

Sheila Brush

From: Edward.G.LeBlanc@uscg.mil on behalf of LeBlanc, Edward CIV [Edward.G.LeBlanc@uscg.mil]
Sent: Wednesday, April 07, 2010 8:37 AM
To: sbrush@growsmartri.com
Cc: Perry, Raymond CAPT; McElligatt, Patrick CDR; Beck, Ronald
Subject: QUESTIONS REGARDING POTENTIAL LNG TANKER TRANSITS IN NARRAGANSETT BAY

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Good morning Ms. Brush,

I understand that Grow Smart Rhode Island had several questions regarding potential transportation of LNG through Narragansett Bay by tanker. Although Captain Perry is unable to address the Board of Grow Smart RI personally, he asked that I reply directly to you with answers to your questions. Listed below are Grow Smart's four questions as posed in your e-mail to Captain Perry of March 17th, 2010, and the Coast Guard's response:

GSRI Question #1:

"It has been stated in public meetings that LNG vessels will only be allowed to come up the Bay during daylight hours, but it has also been stated that that is not an absolute requirement and that the Coast Guard makes that decision.

- If the Coast Guard has not yet decided what its policy will be, when would that decision be made?
- Has a final determination been made as to whether a vessel carrying LNG will be required to come up the Bay in daylight hours?
- Has a final determination been made as to whether a vessel coming back down the Bay after it has unloaded the LNG will be required to do so in daylight hours?"

Coast Guard Answer #1:

The policy for LNG tanker transits would be similar to our current policy for similar type cargo vessels, such as Liquefied Petroleum Gas (LPG).

There is no plan to restrict LNG vessel transits to daytime only. Keep in mind that each and every LNG vessel transit will require the specific approval of the Coast Guard Captain of the Port. Each LNG vessel transit will first be scrutinized through a robust planning process—with input from several federal, state, and local agencies—to consider various safety and security issues. Although not all-inclusive, the following list contains some criteria for all transits, and especially nighttime transits:

- 1. Acclimation of pilot(s) to maneuvering LNG tankers through the waterways and into/out of the new offshore terminal**
- 2. Acclimation of tugboat operators to assisting in the maneuvering of LNG tankers through the waterways and into/out of the new offshore terminal**
- 3. Acclimation of security forces**
- 4. Weather**
- 5. Tides**
- 6. Reasonable alternatives to the nighttime transit**
- 7. Threat assessment**

It may be worth noting that LPG (Liquefied Petroleum Gas) vessels—which currently transit Narragansett Bay—are already subject to this planning process, and at times are permitted to transit at night.

Security zones would generally be established and enforced only on in-bound transits when an LNG tanker is loaded with cargo. On outbound transits, when there is only a small amount

(5% or less of total cargo capacity, known as "in heel") of LNG sufficient to maintain a cold temperatures in the cargo tanks, security zones would be established on a case-by-case basis depending on a number of factors (threats, other vessel traffic or marine events in the bays, etc.). It is anticipated that outbound transits of LNG tankers "in heel" would seldom have a security zone established.

GSRI Question #2:

“It has been stated that the “safety” or “security” area that will be required around an LNG vessel in Narragansett Bay is 2 miles in front, 1 mile in back and 1,000 yards to each side. However, it has also been stated that that is the maximum safety area that could be required but that it won’t necessarily be required.

- Has the safety or security area for LNG vessels in Narragansett Bay already been determined?
- If not, could you please tell us when and how the safety area will be determined?
- Is the same security area required for vessels that are carrying LNG and for vessels that are returning back down the Bay after they’ve discharged the LNG?
- Is a similar “security” area required for vessels carrying any other materials, and, if so, is that security area currently being used for vessels in Narragansett Bay?”

Coast Guard Answer #2:

Federal regulations for Narragansett Bay at 33 CFR 165.121 require a security zone of two miles ahead, one mile astern, and 1000 yards on each side of a “high interest vessel”, which includes LNG tankers. But security zones are not necessarily exclusion zones, and vessels may transit within a security zone, or continue business within a security zone (such as fishing or clamming) with the permission of the Captain of the Port. And although the zone may be of the size described above, the area that the Coast Guard actually enforces may be considerably smaller. As is the case with nighttime transits, the actual size of the security zone to be enforced, and what vessels may be allowed to transit or operate within the security zone, is subject to the same robust planning process. Again, this same process is currently used for LPG vessel transits.

GSRI Question #3:

“It has been stated that the public will only receive an hour’s notice before an LNG vessel comes up the Bay, and it has also been stated that advance information can be available to the public much earlier.

- Who is responsible for providing notice to state and local officials and to the public before an LNG vessel begins to move up the Bay?
- Approximately how much notice would it be possible for state and local officials and the public to receive?”

Coast Guard Answer #3:

As is our current practice for LPG vessel arrivals, the Coast Guard will notify our federal, state, and local stakeholder officials of LNG deliveries as we become aware of the arrival schedule, which is at least 96 hours before each vessel’s arrival. Coast Guard notification to the general public of an LNG transit would normally occur about one hour beforehand. LNG tankers do emit position and other navigation information through the Automatic Identification System (AIS), which is an unclassified system available commercially worldwide. Presumably, anyone so interested could track an LNG vessel’s movement (or the movement of any large commercial vessel) worldwide through the AIS system. Additionally, as LNG tankers will require sufficient tide to transit, one can predict with relative accuracy when a tanker may or may not be transiting.

GSRI Question #4:

“It has been stated that 3’ of clearance under the Pell and Mount Hope bridges is sufficient, and it has been stated that it’s risky.

- In the Coast Guard’s estimation is 3’ clearance under those bridges sufficient and safe for an LNG vessel?”

Coast Guard Answer #4:

The amount of sufficient clearance under a bridge is a subjective decision based on many factors (again, weather, pilot proficiency, etc.), but three feet of clearance is within generally accepted navigation practices. Before any LNG vessel transits are approved by the Coast Guard, Weaver’s Cove Energy LLC is required to provide a comprehensive aids-to-navigation plan, which would include state-of-the-art electronic instrumentation to measure precisely the available clearance between the LNG tanker and the bridges under which it must pass. It should be noted that the air draft is measured from the highest point on the ship, which is often the mast or antenna, which are parts of the ship that are likely to break away without any damage to the bridge.

GSRI Question #5:

“Can you tell us whether LNG vessels will be required by the Coast Guard to hire additional security and, if so, what security will be required and from what sources LNG vessels typically obtain security (e.g., private security forces, off-duty local police officers, etc.)”

Coast Guard Answer #5:

There are no plans to require LNG vessels to hire additional security. However, prior to operation, Weaver’s Cove Energy, LLC, would need to have approved by the Coast Guard a Transportation Management Plan and a Cost Sharing Plan to address where security resources would come from and how they would be financed.

I trust these answers will be satisfactory. But should you have additional questions or comments regarding the Coast Guard’s role relative to the Weaver’s Cove LNG facility, please do not hesitate to contact me at the e-mail address or phone numbers below.

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