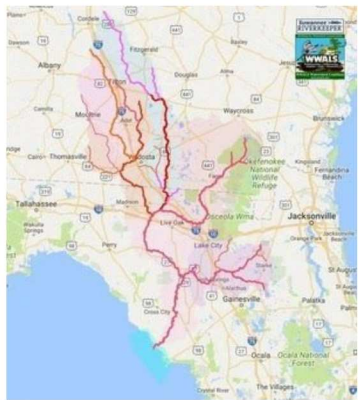


January 13, 2020

To: William S. Schoonover  
Associate Administrator  
Hazardous Materials Safety  
Pipeline and Hazardous Materials  
Safety Administration (PHMSA)  
<http://www.regulations.gov>

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Re: Docket No. PHMSA-2018-0025 (HM-264),  
NPRM Hazardous Materials: Liquefied Natural Gas by Rail

Dear Administrator Schoonover,

Suwannee Riverkeeper for WWALS Watershed Coalition asks PHMSA not to follow the bad precedent of PHMSA Special Permit DOT-SP 20534, that authorized Energy Transport Solutions, LLC (ETS) to transport Liquefied Natural Gas (LNG) in DOT-113C120 tank cars between Wyalusing, PA and Gibbstown, NJ, with no intermediate stops. Instead, we ask PHMSA to reject the subject NPRM, HM-264, Docket No. PHMSA-2018-0025, by taking an Alternative 1: No Action.

We submit the following reasons for rejection of this proposed rule:

1. Low crash rates is not a sufficient reason to risk leaks or explosions that could require evacuation for a mile around and possibly set fires, nor the risk of odorless, colorless, evaporated LNG asphyxiating rail workers or still cold LNG causing freezing, burning, or explosions.
2. The National Transportation Safety Board (NTSB) in a comment submitted to PHMSA December 5, 2019, says the evidence does not support PHMSA's assumption of minimal volume and frequency of LNG by rail. PHMSA fails to address trains of many LNG rail cars. Such a block or unit train could result in a catastrophic failure much more severe than a single LNG rail car, possibly including a Boiling Liquid Expanding Vapor Explosion (BLEVE). NTSB points out that even if volume and frequency were minimal and only single LNG rail cars were used, even at the start, operational controls for safety of workers, the public, and the environment would be required that are not in the PHMSA rulemaking.
3. Few, if any, cities, counties, or states along rail lines that would carry LNG have risk management plans that deal with LNG leaks, wrecks, or explosions. The comment letter of December 20, 2019, filed by the Fire Chief of Zion, Illinois, points out many risks, including one that few local fire departments have contemplated, much less planned for: "the LNG will seek low lying areas outside of its container including but not limited to terrain and potentially basements where ignition sources (i.e. gas furnaces, gas water heaters, fireplaces) are found. This contributes greatly to the risk of a gas release becoming a gas fire."
4. Safety studies are lacking. For example, the Federal Railway Agency (FRA) is currently testing DOT-113 tanker cars for survivability. Those test results will not be available before the end of the comment period on PHMSA-2018-0025 (HM-264). The National Association of State Fire Marshals (NASFM) in a comment in this docket on December 17, 2019, wrote, "Our opposition is predicated on the lack of evidence and research that allowing such an action as