



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

1200 New Jersey Avenue SE  
Washington DC 20590

MAR 08 2019

Mr. Robert Wilson  
Vice President of Operations  
Distrigas of Massachusetts, LLC  
18 Rover Street  
Everett, MA 02149

**Re: CPF No. 1-2018-3004**

Dear Mr. Wilson:

Enclosed please find the Final Order issued in the above-referenced case. It makes one finding of violation and finds that Distrigas has completed the actions specified in the Notice to comply with the pipeline safety regulations. Therefore, this case is now closed. Service of the Final Order by certified mail is effective upon the date of mailing as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

Enclosure

cc: Mr. Robert Burrough, Director, Eastern Region, Office of Pipeline Safety, PHMSA  
Ms. Susan A. Stritter, Regulatory Compliance Manager, Distrigas of Massachusetts,  
LLC, 18 Rover Street, Everett, MA 02149  
Mr. Frank Demaille, President and Chief Executive Officer, ENGIE Gas & LNG, LLC,  
1990 Post Oak Boulevard, Suite 1900, Houston, TX 77056

CERTIFIED MAIL - RETURN RECEIPT REQUESTED



### FINDING OF VIOLATION

In its Response, Distrigas did not contest the allegation in the Notice that it violated 49 C.F.R. Part 193, as follows:

**Item 1:** The Notice alleged that Respondent violated 49 C.F.R. § 193.2605(b)(1), which states:

**§ 193.2605 Maintenance procedures.**

(a) ....

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedure must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance.

The Notice alleged that Respondent violated 49 C.F.R. § 193.2605(b)(1) by failing to follow its manual of written operating procedures for each component, specifically, emergency shutdown (ESD) control systems. The Notice alleged that Distrigas did not follow its Everett Maine Terminal Maintenance Procedure Manual, Process Control System, Loop Testing, dated November 17, 2016, by failing to perform an annual inspection of its ESD control systems that includes all elements of the control system.

During the inspection, the inspector requested missing ESD testing records and Distrigas was unable to provide any documentation that demonstrated that the missing ESD initiating devices were included in the annual inspection and calibration required by its procedure.

Respondent did not contest this allegation of violation. Accordingly, based upon a review of all of the evidence, I find that Respondent violated 49 C.F.R. § 193.2605(b)(1) by failing to follow its manual of written operating procedures for each component, specifically ESD control systems.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

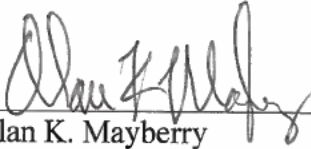
### COMPLIANCE ORDER

The Notice proposed a compliance order with respect to Item 1 in the Notice for a violation of 49 C.F.R. § 193.2605(b)(1). Under 49 U.S.C. § 60118(a), each person who engages in the transportation of gas or who owns or operates a pipeline facility is required to comply with the applicable safety standards established under chapter 601. The Director indicates that Respondent has taken the following actions specified in the proposed compliance order:

1. With respect to the violation of § 193.2605(b)(1) (**Item 1**), Respondent has revised its procedures to address the inconsistencies between the written procedure, the process described in the instructions on its individual ESD testing records, and the implementation of these processes.

Accordingly, I find that compliance has been achieved with respect to this violation. Therefore, the compliance terms proposed in the Notice are not included in this Order.

The terms and conditions of this Final Order are effective upon service in accordance with 49 C.F.R. § 190.5.



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Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

MAR 08 2019

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Date Issued