

William Schoonover
Associate Administrator for Hazardous Materials Safety
Pipeline and Hazardous Material Safety Administration
U.S. Department of Transportation, East Building PHH-30
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Mr. Schoonover:

On behalf of our [hundreds of thousands] of members, who include health and medical professionals, scientists, environmentalists and concerned members of the public, we write to request a prompt extension of the deadline for comments to your agency on the draft Environmental Assessment for proposed Special Permit SP 20534. This Special Permit would allow Energy Transport Solutions, LLC to transport “Methane, Refrigerated Liquid” (UN1972), commonly known as liquefied natural gas (LNG), by DOT-113C120W rail tank cars in unit train or manifest train service.

We are concerned that inadequate attention has been paid to the potential posed by LNG transport by train for severe fire and safety risks to communities from LNG train derailments, fires, explosions, and other hazards.

In the case of an LNG train derailment and release of LNG, the LNG would likely return to vapor form, quickly forming a vapor cloud that could ignite and cause an intense fire, potentially affecting people, property, and natural resources. If the LNG failed to ignite initially, the unignited LNG vapor cloud could move over a large distance, find an ignition source, and burn back to the point of the LNG release. The consequences could be deadly.

We note the relatively recent oil train derailments that have taken place in North America—such as Lac Megantic, Quebec, Mosier, Oregon, and over a dozen other communities—that demonstrate the potential that rail-related accidents can and do lead to health hazards, public safety risks, environmental damage, and even fatalities.

The comment period for the Environmental Assessment is currently set to close on July 8. Given the potential for grave impacts on human health potentially associated with LNG transport by rail, and the paucity of data and analysis provided on those concerns in the Environmental Assessment, we respectfully request an extension of the comment period to 90 days so that we and other interested parties can gather the information necessary for informed comments and submit our comments in timely fashion.

Sincerely,