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October 31, 2011

David L. Bimber
New York Department of Environmental Conservation
Region 8
6274 East Avon Lima Road
Avon, New York 14414

Dear Mr. Bimber:

Re: *Code Compliance for Inergy Watkins Glen Finger Lakes LPG Facility*

The Finger Lakes LPG Facility is engineered by Superior Energy Systems Ltd. As Vice President of Engineering at Superior Energy Systems, I have 50 years experience in designing LPG Facilities. These vary from a small standby system for a McDonalds Restaurant to an Ocean side receiving facility with storage of 30-100,000 gallon tanks. I have also been responsible for the design of numerous rail delivery terminals and several pipeline delivery terminals.

I have been a member of The National Fire Protection Association (NFPA) 58 Liquefied Petroleum Code Committee for over twenty years. I am also a member of NFPA 59 *Utility LP-Gas Plant Code*, NFPA 160 *Standard for the Use of Flame Effects Before an Audience*, and NFPA 1126 *Standard for the Use of Pyrotechnics Before a Proximate Audience*. I am Chairman of two American National Standards Institute (ANSI) Technical Advisory Groups on Gas Consuming Appliances, and have been involved in the ANSI codes for over forty years. For the majority of my working life, I have been involved with Voluntary Consensus Code Development and Design of Large LPG Facilities.

The Watkins Glen Facility will interface with both Pipeline connections and a large rail receiving system.

This facility is designed to be in compliance with the 2011 edition of NFPA 58 *Liquefied Petroleum Code*. The Scope of NFPA 58 applies:

- “to the operation of all LP-Gas systems, including the following:
- (1) Containers, piping, and associated equipment, when delivering LP-Gas to a building for use as a fuel gas.
 - (2) Highway transportation of LP-Gas.
 - (3) The design, construction, installation, and operation of marine terminals whose primary purpose is the receipt of LP-Gas for delivery to

transporters, distributors, or users, except for marine terminals associated with refineries, petrochemicals, gas plants, and marine terminals whose purpose is the delivery of LP-Gas to marine vessels.

(4)*The design, construction, installation, and operation of pipeline terminals that receive LP-Gas from pipelines under the jurisdiction of the U.S. Department of Transportation (DOT) whose primary purpose is the receipt of LP-Gas for delivery to transporters, distributors, or users. Coverage shall begin downstream of the last pipeline valve or tank manifold inlet.”

Rail Terminal Facilities are also covered in various sections of NFPA 58.

The storage tanks to be installed at the Finger Lakes facility are built to the requirements of Section VIII of the American Society of Mechanical Engineers (ASME) code for unfired pressure vessels. The vessels will have a working pressure of 250 psi. The design margin is 3.5 to 1. Each vessel includes a stainless steel tag with the proper information including a “U” stamp as required by NFPA 58.

All pipe welding in the facility is will be compliance with ASME B31.3 *Process Piping*. This includes radiographic examination as prescribed by B31.3. The completed piping will be tested in compliance with the requirements of NFPA 58.

All piping welders used on the project will be certified as required in Section IX of the ASME code.

Valves and fitting utilized in the facility will be in compliance with national standards for such equipment. Safety valves and similar equipment will also be approved by a nationally recognized third party testing laboratory such as UL, CSA, or FM.

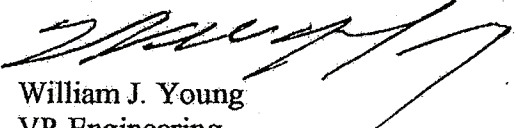
A Programmable Logic Controller (PLC) will monitor the operation of the equipment, and operating switches, transmitters, and valves will communicate with or be controlled by the PLC.

Emergency Stop switches will be strategically located throughout the facility to allow operators to easily shut down any portion of the operation in an emergency.

It is our intent to provide the safest possible operating and monitoring system at the Watkins Glen Finger Lakes LPG Facility to assure a safe and functional facility.

Very truly yours,

SUPERIOR ENERGY SYSTEMS Ltd.



William J. Young
VP-Engineering