



By Electronic Mail

April 20, 2026

Mr. Bryan Lethcoe
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
8701 South Gessner, Suite 630
Houston, Texas 77074

Re: Florida Gas Transmission
Notice of Probable Violation
CPF 4-2026-013-NOPV

Dear Mr. Lethcoe:

Florida Gas Transmission (“FGT” or “Company”) is in receipt of the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Notice of Probable Violation (“NOPV”), Proposed Compliance Order (“PCO”) and Proposed Civil Penalty (collectively referred to as the “Notice”) issued on February 18, 2026 and received by the Company on February 19, 2026. By way of background, the Notice was issued following a PHMSA inspection of the Company’s procedures, records, and pipeline facilities located in Florida, Texas, Alabama, Louisiana and Mississippi between the dates of March 7 to October 5, 2023. The Notice alleges five (5) violations, two (2) of which were issued as Warning Items, and includes a PCO requiring remedial actions to ensure compliance with the pipeline safety regulations found in 49 C.F.R. Part 192 and a Proposed Civil Penalty in the amount of \$79,800.

On February 19, 2026, FGT requested a copy of the case file and an extension of time to respond until April 20, 2026. PHMSA provided the case file on February 24 and additional related documents on March 4, 2026 and approved the extension of time on March 3, 2026; thus, this response is timely.

Please note that this submission contains certain confidential business information and confidential security information that is protected from public disclosure under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. Should PHMSA receive a FOIA request for this information, the Agency is required to notify FGT and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.

FGT shares PHMSA’s commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or concerns during the review of this submission please contact me at (713) 989-7126 or via email at todd.nardozzi@energytransfer.com.

Sincerely,
**Todd
Nardozzi**
Todd Nardozzi
Director – DOT Compliance

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Todd Nardozzi
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Attachments

PHMSA NOPV

1. § 192.163 Compressor stations: Design and construction.

(a)

(d) *Fenced areas.* Each fence around a compressor station must have at least two gates located so as to provide a convenient opportunity for escape to a place of safety, or have other facilities affording a similarly convenient exit from the area. Each gate located within 200 feet (61 meters) of any compressor plant building must open outward and, when occupied, must be openable from the inside without a key.

FGT failed to have at least two gates located in its fence around a compressor station so as to provide a convenient opportunity for escape to a place of safety in accordance with § 192.163(d). Specifically, during a field visit to Silver Springs Compressor Station #17, PHMSA observed the compressor station had one main entrance gate, and two gates along the fence line that were both chained and locked in place. At the time of inspection, nobody present had keys for the locks, and therefore neither of the two gates could act as a convenient method of escape.

Proposed Compliance Order

In regard to Item 1 of the Notice pertaining to FGT's failure to have at least two gates located in its fence around a compressor station so as to provide a convenient opportunity for escape to a place of safety in accordance with § 192.163(d), FGT must modify the fencing at Silver Springs Compressor Station #17 so there are at least two gates which open outward and can be opened without a key and provide evidence to the Director, Southwest Region, PHMSA within **60** days of receipt of the Final Order.

FGT Response

FGT disagrees with the finding of Probable Violation of § 192.163(d) as explained below.

Section § 192.163(d) has two separate and distinct requirements. The first sentence applies to each fence around a *compressor station* and requires "at least two gates located so as to provide a convenient opportunity for escape to a place of safety or have other facilities affording a similarly convenience exit from the area". The second sentence applies to "each gate located within 200 feet (61 meters) of any compressor *plant building*" (emphasis added) and those gates "must open outward and, when occupied, must be openable from the inside without a key."

PHMSA appears to have conflated the two distinct requirements of 49 C.F.R. §192.163(d) when finding FGT in violation of the first sentence of § 192.163(d) and then ordering it to comply with the separate and distinct requirement of the second sentence of § 192.163(d).

The PHMSA Probable Violation contends that the two gates observed at the Silver Spring Compressor station could not function as a "convenient method of escape" because "at the time of the inspection, nobody present had keys for the locks" and that FGT was in violation of § 192.163(d). The Company disagrees that it was in violation of the first part of § 192.163(d). All FGT field personnel have a "master" key that will unlock any lock on the FGT system, and these keys are in each field-based Company vehicle. During the time of the inspection the keys were simply not on the person of the employees accompanying PHMSA, however they were in their vehicles and available to be utilized to open these gates "conveniently" for escape when and if necessary. FGT believes this meets the intent of the first part of § 192.163(d).

