential for a spill to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids are generally less persistent in the environment and would not be likely to be contained or recovered in a manner similar to crude oil.</p> <p>Environmental commitment:</p> <p>Contanda will implement this measure as requested.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Environmental Health Risks – Rail Transport	The proposed action would result in increased need for local emergency service response services that could exceed capacity.	<p>To improve response times to reduce the initial impacts of a spill, the applicant will ensure that two trailers containing the spill response equipment listed below are available prior to beginning operations for use by initial local and emergency responders along the PSAP rail line. One trailer will be kept and maintained on site by the applicant. The second trailer will be offered to either the Quinault Indian Nation or the Confederated Tribes of the Chehalis Reservation.</p> <p>The second trailer and equipment will be maintained by the recipients if accepted for use. The equipment will only be provided to a Tribe government only if they agree to store the equipment in a secure location and ensure the equipment used by appropriately trained personnel. The applicant will work with Ecology and local emergency officials to update the Western Region Response List website (www.wrrl.us), any applicable spills response plans to address the emergency equipment caches and to document notification protocols, necessary training, use of personal protective equipment, and equipment deployment procedures.</p> <p>Mobile trailers should be of a specific size to hold the following equipment:</p> <ul style="list-style-type: none"> - 3,000 feet of river boom - 5,000 feet of sausage sorbent boom - 30 anchoring systems (anchors, lines, floats) - 20 shoreside anchoring systems - 1 towing bridle - 4 heaving lines - 1 machete (or other vegetation cutting tool) - 1 pair of bolt cutters - 50 sandbags - 1 roll plastic sheeting - 4 each plywood sheets (4 feet by 8 feet) - 500 feet 3/8-inch poly line <p>Personal protective equipment: coveralls or Tyvek® disposable suits, gloves, outer (chemical-resistant and disposable) boots, safety glasses or chemical splash goggles, and hard hats—sufficient for 5 people</p>	Yes	<p>Potential for impact: The potential for an incident to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids generally do not require the use of specialized foam for fire-fighting purposes.</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>
		<p>To reduce risks related to a spill, the applicant will not accept petroleum oil by rail until PSAP meets with local emergency management officials to identify training needs for local responders who will respond to an emergency on the PSAP rail line. This effort will include development and execution of a training program to these responders to increase level of awareness and understanding of the hazards associated with a train incident. The training will include identification of notification protocols, use of personal protective equipment, equipment deployment procedures. This training will be completed before the applicant begins receiving trains and will be offered at least annually.</p>		Contanda will implement this measure as requested.

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Environmental Health Risks – Vessel Transport	<p>Increased vessel transport related to the proposed action would increase the likelihood of an incident involving the spill of petroleum oil within Grays Harbor compared to the no-action alternative.</p>	<p>Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of sensitive species, to reduce the risk of incident from loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load petroleum oil to tankers or tank barges unless the vessels have tug escorts through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to ESHB 1449, Section 12, at which time the rules will apply to the proposed action.</p> <ul style="list-style-type: none"> - At least one tug must accompany a laden tanker or tank barge carrying petroleum oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures. - For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor. - Tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted tanker or tank barge. - Tugs must have sufficient mechanical capabilities to provide for safe escort. <p>To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load petroleum oil to tankers or tank barges unless the vessels supply Grays Harbor pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.</p> <p>To reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and, as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these procedures must include the following elements:</p> <ul style="list-style-type: none"> - Escort configurations and maneuvering characteristics of escorted tankers and tank barges. - Specific emergency connection and tethering procedures for connection of tugs to tankers and tank barges. - Specific maneuvers necessary for the tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering. - Appropriate safe speed of transit in Grays Harbor when tugs are tethered. - Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the tug can more effectively steer the vessel through the navigation channel upon incident. - Requirement for a pre-transit conference. - Refueling operations. <p>To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for petroleum oil tank barges described in this section.</p>	<p>Yes</p>	<p>Potential for impact: The potential for a spill to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, Contanda is committing to not handling crude oil as part of the proposed project, and the proposed bulk liquids are generally less persistent in the environment.</p> <p>Environmental commitment: Contanda will implement these measures as requested.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Environmental Health Risks – Vessel Transport		To reduce the potential for a spill from a vessel incident, the applicant will allow only tankers with independent fuel tanks (i.e., not located next to the hull) at the dock. To improve response times and increase coordination of responses, the applicant will develop and implement a program approved by Ecology to educate its tankers and tank barge customers on the reporting requirements for vessel incidents resulting in a threat of a spill under RCW 88.46.100, Notification of Vessel Emergencies Resulting in Discharge of Oil, prior to beginning the proposed operations.		Contanda will implement this measure as requested.
