



**FAIRBANKS NATURAL GAS, LLC**

Office: 3408 International Way, Fairbanks Ak 99701  
Main 907-452-7111 Engineering : 907-357-6111

SENT TO COMPLIANCE REGISTRY

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October 1, 2008  
Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Material Safety Administration  
12300 W. Dakota Ave, Suite 110  
Lakewood, CO 80228

Re: Notice of Amendment  
CPF 5-2008-3001M

Dear Mr. Hoidal,

This letter is written in response to the Notice of Amendment issued for the Fairbanks Natural Gas, LLC (FNG) LNG Storage Sites and facilities in Fairbanks, Alaska. These written responses lay out how FNG has made appropriate changes to its written procedures to come into compliance with PHMSA's notice's.

**Item #1**

FNG has amended its SOPs to state that the Storage Site Facilities will have security lighting connected to an alternate power source. Measures have been completed to implement this change through electrical upgrades (New Generator) to insure the alternate power supply provides power to the security lighting to Storage Site #1. (SOP 1220)

The revised SOPs are attached for PHMSA review to demonstrate that the notice of amendments have been addressed. If there is anything further that PHMSA would like of FNG on these issues, please feel free to contact me.

Thank you for your time and effort.

Sincerely,

**Matthew J Nardini, PE**

Operations Engineer  
Fairbanks Natural Gas  
907-357-7111 office  
815-642-0719 fax

Attachments:  
FNG SOP 1220



# Standard Operating Procedures Manual

**Title: Security Procedures at LNG Storage Facilities**

S.O.P. No.: 1220

Revision No.: 005

Effective Date: 10/01/08

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Authorizing Signature: \_\_\_\_\_ Title: President

**General Security Procedures**

1. All man gates and vehicle gates will remain locked at all times while the site is unmanned.
2. All fencing and protective enclosures shall remain kept in good condition to keep unauthorized personnel out of facility.
3. Warning signs reading NO TRESSPASSING, or equivalent, shall be located on all sides of the enclosed site as to be easily seen at night from a distance of 100 feet.
4. Signs reading NO THRU TRAFFIC, or equivalent, shall be posted at the main entrances to the facility lot.
5. Security lighting is provided at the northwest and southeast corners of the Storage Site #1. Lighting is located around the perimeter of Storage Site #2. The photovoltaic lights come on automatically from dusk till dawn. Additional light may be manually operated from the main breaker panel. These lights shall be backed up by auxiliary power *at both storage facilities*.
6. Any suspicious activity shall be immediately reported to FNG management. FNG management shall decide whether local authorities must be contacted.
7. Most employees are provided with cell phones and pagers. These combined with company vehicle, LNG storage site and FNG office radios and telephones will allow personnel to communicate security events throughout the company and local emergency responders.

**Security Personnel, Patrols, and Duties**

1. Because the LNG storage sites are normally unmanned, FNG does not have assigned security positions.
2. Security rounds will be performed weekly by appointed personnel and will be practiced in everyday activities at the storage sites.
3. Operators will patrol for the following:
  - A. Obvious signs of intrusion, vandalism, theft or other unauthorized mischievous activity.
  - B. Ensure all access points are locked.



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- C. Boiler housing and service building have no signs of abnormal intrusion.
- D. Inspections will be logged using appropriate form.
- 4. If any sign of security breach is found or occurs during manned operation, the Operator will immediately contact Dispatch and report the situation. If occurrence is during off-hours, the Operator will contact the President, or designate, directly.
- 5. Dispatch will contact the President or designate, who will decide if emergency responders (Alaska State Trooper or Fire Department) are needed.
- 6. No FNG personnel will attempt to apprehend or control any obvious unauthorized intruders or situations that could lead to further damage or injury to FNG personnel or property.
- 7. If damage has occurred, the Operator will leave the scene as found and will not tamper with the scene for investigative purposes unless the condition is unsafe or affecting plant operations.
- 8. A full documentation of the event and any supplemental events or information will be maintained and kept on file.

