

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

June 16, 2020

James J. Judge
Chairman, President and Chief Executive Officer
Eversource Energy
300 Cadwell Drive
Springfield, MA 01104

CPF 1-2020-3002M

Dear Mr. Judge:

From May 7, 2019 to May 9, 2019, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) performed a construction inspection of Hopkinton LNG Co.'s (Hopkinton LNG) Liquefier Project in Hopkinton, Massachusetts.

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

1. **§ 193.2605 Maintenance procedures.**
 - (a) ...
 - (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) ...
 - (2) **A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.**

Hopkinton LNG's written procedures for the maintenance of each component were inadequate. Specifically, Hopkinton LNG's procedures *3.3 External Corrosion Control* and *3.5 Internal Corrosion Control* failed to adequately address the requirements of § 193.2605(b)(2) as it pertains to § 193.2637.

Section 193.2637 states:

Prompt corrective or remedial action must be taken whenever an operator learns by inspection or otherwise that atmospheric, external, or internal corrosion is not controlled as required by this subpart.

During the inspection, a PHMSA inspector reviewed Hopkinton LNG's procedure 3.3 *External Corrosion Control*, Section N, which stated in part "Take prompt corrective or remedial action for any deficiency in external corrosion protection discovered as a result of any test survey or inspection." The inspector also reviewed Hopkinton LNG's procedure 3.5 *Internal Corrosion Control*, Section F, which stated in part "Take prompt corrective or remedial action for any deficiency in internal corrosion protection discovered as a result of any test, survey, or inspection." These two procedures used the phrase "prompt corrective or remedial action", but failed to provide a description of the necessary actions as required by § 193.2605(b)(2). Specifically, corrosion being a time dependent treat, the procedures lacked a description of actions that include a timeframe for remediation of corrosion control deficiencies.

Thus, Hopkinton LNG's written procedures for maintenance as required by § 193.2605 were inadequate as it pertains to § 193.2637.

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 Enforcement 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 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 Hopkinton LNG Co. 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, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2020-3002M**

on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

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,

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

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

CC: Miguel Rodriguez, Manager LNG Operations (via email)