

## **CASE IN POINT (#7): American LNG Marketing, Titusville, Florida, May 29, 2015**

The U. S. Department of Energy authorized LNG exports from this American LNG Marketing, Titusville, Florida, facility (“Titusville”) that, if constructed and operated, would have been in violation of Title 49, Subpart B, Part 193.2155(b).

### **A. Citizens advised PHMSA of lack of environmental oversight**

Citizens contacted PHMSA’s Legal Department, and PHMSA required the applicant to provide an Environmental Assessment. If the Titusville facility had been under FERC oversight, FERC would have required that Environmental Assessment.

“An LNG storage tank must not be located within a horizontal distance of one mile (1.6 km) from the ends, or 1/4 mile (0.4 km) from the nearest point of a runway, whichever is longer. The height of LNG structures in the vicinity of an airport must also comply with Federal Aviation Administration requirements in [14 CFR Section 1.1](#).”<sup>22</sup>

The U. S. Department of Energy granted a Long-Term, Multi-Contract Authorization to American LNG Marketing to export LNG from a proposed facility in Titusville, Florida.<sup>23</sup>

If constructed and operated without a Variance from the PHMSA, the facility would have been in violation of Title 49, Subpart B, Part 193. Citizens retained an attorney to ensure compliance with all of the Federal Safety Standards for Liquefied Natural Gas Facilities: see [Exhibit G](#). As of October 2, 2018, PHMSA had not received the relevant site drawings, maps and other supporting documents (see

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<sup>22</sup> Title 49, Subtitle B, Part § 193.2155(b) Structural requirements, Accessed October 3, 2022, <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-D/part-193/subpart-C/subject-group-ECFR6eaa9429e2079dc/section-193.2155>

<sup>23</sup> UNITED STATES OF AMERICA DEPARTMENT OF ENERGY OFFICE OF FOSSIL ENERGY - AMERICAN LNG MARKETING LLC - FE DOCKET NO. 15-19-LNG - ORDER GRANTING LONG-TERM, MULTI-CONTRACT AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS IN ISO CONTAINERS LOADED AT THE PROPOSED TITUSVILLE FACILITY IN TITUSVILLE, FLORIDA, AND EXPORTED BY VESSEL TO FREE TRADE AGREEMENT NATIONS - DOE/FE ORDER NO. 3656 - MAY 29, 2015 <https://www.energy.gov/sites/prod/files/2015/05/f22/ord3656.pdf>