



COMMONWEALTH OF MASSACHUSETTS
TOWN OF ACUSHNET
122 MAIN STREET, ACUSHNET, MA 02743
LNG ADVISORY COMMITTEE

TEL.: (508) 998-0250
FAX: (508) 998-0203

Mr. Jeffrey R. Martin
Director, Project Planning and Siting
Eversource Energy
56 Prospect Street, 56P-1
Hartford, CT 06103

April 14, 2016

Dear Mr. Martin:

The Acushnet Citizens Advisory Committee thanks you and representatives of Access Northeast for accepting our invitation to participate in a question and answer session at our April 26, 2016 meeting. Via email you had requested that we provide you with a list of topics likely to be discussed in order to ensure that the right people are available to address specific questions. While it is not our intention to be limited to questions provided in advance, I will be submitting to you topics committee members have submitted for your review.

The purpose of this letter is to single out one area of specific concern that we would like addressed at our April meeting or sooner, if you desire. It has been learned that the pertinent federal regulations that govern the siting of new LNG facilities incorporate standards established in the National Fire Protection Association's (NFPA) "Standard for the Production, Storage and Handling of Liquefied Natural Gas." This standard is referred to as NFPA 59A. It is our understanding that federal code has incorporated eleven (11) references to the 2001 edition and two (2) references to the revised 2006 edition of 59A. Since that time the standard has been revised several times including most recently in 2015.

As you know, the siting of LNG tanks within the facilities property line is governed by federal code and the referenced sections of NFPA 59A (2001) Chapter 5. Risk assessment requirements for siting decisions fall under the "Prescriptive" category. Vapor dispersion and radiant heat flux are two of the criteria used to determine the actual placement of new storage tanks. In order to meet prescribe directives mitigation actions may be required.

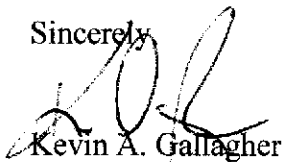
Mr. Jeffrey Martin
April 14, 2016
Page 2

As we now know, the NFPA has developed an alternative to the prescriptive requirements which can be found in Chapter 15 of the current edition of the 59A standard. Performance based risk assessment is a tool that can be used by developers as a replacement to, in combination with or as an alternative to the prescriptive method of risk assessment detailed in Chapter 5 of the 2001 standard.

Before the committee formal issues an opinion to the Acushnet Board of Selectmen, I have been asked to determine the current plans of Access Northeast on this important issue. Understanding that the federal code has not addressed upgrades to risk assessment methods defined in NFPA 59A in fifteen years, which method (prescriptive or performance based) does Access Northeast intend to employ when deciding where to site the two, 3.4bcf tanks in the town of Acushnet? Further understanding that there is presently no federal regulatory mandate to do so, would Access Northeast be open to voluntarily complying with the performance based methods detailed in Chapter 15? Finally, in order to provide confidence that siting decisions comply with all possible risks assessment tools advanced by the NFPA, would Access Northeast voluntarily conduct both Chapter 5 and Chapter 15 defined risk assessments?

While I understand that these questions may take considerable time to address, your assistance in facilitating a response so that we can discuss these matters on April 26th would be greatly appreciated.

Sincerely,



Kevin A. Gallagher
Committee Chair

Fire Chief, Town of Acushnet