

Midcoast Community Council

representing Montara, Moss Beach, El Granada, Princeton, and Miramar
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Chair Vice-Chair Secretary Treasurer

Date: September 26, 2018

To: Summer Burlison, Project Planner

cc: Supervisor Don Horsley
Steve Monowitz, Community Development Director
Renée Ananda, CCC Coastal Program Analyst

From: Midcoast Community Council/ Dave Olson, Chair

Subject: **Airport Street Bulk Propane Facility, PLN2018-00057**

Thank you for the opportunity to comment on the referral for this CDP application to legalize the propane facility site additions including perimeter fence, gravel, 2 storage containers and 8-ft diameter water tank.

The “grandfathered” 15,000 gal LPG tank is located 75 feet from the nearest row of homes at the designated affordable housing community of Pillar Ridge, where 227 mostly low-income families with local jobs own their modest, closely-spaced homes on rented land. Residents have endured decades of expanded unpermitted hazardous activities at this facility, with frequent and sometimes lengthy periods of what they were told was odorant release from empty tanks, until mishandling of an “empty” tank in Sept 2017 caused an explosive leak with a visible gas cloud driving nearby residents choking from their homes. This was followed within a month by a leak from the large tank of unknown duration caused by “operator error”.

In addition to the environmental justice implications of this incompatible hazardous land use, external hazards of this site include location in the airport safety zone and the tsunami inundation zone.

For the public health, safety and welfare, this facility should be moved to a more suitable location, away from vulnerable residents and external hazards.

NFPA Chapter 58, Liquefied Petroleum Gas Code, requires a written LPG Fire Safety Analysis (FSA) which emphasizes avoiding product release using technology and training. Has Amerigas ever submitted a FSA to facilitate a cooperative dialogue with local emergency response agencies and authorities? Have they complied with NFPA 58 in regard to LPG storage container safety features (including retrofit requirements) and operator training? The track record at this facility suggests they have not.

The perimeter fence should be no taller than 6 feet and barbed wire should be limited to a few strands directly above, such as the adjacent MWSD pump station. NFPA 58 only requires a 6-ft fence, and only around the actual propane facility, or alternatively, lock-in-place devices to prevent unauthorized operation. The unpermitted fence is an

oppressive view-blocking 8 feet topped with V-shaped brackets with multiple strands of barbed wire extending out over the sidewalk fronting the community and over the northern neighbor's yard, where the whole fence is sagging. Pillar Ridge 6-ft perimeter fence pre-existed along two sides of the facility, and the space between the fences is difficult to maintain.

Invasive jubata grass infests the propane yard and should be eradicated.

