



SHAINES & McEACHERN, PA
Attorneys at Law

October 21, 2015

VIA E-MAIL AND FEDEX

Martin Honigberg, Chairman
NH Site Evaluation Committee
NH Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301

Re: SEA-3, Inc. ("SEA-3")
Request for Exemption
NHSEC No. 2015-01

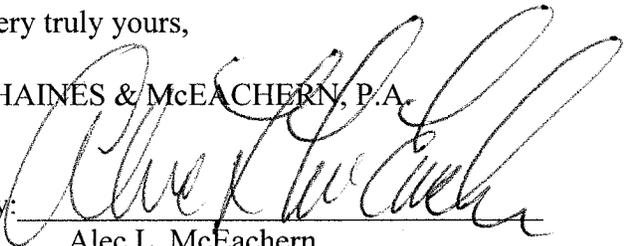
Dear Chairman Honigberg:

Enclosed for filing in connection with SEA-3, Inc.'s Request for Exemption please find the original and two copies of SEA-3, Inc.'s Supplemental Prefiled Testimony for Witnesses Philip R. Sherman, P. E. and Kim Eric Hazarvartian, P. E. An electronic version of the enclosed documents are being delivered via email to Jane Murray at the Department of Environmental Services, Jody Carmody, Docket Supervisor at the Public Utilities Commission and Pamela Monroe, Administrator at the Site Evaluation Committee.

I certify that copies of the within filing have been electronically sent to the parties identified on the SEC's Service List last updated June 11, 2015.

Very truly yours,

SHAINES & McEACHERN, P.A.

By: 

Alec L. McEachern

ALM/jm

Enclosures

cc: SEA-3, Inc.
Michael Iacopino, Esq. (via Email)
Jane Murray, NHDES (via Email)
Jody Carmody, NHPUC (via Email)
Pamela Monroe, NHSEC (via Email)

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE

DOCKET NO. 2015-01

**SUPPLEMENTAL PREFILED DIRECT TESTIMONY OF
KIM ERIC HAZARVARTIAN, Ph.D., P. E., PTOE**

October 19, 2015

1 **Q. In your earlier, Pre-Filed Testimony, you attached a TEPP LLC Traffic Assessment**
2 **Memorandum. Why did you prepare a Traffic Assessment Memorandum and not prepare**
3 **a Traffic-Impact Study?**

4 A. I prepared a Traffic Assessment Memorandum rather than prepare a Traffic-Impact Study
5 because the truck volumes involved do not require a Traffic-Impact Study.

6 **Q. How did you conclude that the truck volumes are not high enough to require a**
7 **Traffic-Impact Study?**

8 A. The Institute of Transportation Engineers suggests that land developments generating at
9 least 100 peak-hour vehicle-trips, in the busier direction, are candidates for consideration of
10 traffic-impact analysis.¹

11 **Q. How does SEA-3's anticipated traffic compare to at least 100 peak-hour vehicle-**
12 **trips, in the busier direction suggested by the Institute of Transportation Engineers?**

13 A. Even if all the truck trips were entirely new to the site, which they are not, the land-side
14 transport-truck configuration limits the number of trucks that can be filled with liquefied
15 petroleum gas to about 10 per hour. Ten trucks filled in an hour leads to far below at least 100
16 peak-hour trucks per direction.

¹ Institute of Transportation Engineers, *Manual of Transportation Engineering Studies* (Prentice-Hall: Englewood Cliffs, New Jersey, 2000), page 144.

1 **Q. What did you conclude?**

2 A. That SEA-3's anticipated truck traffic will not come close to a level indicating that
3 preparation of a Traffic-Impact Study is necessary, so a Traffic Assessment Memorandum is an
4 appropriate level of analysis.

5 **Q. Since preparing the Traffic Assessment Memorandum that has been marked as**
6 **KEH Exhibit 1, have you learned any additional information that would cause you to**
7 **change the conclusions set forth in the Memorandum?**

8 A. No.

STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE
DOCKET NO. 2015-01

SUPPLEMENTAL PREFILED DIRECT TESTIMONY OF PHILIP R. SHERMAN, P. E.

October 21, 2015

1 **Q. In your Fire Safety Analysis that was identified as Exhibit PRS 2 in your earlier**
2 **Pre-Filed Testimony, you indicated response times for area fire departments. Why did you**
3 **do that?**

4 A. Under NFPA Standard 58, as adopted by the New Hampshire State Fire Code, if the
5 emergency response time to the site is greater than ten minutes then the Code requires the
6 consideration of a fixed fire suppression system or other protection measures.

7 **Q. Did you indicate a response time of greater than ten minutes in your Fire Safety**
8 **Analysis?**

9 A. Yes. That's why I required the installation of a fixed fire suppression system.

10 **Q. Are you familiar with the evacuation information given in the U.S. Department of**
11 **Transportation 2012 Emergency Response Guidebook?**

12 A. Generally, yes.

13 **Q. Are the evacuation guidelines in the D.O.T. Emergency Response Guidebook**
14 **appropriate for a facility like SEA-3's?**

15 A. No, the Guidebook is intended for incidents that occur during the transportation of
16 hazardous materials when fixed safety systems are not in place. When railcars are positioned at
17 a fixed facility that is constructed in accordance with NFPA 58, such as SEA-3's, there are

Supplemental Prefiled Testimony of Philip R. Sherman, P. E.

- 1 multiple Code required safety systems in place that will act to minimize the potential effects of
- 2 any release or fire.