RESPONSE FOR NOTICE OF AMENDMENT

Via Electronic Mail to: bryan.lethcoe@dot.gov

March 13, 2026

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

RE: NOA – Florida City Gas LNG (2432) - CPF 4-2026-022-NOA

Dear Mr. Lethcoe,

Florida City Gas (FCG) does not contest this NOA and provides this response and corrective actions for items listed in this Notice of Amendment.

For the items listed in the NOA, Florida City Gas provides these written comments:

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). . . .

(c) Recognizing abnormal operating conditions.

FCG's manuals of written procedures for operations were inadequate to ensure the safe operation of a liquefied natural gas (LNG) facility in accordance with § 193.2503(c). Specifically, FCG's operating procedures failed to include adequate provisions for recognizing abnormal operating conditions.

FCG's procedures, including *Operating Manual, Miami-Dade LNG Storage Facility, B&V Project No. 410546, LNG Trailer Unloading with Pressure, MD-1000-O03*, (rev. 2, 4/2025), and the *Cause and Effect Diagrams, 410546-000-P3001,* p. 1-4, (rev. 1, 10/27/2022), fail to provide operators with facility-specific instructions for recognizing abnormal operating conditions.

Therefore, PHMSA proposes that FCG must revise its operating procedures to include facility-specific instructions for recognizing abnormal operating conditions.

Response 1:

Corrective Action:

FCG is revising its operating procedures at Miami-Dade LNG Storage Facility, LNG unloading procedures, and associated Cause and Effect documentation, to incorporate:

- Facility-specific examples of abnormal operating conditions;
- Clear indicators and alarms associated with abnormal conditions; and
- Required operator responses and escalation protocols.

Revised procedures will provide explicit guidance enabling operators to identify and respond to abnormal operating conditions specific to the Miami-Dade LNG Facility**.**

2. § 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.

FCG's manuals of written procedures for operations were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2503(g). Specifically, FCG's cooldown procedures failed to provide adequate instructions for cooling down components in accordance with the requirements of § 193.2505.

FCG's procedures, including *Tank Cooldown Procedure: Florida City Gas, HS-90000SS-50* (01/05/2023) and *Florida City Gas LNG Facility Storage Tanks - User Manual* (rev. A, 05/07/2019), fail to provide operator- and facility-specific instructions for cooldown which limit the cooldown of components that are subject to cryogenic conditions to a rate and distribution pattern that keeps thermal stresses within design limits, and fail to require that cryogenic piping systems be checked for leaks in the areas of flanges, valves, and seals after cooldown stabilization is reached.

Therefore, PHMSA proposes that FCG must revise its procedures to include operator and facility specific instructions for the cooldown of components in accordance with the requirements of § 193.2505.

Response 2:

Corrective Action:

FCG is revising its cooldown procedures to:

- Define allowable cooldown rates and distribution patterns consistent with design limits.

- Specify stabilization criteria prior to returning equipment to service
- Require post-cooldown leak inspections at flanges, valves, seals, and piping joints.

3. § 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.

FCG's manuals of written procedures for maintenance were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(c). Specifically, FCG's procedures failed to provide facility-specific instructions that enable personnel performing operation and maintenance activities, including periodic inspections or tests, to recognize conditions that may constitute safety-related conditions (SRCs) subject to the reporting requirements of § 191.23. During the on-site inspection, FCG failed to produce maintenance procedures fulfilling the requirements of § 193.2605(c). On September 25, 2025, in response to a request for information issued by Southwest Region in accordance with § 190.203(c), FCG stated that it would revise its Emergency Response Plan for the Miami-Dade LNG Storage Facility to include steps to recognize and report safety-related conditions.

Therefore, PHMSA proposes that FCG must revise its maintenance procedures to provide facility specific written instructions which enable personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions (SRCs) that are subject to the reporting requirements of § 191.23, including when those personnel are performing periodic inspections or tests.

