

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: cynthia.hansen@enbridge.com

July 8, 2025

Cynthia Hansen
Executive Vice President and President
Enbridge, Inc.
915 North Eldridge Pkwy, Suite 1100
Houston, Texas 77079

CPF 4-2025-038-NOA

Dear Ms. Hansen:

From June 4 to 6, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected East Tennessee Natural Gas, LLC's¹ (ETNG) procedures for operations and maintenance of its liquefied natural gas (LNG) facilities in Kingsport, Tennessee.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within ETNG's plans or procedures. The items inspected and the inadequacies are described below:

1. § 193.2503 Operating procedures.

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:

(a)

(g) Cooldown of components according to the requirements of § 193.2505.

§ 193.2505 Cooldown.

(a) The cooldown of each system of components that is subjected to cryogenic temperatures must be limited to a rate and distribution pattern that keeps thermal stresses within design limits during the

¹ East Tennessee Natural Gas, LLC, is a subsidiary of Enbridge, Inc.

cooldown period, paying particular attention to the performance of expansion and contraction devices.

(b) After cooldown stabilization is reached, cryogenic piping systems must be checked for leaks in areas of flanges, valves, and seals.

ETNG's written procedures for conducting normal operations activities were inadequate to provide for safe operation of an LNG facility in accordance with § 193.2503(g). Specifically, ETNG's procedures, including *Liquefied Natural Gas Operations Manual - Storage Tank Procedures, OPS-67.100-5* (Version 1.0; Dec. 2, 2024), *Liquefied Natural Gas Operations Manual - Send-Out Procedure, OPS-67.100-6* (Version 1.0; Oct. 15, 2024), and *Liquefied Natural Gas Operations Manual - Miscellaneous Procedures, OPS-67.100-12* (Version 1.0, Oct. 21, 2024) failed to specify rates and distribution patterns to keep thermal stresses within design limits in accordance with § 193.2505(a). In addition, none of the procedures included instructions for performing the cooldown of components in accordance with the requirements by § 193.2505(a) and (b).

PHMSA proposes that ETNG revise its written procedures to include detailed instructions, including cooldown rates of components to keep thermal stresses within design limits, of how the cooldown of components is to be performed according to the requirements of § 193.2505, in accordance with § 193.2503(g).

2. § 193.2509 Emergency procedures.

(a) Each operator shall determine the types and places of emergencies other than fires that may reasonably be expected to occur at an LNG plant due to operating malfunctions, structural collapse, personnel error, forces of nature, and activities adjacent to the plant.

(b) To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following:

(1) Responding to controllable emergencies, including notifying personnel and using equipment appropriate for handling the emergency.

ETNG's written procedures for adequately handling each type of emergency identified under § 193.2509(a) were inadequate to provide for safe operation of a LNG facility in accordance with § 193.2509(b). Furthermore, the procedures provided inadequate guidance regarding the response to controllable emergencies, including notifying personnel and using equipment appropriate for handling the emergency in accordance with § 193.2509(b)(1). Specifically, ETNG's procedure, *LNG Operations Manual Emergency Tab B* (Rev. 16; January 6, 2022) failed include response procedures for handling emergencies other than fires that may reasonably be expected to occur at an LNG plant due to operating malfunctions, structural collapse, personnel error, forces of nature, and activities adjacent to the plant as required by under § 193.2509(a). ETNG's procedures included instructions for handling only fires and spills.

In addition, ETNG's *Liquefied Natural Gas Operations Manual - Emergency Procedures OPS-67.100-16* (Version 1.1; Nov, 14, 2024) also does not list any other type of emergencies other than fires. Finally, ETNG's procedure, *LNG Operations Manual Emergency Tab B* (Rev. 16; Jan. 6, 2022), *section IV.A* does not contain detailed instruction of how personnel should respond to a controllable rupture emergency, including notifying personnel and using equipment appropriate for handling the emergency.

Therefore, PHMSA proposes ETNG revise its written procedures to include the types and places of emergencies other than fires that may reasonably be expected to occur at an LNG plant due to operating malfunctions, structural collapse, personnel error, forces of nature, and activities adjacent to the plant as required by § 193.2509(a). ETNG must also include instructions for personnel responding to controllable emergencies, including notifying personnel and using equipment appropriate for handling the emergency in accordance with § 193.2509(b)(1).

3. § 193.2605 Maintenance procedures.

(a) Each operator shall determine and perform, consistent with generally accepted engineering practice, the periodic inspections or tests needed to meet the applicable requirements of this subpart and to verify that components meet the maintenance standards prescribed by this subpart.

(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; and

(2) A descriptions of other actions necessary to maintain the LNG plant according to the requirements of this subpart.

