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Commonwealth LNG Project Implementation Plan Volume 2.1 Emergency Response Plan and Cost Sharing Plan

FERC Docket Nos. CP19-502-000 and CP19-502-001

September 22, 2023

Project	Commonwealth LNG
Document Title	Implementation Plan Volume 2.1 – Emergency Response Plan and Cost Sharing Plan
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1. INTRODUCTION

On November 17, 2022, the Federal Energy Regulatory Commission (“FERC” or “Commission”) issued an Order Granting Authorization Under Section 3 of the Natural Gas Act (“NGA”) and Issuing Certificates (“Order”) granting the necessary authorization for the construction and operation of the Commonwealth LNG Project, including an NGA section 3 natural gas pipeline. Commonwealth LNG, LLC (“Commonwealth”) has prepared an implementation plan to address certain conditions included in the November 2022 Order.

Commonwealth hereby submits Implementation Plan – Volume 2.1 to address compliance with certain conditions set forth in Appendix A of the Order. Specifically, Commonwealth is submitting herein responses to Conditions 37 and 38 which are required prior to initial site preparation at the Commonwealth Facility. Responses to additional conditions of the Order will be provided in future implementation plans, in which Commonwealth will seek approval to proceed with certain phases of construction. No specific construction authorizations are requested with this Emergency Response Plan and Cost Sharing Plan Implementation Plan submittal.

2. COMPLIANCE WITH ORDER CONDITIONS

The following pages detail Commonwealth’s responses to the Conditions of the Order.

CONDITION 37

Prior to initial site preparation, Commonwealth shall develop an Emergency Response Plan (ERP) (including evacuation and any sheltering and re-entry) and coordinate procedures with the U.S. Coast Guard (USCG); state, county, and local emergency planning groups; fire departments; state and local law enforcement; and other appropriate federal agencies. This plan shall be consistent with recommended and good engineering practices and based on potential impacts and onsets of hazards from accidental and intentional events along the LNG marine vessel route and potential impacts and onset of hazards from accidental and intentional events at the LNG terminal, including but not limited to a catastrophic failure of the largest LNG tank. This plan shall address any special considerations and pre-incident planning for infrastructure and public with access and functional needs and shall include at a minimum:

- a. materials and plans for periodic dissemination of public education and training materials for evacuation and/or shelter in place of the public within any transient hazard areas along the marine vessel route, and within LNG terminal hazard areas;
- b. plans to competently train emergency responders required to effectively and safely respond to hazardous material incidents including, but not limited to LNG fires and dispersion;
- c. plans to competently train emergency responders to effectively and safely evacuate or shelter public within transient hazard areas along the marine vessel route, and within hazard areas from LNG terminal;
- a. designated contacts with federal, state and local emergency response agencies responsible for emergency management and response within any transient hazard areas along the marine vessel route, and within hazard areas from LNG terminal;
- b. scalable procedures for the prompt notification of appropriate local officials and emergency response agencies based on the level and severity of potential incidents;
- c. scalable procedures for mobilizing response and establishing a unified command, including identification, location, and design of any emergency operations centers and emergency response equipment required to effectively and safely to respond to hazardous material incidents and evacuate or shelter public within transient hazard areas along the marine vessel route, and within LNG terminal hazard areas;
- d. scalable procedures for notifying public, including identification, location, design, and use of any permanent sirens or other warning devices required to effectively communicate and warn the public prior to onset of debilitating hazards within any transient hazard areas along the LNG marine vessel route and within hazard areas from LNG terminal;
- e. scalable procedures for evacuating the public, including identification, location, design, and use of evacuation routes/methods and any mustering locations required effectively and safely evacuate public within any transient hazard areas along the LNG marine transit route and within hazard areas from LNG terminal; and
- f. scalable procedures for sheltering the public, including identification, location, design, and use of any shelters demonstrated to be needed and demonstrated to effectively and safely shelter public prior to onset of debilitating hazards within transient hazard areas that may

better benefit from sheltering in place (i.e., those within Zones of Concern 1 and 2), along the route of the LNG marine vessel and within hazard areas that may benefit from sheltering in place (i.e., those within areas of 1,600 British thermal units (BTU)/ft²-hr and 10,000 BTU/ft²-hr radiant heats from fires with farthest impacts, including from a catastrophic failure of largest LNG tank) of the LNG terminal.

Commonwealth shall notify the FERC staff of all planning meetings in advance and shall report progress on the development of its ERP at 3-month intervals.

Compliance Statement

Commonwealth is filing its Emergency Response Plan (ERP), in accordance with Condition 37, as Appendix V2.1-2 of this Implementation Plan.

Commonwealth will continue to develop its ERP and coordinate procedures with the U.S. Coast Guard (USCG); state, county, and local emergency planning groups; fire departments; state and local law enforcement; and other appropriate federal agencies. Commonwealth met individually with several emergency response stakeholders as documented in Appendix H of its ERP. Commonwealth will hold a general Emergency Response Stakeholder Planning Meeting Q4 2023 of which FERC staff will be notified in advance. Commonwealth will notify FERC staff of all planning meetings in advance and will continue to report progress on the development of its ERP at 3-month intervals.

The ERP is consistent with recommended and good engineering practices and based on potential impacts and onsets of hazards from accidental and intentional events along the LNG marine vessel route and potential impacts and onset of hazards from accidental and intentional events at the LNG terminal, including but not limited to a catastrophic failure of the largest LNG tank. (See ERP Section 8.2 and Appendix M.)

