

REF: UG-151443

Captain R.D. Manning

Aug 1, 2016

Chief, Port & Facility Compliance

I wanted to thank you for your response to my letter earlier this month concerning the LNG facility being proposed by PSE in the tide flats of Tacoma, WA. It was very informative and I appreciate the time and effort you put into the response. After reading your response, it is evident that the Coast Guard is not totally responsible for the permits required to approve the LNG facility. After acknowledging that fact, the Coast Guard does have a significant safety and security responsibility. With that in mind, I would like to appeal the Letter of Recommendation (LOR) for the project. I will copy the COTP with this request also. I am directly affected by this action because I live less than 0.5 miles away as do a great number of other residents.

My grounds for appeal start with the regulations defined below.

The regulations in 33 CFR Part 127 are issued under the Ports and Waterways Safety Act of 1972 (PWSA) (33 U.S.C. Sect. 1221-1232), and apply to structures that are located in, on, or under the navigable waters of the United States or any structure on land, or any area on shore immediately adjacent to such waters, used or capable of being used to transfer LNG, in bulk, to or from a vessel.

There are several items that require substantial considerations that make it extremely dangerous to the plant site and the surrounding areas.

1. PSE has refused to share any modeling that shows any danger zones that would be created from a spill or leak. They have been ordered by the court to provide the information to the public, but they are appealing the court order. Their contention is that there is no potential for a leak to cause damage outside of their property line which is about 500 feet. While the Coast Guard may not be directly responsible for the potential leak from their 8 million gallon storage tank, you do have the authority to look at any potential leak from the marine vessels that would be fueling at the site or the tanker barges that are proposed. To complicate matters even more, the LNG facility is located very close to another fossil fuel storage facility with about 40 million gallons of fuel. Targa Sound Terminal is less than 0.5 miles away. Even your own document requires 300 meters from a LNG loading flange so that the heat flux does not cause structural damage. (33 CFR 127.105) I would request that your preferred technical expert, Sandia National Laboratories, examine the proposal to insure any claims made by PSE are fact based and not just the best case scenario they want to present. Most Sandia models for LNG leaks show the risk of about a 3 mile radius for a potential vapor cloud explosion. The footnote on the PSE map with the 500 foot danger zone states that it was from a model for a refrigerant leak.
2. PSE claims there is no possible threat from an explosion and that any accident would be contained within the plant site. They claim their designs with double walled construction and dikes and barriers it would contain any leaks. At the same time they are arguing in court they do not want disclose any plant details or modeling because it would be too much information to

divulge to potential third parties, such as terrorist, that might want to attack the plant. Their logic or their information is flawed and should be exposed. Homeland Security does consider LNG plants a prime target for terrorist and Tacoma is one of the largest ports in the US. Again Sandia might be able to clarify any discrepancies.

3. Besides the businesses and residents that are exposed to any possible fire or explosion, the whole area is environmentally sensitive. There are considerable wetlands surrounding the waterway, a bird sanctuary, duck and geese refuges and bald eagle nesting areas.
4. Lastly, the location for cargo ship refueling appears to be poorly selected. It is in a rather narrow channel that will have considerable traffic during the refueling.

All these things, I believe, fall under the jurisdiction of the Coast Guard. For security, safety and environmental reasons, this plant should not be allowed at this location. Please review the LOR that was issued to PSE. I hope you will find the information that was presented by PSE lacking, misleading and in some cases untruthful. A third party review by an independent agency such as Sandia National Laboratories would go a long way to get the correct information.

Please advise me of your thoughts.

Thanks for your consideration.

Steven R Storms

1316 Browns Pt Blvd NE

Tacoma, WA 98422

253 202-9925

CC: Secretary Jeh Johnson

Lieutenant Francis O'Brien

Lieutenant Dan McQuate

WUTC