

**U.S. Department
of Transportation**

**Research and
Special Programs
Administration**

May 10 1996

Mr. Jean-Marc Tiexiera
Vice President of Operations
Granite State Transmission, Inc.
325 West Road, P.O. Box 508
Portsmouth, NH 03802-0508

Dear Mr. Tiexiera:

This is in response to your letter of February 26, 1996, in which you requested an interpretation of 49 CFR §193.2155, in regard to Granite States's proposed alternate LNG storage facility at Arundel site (Site 13). Under Section 193.2155(c), *"If an LNG storage tank is located within a horizontal distance of 6,100 m. (20,000 ft) from the nearest point of the nearest runway serving large aircraft as defined in 14 CFR part 1.1, a Class 1 impounding system must be used which is designed to withstand collision by, or explosion of, the heaviest aircraft which can take off or land at the airport."*

According to your letter, Arundel site is approximately 14,500 feet from the nearest point of the Biddeford Municipal Airport runway, and this airport does serve the landing and takeoff needs of a large aircraft defined in 14 CFR part 1.1. According to page 6-6 of Draft Environmental Impact Statement (DEIS) supplied to RSPA by Federal Energy Regulatory Commission (FERC), large aircraft Beech 1900 weighing 16,600 pounds lands at this airport 6 to 12 times a year. Also, Figure 3.3.2-1 "Location of Alternate LNG Storage Facility Sites" of DEIS reveals that one of the runways at the Biddeford Municipal Airport is directly in the line of proposed Arundel site, thus increasing chances of collision. Based on this information, in accordance with the Section §193.2155(c), RSPA would therefore require a class 1 impoundment at proposed Arundel LNG facility.

As you are already aware, a waiver process does exist. A waiver request should show how safety would not be compromised at the site if Section §193.2155(c) is not met.

If we can be of further assistance in this matter, please contact me or Mr. Mike Israni of my staff at (202) 366-4046.

Sincerely,

Richard B. Felder
Associate Administrator
for Pipeline Safety