

Rail LNG model letter briefest 8 2 19

I submit this comment to the U.S. Pipeline and Hazardous Materials Safety Administration (PHMSA) on the application by the company Energy Transport Solutions LLC for a special permit to transport liquefied natural gas (LNG) by rail. This permit would allow LNG to be transported in unit trains as much as 100 cars long for the express purpose of moving the LNG to export facilities across the continent.

As a resident of a major rail corridor state, where these trains carrying this dangerous LNG cargo would travel, I oppose issuance of this permit on the grounds that it poses unacceptable threats to human health and safety, as well as offering new potentially attractive targets, especially for urban terrorism.

To date, the Federal Railroad Administration (FRA) has kept bulk transportation of LNG by rail tank car in the “Forbidden” category of the federal Hazardous Materials Table. This should be maintained:

- 1. The long and hard-to-handle unit trains proposed are similar to the notorious crude oil unit trains. And the tank cars being proposed have not been demonstrated to be safe for this purpose.** The DOT-113 cryogenic tank car is a fifty year-old design which has never before been authorized for LNG service.
- 2. In case of an accident, LNG-by-rail can cause catastrophic fires and explosions.** The permit application would establish no restriction on routing of LNG unit trains through population centers.
- 3. In case of an accident, first responders would be unable to control the resulting fires and explosions.** An unignited dense flammable cloud 600 times larger than the tank car volume could reach far into communities before ignition/explosion. As PHMSA noted, the whole cargo will immediately escape: “Response and mitigation techniques beyond evacuation for breaches in cryogenic tank cars do not exist or are impractical during a derailment scenario... Incidents are rare, though rail impacts can be high-consequence, given the quantity of hazardous materials in transportation.” The LNG cargo is not even odorized for recognition by employees and first responders.
- 4. LNG-by-rail builds demand for fracked gas. That is life-threatening.** Natural gas is primarily methane, and methane is a powerful driver of climate change, more potent in warming the atmosphere than any other fossil fuel. Investing in LNG postpones our society’s highly necessary and urgent transition to renewable energy sources.

Sincerely,