



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

DEC 22 2011

Mr. William G. Cope
Vice President, Operations
Southern LNG Company, LLC
569 Brookwood Village, Suite 501
Birmingham, AL 35209

Dear Mr. Cope:

By letter dated March 24, 2011, Southern LNG Company, LLC (SLNG) filed a request with the Office of Pipeline Safety (OPS), Pipeline and Hazardous Materials Safety Administration (PHMSA), for a written interpretation of the minimum Federal safety standards for liquefied natural gas (LNG) facilities (Part 193). Specifically, SLNG asked whether certain modifications to the truck loading facilities at its Elba Island LNG Import Terminal (Elba Island Terminal) would be considered a replacement, relocation, or significant alteration of an existing LNG facility and require compliance with the current siting requirements in §§ 193.2051 and 193.2067.¹

OPS has reviewed the information submitted with that request and determined that the proposed modifications to SLNG's truck loading facilities, except for a 2000-foot, 6-inch LNG header pipeline and a 2000-foot, 3-inch vapor return header, would be subject to the current siting requirements in Part 193.

Background

On May 4, 1971, SLNG filed an application with the Federal Power Commission (FPC) to construct an LNG import terminal on Elba Island near Savannah, Georgia.² Under the original proposal, the Elba Island Terminal was to occupy a 140-acre site on the island and include three LNG storage tanks and two truck loading stations. FPC reviewed the application and issued a certificate of public convenience and necessity for the project in 1972.

¹ SLNG also asked whether the Process Hazard Analysis Software Tool – Unified Dispersion Model (PHAST-UDM) source term model could be used with the Dense Gas Dispersion Model (DEGADIS) to calculate the vapor gas dispersion exclusion zone for any replaced, relocated, or significantly-altered facilities, but withdrew that portion of its request in a December 6, 2011 letter.

² See *Southern Energy Co.*, Opinion No. 622, 47 FPC 1624 (1972), *reh'g granted in part*, Opinion No. 622-A, 48 FPC 723 (1972), *remanded*. *Columbia LNG Corp. v. FPC*, 491 F.2d 651 (5th Cir. 1974), *on remand*, *Southern Energy Co.*, Opinion No. 786, 57 FPC 354 (1977).

SLNG reactivated the Terminal in 1978, but stopped receiving LNG shipments in 1980. In 1982, after providing peak-shaving services for two additional years, the Terminal was decommissioned.

In July 1999, SLNG filed an application with the Federal Energy Regulatory Commission (FERC) to re-commission the Elba Island Terminal. No request was made at that time to reactivate the two truck loading stations. FERC approved the project, and on December 1, 2001, SLNG reactivated the Terminal.

On May 31, 2002, SLNG filed another application with FERC to expand the Elba Island Terminal. The expansion project included the construction of two additional marine berths, a fourth storage tank, and new piping, control, and sendout facilities. FERC approved the project, and on February 1, 2006, SLNG placed its new facilities into service.

On September 29, 2006, Southern LNG filed a second application with FERC to expand the Elba Island Terminal. In the first phase of the project, SLNG proposed to construct a new LNG storage tank, to increase the vaporization capacity at the Terminal, and to modify the existing marine facilities to accommodate larger LNG tankers and permit the simultaneous unloading of two LNG tankers. During the second phase of the project, SLNG proposed to construct another LNG storage tank and to increase the vaporization capacity at the Terminal. SLNG also sought approval to abandon the unutilized facilities at one of its docks. In April and September 2007, FERC issued orders authorizing both phases of that expansion project.

On August 3, 2010, SLNG filed an application with FERC to abandon, construct, and activate the truck loading facilities at the Elba Island LNG Import Terminal.³ In the first phase of the trucking project, SLNG proposed to abandon, replace, and re-use certain facilities at two existing truck loading stations. During the second phase, SLNG proposed to construct two new truck loading stations.

On March 24, 2011, SLNG filed a request with OPS for a written interpretation of Part 193. SLNG asked whether any of the modifications in the first phase of its trucking project would be considered a replacement, relocation, or significant alteration of an existing LNG facility, thereby requiring compliance with the siting requirements in Subpart B. SLNG also provided additional documentation in support of that interpretation request, including a description and drawing of the current and proposed modifications to the Elba Island LNG Import Terminal's truck loading facilities.

Analysis

PHMSA prescribes minimum Federal safety standards for the design, construction, operation, maintenance, and security of LNG facilities. The National Fire Protection Association Standard 59A, "Standard for the Production, Storage, and Handling of Liquefied Natural Gas," is

³ As proposed, the truck loading facilities would be operated by Southeast LNG Distribution Company, a joint venture between El Paso Corporation and a subsidiary of AGL Resources, and would be used to distribute LNG in the Southeastern United States as an alternative fuel for heavy-duty vehicles and to peak-shaving facilities in Georgia. Initial operations would rely on eight to 10 tanker trucks, with an anticipated expansion over time to 58 tanker trucks.

incorporated into these requirements by reference, with regulatory preemption in the event of conflict.⁴

PHMSA also issues Federal safety standards for siting LNG facilities. Those standards require an operator or governmental authority to exercise control over the activities that can occur within an “exclusion zone,” defined as the area around an LNG facility that could be exposed to unsafe levels of thermal radiation or flammable vapor gas in the event of a release or ignition.

PHMSA’s authority to apply new safety standards to existing LNG facilities is limited by statute and regulation. Specifically, Congress enacted several provisions in the Pipeline Safety Act of 1979 to ensure that new Federal safety standards for siting, design, installation, construction, or initial testing could not be applied to existing LNG facilities.⁵ Those provisions remain codified in the Pipeline Safety Laws at 49 USC §§ 60101(a)(1), (16), and 60103(c).

PHMSA has also promulgated regulations that govern the applicability of the siting requirements to existing LNG facilities. In particular, the pipeline safety regulations state, in relevant part:

§ 193.2005 Applicability.

(a) Regulations in this section governing siting, design, installation, or construction of LNG facilities (including material incorporated by reference in these regulations) do not apply to LNG facilities in existence or under construction when the regulations go into effect.

(b) If an existing LNG facility (or facility under construction before March 31, 2000) is replaced, relocated or significantly altered after March 31, 2000, the facility must comply with the applicable requirements of this section governing, siting, design, installation, and construction, except that:

(1) The siting requirements apply only to LNG storage tanks that are significantly altered by increasing the original storage capacity or relocated, and

(2) To the extent compliance with the design, installation, and construction requirements would make the replaced, relocated, or altered facility incompatible with the other facilities or would otherwise be impractical, the replaced, relocated, or significantly altered facility may be designed, installed, or constructed in accordance with the original specifications for the facility, or in another manner subject to the approval of the Administrator.

§ 193.2051 Scope.

Each LNG facility designed, constructed, replaced, relocated or significantly altered after March 31, 2000, must be provided with siting requirements in accordance with the requirements of this section and of NFPA 59A (incorporated by reference, see §193.2013). In the event of a conflict between this section and NFPA 59A, this section prevails.

⁴ § 193.2013(b).

⁵ Pub. L. No. 96-129, 93 Stat. 989 (Nov. 30, 1979); S. REP. NO. 96-182 (May 15, 1979), *reprinted in* 1979 U.S.C.C.A.N. 1971, 1980-81.

One of PHMSA's predecessor agencies, the Materials Transportation Bureau (MTB), originally adopted these regulations to comply with the statutory requirements for existing LNG facilities in the Pipeline Safety Act of 1979. As MTB explained in discussing the intent of § 193.2005 in the preamble to an August 1980 final rule:

The purpose of this section is to distinguish between new and existing LNG facilities regarding the application of Part 193 standards affecting siting, design, or construction (including installation, initial inspection, or initial testing). . . .

Section 6(c)(1) of the [Pipeline Safety] Act [of 1979] forbids the application of new Federal LNG safety standards affecting design, location, installation, construction, initial inspection, or initial testing to an "existing LNG facility," although standards which do not affect location may under certain conditions (relating to compatibility or practicability) be applied to any "replacement component or part thereof" put in service after the standards are issued. The term "existing LNG facility" is defined by section 2(14) of the Act as any LNG facility for which an application for approval of the siting, construction, or operation was filed before March 1, 1978, with a particular Federal, state or local agency. Standards for the siting, design and construction of any "new LNG facility" are authorized by section 6(a) of the Act; and a "new LNG facility" means any LNG facility other than an existing LNG facility.

Excepted from the meaning of "existing LNG facility" is any facility the construction of which begins on or after November 30, 1979, where the construction is pursuant to an approval initially applied for on or after March 1, 1978, in the form of an amendment to a pre-March 1, 1978, application. Under the Act, such a facility falls within the meaning of a "new LNG facility," and is therefore subject to siting, design, and construction standards for new LNG facilities authorized by section 6(a) of the Act. . . .

MTB does not dispute . . . that nothing about an existing LNG facility may be regulated from a siting standpoint. In adopting this policy, Congress obviously recognized the virtual impracticability of retroactively applying new siting standards to facilities already built or under construction and, as indicated by the legislative history, the unfairness and delays that would result if siting standards were applied to facilities for which applications for approval had been pending since at least before March 1, 1978. Congress was also concerned that these existing facilities not be hindered from making needed replacements, but that the replacements be safe. Therefore, under section 6(c)(1)(B), Congress granted limited regulatory authority over the design and construction of replacements to existing LNG facilities but specifically disallowed regulation of replacements to existing LNG facilities from a siting standpoint. . . . We do believe, however, that . . . the Act's definitions of "LNG facility," "existing LNG facility," and "new LNG facility" presuppose the possibility of a system of LNG facilities functioning as a unit, being composed of new and existing LNG facilities and also the possibility that certain relocation, reconstruction, or modification of an existing LNG facility makes the resulting facility a "new LNG facility." . . .

This reasoning, relied on in adopting § 193.2005(b)(1), is further supported by a statement from H. Rep. No. 96-201, Part 1, 96th Cong., 1st session (1979) at Page 24. At this point in its discussion of the authority to regulate existing LNG facilities, the House Committee on Interstate and Foreign Commerce says:

Standards for existing facilities are to be directed toward operational procedures only, including considerations such as the number of operators and security measures. They [standards for existing facilities] should not apply to any reconstruction or substantial modification of an existing LNG facility, which would result in a substantial increase in capacity. Such reconstruction or modification would render that facility subject to the rules promulgated for new LNG facilities, but only with respect to such reconstruction or modification. The original portion of the facility would remain “existing” but the reconstructed, modified or expanded portion would be “new”.

This statement of the legislative history shows that any reconstruction activity that goes beyond mere replacement-in-kind of an existing facility to the extent that capacity is increased makes the resulting facility a new LNG facility.⁶

SLNG has asked whether any of the modifications proposed in the first phase of its trucking project would be considered a replacement, relocation, or significant alteration of an existing LNG facility. As previously noted, SLNG filed its application with FPC for approval of the two existing truck loading stations before March 1, 1978, and construction began before November 29, 1979. Accordingly, the LNG facilities in those two stations are “existing liquefied natural gas facilities” under 49 USC § 60101(a)(1), and the siting requirements in Part 193 cannot be applied to those facilities (or any replacement components) under 49 USC § 60103(c).⁷

However, if these existing LNG facilities are otherwise replaced, relocated, or significantly altered, they become new LNG facilities under 49 U.S.C. § 60101(a)(16) and compliance with the siting requirements is required under §§ 193.2005(b) and 193.2051. Any reconstruction activity that exceeds in-kind replacement or increases the capacity of an existing facility meets that standard.

According to SLNG’s letter and supporting documentation, the company intends to make the following modifications listed in Table 1 during the first of its trucking project:

⁶ Liquefied Natural Gas Facilities; Reconsideration of Safety Standards for Siting, Design, and Construction. (45 FR 57402; Aug. 28, 1980.)

⁷ The term “component” is not defined in the Pipeline Safety Laws, but is defined for purposes of Part 193 as “any part, or system of parts functioning as a unit, including, but not limited to, piping, processing equipment, containers, control devices, impounding systems, lighting, security devices, fire control equipment, and communication equipment, whose integrity or reliability is necessary to maintain safety in controlling, processing, or containing a hazardous fluid.” § 193.2007.

Table 1: Phase I Modifications to SLNG Trucking Facilities⁸

	Installation	Quantity	Status
A	3-inch liquid return to SLNG Recycle loop	2000 feet	New installation
B	3-inch Vapor return	2000 feet	Existing installing not to be changed
C	6-inch LNG Header	2000 feet	Existing installation not to be changed
D	6000-gallon LNG Tank	1	New installation
E	Chiksan Loading Arms LNG offload connection	2	Replaces old installation of hose style connection
F	Compressed Natural Gas Pumps	2	New installation
G	Controls system with fire and gas detection		Replaces old installation of control and fire system
H	LNG dispenser	2	New installation
I	LNG offload connection	2	New installation
J	Submerged LNG transfer pumps	2	New installation
K	Vapor Drums	2	Replaces old installation of vapor drums in vapor return header
L	Vaporizer	1	New installation

SLNG is proposing to install the facilities listed in Table 1 during the first phase of the trucking project. The items listed in rows A, D, F, H, I, J, and L are not replacement components for existing LNG facilities. Those are new LNG facilities that are subject to all of the current requirements in Part 193, including the provisions for siting.

Moreover, the items listed in rows E, G, and K would exceed the parameters for an in-kind replacement or increase the capacity of these existing LNG facilities. Those modifications qualify as significant alterations of existing LNG facilities that must comply with all of the current requirements in Part 193.

Based on the information available at this time, the items listed in rows B and C would not qualify as a replacement, relocation, or significant alteration of an existing LNG facility. Accordingly, the current siting requirements are not applicable to those facilities.⁹

Conclusion

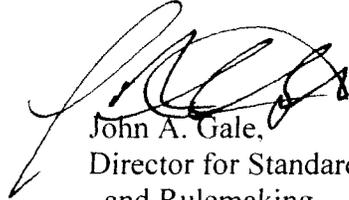
⁸ It appears from SLNG's request that it may be increasing the capacity of one of the existing sumps at the Elba Island Terminal. That change should be reflected in any exclusion zone calculations that are based on that impoundment.

⁹ It should be noted that any subsequent design changes could affect this determination.

The current siting requirements in Part 193 would apply to all of the proposed modifications in the first phase of SLNG's trucking project, except for the 2000-foot, 6-inch LNG header pipeline and the 2000-foot, a 3-inch vapor return header.

I hope that this information is helpful to you. If I can be of further assistance, please contact me at 202-366-4046.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gale", is written over the typed name and title.

John A. Gale,
Director for Standards
and Rulemaking

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March 24, 2011

Mr. Jeffrey D. Wiese
Associate Administrator
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor
Mail Stop: E24-455
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Request for Written Interpretation of Southern LNG Company, LLC

Dear Mr. Wiese:

Southern LNG Company, LLC (“SLNG”) requests a Written Interpretation to confirm that the proposed modifications in Phase I of the proposed Truck Loading Facilities, as defined below, is not considered a replacement or significant alteration, and thus would not require any revisions to its calculations or modeling for siting purposes as required in 49 CFR Parts 193.2005(b) and 193.2051. In the event PHMSA finds that the proposed facilities are a significant alteration and approves the Process Hazard Analysis Software Tool (“PHAST”), currently pending approval by PHMSA as part of SLNG’s request dated January 10, 2011, SLNG requests PHMSA provide a Written Interpretation finding that the inputs and parameters specific to the Phase I modifications may be used in conjunction with the PHAST model to conduct the necessary dispersion analysis, as required by FERC.

BACKGROUND

On August 4, 2010, SLNG filed pursuant to Sections 3(a) and 7(b) of the Natural Gas Act to reactivate the existing truck loading facilities at its liquefied natural gas import terminal on Elba Island (“Elba Island Terminal”) and abandon its certificate authorization associated with certain facilities located on Elba Island with the Federal Energy Regulatory Commission (“FERC”) in Docket No. CP10-477-000 (“Application”). The proposed facilities include construction of new facilities, modification of existing facilities and abandonment of facilities no longer viable for performing the truck loading function (“Truck Loading Facilities”). These facilities were not re-commissioned in 2001 with the rest of Elba Island Terminal and are being upgraded to make the facility operational again.

On January 10, 2011, SLNG requested a Written Interpretation on the usage of PHAST, developed by DNV Software, as the source term model for generation of the source term for vapor-gas dispersion calculations performed in DEGADIS (“Dense Gas Dispersion Model” – Gas Research Institute Report GRI 0242). On March 4, 2011, the FERC’s Office of Energy Projects issued a data request to SLNG to “[p]rovide an interpretation from PHMSA on whether the extent of these activities qualifies as a replacement or significant alteration under §

193.2005(b) which would require compliance of the Phase I facilities with the Part 193 siting, design, installation, and construction requirements.”¹

The Truck Loading Facilities were built in 1978 as part of the original appurtenances and service to the Elba Island Terminal. The two LNG truck loading bays were operated successfully for several years during Elba Island Terminal’s early operating years. Although the Truck Loading Facilities were not a part of SLNG’s recommissioning application in 1999, these facilities have remained in place, merely isolated from LNG by a blind flange. The original truck loading infrastructure, including the impoundments, original grading, control room, electrical and mechanical facilities remain in place today.

COMPARISON OF THE ORIGINAL TRUCK LOADING FACILITIES TO PHASE I OF THE PROPOSED TRUCK LOADING FACILITIES

The truck loading facility encompasses approximately 2 acres on the northern end of Elba Island, located near Savannah, Georgia. After the re-activation, it will initially be comprised of a vertically-oriented vacuum jacketed storage tank (T-100A) for LNG, two submerged LNG pumps for truck fueling, and two bays for loading trucks, each equipped with Chicksan LNG loading and vapor return arms, a load scale, LNG dispenser for truck fueling, and a connection for offloading LNG.

The facilities were designed to the standards of the equipment that operated in that era. The two scales were designed for lighter cargo and physically smaller trucks. These scales measured approximately 80’ by 10.’

The scales are parallel to each other and allow for a “drive-thru” style logistics for operation. Both scales sit upon pre-cast concrete pilings and remain situated upon a “mote” style impoundment area joined and graded to allow for the natural flow of unplanned spills into one of the two existing sump basins. The sump basins are each maintained free of water with the assistance of thermally controlled pumps that evacuate rainwater and other run off from the impoundment area.

The scales have maintained their elevation, but settlement and erosion have resulted in the reduced elevation to the control room, egress and ingress roads. The settlement has driven our desires to replace the equipment, using the current design, with state-of the-art replacements. These replacements include re-grading to original elevations, and new larger scales, approximately 100’ x 12’ that will be situated upon the existing pilings. The existing piles shall be tested for fitness of use using current accepted non-destructive testing techniques.

The control room which served as the hub of truck loading operations was situated between the two scales. It, too, remains standing and capable of originally planned operations today with the help of reactivation and replacement of many of the electrical and computerized components that have failed due to lack of maintenance from non-use.

¹ See Engineering Data Request issued on March 4, 2011 in Docket CP10-477-000.

The original 6" S10S piping, that supply the LNG truck loading facilities remains in places traversing the island for nearly 2000' before crossing the truck loading drive-way via pipe bridge and ending up tying into a complex system of pipes and valving that provided LNG services to the two older style LNG loading hoses. Time has resulted in the saturation of the 6" pipe insulation. And, while the insulation will be replaced, the truck bridge, piping and volumetric capacity of the station will not be changed. However, LNG will be circulated through the truck loading facility and returned to the plant through a 3" LNG recycle line to maintain piping at cryogenic temperatures when the facility is not in use. Vapor generated at the facility flows to the plant vapor return header through a 3" vapor return line.

Fire and gas detection systems, including firewater protection systems were designed as part of the original truck loading facility and remain in place today. These systems are intended to shut-in the truck loading facility in the event of localized upset or shut-in the entire facility for more threatening abnormal operating conditions. Similarly, the controls would also allow for the Elba Island Terminal Supervisory, Control and Data Acquisition system to shut-in the truck loading facilities for significant abnormal operating conditions at the terminal.

The substantive design and function of the truck loading facilities and area will remain unchanged. Modifications to the facility originate from the necessity to upgrade the older LNG loading hoses with new state-of-the-art Chicksan® Loading arms; to add new scales to accommodate modern trucks and their improved geometric dimensions; and, to add new connections to provide clean burning LNG refueling services to the new truck engines. Please see Attachment A for P&ID drawings and Attachment B for an additional, narrative of the differences between the original truck loading facility and Phase I.

SLNG'S REQUEST FOR INTERPRETATION

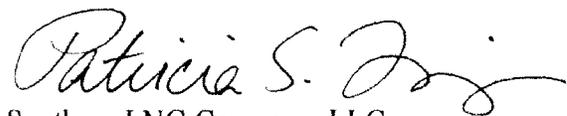
SLNG requests a Written Interpretation that the proposed modifications to Phase I of the Truck Loading Facilities are not considered a "significant alteration," and thus would not require any revisions to its calculations or modeling for siting purposes as required in 49 CFR Parts 193.2005(b) and 193.2051. In the event PHMSA finds that the proposed facilities are a significant alteration and approves the Process Hazard Analysis Software Tool ("PHAST"), currently pending approval by PHMSA as part of SLNG's request dated January 10, 2011, SLNG requests PHMSA provide a Written Interpretation finding that the inputs and parameters specific to the Phase I modifications may be used in conjunction with the PHAST model to conduct the necessary dispersion analysis, as required by FERC.

The proposed modifications to the existing truck loading facility along with the proposed modifications to the impoundments combined with the re-grading of the site back to the original operating plans of the 1978 facility do not add any new sources of LNG to the facility and, therefore, cannot produce any additional vapor than that which was originally contemplated by the 1978 operational and FERC approved design. In the alternative, Attachments A and B support SLNG's position that the primary functionality of the Truck Loading Facilities will not change after the completion of the proposed facilities even noting the addition of the 3" recycle

line to enable the facility to remain cold at all times. Like the design of the existing 6" line, the new 3" line will be of all welded, stainless steel construction with 100% X-Ray inspection. In the improbable event of a leak or rupture, this line would be a smaller source of LNG than the originally operating 6" line. Consequently, there would be no additional capacity or flow rate increase into any impoundment that could result in increased vapor production.

In the event you have any questions, please feel free to contact Trae Miller at (713) 420-7219 or trae.miller@el Paso.com. If PHMSA agrees that Phase I of the Truck Loading Facilities is not a "significant alternation," SLNG respectfully requests a Written Interpretation as quickly as is practicable.

Very truly yours,



Southern LNG Company, LLC
Patricia S. Francis
Associate General Counsel

SUMMARY OF P&ID DRAWINGS

P&ID Drawings – OLD = 1-023; New M-01 through M-06.

Attached, please reference Existing Elba Island Sheet No. 1-023 and proposed Sheet Nos. M01 through M06. The sheets have been color coded for clarity and to illustrate that the substantive design of the facility remains unchanged. The P&ID drawings have been broken into seven nodes representing a specific service.

Yellow node – Nitrogen purge system;
Orange Node – LNG Supply to new refueling station;
Blue Node – Vapor Return Header from Truck Trailer;
Pink Node – LNG supply to Truck trailer,
Green Node – relief valve and instrument gas vapor collection;
Green Dash – Future Phase II vapor return connection;
Purple Node – LNG recycle loop.

Each node and service will be discussed in detail to illustrate prior operation, current operation and changes that are proposed.

Yellow Node – Nitrogen Purge System – The nitrogen purge system will remain intact as originally designed. It will, however, be upgraded to reflect a few new improvements. Specifically, Nitrogen will now be run to the vapor return loading arms. This will allow gas to be purged from the loading arms minimizing gas release to the atmosphere when the loading arm is disconnected from the truck. The two (2) new Nitrogen new lines will each have a check valve and hand valve. Additionally, a main Nitrogen supply shut-off valve will be added to the new Nitrogen tubing to allow for shutoff and to aid in line maintenance.

Orange Node – LNG Supply to New Refueling Station – The majority of the trucks used to transport LNG from Elba Island will run on LNG. Consequently, the new facility proposes the addition of an LNG refueling station and associated pump skid to supply this feature.

Blue Node – Vapor Return Header from Truck Trailer – The vapor return header will be upgraded with new pipe but will return the same functionality to the system with new vapor drums and purgeable Chicksan® Loading arms to connect to the trailers.

Pink Node – LNG supply to Truck trailer – The supply to the LNG truck loading facility will be upgraded with new pipe but retain the same functionality. Saturated insulation will be replaced on the entire ~2000 feet of pipe. A recycle loop will be connected to the supply line for added functionality.

Purple Node – LNG recycle loop – A new 3” insulated line shall be connected to leave the loading facilities in an “At ready” state at all times. This adds new functionality to the system.

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Green Node – relief valve and instrument gas vapor collection – The vapor recovery system will be upgraded with new pipe and add all sources of LNG to minimize environmental impact and reduce ignition possibility.

Green Dash Node – Future Phase II vapor return connection – This provides a connection for the Phase II addition.

For reference, Sheet M-01 is a standard SLNG cover sheet. M-02 is shown color coded with proposed changes, M-06 shows the same information for the proposed Phase II truck loading bays. Sheets M-04 and M-05 show the General Physics proprietary pumping skids with tank for the refueling facilities and future CNG connections for Phases I and II respectively. M-05 shows the proprietary refueling card reader for Weights and Measures sale of LNG.

Pile Location Drawings –

Existing piles will be tested using NDE methods. Defective piles shall be removed. To the extent the new scales require additional load bearing, new piles will be added.

Impoundment and Sumps –

The impoundments for Phase I will be re-graded and replaced to account for the future Phase II truck loading. The far east sump shall remain unchanged. The existing west sump (to be in the middle after Phase II addition) shall be increased (doubled) in size thereby improving the capacity of Phase I by 50%. The overall impoundment area shall remain the same for the Phase I facilities.