

Cardinal Joint Fire District

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4/5/2022

Canfield Local School District
Attn: Joe Knoll, Superintendent
100 Wadsworth St.
Canfield, OH 44406

Re: Proximity of Proposed School Building to Gas Pipelines

Dear Mr. Knoll:

I am writing to you with respect to our recent conversations concerning the proposed construction of a new school building near multiple gas pipelines. You have asked me to provide my assessment and opinion regarding the feasibility and appropriateness of placing school buildings, athletic fields, and parking lots within various distances of the pipeline.

As you are aware, pipelines are regulated by the federal government, including the United States Department of Transportation (USDOT). Regulations relating to the placement of occupied structures within the pipeline area are regulated by 49 CFR § 192.1-192.1015. My review of the regulations suggests that the placement of the school and related facilities would be in a "high consequence area" as the school building and its related facilities are defined as "an identified site" within the regulations. The proposed placement of school facilities has raised a significant safety concern for me, as it should for the school administration.

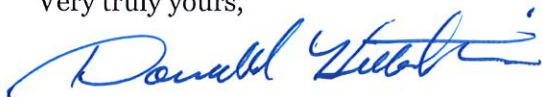
Despite my concerns, you should understand that I do not have jurisdiction over the placement of school facilities in relation to pipelines. Clearly, the pipeline operator is federally mandated to determine where school facilities may safely be placed in relation to its pipeline.

In the event of emergency, Fire Departments follow the 2020 Emergency Response Guidebook that is published by USDOT. In this guidebook, the immediate evacuation for an isolated leak is 330' in all directions, which coincides with the DOT Office of Pipeline Safety distance for High Consequence Areas, based on product and size piping and PSI = 300'.

Please request that the pipeline operator perform the mandated analysis for the school system, based upon the types of products that will be transmitted through its pipeline. This analysis will permit the pipeline operator and school system to make informed decisions with respect to the placement of school facilities in proximity to the gas pipelines.

Should you have any questions, please do not hesitate to contact me at 330-533-4316 or dhutchison@cardinaljointfire.com.

Very truly yours,



Chief Donald Hutchison
DJH/sml