

TOWN OF SOUTHBOROUGH FIRE DEPARTMENT 21 MAIN STREET SOUTHBOROUGH, MA 01772 (508) 485-3235 (508) 485-3887 (FAX) John D. Mauro, Jr., Fire Chief/Emergency Management Director firechief@southboroughma.com



Mrs. Bonnie Phaneuf, Chair Board of Selectmen Town of Southborough 17 Common Street Southborough, MA 01772

Dear Mrs. Phaneuf,

I am writing to you regarding the proposed Transflo Facility located off of Walk-up Drive in Westborough. Through information learned over the past several weeks, I am confident that the proposed facility poses little risk to the Town of Southborough.

At the invitation of Westborough Fire Chief Walter N. Perron, Captain Joseph Mauro and I attended a meeting in Westborough on November 23, 2010. The meeting was held at the request of Westborough Selectman Rod Jane, and consisted primarily of Westborough Department Heads, as well as Jan Barns of Transflo and Greg Rhoades, Hazardous Material Specialist under contract by Transflo.

Prior to the start of the meeting, Captain Mauro and I met with Ms. Barnes and Mr. Rhoades regarding the proposed facility to answer questions we had. Captain Mauro and I heard additional information during the meeting, and conducted a follow-up meeting with Chief Perron and Westborough Fire Lieutenant Robert Rand. Lt. Rand is the LEPC Chairman in Westborough, and is also a member of the Massachusetts Hazardous Materials Response Team.

Based upon the information received during the meetings on November 23, and through previous discussions with Westborough fire officials, I feel confident that all steps are being taken by the Town of Westborough to adequately protect their town, as well as Southborough from any negative effects which may occur at the proposed Transflo facility.

The following is a synopsis of the proposed facility and safety measures:

- Up to 30 trucks per day will use the facility,
- Hours of operation: 6:00 AM to 6:00 PM,
- Up to 11 people will be employed on site.
- All trucks leaving the site will take a left turn onto Flanders Road, to Route 9 and beyond. The Town of Westborough is proposing this route as a condition of their permit.
- Approximately 70% of all product handled at the proposed site are to be nonhazardous as classified by the United States Department of Transportation (US DOT). Approximately 30% will be hazardous materials as classified by the US

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DOT. No extremely hazardous materials will be handled at this site (as defined by the US DOT). It is important to note that Transflo does not handle poison gas, explosives, flammable solids, or radioactive materials system-wide.

- Provisions will be made by Transflo for containment on site should a spill or leak occur. Transflo has committed to protect the environmentally-sensitive areas surrounding the site. The Town of Westborough Conservation, Planning, Building, Public Works and other departments are working to ensure the environment is protected.
- Transfer equipment at the proposed site is designed to handle the specific product being transferred,
- An attendant must be present when a transfer is in process in order to monitor the transfer, and shut down the system in the event of a problem or release,
- Switching of railcars occurs at a slow speed (under 5 M.P.H.),
- Rail cars are designed with safety couplers as well as double-walled ends to prevent a puncture in a derailment,
- Transport vehicles (trucks and rail cars) have to meet strict US DOT construction regulations to prevent accidental spill or release in the event of a crash or fire,
- Site security to prevent unauthorized entry and surveillance which will allow Westborough emergency responders remote visual access.

The Town of Westborough is seeking intersection improvements at Flanders Road and Walk-up Drive to prevent crashes involving trucks exiting Walk-up Drive.

After a review of the potential commodities list of potential hazardous materials to be transferred at this site, I referenced the 2008 Emergency Response Guide, a publication issued to all emergency response agencies throughout the United States for the evacuation distances required should vehicle or tank car be involved in a spill, leak, or fire. The worst-case scenario material resembles propane. A large spill or leak would require an evacuation of ½ mile. For a fire involving a tank truck or rail car states, the *Response Guide states* "ISOLATE for 1600 meters (1 mile) in all directions, consider initial evacuation for 1600 meters (1 mile) in all directions. Only three materials (all three classified as flammable gases by the US DOT) on this list of 30 hazardous materials would require this large of an isolation or evacuation. The Guide for the remaining 27 commodities suggests isolation or evacuation in a spill or leak of 330 to 1000 feet, and isolation and evacuation considered for up to ½ mile.

Using the Town of Southborough *MapsOnLine* GIS system, I determined that the east switch to the entrance of the proposed Transflo facility is 5,482 feet (1.038 miles) to the nearest point of Southborough (see picture #1 attached). The actual proposed transfer areas are further away. The intersection of Flanders Road and Walk-up Drive to the nearest point in Southborough (near the EMC Complex) is 4,316 feet (.82 miles) (see picture #2 attached).

In speaking with Westborough Fire officials, I was informed that they called fire departments in several communities across the country where Transflo terminals are located. Not one fire department reported a response to their respective Transflo facility for a spill or release. Mr. Rhodes reported that Transflo has recorded 2.7 million transfers of product from rail-to-truck. The largest release ever reported was approximately 500 gallons, and that was long before the implementation of the latest in safety equipment and standards.

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Once trucks leave the facility, there is always a concern that the vehicle will be involved in a crash or release. Just this past weekend an "empty" propane tanker truck struck a utility pole in Palmer, Massachusetts. The live utility lines sparked a fire in the truck's cab and trailer wheels. "Empty" flammable gas tanks pose the greatest danger for fire and explosion hazards. Fire officials decided to let the fire burn out and evacuate the area. Due to the strict design standards for tank trucks, the tank vessel remained intact in spite of fire impingement on both ends. On May 19, 2006, a tractor trailer containing flammable gas rolled over on the Mass Turnpike just over the line in Hopkinton. Although the truck landed on its side, no product was spilled or released. These are just two examples of how the US DOT has implemented standards which protect the public from accidental spills or released in the event transport vehicles are involved in fire or crashes.

Given all of the oversight by Westborough Officials, the transport vehicle standards for rail cars and trucks, and Transflo's commitment to safety, I am confident that the proposed Transflo facility in Westborough poses little, if any risk to the Town of Southborough, or its occupants due to spills or releases of materials during transfer or transportation of product.

The Town of Westborough continues to work with Transflo on the proposal, and a series of meetings are scheduled in the upcoming months between both entities.

Very Truly Yours,

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John D. Mauro, Jr., Fire Chief/Emergency Management Director

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