



June 18, 2018

Mr. James A. Urisko, Director  
Office of Pipeline Safety  
PHMSA Southern Region  
233 Peachtree Street Suite 600  
Atlanta, GA 30303

Re: CPF2-2018-001W

Dear Mr. Urisko:

Clearwater Gas System (CGS) has received and reviewed your LP gas pipeline safety evaluation letter dated May 22, 2018. Prior to your notification, CGS was made aware of several issues, probable violations during our inspection interview meeting with PHMSA Supervisor Engineer Don Murphy, General Engineer Blesson Mathew and General Engineer Seth Perkins that transpired February 28 through on March 2, 2018. Mr. Mike Deegan, Gas Operations Coordinator/ Regulatory Compliance and Safety was in attendance for the entire system evaluation interviews. The following people were in attendance for most or part of the evaluation interviews to include Mr. Del Mulholland LP Gas Supervisor, Ms. Lisa Friday, Marketing, Specialist, and Mr. Keith Downs, Gas Operation Coordinator Safety, Training and Compliance. All attendees were briefed on the findings, deficiencies and recommendations of their areas of responsibility during their interviews. Below is the list of italicized actions to rectify each deficiency, along with projected completion dates.

**1. §192.11 Petroleum gas systems**

(b) Each pipeline system subject to this part that transports only petroleum gas or petroleum gas/air mixtures must meet the requirements of this part and of ANSI/NFPA 58 and 59. CGS failed to comply with the requirements of NFPA (2004) as follows:

**- NFPA 58- §5.7.3.9**

First stage regulators shall have an outlet pressure setting up to 10.0 psig (69 kPag) in accordance with UL 144 Standard for LP- Gas Regulators.

*CGS has taken immediate corrective action, by changing out the regulators to allow a maximum MAOP of 10 PSIG to conform to the requirements of NFPA 58- §5.7.3.9 in accordance with the UL 144 Standard for LP- Gas Regulators. **Status Completed***

**- NFPA 58 §6.7.4.5**

The point of discharge from the required pressure relief device on regulating equipment installed outside of buildings in fixed piping systems shall be located not less than 3- ft. (1m) horizontally away from any building opening below the level of such discharge, and not beneath any building unless this space is well ventilated to the outside and is not enclosed for more than 50 percent of its perimeter.

CGS has taken immediate corrective action, by piping away the pressure relief device terminus of the service regulator to the appropriate code mandated distance of 3- ft. away from the building opening, of the residence located at 4521 Harborpointe Drive, Port Richey FL. **Status: Completed**

**- NFPA 58 S6.7.4.6**

The point of discharge shall also be located not less than 5 ft. (1.5m) in any direction away from any source of ignition, openings into direct-vent (sealed combustion system) appliances or mechanical ventilation air intakes.

CGS has taken immediate corrective action, by piping away the pressure relief device terminus of the service regulator to the appropriate code mandated distance of 5 ft. away in all directions from the sources of ignition at both 1819 and 1890 Lexington Place, Tarpon Springs FL. **Status: Completed**

**2. §192.195 Protection against accidental over-pressuring.**

- (a) General requirements. Except as provided in §192.197, each pipeline that is connected to a gas source so that the maximum allowable operating pressure could exceed as the result of pressure control failure or some other type of failure, must have pressure relieving or pressure limiting devices that meet the requirements of §192.199 and §192.201

CGS has taken immediate corrective action with an inline installation of a pressure relief valve (PRV) on both the Savannah Pointe LP System in Tarpon Springs, FL and the Harbor Pointe System in Port Richey, FL in compliance with the requirements of §192.199 and §192.201. The MAOP is less than 12- p.s.i. gage (83 kPa) 12- p.s.i. (83 kPa) gage, the pressure may not exceed the maximum allowable operating pressure plus 50 percent.

The Savannah Pointe LP System in Tarpon Springs, FL and the Harbor Pointe System in Port Richey, FL MAOP is 10- p.s.i. gage with the PRV's set at 15- p.s.i. **Status: Completed**

**3. §192. 603 (b) Each operator shall keep records necessary to administer the procedures established under §192. 605.**

CGS has taken immediate corrective action to include the following upgraded O&M manual written process to evaluate, document and capture the required information of periodically reviewing work done by CGS and contractor personnel to determine the effectiveness and adequacy of the procedures used in normal operations and maintenance and modified the procedures when deficiencies were found corrective action has been implemented.

