



Alachua County Board of County Commissioners

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County Manager

July 1, 2019

Mr. Ryan Paquet
Docket Management System
U.S. Department of Transportation
W. Bld., Ground Floor, Rm W12-140, Routing Symbol M-30
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket Number PHMSA-2019-0100-0002

Special Permit for the transportation of Methane, Refrigerated Liquid (LNG) by rail tank car

Dear Mr. Paquet,

The Alachua County Board of County Commissioners approved a motion at their June 18, 2019 meeting to provide comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) on the above referenced special permit request. The special permit is in response to a request from Energy Transport Solutions, LLC seeking authorization to transport "Methane, Refrigerated Liquid" (UN1972), commonly known as liquefied natural gas (LNG), in a rail tank car. Specifically, the request is to authorize shipment of LNG in a DOT specification 113C120W tank car subject to certain operational conditions.

Alachua County staff has reviewed the draft DOT-SP 20534 Special Permit and draft SP 20534 Environmental Assessment. The documents reviewed indicate that:

1. LNG is currently transported via pipeline, MC-338 cargo tanks by truck or in ISO portable tanks via highway or by rail. Transporting LNG in ISO portable tanks by rail requires an approval from the Federal Rail Administration (FRA).
2. DOT-113C120W tank cars are currently authorized to transport other cryogenic flammable liquids (e.g. cryogenic liquid ethylene). The DOT-113 specification rail tank car is specifically designed for the transport of cryogenic liquids. The tank car design has been in use for over 50 years, and it has an excellent safety record. There are only two documented derailments and breach of the tank holding the cryogenic material from the DOT-113C120W specification tank car.
3. The PHMSA's draft authorization approval does not remove any of the existing requirements for the transportation of Hazardous Materials, including compliance with the "Recommended Railroad Operating Practices for Transportation of Hazardous Materials (Association of American Railroads OT-55). The draft authorization does not include any new requirements for the transportation of LNG in DOT-113C120W tank cars by rail.

Two factors that can contribute to the occurrence and severity of train derailment accidents are speed of the train and number of rail cars. AAR OT-55 recommends a maximum speed of 50 mph for LNG carrying unit trains. OT-55 does not specify a recommended maximum number of rail cars. The draft Environmental Assessment performed by the PHMSA indicates that the applicant expects to use 100 rail cars.

Alachua County recommends that the PHMSA includes specific conditions in the Special Permit to:

1. Limit the maximum number of rail cars used for the transportation of LNG.

Please contact Chris Bird, Environmental Protection Department Director at (325) 264-6806 or chris@alachuacounty.us if you have any questions or need additional information regarding this letter.

Sincerely,



Charles S. Chestnut, IV, Chair
Alachua County Board of County Commissioners
Chr19.078

- cc. Michele Lieberman, County Manager
Sylvia Torres, County Attorney
Scott R. Koons, North Central Florida Regional Planning Council
Dwayne L. Mundy, North Central Florida Local Emergency Planning Committee
Jeff Lane, Gainesville Fire and Rescue
Harold Theus, Alachua County Fire and Rescue
Chris Bird, Alachua County Environmental Protection Department