Environmental Health Risks – Vessel Transport	Increased vessel traffic related to the proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative. Potential impacts are described in general terms in Section 4.7, Impacts on Resources, and apply to the resources described in greater detail in Chapter 3, Affected Environment, Impacts, and Mitigation Measures.	To improve response times and communication in the event of an incident that could affect commercial or recreational fishing, the applicant will develop a method for provide information on potential incidents to commercial and recreational fishing boats and will describe this measure in the oil spill contingency plan prior to beginning operations.	Yes	<p>Potential for impact: The potential for an incident to occur would be lower by comparison because of the lower proposed total annual throughput and the fact that Contanda would not handle crude oil.</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>
Environmental Health Risks – Vessel Transport	The proposed action would result in increased need for local emergency service response services that could exceed capacity.	Voluntary Measure— Supply three totes of alcohol-resistant aqueous film-forming foam at the project site for use by local fire departments.		<p>Potential for impact: The potential for an incident to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids generally do not require the use of specialized foam for fire-fighting purposes.</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>

Environmental Resource	Westway Project Potential Impact	Recommended Applicant Mitigation Measure(s) to Address Impact from the Westway Expansion Project EIS or as Subsequently Developed in Coordination with the City and Ecology	Potential Unavoidable and Significant Adverse Environmental Impacts in Westway Expansion Project EIS?	Comments
Environmental Health Risks – Vessel Transport	Increased vessel transport related to the proposed action would increase the likelihood of an incident involving the spill of materials within Grays Harbor compared to the no-action alternative.	To improve vessel management and reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and participate as an active member of the Grays Harbor Safety Committee (https://www.portofgraysharbor.com/harbor-safety/index.php) and work to implement the recommendations for waterway management detailed in the recently completed Grays Harbor Vessel traffic Risk Assessment (https://www.ezview.wa.gov/site/alias_1962/view_our_committees_grays_harbor_vtra/37194/grays_harbor_vtra.aspx).	Yes	<p>Potential for impact: The potential for a spill to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, Contanda is committing to not handling crude oil as part of the proposed project, and the proposed bulk liquids are generally less persistent in the environment.</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>
Environmental Health Risks – Vessel Transport	The proposed action would result in increased need for local emergency service response services that could exceed capacity.	To improve marine firefighting capabilities in Grays Harbor, the applicant will enter into a memorandum of understanding (MOU) with Brusco Tug & Barge, Inc., located in Grays Harbor, for marine firefighting capacity. The MOU would state that in the event of a vessel or dock fire at the Contanda terminal, Brusco Tug & Barge would respond with their tug to provide marine fire-fighting assistance. The MOU will be in place prior to operation at the expanded facility.		<p>Potential for impact: The potential for an incident to occur would be lower by comparison because of the lower proposed total annual throughput. In addition, the proposed bulk liquids generally do not require the use of specialized foam for fire-fighting purposes.</p> <p>Environmental commitment: Contanda will implement this measure as requested.</p>
Economics, Social Policy, and Cost Benefit Analysis	Operation of the proposed action could result in an increased need to establish ways to provide and share information with the public and City of Hoquiam.	<p>The applicant will appoint a community liaison to consult with affected communities, businesses, and agencies; develop cooperative solutions to address local concerns; be available for public meetings; and conduct periodic public outreach. The applicant will provide the name, telephone number, and email address of the community liaison to mayors and other local officials in each community through which the PSAP rail line passes.</p> <p>The applicant will appoint a tribal liaison to assist in addressing issues of concerns to federally recognized tribes, develop cooperative solutions to tribal concerns, be available for tribal meetings, and conduct periodic outreach. The applicant will provide the name, telephone number, and email address of the tribal liaison to officials of each tribe that wish to be notified.</p> <p>The applicant will submit quarterly reports to the City of Hoquiam on the progress of, implementation of, and compliance with all mitigation measures. The reporting period for these reports will begin the first quarter after permit issuance and continue quarterly through the first year of project operations, after which the applicant will submit a report annually through the first 5 years of operation.</p>	No	<p>Potential for impact: The proposed project could similarly result in the increased need to provide and share information with the public and the City of Hoquiam.</p> <p>Environmental commitment: Contanda commits to sharing and updating each affected organization as needed on the proposed project.</p>