The second sentence of § 192.163(d) applies only to gates within 200 feet of a *compressor plant building* – *not a compressor station*. Although PHMSA did not find that FGT was in violation of the second sentence of § 192.163(d) in its probable violation, it nonetheless ordered FGT to “modify the fencing at Silver Springs Compressor Station #17 so there are at least two gates which open outward and can be opened without a key”. First, there is no finding that FGT violated this requirement in the Notice. And second, the one and only “compressor plant building” is not within 200 feet of a gate and the requirement in the second sentence of § 192.163(d) that such a gate “must open outward and, when occupied, must be openable from the inside without a key” does not apply.

Included with this submission under Attachment A is an overhead image of the Silver Spring compressor station with a 200-foot buffer (black circle border with yellow center dot) overlayed at the center and edges of both compressor plant buildings on site. As shown in this image, neither compressor plant building is within 200 feet of a gate. The other buildings located within the facility fencing are either the office building or other ancillary function buildings none of which are “compressor plant buildings”. The function of these buildings is noted on the image (red circle border with red font label). FGT also notes that while personnel are on site and in the office building (building nearest the main entrance gate in the image) that gate remains open.

For the reasons described above FGT respectfully requests that PHMSA withdraw the Probable Violation of § 192.163(d) and the associated Proposed Compliance Order.

2. § 192.706 Transmission lines: Leakage surveys.

Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line which transports gas in conformity with § 192.625 without an odor or odorant, leakage surveys using leak detector equipment must be conducted—

FGT failed to conduct leakage surveys using leak detector equipment on a transmission pipeline, which transports gas in conformity with § 192.625 without an odor or odorant, in accordance with § 192.706. Specifically, FGT failed to provide records showing that leak detector equipment was used to conduct leakage surveys in Class 3 locations.

FGT’s procedure, *Gas Leakage Survey, I.22* (Rev. May 1, 2023), table 5, requires leakage surveys in Class 3 locations to utilize gas leakage detection equipment. During the inspection, FGT provided PHMSA work orders for leakage surveys conducted in Class 3 locations that failed to specify that leakage surveys were conducted using leak detector equipment in accordance with § 192.706 and its procedure, for the following segments:

1. Tallahassee West Hopkins M&R;
2. Port Barre segment;
3. Munson segment;
4. Vidor segment; and
5. Eunice segment.

Therefore, FGT failed to conduct leakage surveys using leak detector equipment on a transmission pipeline, which transports gas in conformity with § 192.625 without an odor or odorant, in accordance with § 192.706.

FGT Response

FGT disagrees with the finding of Probable Violation of § 192.706. Although PHMSA has issued this item as a Warning, FGT desires to explain and substantiate its process for complying with the requirements of § 192.706 to prevent further misunderstanding on this issue in the future.

As PHMSA notes, FGT follows SOP *I.22 Gas Leakage Survey* to properly conduct leakage surveys as required by § 192.706 including surveys conducted in Class 3 locations with leak detection equipment. This SOP provides detailed information and steps that are followed by personnel conducting these surveys.

Further, the SOP also includes Section 7.4 that guides the user in selecting the appropriate leak detector equipment when required. Section 8.0 of the SOP describes the documentation requirements which provide the user with the option to either use the *I.21.A Pipeline Patrol and Leak Survey* report or utilize the electronic database to record the work order activity, acknowledge the requirements as outlined in the SOP were followed, and complete the work order. When the work order is completed the qualified personnel that performed the leak survey activity certify that the work was completed by all applicable requirements of the SOP up to and including use of leak detector equipment. Therefore, FGT's process ensures and documents that the subject leakage surveys are conducted using leak detector equipment in accordance with § 192.706 and its procedures.

FGT believes that this documentation process meets all requirements of § 192.603(b) which states that "Each operator shall keep records necessary to administer the procedures established under § 192.605" which is the Procedural manual for operations, maintenance, and emergencies.

3. § 192.731 Compressor stations: Inspection and testing of relief devices.

(a)

(c) Each remote control shutdown device must be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.

