

December 19, 2016

Total Peaking Services
775 Oronoque Rd
Milford, CT 06461



Byron E. Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2016-3002M

Dear Mr. Coy, P.E.

In response to your NOTICE OF AMENDMENT letter dated November 22, 2016, Total Peaking Services is taking the following actions to address the apparent inadequacies found within TPS's plans or procedures. Procedural changes are being implemented into our Operations Manual and our Work Order system as stated 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 required" field on 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 & Plant 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.

TPS Response: *TPS has modified work order (WO) 352 to address PHMSA's Notice of Amendment Item #1. Specifically, this modification provides clarification on which piping is included in the evaluation. This revised document is provided in Attachment A.*

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) 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 labeled 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 provided 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”

TPS Response: *TPS has modified the Operations & Maintenance Manual, Tab-17, Inspection & Maintenance Plan (IMP)-2 – Record Keeping, Subpart V to address documentation concerns in PHMSA’s Notice of Amendment Item #2. Specifically, this procedure ensures Maintenance Work Orders are completed in a consistent manner for close-out. This revised document is provided in Attachment B.*

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 with 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.

TPS Response: *TPS has modified the Operations & Maintenance Manual, Tab-17, IMP-2 – Record Keeping, Subpart V and added Operations & Maintenance Manual, Tab-17, IMP-8 – Management of Change to address field personnel input and documentation concerns identified in PHMSA's Notice of Amendment Item #3. These documents are provided in Attachment B and Attachment C.*

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 closed 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.

TPS Response: *To provide clarification, there are two preventative maintenance MWOs related to compliance with §193.2605 (b), (c) as follows:*

- *PM ID #338 addresses thermographic inspection of the LNG tank by a 3rd party contractor every 5-years. This inspection results in a detailed report.*
- *PM ID #171 addresses infrared inspection of the LNG tank for cold spots by LNG plant personnel every 6-months.*

TPS has modified PM ID #171 to include inspection parameters identified in PHMSA's Notice of Amendment Item #4. Specifically, the following documentation parameters were added:

- *Ambient temperatures*
- *Temperature ranges*
- *Presence of frost spots*
- *Meteorological conditions – (sunny, partly cloudy, or overcast)*

This revised document is provided in Attachment D.

If you require additional information, please contact me at your convenience.

Sincerely,



Robert J. Kopjanski, P.E.
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Enclosures:

- Attachment A – Revised WO #352
- Attachment B – Revised IMP #2
- Attachment C – Added IMP #8
- Attachment D – Revised PM ID #171

Cc: Karl Baker, CT DEEP