The ERP includes on-site evacuation, sheltering, and re-entry and off-site evacuation, sheltering, and re-entry. (See ERP Section 8.3, Appendix F, and Appendix G.)

The ERP addresses pre-incident planning for infrastructure and public with access and functional needs. (See ERP Section 8.2 and Appendix F.)

See the following sections and appendices of the ERP to find content addressing Condition 37 items a through i:

- a. Section 8.3.5.1 and 9.2
- b. Section 9.4 and 9.5
- c. Section 9.2.1
- d. Appendix A
- e. Appendix N and Appendix P
- f. Section 6.3.1
- g. Section 8.1.3, Section 12, and Appendix F
- h. Appendix F
- i. Appendix F

CONDITION 38

Prior to initial site preparation, Commonwealth shall file a Cost-Sharing Plan identifying the mechanisms for funding all Project-specific security/emergency management costs that would be imposed on state and local agencies. This comprehensive plan shall include funding mechanisms for the capital costs associated with any necessary security/emergency management equipment and personnel base. This plan shall include sustained funding of any requirement or resource gap analysis identified to effectively and safely evacuate and shelter public and to effectively and safely respond to hazardous material incidents consistent with recommended and good engineering practices.

Commonwealth shall notify FERC staff of all planning meetings in advance and shall report progress on the development of its Cost Sharing Plan at 3-month intervals.

Compliance Statement

In accordance with Condition 38, Commonwealth is filing its Cost Sharing Plan (CSP) as Section 11 of its ERP (see Appendix V2.1-2). The CSP addresses the funding mechanisms for all Project-specific security/emergency management costs that would be imposed on state and local agencies, including for the 1) capital costs associated with any necessary security/emergency management equipment and personnel base, and 2) sustained funding of any requirement or resource gap analysis identified to effectively and safely evacuate and shelter public and to effectively and safely respond to hazardous material incidents consistent with recommended and good engineering practices.

The FEIS states the following:

“Impacts on public services during operation of the Terminal would be mainly associated with the ability to respond to an emergency. Commonwealth conducted an Emergency Services Gap Analysis (AcuTech, 2019) that assessed the current capabilities of emergency services within the Project area. Based on the analysis, Commonwealth identified several areas where local resources are lacking training and or appropriate equipment to respond to an emergency at the Terminal facility. In order to address the limitations of the local fire departments, Commonwealth would train Terminal personnel to address non-LNG fires, establish a mutual aid agreement to support more advanced fire scenarios, and assist in the development of the local fire departments capabilities based on coordination with those agencies.

Overall, construction of the Project would have a minor temporary impact on available public services. Additionally, based on Commonwealth’s commitment to supplement local fire department gaps by expanding internal training and aiding local fire departments, impacts on public services due to operation would not be significant.”

Commonwealth representatives met with Cameron Parish Fire District #10 on 14 March 2023 to discuss the CSP and a potential Memorandum of Understanding for cost sharing between Commonwealth and the Cameron Parish Fire District. Excerpts of the Meeting Notes are provided in Appendix V2.1-1.

The emergency services gaps identified in the FEIS and the meeting with Cameron Parish Fire District #10 led Commonwealth to its decision to provide its own contract emergency and security services rather than burden local emergency response agencies. This decision is reflected in Commonwealth’s ERP and CSP.

Commonwealth has met individually with several emergency response stakeholders as documented in Appendix H of the ERP (see Appendix V2.1-2). Commonwealth will hold a general Emergency Response Stakeholder Planning Meeting Q4 2023 of which FERC staff will be notified

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in advance. Commonwealth will notify FERC staff of all planning meetings in advance and will continue to report progress on the development of its CSP at 3-month intervals.

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Appendices

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APPENDIX V2.1-1

This appendix contains excerpts from Meeting Notes between Commonwealth LNG and Cameron Parish Fire District #10 which are classified as CUI//PRIV.

Excerpt #1:

Title: **MOU/Cost Sharing Follow-up Meeting**

Meeting location: **Johnson Bayou Fire Department, 6246 Gulf Beach Highway**

Date and Time: **14 March 2023, 1000 hours**

Attendance:

Number	Name	Email	Affiliation
1	Chief Ronny Doucet	rwdoucett07@gmail.com	CPFD #10 (Cameron Parish Fire District #10)
2	Charla Adams	charla4adams@gmail.com	CPFD #10 (Cameron Parish Fire District #10)
3	Patrick A. Chaney	pchaney@teamcpl.com	Commonwealth LNG
Via Teams			
4	Stephan Calabrese	Scalabrese@acutec-consulting.com	AcuTech Group, Inc

Excerpt #2:

- Chief Doucett stated that his Department is not staffed to provide coverage for an LNG Terminal beyond the coverage they are already providing, i.e., dealing with a non-industrial fire or emergency on a plot of land.
- Chief Doucett stated that he and his department oppose being primary responders for the project; not during construction and not during operations.
 - He stated that if we had a building fire, they could help as this is what they are trained to do.
 - He is concerned that providing first-responder support for the Terminal would negatively impact their ability to respond to the needs of the surrounding community and put firefighters at greater risk than normal for a community fire department.
 - His preference is for Commonwealth to provide in-house first responders with a dedicated, on-site, properly trained and well-practiced fire and emergency response brigade.

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Appendix V2.1-2 Condition 37 and 38

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APPENDIX V2.1-2

This appendix contains Commonwealth LNG Emergency Response Plan (ERP) Document No. CWLNG-000-REG-Man-0001 which is classified as CUI//PRIV.