FGT failed to inspect and test each remote-control shutdown device at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly, in accordance with § 192.731(c). Specifically, FGT failed to document its determination that remote control shutdown devices (emergency shutdown devices or ESDs) were determined to function properly.

During the inspection, FGT provided inspection and test records for ESDs at its Port Barre and Silver Springs CS17 stations for the years 2021 through 2023. The records provided failed to verify performance functions during the inspection and tests, and thus FGT could not show that it had determined the shutdown devices were functioning properly for those years.

Therefore, FGT failed to provide records that it inspected and tested each remote-control shutdown device at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly, in accordance with § 192.731(c).

FGT Response

FGT disagrees with the finding of Probable Violation of § 192.731(c). Although PHMSA has issued this item as a Warning, FGT desires to explain and substantiate its process for complying with the requirements of § 192.731(c) to prevent further misunderstanding on this issue in the future.

FGT follows SOP *H.16 Emergency Shutdown System* to properly conduct the inspection and testing of each remote-control shutdown device as required by § 192.731(c) including ESD equipment. This SOP provides detailed information and steps that are followed by personnel conducting this inspection and testing.

Section 8.0 of the SOP describes the documentation requirements which provide the user with the option to either use the *H.16.A Station ESD Test report* or utilize the electronic database to record the work order activity, acknowledge the requirements as outlined in the SOP were followed and complete the work order. When the work order is completed the qualified personnel that performed the inspection and testing certify that the work was completed by all applicable requirements of the SOP.

The records reviewed during the inspection and noted by PHMSA in the Notice¹ not only included closed work orders from the electronic database but also the corresponding H.16.A forms completed for the Port Barre and Silver Springs compressor stations.

The H.16.A forms specifically note that the entire ESD system was tested, all valves associated with the ESD system functioned properly as did all push/pull buttons. FGT believes that this documentation clearly demonstrates that for these specific inspections and testing all performance functions were achieved and thus it determined that the ESDs were functioning properly. Had any equipment issues been encountered during the inspection and testing, a corrective work order would have been issued and/or form *H.16.B Equipment Failure report* would have been completed, again as described in the SOP. Further, the work order to perform the inspection and testing would remain open until the corrective work order was completed and closed.

FGT believes that this documentation process meets all requirements of § 192.603(b) which states that “Each operator shall keep records necessary to administer the procedures established under § 192.605” which is the Procedural manual for operations, maintenance, and emergencies.

4. § 192.736 Compressor stations: Gas detection.

(a)

(b) Except when shutdown of the system is necessary for maintenance under paragraph (c) of this section, each gas detection and alarm system required by this section must-

(1) Continuously monitor the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; and

(2) If that concentration of gas is detected, warn persons about to enter the building and persons inside the building of the danger.

FGT’s gas detection and alarm system failed to warn persons about to enter the building and persons inside the building of a concentration of gas in air of not more than 25 percent of the lower explosive limit (LEL), in accordance with § 192.736(b)(2). Specifically, the gas detection and alarm systems at the following compressor buildings failed to actuate an audible or visual alarm at a gas concentration of 25 percent LEL:

1. Trenton #24 unit 24-2 Building D & unit 24-3 Building E
2. Brooker #16 unit 1601 Building E
3. Silver Springs #17 unit 1703
4. Lecanto #26 unit 2602 Building E

¹ PHMSA Exhibits 23-266740_Exhibit B1 through B9 referenced in CPF# 4-2026-013-NOPV Pipeline Safety Violation Report pgs. 21-22.

During the field inspection, FGT performed a test of the gas detection and alarm systems in each of these compressor buildings. The FGT technician isolated the gas detection system to allow for testing without service disruption and used calibration gas to trigger the alarm system at 25 percent LEL. However, the test did not actuate an audible or visual alarm at a gas concentration of 25 percent LEL or less or turn on any building ventilation fans and/or louvers.

Therefore, FGT's gas detection and alarm system failed to warn persons about to enter the building and persons inside the building of a concentration of gas in air of not more than 25 percent of the lower explosive limit (LEL), in accordance with § 192.736(b)(2).

