

April 30, 2019

Total Peaking Services  
775 Oronoque Rd  
Milford, CT 06461



Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

**RE: CPF 1-2019-5002M**

Dear Mr. Burrough,

In response to your NOTICE OF AMENDMENT letter dated April 1, 2019, 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 Work Order maintenance system as stated below:

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**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 ofNFPA-59A-200I 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 PI05645). WO PI05645 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.

***TPS Response:*** *TPS has modified preventative maintenance (PM) work order (WO)-522, PI05645 to address PHMSA's Notice of Amendment Item #1. Specifically, this modification states the location of cryogenic PPE to be inspected, the condition of that PPE, and specific indications that warrant replacement of that PPE such as tears, fraying, cracks, and visual defects.*

*Additionally, TPS has added inspection of non-cryogenic PPE currently in use to (WO)-522 to look for specific indications that warrant replacement such as visual defects and expiration dates.*

*This revised document is provided in Attachment A.*

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## **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.

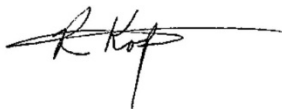
Therefore, TPS's written procedures were inadequate.

***TPS Response:*** *TPS Operations & Maintenance Manual, Tab 17 - Inspection & Maintenance Plan (IMP) - 7.3 states, "All fire protection systems are to be inspected at least semi-annually". (WO)-657 has been modified to provide guidance for calibrating plant gas & fire detectors. Additionally, the maintenance interval between inspections has been modified from six months to four-months to ensure adequate time is allotted for the inspection to be completed. This revised document is provided in Attachment B.*

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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)-522
- Attachment B – Revised (WO)-657

Cc: Karl Baker, CT DEEP