

**From:** [David McRae](#)  
**To:** [Kitimat Clean Refinery / Raffinerie de Kitimat Clean \(CEAA/ACEE\)](#)  
**Subject:** Kitimat Clean Refinery Comments  
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## Kitimat Clean Refinery Comments—

After reading the CEAA Draft Guideline for the Kitimat Clean Refinery EIA and rereading the Project Description by Hatch, I find that I have many concerns and downright fears regarding this project. Some of which are as follows.

1: The two most Valued Components, our Air shed and Water Shed of the Kitimat valley will be drastically degraded over the life of this project alone. No amount of regulation or mitigation will be able to prevent this. Toxic plant emissions from all the flair and incinerator stacks (heavy metals, SO<sub>2</sub> etc.) will accumulate on the mountain sides and valley bottom to eventually contaminate the flora and fauna and all other receptors then will be transported downstream during spring freshets adding dissolved heavy metals and lowering the PH levels at a bad time for emerging fry.

2: What criteria will be used in determining that the removal of 125000bpd of groundwater is sustainable and not detrimental to downstream users during prolonged low water conditions? (Drought, winter cold snaps etc.) What is the groundwater recharge rate during these type of conditions? Hatch mentions that no degradation of surface water quality is expected during normal plant operations but does not mention what the possible draw down effects will be of the Wedeene Rivers where they meet the Kitimat River. Or even the overall effect to the Kitimat River. This could prove to be substantial.

3: The close proximity of the plant to the people of the area exposes us to uncontained, accumulating Bitumen fumes from the tank farm during times of hot, slow moving air that becomes trapped in the valley. The need for long term human health studies is evident here.

4: I have great concerns that regulators (OGC and MOE etc.) may become captured in a way that may allow this project to advance without the close scrutiny it so richly deserves. The recent happenings in Alberta with Encana, Baytex Energy and AER come to mind. As a result I have lost trust with the NEB and regulators.

5: Another big concern the EIA needs to address with close scrutiny is whether or not this whole project is really economically viable. To find out half way through construction, or the first two years of production that this project needs heavy financial support from federal or provincial governments will be disastrous. We don't want to be subsidizing this project with taxpayer dollars or even relaxing regulations as cost saving measures. If this project cannot stand on its own financially and economically it should not be allowed to proceed. It

is just too much of a gamble. Especially as this whole project is very much an experiment by a proponent with very little expertise and experience in this field.

- 6: The citing of this project just a short distance upstream from our town and industries water intake supply is quite problematic as it is all put in jeopardy by this proposal. Should there be an unanticipated release of product (bitumen or refined) that finds its way to the Kitimat River these water intakes will have to be shut down immediately for an unknown amount of time to prevent contamination of the delivery systems.

This scenario would leave our town without (among many other things) adequate fire protection and the ability to flush our toilet's when the storage tanks run dry. In addition the local aluminum industry may incur a considerable loss of production during this time.

- 7: There will be unwanted effects from the accumulating plant emissions for observing the night sky.

The emissions from all the flair and incineration stacks will add vast amounts of particulate matter to the atmosphere only the brightest of stars overhead will be observable. Those star fields below the zenith or near the horizon will be obscured behind this haze of particulate matter.

- 8: The CEAA would be right in requiring the proponent(s) to include all emissions from this project. That would also include the third party natural gas pipeline and its upstream effects. The process by which the proponent will be using to process 400000bpd of bitumen for 50 years uses far more energy than some other processes and as a result has a much larger carbon footprint than needed.

This whole proposal flies in the face of what our federal government (and others) are wanting to achieve within the Paris Accord. This project alone will make that goal impossible.

- 9: The proponent is proposing the use of VLCC in the transporting of his refined products through B.C. inland waters and confined channels. This tells me that the proponent(s) has no knowledge, no understanding or worse yet doesn't care what transpired with the signing of the document to protect the Great Bear area of our coast. To suggest using VLCCs is showing disdain for the people who are bound by tradition to protect the Great Bear.

Thank you for your time. David G McRae Kitimat B.C.