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to ogc.writtensubmissions

Questions for the BC Oil & Gas Commission:

We have been following the progress of the Woodfibre project and a number of stakeholders from Howe Sound attended the third workshop of the Oceans Protection Plan Pacific Dialogue Forum hosted by Transport Canada. At each of the meetings we continue to seek answers to questions from Federal and Provincial agencies about safety concerns related to the Woodfibre LNG project. A recent announcement in the press states Woodfibre LNG intends on starting construction Q1 of 2019. We are not confident the gaps in oversight and regulation are filled between the different agencies responsible and there is too much reliance on the proponent. We are concerned the proponent's main concern is their business and their employees, less so the environment and the public, this terminal is not under any Port authority or third party Management, and explosions and fires at terminals and gas pipelines do happen so our concerns should be taken very seriously.

We understand Woodfibre has applied to BC Oil and Gas Commission for permitting and the project is in the review stage. We have the following questions for the regulators:

1. The TERMPOL report from Transport Canada issues recommendations for Terminals which would relate to safety. Will BC Oil & Gas review this final report prior to permitting? We understand the TERMPOL review is on hold and it is uncertain when it will resume. This report should be made public prior to BC Oil & Gas permitting in order to allow time for the public to comment.
2. Has a final Qualitative Risk Assessment been conducted? What is the order and timing of final design of the terminal and this assessment? This document should be made public.
3. We understand the two re-purposed gas tankers owned by Pacific Oil and Gas now located in Malaysia will be considered part of the terminal solely regulated by BC Oil and Gas Commission, not Transport Canada. We are very concerned about the safety of this floating storage facility, it is unprecedented to have two floating tankers side by side storing large amounts of this hazardous material. This question for BC Oil & Gas Commission:
  - 3.1 Who monitors the ships' condition? We understand the storage of liquefied gas required certain conditions inside the tanks to be maintained due to the brittleness of the inside of the container.
  - 3.2 We are concerned about the cascading effect of a fire in the storage tankers. How is this addressed?
  - 3.3 Should an accident occur, who is responsible for containing fire if it burns beyond the specific site, i.e. to the other FSU or to the surrounding forest? According to the Preliminary QRA included in the Environmental Assessment application, "due to the inventory of the FSO storage tank, the pool fire event would pose a risk outside the plant boundary".
  - 3.4 We were told Canada has yet to ratify the HNS protocol agreement and that, even when ratified, it only covers vessels registered in signatory countries. Who pays should there be a catastrophic loss occurring from an accident?
  - 3.5 During an early Hazard ID meeting there were concerns about the functioning of the loading arm. What design changes have been made to address this concern?

3.6 Will restrictions be imposed (as there are in all major LNG terminals) that require loading to cease, and tugs be available to pull the recipient tanker away from loading dock, in windy conditions.

3.7 Where will these tankers be bunkered for their voyage back to Asia (there are no LNG tankers that run on boil-off gas alone)?

3.8 what coordination with local emergency authorities will be required - to deal with emergencies (similar to Europe's SEVESO protocols)?

The Society for International Gas Tankers and Terminals have recommendations for safety. During the review period we raised concerns that this project did not meet the recommendations.

#### 1.4 Port Services:

Fire fighting services comprising specially equipped craft, or, one or more suitably equipped tugs should be provided.

WFLNG Response: *Woodfibre LNG will have a tugboat equipped with firefighting capabilities at the Woodfibre site as well as additional docking space for vessels associated with the project.*

Comment: High-density foam is required to put out an LNG fire however these specifics have not been described by Woodfibre in regards to the onsite tugboat. More detail should be provided to confirm adequate high-density foam is available to fight a major fire from the water.

Breakwaters should be constructed for jetty areas exposed to sea action, such as excessive waves and currents.

WFLNG Response: d. *There are currently no plans for a breakwater.*

Has BC Oil & Gas confirmed the weather and wave conditions or are they relying on the other agencies and the proponent?

Thank you for responding to our questions, we look forward to the response from BC Oil & Gas Commission.

Regards

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