Response 3:

Corrective Action:

FCG is revising its maintenance procedures to:

- Define facility-specific examples of SRCs;
- Provide explicit guidance for recognizing SRCs during routine and non-routine activities; and
- Establish clear reporting and documentation requirements
- Require training and knowledge checks on SRC

4. § 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 procedures must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and

FCG's manuals of written procedures for maintenance were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b)(1). Specifically, FCG's written procedures failed to ensure that maintenance activities on fire control equipment are scheduled so that a minimum of equipment is taken out of service at any one time and is returned to service in a reasonable period of time in accordance with § 193.2611(a).

FCG's procedure *Operating Manual, Miami-Dade LNG Storage Facility, B&V Project No. 410546* failed to require scheduling maintenance of fire control equipment that minimizes the amount of time that the equipment is taken out of service and ensures the equipment is returned to service in a reasonable amount of time.

Therefore, PHMSA proposes that FCG must revise its procedures to provide operator and facility specific written instructions, consistent with generally accepted engineering practice, specifying processes for scheduling maintenance of fire control equipment that minimizes the amount of time that the equipment is taken out of service and ensures the equipment is returned to service in a reasonable period of time.

Response 4:

Corrective Action:

FCG is revising the Operations Manual to:

- Require maintenance planning that minimizes concurrent outages of fire control equipment.
- Establish restoration time expectations
- Require supervisory approval and documentation for any extended outages.

5. § 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 procedures must include:

(1) . . . .

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

FCG's manuals of written procedures for maintenance were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b)(2). Specifically, FCG's procedures failed to provide instructions for the use of positive isolation methods beyond isolation valves to ensure the work area is free of flammable fluids when a component or maintenance activity provides an ignition source in accordance with § 193.2615(b).

FCG's procedure *GP-05: Isolation and Purging* (rev. 1, 04/2025) fails to provide for techniques in addition to isolation to ensure that a work area is free of flammable fluids when a component or maintenance activity provides an ignition source.

Therefore, PHMSA proposes that FCG must revise its procedures to provide operator- and facility-specific written instructions consistent with generally accepted engineering practice processes which are in accordance with § 193.2615(b).

Response 5:

Corrective Action:

FCG is revising isolation and purging procedures to include:

- Use of blinds, spades, physical disconnections, or purging methods where appropriate.
- Verification steps to ensure work areas are free of flammable fluids
- Facility-specific examples tied to common maintenance scenarios.
- Ignition source work clearance
- Include return to service checklist

6. § 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 procedures must include:

(1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of performance; and

FCG's manuals of written procedures for maintenance were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b)(1). Specifically, FCG's written procedures failed to ensure that the maintenance and inspection of its control systems is performed in accordance with § 193.2619.FCG's procedure *Operating Manual, Miami-Dade LNG Storage Facility, B&V Project No. 410546,* Sections 8.17 through 8.21, specified the use of device manufacturer's maintenance procedures for scheduling and performing maintenance on components, including control systems. FCG's procedure failed to include multiple required details of inspections or tests on control systems for FCG's facility specifically. First, FCG's procedures failed to require control system components which are out of service for 30 days or more be inspected and tested for operational capability before returning it to service in accordance with § 193.2619(b). Second, FCG's procedures failed to identify or categorize control systems by function for the purposes of applying the differing inspection and testing intervals in accordance with § 193.2619(c), § 193.2619(c)(1),
§ 193.2619(c)(2), and § 193.2619(d) as applicable, nor do the procedures implement those intervals. Third, FCG's procedures failed to require that relief valve inspection and testing include the verification of the valve seat lifting pressure and reseating in accordance with § 193.2619(e).

Therefore, PHMSA proposes that FCG must revise its procedures to ensure that the maintenance and inspection of its control systems is performed in accordance with § 193.2619.

Response 6:

Corrective Action:
FCG is revising procedures to:

- Categorize control systems by function;
- Implement required inspection and testing intervals;
- Require inspection and testing prior to return to service after extended outages
- Include verification of relief valve set pressure and reseating.

7. § 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 procedures 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 description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.

FCG's manuals of written procedures for maintenance were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b)(1) and (2). Specifically, FCG's procedures fail to provide operator- and facility-specific written instructions, consistent with generally accepted engineering practice, which ensure that FCG's corrosion control program is performed in accordance with § 193.2625, §193.2627, §193.2631, and § 193.2637.

