

Good afternoon, Mr. Chairman – members of the commission. My name is Rick Bryant, and I am a resident of Class Harbor, a floating home community a short distance up the Oregon Slough from the proposed Pembina facility. We currently have 23 homes in our moorage. We, along with a neighboring moorage, Suttle Road Moorage, are the closest residences to the proposed facility. I have been trying to ascertain the exact distance that our homes lie from the facility. A December article found on the Oregonian's web-site includes a map pinpointing a location which is within 1000 yards of every home in the two moorages. The Portland Rising Tide web-site shows a different location further down river which would place our homes within about 2300 yards of it. A call to the Port of Portland Community Relations Department yesterday morning has not been returned, and, as far as I can tell, the port web-site doesn't even mention the proposed facility, let alone indicate where it would be built.

I wish to address safety issues as they pertain to our homes. Whether we are about a ½ mile or a mile and ½ away, the impact of an accidental release of propane could be devastating to our lives and our homes. An on-line article by the Oregonian on Dec. 26, states that there will be eight tanks, with a capacity of 125,000 gallons each. This, of course, is in error, as the capacity of each would have to be 125,000 BARRELS in order to handle the volume of LPG coming in and going out of this facility. Translated into gallons, each of those eight tanks would have a capacity of over 5 million gallons, or over 40 million gallons total. Receiving unit trains of 100 railcars every other day, and off-loading, filling the tanks, and subsequently transloading the product by pipeline onto ships, presents hundreds of opportunities for an accidental leak every week. I have spent almost my entire career in industry, and specifically 15 years in the petroleum industry. I have witnessed safety systems perform flawlessly, but I have also seen them fail. What I have not seen is a system that is fool-proof and fail-safe.

In a September interview with Mick Dilger, CEO of Pembina, he is quoted as saying, "Our tanks are not near anybody directly," and also, "Given where we are, I don't see it as any more risky than having a propane tank next to your barbecue." To me this shows two things: 1. He either doesn't know or doesn't care that we are there and 2. He exhibits an extremely cavalier attitude toward the community as a whole. Comparing a 30 to 40 million gallon storage facility to a 5 gallon backyard tank is ludicrous.

Also, in the same interview, he states that, "If there's a leak it will vent into the atmosphere." Here he both admits to the possibility of a leak, and tries to sugar coat it by making it seem a minor thing. The false connotation being that propane will simply dissipate into the atmosphere.

As you and I both know, Mr. Chairman, propane is heavier than air. It does not just dissipate as Mr. Dilger would have us believe. A large leak at this facility would flow downhill, almost certainly to the surface of the Oregon Slough where winds would move it either up or down the slough. According to data regarding prevailing winds

from the Western Regional Climate Center, during the six month period from May through October, our homes are almost directly downwind of the facility.

According to the National Propane Gas Association, at 60 degrees F, a gallon of LPG when released will expand to over 36 cubic feet of propane gas. One of those eight 125,000 barrel tanks, containing over 5 million gallons of liquid propane would therefore contain over 182 million cubic feet of propane gas.

In a paper prepared in 2012, for presentation to the Army Corps of Engineers regarding a proposed LPG import facility in Maine, MIT professor emeritus Dr. James A. Fay, states,

a. "The major public safety concern about such facilities lies in the uncontrolled release to the atmosphere of large quantities of LPG...which would vaporize and mix with air to form a combustible mixture."

b. "...the safety problem caused by a spill from a typical LPG storage tank is greater than that from a typical oil terminal tank. the rapid vaporization rate of spilled refrigerated LPG compared with gasoline compounds the relative danger of LPG terminal spills."

c. "LPG is more hazardous than LNG (liquid natural gas), having higher specific gravity, a greater tendency to form explosive vapor clouds, a lower minimum ignition energy and higher fundamental burning velocities..... LPG should, therefore, receive equal or greater public safety scrutiny than LNG."

Also, in a separate paper, Dr. Fay states, "Fires that burn thousands of tons of fuel in a few minutes are extraordinarily large, lying well outside the range of domestic firefighting experience."

I do hope that in making its decision, the commission and the City of Portland will take into account these facts.