

## Anita J. Thomas

TO: Department of Ecology, 401 Certification Staff

I am concerned that specific aspects of water quality may not be adequately protected in the 401 certification process now under consideration. Further, I am not convinced that the monitoring of water quality, either during construction or during operation itself, would be objective and adequate.

First, the Columbia River is already burdened with numerous effluents from harmful sources. These include, among others, the Columbia Generating Station, the old Hanford site, and various industries, especially in Portland and Vancouver. The river water quality is already fragile before it reaches Longview and Millennium and needs extraordinary protection rather than further damage from the proposed MBTL.

More specifically, the water quality of the Columbia and the local groundwater sources in the Longview area would be adversely affected by the mud and coal sediment that would leach into the water system. This contamination could happen by several means. The regular discharge from the construction and operation could cause unhealthy increases in water turbidity, which would be particularly hazardous to salmon and other wildlife. In addition, coal dust could be washed into the river by trains unloading their cargo, by rainfall, and by landslides. Coal dust itself would be the major part of the turbidity in the Columbia River, mentioned above. Additionally, the coal dust is especially pernicious because it would increase acidity in the Columbia from carbonic acid. There are numerous other nasty chemical agents that are involved in the construction and operation of the proposed facility, which would further pollute the Columbia and the ground water.

Finally, I am deeply concerned that there will be inadequate monitoring of the water at this site on an ongoing basis. Budget cuts often result in decreases of oversight from government officials. Any monitoring of water quality by MBTL itself would not be credible because of the built-in conflict of interest involved.

For these and numerous other reasons, I exhort you to deny this Section 401 Water Quality Certification.