

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

April 2, 2019

Anthony Marone
Senior Vice President, Gas Operations
AVANGRID Networks
Total Peaking Services
180 Marsh Hill Rd.
Orange, CT 06477

CPF 1-2019-5005M

Dear Mr. Marone:

On April 24 to April 30, 2018, an inspector from the Connecticut Department of Energy and Environmental Protection (CT DEEP), acting as Agent for Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of Title 49 of the United States Code inspected Total Peaking Services' (TPS) records and procedures for its LNG plant in Bridgeport, Connecticut. TPS is a wholly-owned subsidiary of United Resources, Inc., which was a subsidiary of UIL Holdings Corporation acquired by Avangrid.

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

1. § 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 written plans and procedures required for each LNG plant by Part 193 were inadequate. Specifically, TPS procedures failed to include updated guidance for inspection of cryogenic personal protective equipment (PPE) nor sufficient guidance for inspection of non-cryogenic PPE per the requirements of § 193.2801.

Section 193.2801 states in part:

Each operator must provide and maintain fire protection at LNG plants according to sections 9.1 through 9.7 and section 9.9 of NFPA-59A-2001 (incorporated by reference, see § 193.2013).

Sections 9.7.1 and 9.7.3 of NFPA-59A-2001 state:

9.7.1* Protective clothing, which will provide protection against the effects of exposure to LNG, shall be available and readily accessible at the facility.

9.7.3* Written practices and procedures shall be developed to protect employees from the hazards of entry into confined or hazardous spaces.

During the inspection, the CT DEEP inspector reviewed TPS's Preventive Maintenance Work Order Cryogenic PPE Quarterly Inspection (WO P105645). WO P105645 stated in part:

"The approved storage location for personal cryogenic (sic) PPE is either the control room hallway or personal locker."

However, only shared cryogenic PPE is available for use at the Plant and this shared cryogenic PPE is never stored in personal lockers. Additionally, WO P105645 does not list specific indications that determine when the cryogenic PPE needs to be replaced.

CT DEEP inspector reviewed TPS's Preventive Maintenance Work Order Inventory Safety (WO P105729). TPS stated that inspection was performed on non-cryogenic PPE as part of WO P105729. TPS procedures did not provide for the periodic inspection of non-cryogenic PPE that is currently in use. TPS stated they expect to add the periodic inspection of non-cryogenic PPE into work orders.

Therefore, TPS written plans and procedures were inadequate regarding inspection and maintenance of PPE required by NFPA-59A-2001.

2. § 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 procedure must include:

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

TPS' written procedures for the maintenance of each component were inadequate. Specifically, TPS's procedures failed to include sufficient guidance for inspection and testing of UV detectors per the requirements of § 193.2619(c)(2).

Section 193.2619(c)(2) states:

(c) Control systems in service, but not normally in operation, such as relief valves and automatic shutdown devices, and control systems for internal shutoff valves for bottom penetration tanks must be inspected and tested once each calendar year, not exceeding 15 months, with the following exceptions:

...

(2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed 6 months.

During the inspection, the CT DEEP inspector reviewed TPS's Inspection and Maintenance Plan IMP-7.3 Hazard Detection and Mitigation (IMP 7.3). IMP 7.3 did not provide adequate guidance to perform inspections or testing of UV detectors. Additionally, work orders did not require the inspection and testing of UV detectors in TPS' work management system.

Therefore, TPS's written procedures were inadequate.

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. If you do not respond within 30 days of receipt of this Notice, this 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 90 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 AVANGRID Networks maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2019-5005M** and, for each document you submit, please provide a copy in electronic format whenever possible.

If you have any questions, please contact us at 609-771-7800.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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