

Mary L. McDaniel, PE  
Director, Southwest Region  
DOT/PHMSA/OPS  
8701 S Gessner, Suite 630  
Houston, TX 77074

March 7, 2022

REFERENCE: CPF 4-2022-025-NOPV

Dear Ms. McDaniel,

The following information is provided in response to the Notice of Probable Violation (NOPV), CPF-4-2022-025-NOPV, dated February 10, 2022, and the one (1) probable violation relative to the fire protection evaluation and design for Chattanooga Gas Liquefied Natural Gas (LNG) facility (CHLNG or Company) noted in the NOPV. This probable violation is related to inspections of CHLNG's facilities, plans, and procedures from June 14, 2021, through July 8, 2021 for compliance with the Minimum Federal Safety Standards in § 49 CFR Part 193.

The alleged NOPV is detailed out below along with the Company's written response.

**§ 193.2801 Fire protection.**

CHLNG failed to perform an adequate fire protection evaluation and design an adequate fire water supply system in accordance with *NFPA 59A, Standard for the Production, Storage, and Handling of Liquefied Natural Gas (LNG), 2001 Edition*. First, CHLNG's fire protection evaluation did not follow *NFPA 59A (2001 Edition), Section 9.1.2* in that it did not include all hazards within the facility. Second, by not including all hazards, CHLNG failed to design an adequate fire water supply and distribution system at its Hamilton County, Tennessee Peak Shaving LNG facility in accordance with *NFPA 59A (2001 Edition), Section 9.4 Fire Protection Water Systems*

**Company Response:**

While the Company is of the belief that it had included all the hazards within the facility for its fire study, it has retained the services of a fire hazard analysis contractor to review the hazards within the plant as well as the associated plan. This review will include an assessment of the plant to ensure all hazards within the facility are properly identified. This review is expected to be completed within 60 days.

Once the updated review is complete. The identified hazards will be compared to the already known hazards within the existing fire study. Any new hazards found



will then be evaluated against the existing fire water supply and distribution system. If the existing fire water system is found to be inadequate, CHLNG will take appropriate measures within 120 days of the completion of the evaluation to make certain that the fire water system provides the level of protection as required by NFPA 59A (2001), Section 9.4, Fire Protection Water Systems.

Please let me know if you have any questions or more detail is needed.

Sincerely,



James M. Hotinger, PE  
Director, Regulatory Compliance

