



July 18, 2017

CC-2913

Mr. Huy Nguyen
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Reference: CPF 5-2017-1010M

Subject: Response to a DOT Pipeline and Hazardous Materials Safety Administration "Notice of Amendment" Concerning Inadequacies in Midway Sunset Cogeneration Company (MSCC) plans or procedures.

Dear Mr. Nguyen:

Mr. Cruz, of the Office of Pipeline Safety – Western Region, conducted an onsite inspection of our pipeline facility from February 6 to February 8, 2017. A result of that inspection was a DOT "Notice Of Amendment" notifying MSCC of two (2) inadequacies found within MSCC's procedural manual (please find attached a copy of "Notice Of Amendment" **CPF 5-2017-1010M**). MSCC's following plan is numbered in concert with the "Notice of Amendment":

1. MSCC's operations and maintenance manual did not establish adequate written procedures to address prompt remedial action in correcting any valve found inoperable, unless it designates an alternative valve, in accordance with §192.745(b). MSCC failed to define the meaning of "immediately" or "in a prompt manner" the repair or replacement of emergency shutdown (ESD) valve or critical valve found to be inoperable, unless the operator uses an alternative valve.

Response: MSCC has inserted in O&M Manual Section 109 Valve and Pressure Limiting Device Inspections and Specifications headings Notification, Annual Valve Inspection, and Reporting and in Plant Procedure, MW-I-112 Natural Gas Valve Cleaning & Lubrication Procedure the following changes as indicated in bold italics font:

Any abnormal condition will be reported to the control room Operator Mechanic without any delay and corrective actions shall begin the moment the condition is detected.

2. MSCC did not establish adequate written procedures to train the appropriate operating personnel to assure that they are knowledgeable of emergency procedures and verify that the training is effective in accordance with §192.615(b)(2). MSCC lacked written procedures to undertake regular and periodic training and review of the emergency procedures with appropriate operating personnel.

Response: MSCC has included, in O&M Manual Sections 202 Emergency Operating Plan heading Planning and 602 Emergency Plans heading General, and in its Plant Procedure, MW-VII-003, MSCC/MOAJVE Gas Pipeline Emergency Response Procedure the following statement.

MSCC conducts annual onsite training for all operating personnel on this Emergency Response Procedure plan to assure that they are knowledgeable of emergency procedures. The effectiveness of this training is evaluated by the results of an end of training quiz and actions during an actual emergency event.

Copies of the documents with the listed revisions are attached to this letter. MSCC embraces the importance of public safety and, therefore, wishes not only to meet the letter of the law but the overriding intent.

MSCC commends Mr. Cruz's professional demeanor during the inspection. It proved an excellent opportunity for MSCC's employees to interact with and learn from a knowledgeable, professional, DOT representative.

If you have any questions or comments, please email me at; management@midwaysunset.com or call me at (661) 768-3000 ext. 3020.

Sincerely,



Dave Faiella
Executive Director

Attachment

cc: File CC-2913 CEC DOT Form 1 D. Faiella G. Jans
S. Henriksen M. Bojorquez M. Ellano S. Settlemyre R. Smith