Proposed Compliance Order

In regard to Item 4 of the Notice pertaining to FGT's gas detection and alarm system's failure to warn persons about to enter the building and persons inside the building of a concentration of gas in air of not more than 25 percent of the lower explosive limit (LEL), in accordance with § 192.736(b)(2), FGT must repair or replace the gas detection and alarm systems at the following compressor station buildings compressor building, conduct a satisfactory alarm system test of the gas detection and alarm system in accordance with the requirements of § 192.736(b), and provide records documenting the repair or replacement and the results of the test to the Director, Southwest Region, PHMSA within **60** days of receipt of the Final Order.

1. Trenton #24 unit 24-2
2. Brooker #16 unit 1601
3. Silver Springs #17 unit 3
4. Lecanto #26 unit 2602

Proposed Civil Penalty

\$79,800

FGT Response

FGT neither admits nor denies the allegation of a probable violation of § 192.736(b)(2). However, as set forth below, there are factual inaccuracies asserted by PHMSA in the Notice that warrant a reduction in the Proposed Civil Penalty. FGT provides the evidence below supporting a reduction in Proposed Civil Penalty and includes additional information and explanations for instances where the alarms did actuate during the PHMSA inspections, and for why, in certain instances, the alarms did not actuate during PHMSA inspections. In addition, FGT has already completed any necessary work on the alarm systems as required in the PCO, rendering the PCO moot. Based on this information, FGT requests a reduction in the Civil Penalty and confirmation from PHMSA that the PCO is satisfied when the Final Order is issued.

FGT has included with this response the completed 2022 and 2023, twice per calendar year, not to exceed 7.5-month inspection and testing H.18 Gas Detection system work orders for the following compressor station units;

1. Trenton #24 unit 24-2 ([Attachment B](#))
2. Brooker #16 unit 1601 ([Attachment C](#))
3. Silver Springs #17 unit 3 ([Attachment D](#))
4. Lecanto #26 unit 2602 ([Attachment E](#))

These completed work orders clearly demonstrate that the qualified personnel that performed the inspection and testing of the gas detection systems at these locations certified that the work was completed according to all applicable requirements of SOP *H.18 Stationary Gas and Fire Detection Systems*². The 2022 and initial 2023 inspection and testing records also indicate that the gas detection systems at each of these locations were found to be functioning properly prior to the PHMSA inspection and the second 2023 inspection and testing records indicate that the systems were again functioning properly after FGT investigated the cause and enacted remedial activities (where necessary) to address the PHMSA field findings detailed in Item 4 of the Notice. The results of these investigations are described below for each identified location:

Trenton #24 unit 24-2 Building D & unit 24-3 Building E – This location was physically inspected by PHMSA on July 12, 2023. FGT performed gas detection alarm tests in buildings C, D and E to demonstrate audible and visual alarms that actuate at a gas concentration of 25 percent LEL to PHMSA as requested. No deficiencies were noted by the FGT inspection lead, and none were communicated at this time to FGT by PHMSA. It is unclear to FGT why PHMSA has indicated that the gas detection and alarm system failed to actuate at the Trenton compressor station during this inspection. Included with this submission under Attachment B are the completed 2022 and 2023 inspection and testing H.18 Gas Detection system work orders.

Brooker #16 unit 1601 Building E – This location was physically inspected by PHMSA on July 11, 2023 and the gas detection and alarm system failed to actuate an audible or visual alarm at a gas concentration of 25 percent LEL. FGT discovered through its investigation that audible and visual alarms had been disconnected during a control system upgrade. The alarms were restored and tested on July 13, 2023 and the completed subsequent inspection and testing H.18 Gas Detection system work order (September 28, 2023) is included under Attachment C along with the prior 2022 and 2023 completed work orders.

Silver Springs #17 unit 1703 – This location was physically inspected by PHMSA on June 21, 2023 and the gas detection and alarm system failed to actuate a visual alarm at a gas concentration of 25 percent LEL. FGT discovered through its investigation that visual alarms failed to actuate during the PHMSA inspection due to a blown fuse which was subsequently replaced and the completed subsequent inspection and testing H.18 Gas Detection system work order (August 17, 2023) is included with this submission under Attachment D along with the prior 2022 and 2023 completed work orders. It is believed that severe thunderstorms in the area days before the PHMSA inspection at this location caused the blown fuse.

