

August 10, 1993

FHWA Docket No. MC 92-4  
Room 4232  
HCC-10  
Office of the Chief Counsel  
Federal Highway Administration  
400 Seventh Street SW  
Washington DC 20590

QA  
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Subject: Comments on Notice of Proposed Rulemaking (NPRM)  
Federal Highway Administration (FHWA)  
Federal Motor Carrier Safety Regulations: Transportation  
of Hazardous Materials  
Docket No. MC 92-4

Minnegasco is a natural gas utility with 550,000 customers in Minnesota. Minnegasco, along with Entex and the Arkansas Louisiana Gas Company, is a division of Arkla, Inc., the 3rd largest natural gas distribution company in the country.

Minnegasco meets its peak winter demands, in part with Liquefied Natural Gas (LNG). Minnegasco has been operating a Liquefied Natural Gas Plant since 1978. Our 10,000 gallon LNG trailer operated by a common carrier, and two portable vaporizers have been used frequently to provide interim service for Minnegasco and competitive gas suppliers during repair and maintenance down-times. This equipment is also sited and used to meet increased customer demand during extremely cold periods.

Minnegasco has been involved in the natural gas vehicle market, actively marketing compressed natural gas as a vehicle fuel to fleet operators in our service area. In response to customer demands concerning range and on-board storage requirements, we are interested in the development of LNG as a clean liquid fuel for heavy duty fleet applications. LNG is one of many fuels being evaluated as a clean alternate to gasoline and diesel.

Minnegasco agrees with FHWA's position on the need for rulemaking concerning appropriate requirements for the safe transportation of hazardous materials and carrier qualifications. We have the following comments or suggestions for the Transportation of Hazardous Material program.

**Define clearly the use of the term "liquefied natural gas". The specific commodity Liquefied Natural Gas (LNG) is a fluid in the liquid state composed predominantly of methane that can contain minor quantities of ethane, propane, nitrogen, or other components normally found in natural gas. Natural gas liquids include other materials meeting the RSPA hazard classification Division 2.1, i.e. propane and butane which are transported by many more carriers in greater tonnage numbers than LNG.**

Review materials classified under RSPA 2.1 LNG is one material on a larger list of materials meeting Division 2.1 criteria. The Federal Highway Administration should review the safety record of all materials in this classification before promulgating and implementing the rules. It appears a high priority has been placed on LNG, singling it out as a high risk hazardous material for immediate regulation. If the safety record and risks associated with other materials in various other quantities is equal to those state for bulk shipments of LNG, these materials and quantities should be regulated.

Analyze this action with respect to the Alternate Fuels Act of 1988, the Clean Air Act Amendments of 1990, and the Energy Policy Act of 1992 and determine the impact of this action with respect to the development of the LNG transportation fuels market. Singling out LNG as the sole high risk hazardous material under Division 2.1 could adversely effect the public's perception concerning LNG safety and make LNG vehicle operation and fuel station siting infeasible.

We appreciate the opportunity to provide you with comments in the development of this rulemaking. We have enclosed a pre-addressed and stamped envelope for mailing when you receive our comments.

Sincerely,



/Jerome Kallstrom  
Director, Peak Shaving  
Minnegasco