

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTACHMENT "C"



September 8, 2014

Jared Blumenfeld
Regional Administrator
USEPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

**RE: RANCHO LPG/PLAINS ALL AMERICAN PIPELINE, SAN PEDRO,
CA**

Dear Mr. Blumenfeld:

I am writing regarding the Risk Management Plan (“RMP”) for the Rancho Liquefied Petroleum Gas (“LPG”)/Plains All American Pipeline (“Rancho Facility”) in San Pedro, California. As the EPA is well aware, facilities that handle LPG can pose serious threats to neighboring communities. Given the dense community adjacent to the Rancho Facility, it is vital that the RMP provide a sufficient approach to protect the community from what could be great harm given the amount of flammable fossil fuels that are stored at this facility.

In particular, I am seeking justification for the inclusion of a ½ mile worst case scenario blast radius in the RMP. It appears that the blast radius calculation for this facility is not based on storing flammable materials, but rather based on the formula for toxics. This substitution of liquefied toxics allows for a much smaller blast radius. It appears EPA has allowed this reduced blast radius because of passive mitigation in the form of an impound basin. It does not appear that this reduced blast radius is justified because of this passive mitigation.

Based on my understanding of the physical properties of LPG, the product is only liquefied under pressure and low temperatures. If this product is released into the ambient air, it would rapidly turn into a vapor and dramatically expand in volume. It appears that the impound basin would be wholly ineffective to catch the entire contents of the facility’s two 12.5 million gallon tanks if there is a rupture. In the event of release of LPG, the product would likely flow into the community in its vaporized form. Any spark could result in ignition, which could lead to great harm to the surrounding community and the port.

This lenience in protection of public safety is further exacerbated because the Rancho Facility does not have to directly notify the neighborhood in the event of an emergency because there are “no toxics” stored at the facility. It only needs to notify the police and fire department. The Rancho Facility tries to have it both ways. On one hand it seeks lenience because it claims it is more like a facility storing liquefied toxics, and on the other hand it says it does not need to

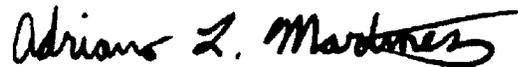
Jared Blumenfeld
September 8, 2014
Page 2 of 2

notify the public because there are "no toxics" on site. This problematic inconsistency needs to be better justified.

Overall, Earthjustice would like to understand more fully the basis for discounting the blast radius due to the passive mitigation measures. It does not appear to be an effective mitigation measure to protect the community if an accident happens. In my discussions with community members, they are deeply concerned about this facility. Residents should not be afraid to live in their communities, and it is incumbent upon our public agencies to make sure residents feel secure in their neighborhoods.

Given the serious nature of the concerns about this facility, I would appreciate a prompt response about whether the RMP is adequate to protect public and safety. Please do not hesitate to contact me if you have questions about my request.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is written in a cursive, slightly slanted style.

Adriano L. Martinez
Staff Attorney
Earthjustice