Lecanto #26 unit 2602 – This location was physically inspected by PHMSA on June 22, 2023 and the gas detection and alarm system failed to actuate a visual alarm at a gas concentration of 25 percent LEL. FGT discovered through its investigation that two (2) strobes were not functioning and both were replaced and the completed subsequent inspection and testing H.18 Gas Detection system work order (October 11, 2023) is included with this submission under Attachment E along with the prior 2022 and 2023 completed work orders.

FGT requests that PHMSA review the H.18 work orders from each location that document the inspection and testing of the gas detection alarm systems after the PHMSA inspection and remedial measures (where necessary) were affected as evidence that the PCO for this item is complete and to indicate such in the Final Order when issued.

² PHMSA Exhibit 23-266740 _Exhibit C1 referenced in CPF# 4-2026-013-NOPV Pipeline Safety Violation Report pg. 38.

Reduction of Proposed Civil Penalty

Instances of Violation – As FGT describes above it was unclear to the Company why the Trenton #24 unit 24-2 Building D & Unit 24-3 Building E were included as the demonstration of audible and visual alarms at this station were satisfactory during the PHMSA inspection. As such, this instance of Probable Violation should be withdrawn, and the Civil Penalty should be recalculated with the number of instances as three (3) and not four (4).

Gravity - The PHMSA Civil Penalty worksheet includes a penalty calculation under the Gravity section of seventeen (17) points which correlates with the violations occurring within an HCA or “could affect” HCA. None of the compressor stations identified by PHMSA are within an HCA and under Attachment F FGT has included images of each compressor station from its mapping database that support this fact. Managed HCA segments are indicated in the images by a change in color of the pipeline centerline to red. Several of the images included are at a scale that shows the closest managed HCA segments to the compressor station, but which do not include the compressor station. PHMSA will note that the Lecanto compressor station has managed HCA mainline segments on both the suction and discharge sides of the station however, none of the equipment or piping within the Lecanto station is managed HCA. Because these compressor stations are not in an HCA, PHMSA must recalculate the Civil Penalty for this item using seven (7) points which correlate to the violations not occurring within an HCA.

Good Faith – FGT has provided the 2022 and initial 2023 twice per calendar year, not to exceed 7.5-month inspection and testing H.18 Gas Detection system work orders for each station all of which indicate that the systems were found to be functioning properly prior to the PHMSA inspection. Despite the fact that at three of the four stations the systems failed to function properly during the PHMSA inspection, FGT believes that it has acted in good faith and in compliance with the requirements of § 192.736(b)(2) and as such PHMSA must consider that and recalculate the Proposed Civil Penalty including a -10 indicating that “the operator had a reasonable justification for its non-compliance” in the Good Faith section of the Civil Penalty worksheet.

FGT requests that PHMSA consider the discussion above and recalculate and reduce the Civil Penalty for Item 4 of the Notice by reducing the instances of violation to three (3), selecting seven (7) points under Gravity indicating that the three (3) instances of probable violation occurred not within an HCA and applies -10 to the Good Faith section of the Civil Penalty worksheet.

5. § 192.736 Compressor stations: Gas detection.

(a)

(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

FGT failed to maintain and perform tests of each gas detection and alarm system to ensure it functioned properly in accordance with § 192.736(c). Specifically, FGT’s maintenance records failed to verify performance tests included continuous monitoring of the compressor building for a concentration of gas in air of not more than 25 percent of the lower explosive limit; warnings to persons about to enter and inside the building of danger; and operation of ventilation fans and louvers at the following compressor stations:

1. Quincy Station
2. Port Barre Station
3. Eunice Station

4. Mt. Vernon Station

FGT's procedure *Stationary Gas and Fire Detection Systems H.18* (Rev. Nov. 11, 2019), section 7.1, step 7, states that personnel will "TEST the system in each compressor building by introducing a simulated condition to a gas sensor or fire eye that activates the alarms and verify that the appropriate warning devices function properly." In addition, section 7.5 requires every gas sensor to be tested at a low alarm trip point of not more than 25% Lower Explosive Limit (LEL) and a high alarm trip set point not more than 50% LEL. Section 7.7, steps 3 and 5, require FGT personnel to verify the proper operation of all audible and visual alarms, as well as the building ventilation fan(s) and louvers.

