

July 15, 1993

Mr. Jeff Lowenfels
Vice President
Yukon Pacific Corporation
1049 West Fifth
Anchorage, Alaska 99501-1930

Dear Mr. Lowenfels:

Your April 16, 1993, letter to Lloyd W. Ulrich requested the Office of Pipeline Safety to provide an opinion on whether 49 CFR 193.2055 requires an all-weather road to be constructed to provide access to the proposed liquefied natural gas (LNG) plant at Anderson Bay, Alaska.

Section 193.2055 of the Department's LNG Federal safety standards is a performance standard which states in part ". . . A site must provide ease of access so that personnel, equipment, and materials from offsite locations can reach the site for fire fighting or controlling spill associated hazards or for evacuation of personnel." The method of access is not prescribed. The regulation's history makes it clear that a road is not required for ease of access, if another method of access can be used to comply with 49 CFR 193.2055.

Your April 16, 1993, letter also requests an opinion whether the National Fire Protection Association's (NFPA) standards for emergency access/egress to and from an LNG terminal contained in NFPA 59A is a regulation or a performance standard. For an opinion of this standard, I suggest you contact the NFPA directly. Their address is: National Fire Protection Association; Batterymarch Park; Quincy, Massachusetts 02269.

Sincerely,

Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety