August 4, 2016

Governor Larry Hogan:

We urge you to order a thorough and objective quantitative risk assessment (QRA) for the Dominion Cove Point liquefied natural gas (LNG) export terminal and liquefaction plant — and to stay construction while this is carried out. This facility is sited on the side of a town of more than 20,000 of your constituents. People live as close as across the street. Yet there has not been a QRA to determine the risks thousands of us would face and the necessary emergency response plans to adequately address those risks. As governor, you can order a QRA whenever you like. Many of our lives may depend on it.

In 2006, Constellation Energy asked the Maryland Department of Natural Resources to perform a QRA on Dominion’s then-import terminal in order to learn what threats the nuclear plant could face from the nearby gas facility. Basing much of the figures on information from Dominion (which needed to be corrected in a re-issue of the QRA in 2010), the study determined anybody living within 0.8 miles of the Dominion import facility was at risk of being consumed in a flash fire. The terminal was found to be 2.5 times the “acceptable” risk threshold established by the Nuclear Regulatory Commission for nuclear facilities.

Now, adding a 130 MW power plant, a liquefaction train, 410,000 gallons of propane, 14.6 billion cubic feet of LNG, and other toxic, carcinogenic and potentially explosive chemicals including ethane, acid-gases and benzene, we’re faced with a very different threat. However, Dominion has gotten away with performing minimal studies that don’t actually reflect the real impacts of many potential scenarios. Because Dominion was only ordered to conduct a basic environmental assessment, it didn’t even evaluate the impacts of what the National Fire Prevention Association (NFPA) considers to be the most dangerous and likely equipment failures of the entire project: catastrophic failure of heat exchangers and compressors. These are two-to-three orders of magnitude more likely to occur than the minimal piping ruptures that Dominion focused on. Instead, Dominion is using a version of the NFPA’s safety guidelines that is so outdated, it was written when gas liquefaction and export didn’t even exist in the US. Today’s modern NFPA guidelines reflect lessons learned from explosions and accidents at similar facilities, and they require a QRA for LNG terminals.
In its application to the Federal Energy Regulatory Commission, Dominion stated the population of southern Calvert County (Solomons to Prince Frederick) was 4,906. That missed 90 percent of the actual population of 44,638 (2010 Census), including the 20,483 in Lusby, Calvert County’s largest town and the town in which this facility is being built. The Society of International Gas Tanker and Terminal Operators (SIGTTO), to which Dominion Cove Point belongs, states: (a) “LNG ports must be located where LNG vapors from a spill or release cannot affect civilians,” and (b) “There is no acceptable probability for a catastrophic LNG release.” SIGTTO’s standards refer to a Department of Energy “hazard zone” of 2.2 miles, the minimum distance an LNG port should be located from civilians.

Nowhere else in the world is there an LNG export terminal in such a densely populated area. Within two miles of this facility are 2,365 homes, 19 day care centers, three churches, two schools, two shopping centers, two senior centers and 7,000 of your constituents — all currently at risk of being consumed in a flash fire with the terminal as is. We don’t know how wide the risk radius should be extended, because there hasn’t been a QRA.

An explosion isn’t hypothetical. In spite of all of the promises of public safety and proper procedures, fatal explosions have occurred at other facilities owned by Dominion (in 2014), in Southern Maryland (in 1986), and even at this exact same facility in Cove Point (in 1979)! This terminal depends upon local volunteer fire departments, yet these are simply not prepared or equipped for LNG industrial accidents. This is no slight to the professionalism of our local fire departments. The biggest, best-equipped fire departments procedurally let major natural gas fires burn out. We can’t risk letting an explosion at this facility burn out, with so many people and homes potentially in that fire, and more trapped on peninsulas.

We need to know the full scope of the risks the public would face from this facility. We need you to order a thorough and objective QRA, and a halt to construction while it’s performed. The safety of thousands of your constituents needs to be a priority. The time is now to do the right thing. Please order a QRA.

Sincerely,

We Are Cove Point
Calvert Citizens for a Healthy Community

350 Eugene
350 Loudoun County
350 Montgomery County
Allegheny Defense Project
AMP Creeks Council
Athens County Fracking Action Network
Augusta County Alliance
Berks Gas Truth
Beyond Extreme Energy
Breathe Easy Susquehanna County
Blue Ridge Environmental Defense League
Catskill Mountainkeeper
Cedarville Band of Piscataway Indians
Center for Sustainable Economy
Chesapeake Climate Action Network
Chesapeake Citizens
Chesapeake Earth First!
Chesapeake Physicians for Social Responsibility
Citizen Shale
Climate First
Coalition Against the Rockaway Pipeline
Collective X
Damascus Citizens for Sustainability
DC Chapter of the Surfrider Foundation
DC Stampede
Delaware Riverkeeper Network
Douglas County Global Warming Coalition
Earthworks
EDGE: Encouraging Development of a Green Economy
The FANG Collective
Food and Water Watch
Free Nelson
Friends of Buckingham County
Friends of Nelson
Gas Free Seneca
Grassroots Environmental Education
Green America
Greenpeace USA
Gulf Restoration Network
Harford County Climate Action
Heartwood
Howard County Climate Change
Illinois People’s Action
Interfaith Power and Light (DC, MD, NoVA)
Juniata Watershed People Before Pipelines
Lancaster Against Pipelines
Lebanon Pipeline Awareness
Lehigh Valley Gas Truth
Marcellus Shale Earth First!
Maryland Environmental Health Network
Midshore Riverkeeper Conservancy
Myersville Citizens for a Rural Community
NC WARN
New York Climate Action Group
New Yorkers Against Fracking
No Atlantic Coast Pipeline
Oil Change International
Patuxent Riverkeeper
Popular Resistance
Potomac Riverkeeper Network
Protecting Our Waters
Public Citizen
Rainforest Action Network
Resist AIM
Rising Tide North America
Rogue Climate
Safe Energy Rights Group
Sane Energy Project
Savage Mountain Earth First!
Save RGV From LNG
SEED: Stopping Extraction and Exports Destruction
Shalefield Organizing Committee
Sierra Club Lone Star Chapter
Sierra Club Maryland Chapter
Sierra Club Oregon Chapter
Sierra Club Pennsylvania Chapter
Sierra Club Virginia Chapter
Stop the Algonquin Pipeline Expansion
Tidewater Earth First!
Waterkeepers Chesapeake
We Are Seneca Lake
Wild Virginia