The upgraded language process and record retention is implemented in the CGS LP O&M manual under the heading "Instruction to employees § 192.605 (b)(8)" as referenced by the following:

*This O&M manual covers operating, maintenance and emergency procedures that shall apply to all CGS jurisdictional gas systems under the regulatory jurisdiction of US DOT / PHMSA.*

*"Periodically reviewing the work done by CGS or CGS contractor personnel to determine the effectiveness and adequacy of the procedures and modifying the procedures when differences are found in the procedures and the manner that the work needs to be done such as when there may be a change in materials or equipment.*

*Work performed in all areas covered by NFPA 58 and CFR 49 Part 192 will be reviewed through records submitted by field personnel and by on-site observation of work to include-preparation, progress, and completion. The CGS LP supervisor will conduct this review of work performed and initial the work order and retain a copy as part of the review process and for record reference.*

The work reviews will be done with the applicable procedures in mind and evaluated on that basis. Any deficiencies in the manner any work is being done will be discussed and training and/or modification of the procedures will be done as appropriate." **Status: Completed**

**4. §192.619 maximum allowable operating pressure: Steel or plastic pipelines.**

**(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:**

**(1) the design pressure of the weakest element in the segment, determined in accordance with C and D of this part. ....**

*CGS has taken immediate corrective action, to de-rate the 15 psig MAOP to 10 psig MAOP; to conform to the primary governing code of NFPA 58- §5.7.3.9 "First stage regulators shall have an outlet pressure setting up to 10.0 psig (69 kPag) in accordance with UL 144 Standard for LP- Gas Regulators". Which provides the direction of the weakest element.*

*Both the Savannah Pointe LP System in Tarpon Springs, FL and the Harbor Pointe System in Port Richey, FL were designed and constructed for the utilization of natural gas with an initial anticipated MAOP of 100 psi. Both systems are constructed of HDPE and were initially test documented at 1.5 times (150 psig) §192.105 which states that the pipeline design pressure must be based upon the current class location design factor and the actual pipe properties which include yield strength (grade), wall thickness, longitudinal joint factor (seam type), maximum operating temperature and pipe diameter. If the pipeline segment contains pipeline components (the outlet of the first stage LP regulator per NFPA 58- §5.7.3.9 design & operating limitations of 10 psig) such as bends, fittings, flanges or valves, the operator would need to determine the design pressure of these pipeline components in accordance with applicable sections of Subparts C and D of Part 192. **Status: Completed***

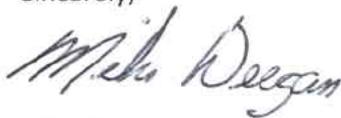
**5. §192.625 Odorization of gas**

**(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.**

**Operators of master meter systems may comply with this requirement by [...]**

*CGS has taken corrective action to ensure periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes detectable. The replacement calibrated LP gas specific odorometer is currently back ordered, as the interim method of using a calibrated natural gas specific odorometer does not accurately capture the percentage of gas in air at which the odorant in the LP- pipeline systems become readily detectable. **Status: Continued pending arrival of LP specific odorometer. (See attached (Re: Milton Roy) letter dated June 15, 2018***

Sincerely,



Mike Deegan  
Gas Operations Coordinator/ Regulatory Compliance and Safety  
Clearwater Gas System



## MILTON ROY

ISO9001 Certified Quality System  
FLOW CONTROL DIVISION  
LMI/HARTELL  
WILLIAMS MILTON ROY  
YZ SYSTEMS. PPI  
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Ivyland, PA 18974-0577  
(215) 441-0800  
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June 15, 2018

Mr. Mike Deegan  
Clearwater Gas system  
400 N. Myrtle Ave.  
Clearwater, FL 33756

Ref: Clearwater PO#BR512548

Mr. Deegan,

Our Sales Representative Devtech Sales, Inc. placed an order for a DTEX odorant detection system on March 8, 2018. When the order was processed it was mistakenly entered as a natural gas system.

We corrected the order for the LP version but were recently informed some of the components were a very long lead time from our supplier.

The minute we receive the material the unit will be built and tested. We will be shipping overnight with no shipping charges.

Our sincere apologies for this long delay in the shipment of the order.

Lynn Hilton  
Inside Sales  
Milton Roy LLC, dba YZ Systems