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The following three security issues present significant potential risks not only in Kalama and Cowlitz County, but to our state as well. The common thread tying the three together is foreign ownership and management of the proposed KMMEF refinery in Kalama.

Before discussing the three risk factors, I will clarify who owns and would manage the NWIW refinery.

NWIW LLC (WA Secretary of State ♦ no active L&I license ♦ no covered employees) is majority or wholly owned by a U.S. company called Pan-Pacific Energy Corp. (PPE) Delaware LLC. This corporation is registered with the WA Secretary of State ♦ UBI 603 371 412 as a Foreign Profit Corp. with 11-20 workers. PPE is majority or wholly owned by a Chinese company called Shanghai Bi Ke Clean Energy Technology Co. Ltd. (commonly called "CECC". Most shares (45%) of CECC are owned by the Chinese Academy of Sciences Holdings Co. Ltd. (CASH), which is a state-owned company and the investment arm of the Chinese Academy of Sciences, a Chinese government agency. The other significant (44%) shareholder in CECC ♦ called Double Green Bridge Hong Kong ♦ appears to be composed of managers of CASH. The Chinese Academy of Sciences controls the methanol proposal and merely "uses the dab of Northwest Innovations Works." The Chinese government has legal or actual control over NWIW.

Having learned that this whole endeavor would be owned and operated by the Chinese government, I find the three security risks listed below of grave concern and urge Ecology to address them in preparing for the FSSEIS.

1. Foreign Control of Infrastructure

The future viability of our three key arterials (rail, interstate and water) could be in question if this refinery is built. This threat to our infrastructure systems has to do with size, location and ownership.

There are seven methanol refineries in the U.S. The largest is on 1,000 acres, and the smallest on 230 acres to provide sufficient buffer should there be a spill or explosion. The proposed Kalama refinery is almost as large as all seven existing methanol refineries COMBINED! Knowing this, the size and location of the NWIW refinery could not be worse.

This proposed world's largest fracked gas-to-methanol refinery would be built on a mere 92 acres, literally adjacent to BNSF rail line, approximately an 1/8 of a mile from I 5 and on and in the Columbia River with no buffer protection of additional acreage! Should there be a worse-case explosion at the refinery, all means of transportation (rail, interstate and water) for commerce, first responders and personal use would be destroyed leaving the northern and southern sections of I 5 and BNSF rail completely cut off at Kalama taking years to replace at an astronomical price.

It is important to remember that this is not a harmless widget factory. This refinery could best be described as a toxic, volatile petrochemical behemoth encompassing the entire 92 acre site.

To understand the potential dangers inherent in a facility like this, I will briefly discuss a few of those dangers.

NWIW assures that the methanol storage tanks are designed to withstand a 9.0 earthquake. Considering these eight 105' x 145' tanks, each holding 9.4 million gallons of volatile methanol, would be located on: soils with a moderate to high risk of liquefying in an earthquake; the same fault line that shut down Trojan; 36 years of dredged spoils (fill); a designated floodplain....defies logic! Fill, floodplain, fault line. A true 'perfect storm' for disaster!

BNSF passenger service speeds past the east end of the refinery at 79 MPH. Two of the massive 9.4 million gallon methanol storage tanks are located at that far NE corner of the site close to the BNSF tracks. Train service numbers approximately 39 trips a day of varying types. The thought of one derailment into those storage tanks is horrifying.

Another area of concern is the proposed 24" fracked gas pipeline needed to service the refinery. This line would run under the BNSF tracks and all six lanes of I 5. Soils are questionable in this area concerning movement putting pipelines at risk for rupture and explosion. I vividly remember witnessing the rupture and explosion in 1997 of the NW Pipeline due east on the Kalama River hillside at Mahaffey. The fireball could be seen for miles and pelting rock and debris showered down a mile away.

Tragically, there could also be numerous threats to our beautiful Columbia River from increased shipping traffic to and from the refinery. 800' - 1,000' Panamax ships (unaccustomed to the Columbia River) carrying 14 million gallons of methanol would make 72 - 144 round trips in the river's rather shallow 43' channel. More unsettling is knowing that a minute spill of only a gallon of methanol into 198,000 gallons of River water would kill all marine life!

2. Foreign Control of a Major Energy Asset

If this refinery is approved, another glaring security risk would be the staggering amount of fracked gas consumed each day ♦ more than all gas powered plants in WA; more than all industry in WA; more than all homes; more than all commercial businesses in WA. At this massive consumption rate, WA residents and industry would be competing with the Chinese government for our own resources! This exploitation by China of our natural resources would create long-term impacts on U.S. energy resources creating a national security risk.

The stark reality for Washingtonians is this... if the Kalama methanol refinery gets built, China will control ALL of the excess fracked gas capacity in the state. Thereby controlling ALL new or existing gas industries future plans to build or expand here in WA. Is this the future we want to see for our state?

3. Foreign Ownership and Entanglements

The unvarnished truth: The government of China wants methanol and they are using our money and our resources to get it!

The Chinese government's quest to control the world's technology and energy natural resources by 2030 was recently highlighted by Attorney General Barr: "The ultimate ambition of China isn't to "trade" with the United States. It's to "raid" the U.S."

This refinery proposal is a prime example of Attorney General Barr's remarks. China's voracious appetite for our vital natural resources would unequaled!

To add insult to injury, are China's numerous brazen schemes to make sure Washington taxpayers and U.S. taxpayers pick up the "tab" for the cost of the entire project.

One of the most blatant and outrageous schemes: NWIW wants U.S. taxpayers to bear the full financial risk up to \$2.1 billion if the refinery fails! NWIW is asking the U.S. Department of Energy for a loan guarantee. If NWIW goes bankrupt, the federal government (U.S. taxpayers) could be responsible for paying some or all of the \$2.1 billion cost of building the methanol refinery.

China's evading financial responsibility for the building costs of the refinery go hand in hand with ensuring that financial responsibility for any accidents or any worse-case explosions at the refinery would be minimized and capped thru Limited Liability Co. designations for NWIW and its parent company Pan-Pacific Energy Corporation, a Delaware LLC. Just one more way Kalama, Cowlitz County and Washington state will "be left holding the bag" courtesy of China!

It should be noted that according to NWIW, the refinery components would be built in China and assembled here. One more half truth promised to local union workers. So much for "Made in America". With China you get "Assembled in America". And with "Made in China" you get China's specifications and quality (?) controls not ours!

I urge Ecology to be mindful of these three security risk issues that I have previously detailed. I believe that they have been overlooked during the entire five-year EIS process.

I thank you for extending the public comment period and ask you to deny the permit.