During the inspection, PHMSA reviewed the gas detector test records at Quincy, Port Barre, Eunice, and Mt. Vernon stations for years 2021 to 2023, and determined that the records did not document performance tests that verified the gas detection devices actuate audible and visual alarms at a gas concentration of low alarm trip point of 25 percent or a gas concentration high alarm trip point of 50 percent LEL or less. In addition, the records failed to document proper operation of the building ventilation fans and louvers during the test.

Therefore, FGT failed to provide records that each gas detection and alarm system was maintained and tested to function properly in accordance with § 192.736(c).

Proposed Compliance Order

In regard to Item 5 of the Notice pertaining to FGT's failure to provide records that each gas detection and alarm system was maintained to function properly in accordance with § 192.736(c) and its procedures, FGT must provide records documenting the results of the test of the gas detection and alarm systems at the compressor stations listed in Item 7. In addition, FGT must update or revise its procedure and testing records to require personnel to document all requirements of gas detection system performance testing. FGT must provide results of the tests and the revised document to record the gas detection test to the Director, Southwest Region, PHMSA within **60** days of receipt of the Final Order.

FGT Response

FGT disagrees with the finding of Probable Violation of § 192.736(c) and requests that it be withdrawn along with the associated PCO. First of all, and importantly, an alleged lack of records is not conclusive proof that FGT violated § 192.736 (c). That section requires maintenance and testing, not records. There is no evidence that FGT failed to perform maintenance and testing - only allegations that its records and procedures are inadequate. PHMSA reviewed the associated records during its 2023 inspection and references such in its Pipeline Safety Violation Report³

Regarding FGT records and procedures, FGT describes in detail below its process for complying with the requirements of § 192.736(c) to prevent further misunderstanding on this issue in the future and to support the FGT request to withdraw this Probable Violation and the associated Proposed Compliance Order.

FGT follows SOP *H.18 Stationary Gase and Fire Detection Systems*⁴ to properly conduct the inspection and testing of each stationary gas and fire detection system as required by § 192.736(c). This SOP provides detailed information and steps that are followed by personnel conducting this inspection and testing.

³ PHMSA Exhibits 23-266740_ Exhibits C2 through C32 referenced in CPF# 4-2026-013-NOPV Pipeline Safety Violation Report pgs. 38-39.

⁴ PHMSA Exhibit 23-266740_ Exhibit C1 referenced in CPF# 4-2026-013-NOPV Pipeline Safety Violation Report pg. 38.

These inspections and tests are conducted as outlined in section 7 of the H.18 SOP. Section 7.1 step 7 is completed by the qualified employee and step 8 states to “Record the date the sensors and system are tested in per section 8 Documentation Requirements”. This was completed for each of the stations listed above in the electronic database. There are no additional documents required to document performance of the system. Additionally, section 7.1 step 6 states “If a failed component cannot be corrected immediately, implement a contingency plan for the unprotected building or equipment until the system is functionally restored, and notify Operations Management and Gas Control.

The contingency plan will include but not be limited to:

- An instrument and visual gas leakage and/or visual fire survey every two hours.
- An instrument and visual gas leakage and/or visual fire survey when unit status changes are made.

Notify all parties listed above when the Gas and or Fire detections system(s) is returned to normal service.”

This step outlines what to do if any device fails to operate properly and the steps to follow until the system is repaired and back to full functionality. The electronic database work order will not be completed until these steps are taken and the system is back to full functionality. Therefore, if the work order is certified the system performed satisfactorily, including the systems referenced specifically by PHMSA above (audible and visual gas concentration alarms and building ventilation fans and louvers). Sections 7.5 and 7.7 are also completed according to the steps outlined in each section and documented according to Section 8:

Section 8.0 of the SOP describes the documentation requirements which provide the user with the option to either use the *H.18.A Gas Fire Detection report* or utilize the electronic database to record the work order activity, acknowledge the requirements as outlined in the SOP were followed and complete the work order. When the work order is completed the qualified personnel that performed the inspection and testing certify that the work was completed by all applicable requirements of the SOP.

FGT believes that this documentation process meets all requirements of § 192.603(b) which states that “Each operator shall keep records necessary to administer the procedures established under § 192.605” which is the Procedural manual for operations, maintenance, and emergencies. As such and as supported by the discussion above FGT requests that PHMSA withdraw the finding of Probable Violation of § 192.736(c) and the associated Proposed Compliance Order.