## TOWN OF HOPKINTON OFFICE OF THE SELECTMEN



April 5, 2016

Mr. Ken Weismantel Chairman, Planning Board Town of Hopkinton *Via email* 

Dear Chairman Weismantel,

As you are aware, the Town of Hopkinton recently commissioned an engineering study to evaluate the Hopkinton LNG Corp. natural gas storage facility on Wilson St. The purpose of the study was to estimate the area of potential natural gas vapor dispersion in the event of a catastrophic event at that facility. As specifically requested, the analysis modeled a "worst-case" outcome for two separate failure scenarios related to the tanks and the associated piping.

The final documents were received on Friday, April 1 and examined by the Board of Selectmen on Monday, April 4. The Town engaged Smith & Burgess, a reputable, nationally recognized engineering firm to conduct the analysis in the primary report. In addition, the Town had the report peer reviewed by a separate organization, Sanborn Head and Associates Inc., to evaluate the calculations and conclusions. The peer review is also attached. Finally, a response to the peer review from Smith & Burgess is also attached.

The Board's review was conducted in Executive Session as part of its consideration of the potential deployment of public safety personnel, equipment and strategies. As you can see, our two experts differ sharply on how best to describe and model worst-case catastrophic scenarios, and therefore what area of potential dispersion most accurately and appropriately represents the potential result of the events that Smith & Burgess was tasked to model.

Per the Town Charter, the Board of Selectmen is the Chief Executive of the Town and is ultimately responsible for all matters of public safety. Elements of the three reports will be used by the Selectmen, together with the Police and Fire Departments, in the Town's emergency response planning. However, as you know, our role does not encompass planning and permitting of specific development projects. The Planning Board is the elected entity responsible to the Town for working with property owners on the details of proposed developments and for issuing the necessary permits and decisions including, in the case of Legacy Farms, a determination under the OSMUD Zoning Bylaw of whether adequate mitigation has been provided with respect to conditions impacting the safety of that development.

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These reports are provided to support your fulfillment of that OSMUD obligation. According to the Smith & Burgess report, most or all of the Legacy North parcel appears to be within the area subject to significant impact from a catastrophic event at the Hopkinton LNG facility. We emphasize, however, that the report is a worst-case analysis of the potential impact if such an event *actually were to occur*. By design, it does not take into account the statistical probability of such an event or the potential for any mitigation to reduce the area of impact. There is also disagreement as to the size of the impact area; Sanborn Head believes it likely to be smaller, though they provided no independent estimate of their own. As the peer review and response make clear, both parties strongly defend their calculations, and the technical complexities are such that either could be correct in certain circumstances.

The Board of Selectmen makes no specific recommendation as to how the Planning Board should act with respect to approvals of further Legacy Farms development. Our goals are to report an important public safety consideration and to provide your Board with relevant information for use as you continue to evaluate the Legacy Farms project on behalf of the Town. Important questions regarding the likelihood of such an event and existing and potential mechanisms to mitigate the impact appear to us to be appropriate for inclusion in your consideration. We do, however, believe that any future discussions of development in the vicinity of the LNG facility should be conducted in full awareness, for all, of the potential public safety implications that result from that proximity. Our first and foremost obligation is always to protect the safety of current, and future, residents of our community.

With that obligation in mind, we strongly emphasize that we do not consider the LNG facility an imminent threat to Town safety. The facility has operated safely for over 50 years and the statistical likelihood of an event similar to that modeled is calculated to be extremely small – well below the annual probability threshold of 30 chances per million set by the Federal Energy Regulatory Commission as a trigger for further analysis. This report should be considered a technical analysis that deserves thoughtful consideration, and not a cause for alarm.

We remain always willing to provide whatever additional support we can, within the limits of our powers under the Town Charter and other applicable laws and regulations.

On behalf of the Board of Selectmen,

Chairman

- cc: Members of Hopkinton Planning Board
- encl: Report of Smith & Burgess Project #0639, dated February 9, 2016 Peer Review Report of Sanborn Head & Associates, Inc., dated March 29, 2016 Response of Smith & Burgess, dated April 1, 2016