

May 20, 1999

Mr. James J. Malachowski  
Administrator  
Division Of Public Utilities and Carriers  
100 Orange Street  
Providence, RI 02903

Dear Mr. Malachowski:

This is in response to your letters of July 19 and September 6, 1996, concerning proposed changes to the existing Algonquin Liquefied Natural Gas (ALNG) facility in Providence, Rhode Island. You requested the Office of Pipeline Safety (OPS) to review ALNG's plans for facility modifications, and advise your office whether these modifications constitute a "significant alteration."

Review of the site plans and description of the ALNG modifications to the existing LNG facility in Providence, RI, indicate that the following modifications and inspections ALNG proposes to undertake:

- (1) addition of pumps and vaporizers for high pressure sendout,
- (2) replacement of the existing low pressure vaporizers,
- (3) inspection of the existing LNG tank,
- (4) addition of a gas liquefaction system.

Rules governing the applicability of the siting, design, installation, and construction standards are set forth in 49 CFR §193.2005. Under that section, the new vaporizers and liquefaction facilities proposed by ALNG would be subject to Part 193. However, the current Part 193 requirements for siting, design and construction may not be applied to ALNG's existing storage tank. The storage tank is not being replaced or relocated, nor is the proposed work on the tank "significant."

Furthermore, OPS is not in a position to comment on the significance of the alterations to ALNG facility in relation to the applicability of the "Building Officials and Code Administrators International, Inc." (BOCA) standards, because the Department of Transportation has not adopted the BOCA code.

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

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