ETNG's written procedures for conducting maintenance activities were inadequate to provide for safe operation of a LNG facility in accordance with § 193.2605(b). Specifically, ETNG's procedures, *LNG Maintenance Manual M-1 Maintenance Procedures Tab A* (Rev. 8; Aug. 8, 2018) and *Hazardous Energy Control Lockout/Tagout Procedure SAF-58.300* (Version 1.1, Apr. 2, 2024) failed to identify components that are required to be inspected and tested, to include details of the inspections or tests determined under paragraph (a) of § 193.2604, the activities required to maintain each component, including any required corrosion control, frequency of performance, or any descriptions of other actions necessary to maintain the LNG plant according the requirements of Subpart G, in accordance with § 193.2509(b)(1) and (2).

Therefore, PHMSA proposes ETNG revise its written procedures to include detailed instructions on components requiring inspections and tests, including any required corrosion control, instructions to personnel on performing required maintenance, a schedule of the frequency of maintenance performance, and a detailed description of any other actions necessary to maintain the LNG plant in accordance with the maintenance requirements in Subpart G in accordance with § 193.2509(b).

4. § 193.2605 Maintenance procedures.

(a)

(c) Each operator shall include in the manual required by paragraph (b) of this section instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 191.23 of this subchapter.

ETNG's written procedures for conducting maintenance activities were inadequate to provide for safe operation of a LNG facility in accordance with § 193.2605(c). are insufficient to adequately enable personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 191.23 of this subchapter, in accordance with § 193.2605(c). Specifically, ETNG's procedure, *Safety-Related Condition Reporting Procedure, SOP 5-2040* (Version 2.5; Dec. 1, 2023) failed to provide adequate guidance for personnel to recognize safety-related conditions (SRCs).

Section 6.1 *Potential Reportable Conditions* lists SRCs that repeat the list in 49 CFR § 191.23 and includes conditions that are specific to transmission pipelines and underground natural gas storage facilities, but does not include any instructions to personnel on recognizing potential SRCs at its Kingsport LNG facility.

Therefore, PHMSA proposes that ETNG revise its written procedures to enable personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requires of § 191.23, in accordance with § 193.2605(c).

5. § 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 procedure must include:

(1)

(2) A descriptions of other actions necessary to maintain the LNG plant according to the requirements of this subpart.

§ 193.2617 Repairs.

(a) Repair work on components must be performed and tested in a manner which:

(1) As far as practicable, complies with the applicable requirements of Subpart D of this part; and

(2) Assures the integrity and operational safety of the component being repaired.

ETNG's written procedures for conducting maintenance activities were inadequate to provide for safe operation of a LNG facility in accordance with § 193.2605(b)(2). ETNG's written procedures are insufficient to adequately ensure that repair work on components must be performed and tested in a manner which as far as practicable, complies with the applicable requirements of Subpart D of Part 193 and assures the integrity and operational safety of the component being repaired, in accordance with § 193.2617(a). Specifically, ETNG's procedures, *LNG Maintenance Manual M-1 Maintenance Procedures Tab A* (Rev. 8, August 8, 2018), and *Hazardous Energy Control Lockout/Tagout Procedure SAF-58.300* (Version 1.1, April 2, 2024) do not require that repair work on components is performed and tested in a manner that complies with the construction requirements in Subpart D, to the extent practicable, and fails to provide instructions on performing repairs that assures the integrity and operational safety of the component being repaired in accordance with § 193.2617(a)(1) and (2).

Therefore, PHMSA proposes ETNG revise its written procedures to include specific instructions for performing repair work on components in a manner which, as far as practicable, complies with the applicable requirements of Subpart D of Part 193 and assures the integrity and operational safety of the component being repaired, in accordance with § 193.2617(a).

6. § 193.2017 Plans and procedures.

(a)

(c) Each operator must review and update the plans and procedures required by this part --

(1) When a component is changed significantly or a new component is installed; and

(2) At intervals not exceeding 27 months, but at least once every 2 calendar years.

ETNG's written procedures failed to require ETNG to review and update the plans and procedures required by Part 193 when a component is changed significantly or a new component is installed, and at intervals not exceeding 27 months, but at least once every 2 calendar years, in accordance with § 193.2017(c). Specifically, ETNG did not provide specific written procedures or instructions in its procedures requiring that all written procedures and plans be reviewed and updated when a component is changed significantly or a new component is installed and at intervals not exceeding 27 months, but at least once every 2 calendar years.

Therefore, PHMSA proposes that ETNG updates its plans and procedures so that each is reviewed and updated as required by Part 193 when a component is changed significantly or a new component is install and at intervals not exceeding 27 months, but at least once every 2 calendar years, in accordance with § 193.2017(c).

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 ETNG maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Bryan Lethcoe, Director, Southwest, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2025-038-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

cc: Peter Seydewitz, Director, Operational Excellence, Enbridge, Inc.,
peter.seydewitz@enbridge.com
Andrew Kohout, Director, Division of LNG Facility Reviews and Inspections
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