

May 7, 2021

ATTN: Emma Rodvien
Coordinator, Energy Facility Siting Board
RIPUC

RE: SB-2021-03 Sea 3 Providence, LLC

As the Chair and Vice Chair of the City of Providence's Environmental Sustainability Task Force (ESTF), we are writing to urge the Energy Facility Siting Board to require a full application, and to conduct a detailed and thorough review of the Sea 3 Providence proposal for rail service incorporation at the Liquid Propane Gas (LPG) terminal in the Port of Providence.

The proposed expansion of the LPG facility should be considered an alteration to a major energy facility, defined by Rhode Island General Law § 42-98-3(b) Energy Facility Siting Act as "a significant modification to a major energy facility, which, as determined by the board, will result in a significant impact on the environment, or the public health, safety, and welfare."

The initial documents included in EFSB docket SB-2021-03 raise numerous questions about areas in which the project could result in significant impacts on the environment, public health, safety and welfare. In this letter we list questions and concerns below related to transportation (truck and rail traffic impacts), chemical hazard risks, and climate change impacts. These questions and others should be considered in depth through a public process that prioritizes engagement with key stakeholders, especially the frontline communities near the Port of Providence that will be most impacted. We are highly concerned about the lack of notification and community awareness about this project prior to the notice and communication from the Rhode Island Attorney General's office.

The proposed project is located in an Environmental Justice community that is already significantly impacted by pollution with disproportionately high risks to public health, safety, and welfare. According to the EPA's EJSCREEN tool, within a 1-mile radius surrounding the project there are approximately 9000 people, of which 53% are people of color and 10% are "linguistically isolated" and do not speak English. This ranks the surrounding community in the 80th percentile (top 20%) for these categories compared to the rest of the state. The community living closest, within a half mile of the project, is 63% people of color (84th percentile in the state) and 17% "linguistically isolated" (87th percentile in the state). Robust outreach and engagement of this frontline environmental justice community is essential, especially given that they are already placed at higher risk on multiple environmental indicators, including:

- 99th percentile (top 1%) for proximity to hazardous waste facilities with 7 nearby hazardous waste treatment, storage, or disposal facilities
- 97th percentile (top 3%) for proximity to high risk chemical facilities requiring Risk Management Plans

The proposed alterations to the major LPG energy facility must consider the cumulative impacts and current pollution burden on the directly impacted frontline environmental justice communities. The [City of Providence's Climate Justice Plan](#) centers frontline communities and includes specific strategies and recommendations related to the Port of Providence in particular. Sea 3 Providence, LLC is a tenant of ProvPort, which operates under a long-term lease from the City of Providence. As such the City of

Providence, its boards and commissions, and the neighborhoods adjacent to the Port of Providence, need to be included and prioritized in the decision-making process for this proposed project. The City of Providence's 2019 Multi-Hazard Mitigation Plan ("Strategy for Reducing Risks from Natural, Human-Caused and Technological Hazards: A Multi-Hazard Mitigation Plan") specifically references the existing LPG storage tank as an existing hazard. The following extended quote from this document further illustrates the significant impacts and risks to public health, safety and welfare.

"The City of Providence is also home to Liquefied Natural Gas (LNG) and Liquefied Petroleum Gas (LPG) facilities. [...] The LPG facility is located approximately one mile away from the LNG facility. The LPG facility contains 400,000 barrels of LPG. LPG is a gas cooled to -44°F, with an expansion ratio of 270 to 1 and is mainly propane. The flammable range is 2 to 9% in air. The LPG facility is also approximately 500 feet from the largest chemical storage company in the city. LPG is used commercially for heating and is distributed under pressure via truck. LPG is brought to the city via ship. The facility receives approximately 12 deliveries annually. The main hazard of propane is that it is heavier than air, and should a leak occur, the gas will seek an ignition source and flash back to the container. **Both hazards present the potential for cascading events.** An LPG or LNG tank fire may ignite other containers. **The LPG tank would undoubtedly expose the chemical facility to heat that would compromise other containers located onsite.** [emphasis added] There have been several chemical incidents in Providence over time, with the most recent incident occurring in October 2018 when a tractor trailer carrying 11,000 gallons of gasoline rolled over on the Allens Avenue ramp to Route 95, spilling an undetermined amount in the Providence. Providence is considered at moderate risk to chemical incident-related events.

Population at Risk from Chemical/Hazardous Materials Release Incident-Related Hazards in Providence: The entire City of Providence is equally susceptible to a chemical incident. Many chemical shipments move through Rhode Island annually at any time, day or night, via roadway networks, rail, air and water, and often through urbanized areas like Providence.

Probability of Future Occurrence of Chemical/Hazardous Materials Release Incident Related Hazards in Providence: Based on the number of facilities, the highly urbanized areas, and transportation routes in and through Providence, there is a likely probability of a chemical incident occurring.