### **Identification and Access Control**

- 1. Only FNG, and contracted LNG truck operators are allowed within the LNG storage sites without FNG supervision. All others will be considered an intruder.
- 2. Any non-employee individuals wanting to enter the facility must request and receive the approval or permission from FNG management. On-site personnel will grant access under following conditions:
  - A. Prior authorization, written or telephonic, must be issued by the FNG management and received by the LNG operator before any individual(s) will be allowed to enter.
  - B. FNG Employees will present their Employee Identification Pass. The passes are color coded as follows:
    - 1) FNG Employees – White with Green lettering and employee ID number



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- C. Entering parties who are not accompanied by an authorized Company representative or who are not visibly or verbally identifiable to on-site FNG personnel must present a currently valid FNG Guest or Contractor Identification Pass or State Driver's License. Their passes are color coded as follows:
  - 1) Guests – Orange with yellow lettering (1001-1010)
  - 2) Contractors– Yellow with orange lettering (2001-2005)
- D. Governmental Authorities must present a State Driver's License and an official picture badge identifying the governmental authority, the approving office's signature and the individual's signature.
- E. FNG and contracted LNG truck operators must possess and, if required, present an FNG Employee Identification Pass, but can enter the facility after verbal and visual identification and acknowledgement by on-site personnel.
- F. All normally closed access points will remain locked during identification checks.
- G. Under emergency conditions, on-site personnel will coordinate with a designated representative from each enforcement, emergency, and safety authority present in order to identify and allow appropriate personnel to enter the facility. However, priority should be given to handling the emergency first, while taking the best and most prudent steps possible, under these conditions, to prevent entry of unauthorized and non-emergency persons and equipment (e.g. vehicles, hazardous transports, etc.).
- H. All non-employee individuals entering the site must sign in and out on the LNG storage site sign-in log sheet:
  - 1) Date, time IN, and time OUT
  - 2) Name, Company or Agency affiliation and initial
  - 3) ID number
  - 4) Purpose of visit or function at the facility
- I. Under emergency conditions, on-site personnel are required to make the best effort possible to attain the name of all individuals and their affiliation from someone representing the enforcement, emergency or safety authority.



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3. Any individual(s) attempting to enter the facility without proper authorization or permission of the on-site personnel will cause the following action:
  - A. The individual(s) will be instructed to contact appropriate FNG management or onsite personnel for authorization, only if the on-site FNG operator cannot get authorization via telephone.
  - B. Any individual(s) who is caught attempting to breach the fencing, tampering with equipment or property or threatens the operational security of the facility, shall be immediately reported to the local police authorities, in order that they may handle the individual and the situation within the boundaries of police authority and jurisdiction. Alaska State Troopers are the local authority.
  - C. LNG operators are instructed to use their judgement in intercepting any intruders. FNG personnel should not initiate action that could cause them bodily harm, unless the action is in self-defense. Only local police should take any "forcible" action as needed to apprehend the intruder and render the area secure.

**First Contact Names and Numbers**

Dan Britton  
FNG President  
Home Phone 458-7502  
Cell 452-7111

Jim Branch  
FNG LNG Plant Supervisor  
Home Phone 745-3014  
Office Phone 373-6111  
Cell 863-3112

**Liaison with Local Law Enforcement**

1. A liaison between FNG and the Alaska State Troopers will be established and maintained.
2. Training and communication of security and defense procedures will be exchanged between FNG and Trooper personnel.
3. After initial contact, FNG will meet with the liaison, at least annually, or as often as necessary, for refresher training and/or to communicate changes in plant operations or emergency and security procedures.
4. The Operations Engineer will be responsible for establishing contact with the liaison and maintaining the records of all contact.

**Training**



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1. Upon initial hire, personnel with LNG storage site responsibilities will be trained on:
  - A. Security operating procedures
  - B. Recognizing security breaches
  - C. Performing assigned security duties
  - D. Recognizing conditions where security assistance is needed
2. Refresher training will be provided for all LNG storage site personnel every 2 years.
3. Records of training will be retained for duration of the personnel's employment plus a minimum of one year.