

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS DELIVERY

November 22, 2016

Anthony Marone  
Senior Vice President, Gas Operations  
AVANGRID Networks  
180 Marsh Hill Road  
Orange, CT 06477

**CPF 1-2016-3002M**

Dear Mr. Marone:

Between February 22-26, 2016, inspectors from the Connecticut Department of Energy and Environmental Protection (CT DEEP), acting as agents for the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Total Peaking Services's (TPS) procedures, records, and LNG plant facilities in Milford, CT.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within TPS's plans or procedures, as described below:

- 1. §193.2605 Maintenance procedures.**
  - b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedures must include:**
    - (1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and**
    - (2) A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.**

TPS's procedures were inadequate in that they failed to clearly identify the specific piping that must be included in the atmospheric corrosion control preventive maintenance inspections.

TPS performed atmospheric corrosion checks on the piping downstream of the vaporizers in accordance with Preventive Maintenance (PM) Work Order form PM ID Number 352. The "work requested" field on PM ID Number 352 stated "HE-86-A, B & C Vaporizers, Evaluate & Paint Necessary Piping, Evaluate & Paint Equipment and Necessary Piping as needed." The

phrase “necessary piping” does not provide sufficient guidance on what piping is included in the inspection, such as the piping outside of the vaporizer building.

## 2. §193.2017 Plans and procedures

**a) Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws (49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.**

TPS procedures for maintaining a system of records as evidence that personnel have undergone and satisfactorily completed the required training programs as per §193.2719(a)(2) were inadequate. §193.2719(a)(2) states that: Each operator shall maintain a system of records which—(2) Provide evidence that personnel have undergone and satisfactorily completed the required training programs.

During the inspection, CT DEEP inspectors reviewed TPS Preventative Maintenance Work Order records for firefighting training and operating manual review. The bottom of each record provided six blank spaces for the following information:

“Completed By: \_\_\_\_\_ Completion Date: \_\_/\_\_/\_\_  
SIGN OFF: Production \_\_/\_\_/\_\_ Maintenance \_\_/\_\_/\_\_  
Signed: \_\_\_\_\_”

TPS personnel indicated that the work orders for training are generated automatically at the required interval, and that once training is completed, personnel and supervisors sign off on the work order prior to closing it. CT DEEP’s review of training work orders identified inconsistencies in how the records labelled PM ID numbers 303 and 464 were completed such as:

1. “Completed by” was initialed, printed or signed
2. “Signed” was signed, initialed or blank
3. “Maintenance” and “Completed Date” were completed or blank

In addition,

TPS’s procedures did not provide sufficient guidance on items such as:

1. Individuals responsible for completing each field on the form
2. Entries that must be printed
3. Entries that must be signed
4. Requirements for stamping and signing as “CLOSED”

## 3. §193.2017 Plans and procedures

**a) Each operator shall maintain at each LNG plant the plans and procedures required for that plant by this part. The plans and procedures must be available upon request for review and inspection by the Administrator or any State Agency that has submitted a current certification or agreement with respect to the plant under the pipeline safety laws**

**(49 U.S.C. 60101 et seq.). In addition, each change to the plans or procedures must be available at the LNG plant for review and inspection within 20 days after the change is made.**

TPS's procedures for ensuring that each change to the plans or procedures were available at the LNG plant for review and inspection within 20 days after the change is made were inadequate. Specifically, TPS's procedures did not include details on items such as:

1. The process for ensuring that verbal and input from field personnel are taken into consideration
2. Documentation of decisions made related to input received field personnel.

**4. §193.2605 Maintenance procedures.**

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

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

**(2) A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.**

TPS's procedures for thermographic inspection of an LNG tank using an infrared (IR) thermometer were inadequate to maintain the LNG plant according to the requirements of this subpart. §193.2623 states that:

“Each LNG storage tank must be inspected or tested to verify that each of the following conditions does not impair the structural integrity or safety of the tank:

- (a) Foundation and tank movement during normal operation and after a major meteorological or geophysical disturbance.
- (b) Inner tank leakage.
- (c) Effectiveness of insulation.
- (d) Frost heave”

TPS Work Order form PM ID Number 338 does record temperature readings at designated numbered locations on the LNG tank; however, other factors that could affect the temperature readings, such as the ambient temperature, frost, or cloud cover, are not recorded.

TPS's procedures failed to provide details such as:

1. Collection and assessment of specific information that could indicate a potential problem, such as
  - a. Readings that fall outside of a typical range
  - b. The presence of frost
2. Conditions under which the inspection must be performed (such as on overcast days to eliminate the heating effects of sunlight).
3. Documentation requirements.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document, you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted, and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. Failure to respond within 30 days of receipt of this Notice constitutes a waiver of your right to contest the allegations in this Notice, and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you, and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **30 days** of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Total Peaking Services maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron E. Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2016-3002M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Byron Coy, PE  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

Cc: Karl Baker, CT DEEP