

July 2, 2019

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 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.

We plan to comment on the docket at <https://www.regulations.gov/document?D=PHMSA-2019-0100-0001>

Sincerely,

National organizations:

Physicians for Social Responsibility	Health Care Without Harm
Beyond Extreme Energy	Lotus Institute
Brotherhood of Maintenance of Way Employes	Natural Resources Defense Council
Food & Water Watch	Railroad Workers United
FracTracker Alliance	Stand.Earth
Green America	

State, Local and Regional organizations:

350Brooklyn	NY
350.Org Bucks County	PA
Alliance for a Green Economy	NY
Baysave	DE
Berks Gas Truth	PA
Better Path Coalition	PA
Breathe Easy Susquehanna County	PA
Brook Consulting Services Inc	TX
Bucks County Concerned Citizens Against the Pipelines	PA
Bucks County Sierra Club	PA
Catskill Mountainkeeper	NY
Central Jersey Coalition Against Endless War	NJ
Central Jersey Environmental Defenders	NJ
Citizens Environmental Coalition	TX
Citizens for Sustainable Planning	NJ
Climate Justice Committee of CNY Solidarity Coalition	NY
ClimateMama	NJ
Coalition to Ban Unsafe Oil Trains	NJ
Comeback Farm Organic Produce	NJ
Concerned Health Professionals of New York	NY
Damascus Citizens for Sustainability	PA/DE/NJ/NY
Delaware Riverkeeper Network	DE
Environment New Jersey	NJ
Environmental Law & Policy Center	Midwest
Fossil Free Tompkins	NY
FreshWater Accountability Project Ohio	OH
Friends of Buckingham	VA
Genesis Farm	NJ
Green Party of New Jersey	NJ

Indian Creek Watershed Association	IN
Lancaster Against Pipelines	PA
Lebanon Pipeline Awareness	PA
Local Authority Western Pennsylvania	PA
Marcellus Outreach Butler	PA
Mountain Lakes Preservation Alliance	WV
NJ State Industrial Union Council	NJ
North American Climate, Conservation and Environment	NY
North Jersey Green Alliance	NJ
Occupy Bergen County	NJ
Occupy Hingham	MA
Peace Academy at Liberty	NY
Peace Action New York State	NY
PennEnvironment	PA
People Demanding Action NJ	NJ
Physicians for Social Responsibility Pennsylvania	PA
Raritan Riverkeeper	NY/NJ
RDNA	WI
Sanderson Architectural	CO
Sane Energy Project	NY
ShaleshockCNY	NY
South Orange-Maplewood Action	NJ
Sullivan Alliance for Sustainable Development	NY
Sustainable Medina County	OH
Sustainable Monroeville	PA
Terra Vigilante	PA
The Alliance for Sustainable Communities Lehigh Valley	PA
The Fire Mountain School	NY
The Sourland Conservancy	NJ
Tidewaters Gateway Partnership Inc.	PA
Tri-County Sustainability Alliance	NJ
Unitarian Universalist FaithAction New Jersey	NJ
United for Action	NY
Upper Burrell Citizens Against Marcellus Pollution	PA
Upper Delaware Preservation Coalition	NY/PA
Uwchlan Safety Coalition	PA
Virginia Citizens Consumer Council	VA
We Design For Good	NJ
Weavers Way Coop Environment Committee	PA
WWALS Watershed Coalition	GA-FL