Given the existing hazards, the additional risk from adding rail service and additional LPG storage and delivery capacity should be considered in the context of the existing risk profile for Providence. The rail and truck transportation routes throughout the City also imply that the entire city, and particularly those communities living closest to freight transportation routes, should be considered as communities impacted directly by the proposed project.

The following list of questions are based on a brief and initial review of the limited information provided to date. These questions are not exhaustive, and further engagement with impacted frontline communities and key stakeholders is needed to determine the full scope of the review. This further illustrates the need for a more robust and extensive review of the proposal to identify the multiple ways that it could pose a significant impact on the environment, public health, safety, and welfare.

Initial questions related to accidents, hazards, risk management, and disaster and emergency scenarios:

- The existing LPG storage tank is subject to EPA Risk Management Plan (RMP) regulations under the Clean Air Act Section 112(r) as a Tier 1 high risk chemical facility. What is the current radius for off-site impacts under the RMP worst case scenario? How would the proposed additional horizontal bullet storage tanks and connection infrastructure impact potential worst-case scenarios?
- Univar is an adjacent facility in the Port of Providence that is also subject to EPA Risk Management Plan (RMP) regulations under the Clean Air Act Section 112(r) as a Tier 1 high risk chemical facility for storage of large quantities of regulated chemicals including chlorine, anhydrous ammonia, and other hazardous chemicals. What is the current distance between the LPG storage tank and the nearest Univar chemical storage tank, and how close would the proposed rail delivery terminal and bullet storage tanks be to the nearest Univar storage tank? What are the potential scenarios in which an incident at one of the facilities could impact the other facility, and what are the worst-case scenarios for cascading incidents involving both facilities?
- What is the recommended evacuation radius for accidents involving LPG/propane rail shipments, and what are the worst-case scenarios for a derailment, collision, fire, or explosion involving LPG rail cars? How many people reside within the evacuation radius along these routes, what are their demographics, and how would they be notified and included in decision-making about this proposal?
- What are the routes that LPG rail shipments would be travelling through Providence, and would there be any short-term storage of rail cars containing LPG within Providence city limits or within Rhode Island? This could include the rail yard along Elmwood Avenue south of Huntington Expressway/RI-10 near the Cranston border, as well as the rail yard along I-95 by Smithfield Avenue along the Pawtucket border.
- Given the age of existing LPG tank, what is the expected lifespan for safe use? How long will the existing facility be able to operate safely before having to be decommissioned or replaced?
- What steps has Sea 3 Providence, LLC taken to engage the surrounding frontline communities in emergency preparedness and communication about the hazards and risks of LPG storage and transportation?

Initial questions related to Transportation (rail and truck traffic impacts) of the proposed project:

- What is the current daily and annual LPG truck traffic associated with the Sea 3 LPG terminal?
- For each rail shipment of 16 rail cars delivering LPG, what would be the associated number of LPG trucks required to transport that cargo? With the project proposing daily rail shipments, what would be the annual LPG truck traffic associated with daily rail deliveries?
- What is the current average daily and annual rail traffic in and out of the Port of Providence? How much of an increase (amount and percentage) would the additional daily rail delivery represent and what are the associated air emissions.
- What time of day or night would the LPG rail shipments into the Port of Providence cross the Allens Ave rail crossing?
- Would rail shipments of LPG be combined with deliveries of other chemicals or hazardous materials to the Port of Providence, including but not limited to ethanol, chlorine, anhydrous ammonia, sodium hypochlorite, potassium hydroxide, or sodium hydroxide?

Initial questions related to climate change and resilience, land use and siting:

- How is Sea 3 Providence, LLC considering the impacts of climate change including both sea level rise and hurricane storm surge scenarios for both the existing and proposed new infrastructure?

- What are the total cumulative greenhouse gas emissions expected over the lifetime of the project (including all associated transportation emissions), and what are the social costs of those emissions?
- Rhode Island and Port of Providence are well positioned for growth in offshore wind but are limited by lack of available land in deep water port facilities. Given the competition for land use and the priority for economic development and climate change with offshore wind, why would the vacant lot be used for expanding fossil fuel infrastructure?
- The emphasis of the proposed project is around supply-demand flexibility and the ability to transfer LPG cargo from rail to truck; Since this is not a marine-dependent use why is being proposed in a high priority waterfront property that is both at risk of climate impacts and could be used for higher priority uses such as offshore wind?
- There is an existing rail facility in North Kingston near Quonset with a storage capacity of 75,000 gallons – why not propose expansions there instead of building much larger capacity of six 90,000 gallon tanks in a much more densely populated environmental justice community?

These are not a comprehensive set of questions, but demonstrate the need for a robust and public process of identify and evaluate the impacts of the proposed project and engage the communities that will bear the cost of those impacts.

Thank you for considering these concerns. We urge the Energy Facility Siting Board to require a full application, and to conduct a detailed and thorough review of the Sea 3 Providence proposal for rail service incorporation at the Liquid Propane Gas (LPG) terminal in the Port of Providence.

Please be in touch with any questions.

Sincerely,

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