FCG's *Annual Atmospheric Corrosion Monitoring Procedure, MD-9200-M01 (Rev A; April 2025)* failed to provide adequate instructions in several areas. First, the procedure failed to provide for the identification of metallic components which could have their integrity or reliability adversely affected by external, internal, or atmospheric corrosion during their intended service life, and failed to provide that such components be protected from corrosion or inspected and replaced in accordance with § 193.2625. Second, the procedure failed to require that components subject to atmospheric corrosive attack be protected with corrosion-resistant material or appropriate coating or jacketing in accordance with §193.2627. Third, the procedure failed to require that components subject to internal corrosive attack be protected with corrosion-resistant material or appropriate coating, inhibitor, or other means in accordance with §193.2631. Fourth, the procedure failed to provide specific instructions for prompt remedial action whenever an inspection or other method discovers that atmospheric, external, or internal corrosion is not controlled, in accordance with § 193.2637.

Therefore, PHMSA proposes that FCG must revise its procedures to provide operator- and facility-specific written instructions, consistent with generally accepted engineering practice, which ensure that FCG's corrosion control program is performed in accordance with § 193.2625, §193.2627, §193.2631, and § 193.2637.

Response 7:

Corrective Action:

FCG is revising its corrosion control program (MD-9200_M01) to:

- Identify components susceptible to atmospheric, external, and internal corrosion;
- Require appropriate protective measures;
- Define inspection frequencies and evaluation criteria
- Establish prompt remedial action requirements when corrosion is identified.

8. § 193.2713 Training: operations and maintenance.

(a) Each operator shall provide and implement a written plan of initial training to instruct—

(1) All permanent maintenance, operating, and supervisory personnel—

(i) About the characteristics and hazards of LNG and other flammable fluids used or handled at the facility, including, with

regard to LNG, low temperatures, flammability of mixtures with air, odorless vapor, boiloff characteristics, and reaction to water and water spray;

(ii) About the potential hazards involved in operating and maintenance activities; and

(iii) To carry out aspects of the operating and maintenance procedures under §§ 193.2503 and 193.2605 that relate to their assigned functions; and

(2) All personnel—

(i) To carry out the emergency procedures under § 193.2509 that relate to their assigned functions; and

(ii) To give first-aid; and

(3) . . . .

(b) A written plan of continuing instruction must be conducted at intervals of not more than two years to keep all personnel current on the knowledge and skills they gained in the program of initial instruction.

§ 193.2715 Training: security.

(a) Personnel responsible for security at an LNG plant must be trained in accordance with a written plan of initial instruction to:

(1) . . . .

(b) A written plan of continuing instruction must be conducted at intervals of not more than two years to keep all personnel having security duties current on the knowledge and skills they gained in the program of initial instruction. § 193.2717 Training: fire protection.

(a) All personnel involved in maintenance and operations of an LNG plant, including their immediate supervisors, must be trained according to a written plan of initial instruction, including plant fire drills, to:

(1) . . . .

(b) A written plan of continuing instruction, including plant fire drills, must be conducted at intervals of not more than two years to keep personnel current on the knowledge and skills they gained in the instruction under paragraph (a) of the section.

FCG's manuals of written procedures for training were inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2713, § 193.2715, and § 193.2717(a) and (b). Specifically, FCG's training procedures failed to provide specific instructions for the implementation of a training program in accordance with the applicable requirements of § 193.2707, § 193.2709, § 193.2711, § 193.2713, § 193.2715, and § 193.2717.

Regarding Section 1, General Orientation, the training modules including *S1M1 Introduction, S1M2 LNG Fundamentals, S1M3 Codes and Standards, S1M4 Safety Basics, S1M5 LNG Hazards,* and *S1M6 Safety Equipment and Procedures*, failed to include all topics required by §

193.2713(a)(1)(i), such as LNG vapor flammability limits, LNG boil off characteristics, odorless vapor, and LNG reaction to water and water spray. In addition, *S1M3 Codes and Standards* consisted primarily of paraphrased recitations of incorporated-by-reference industry standards without further explanation or instruction. As such, it does not provide sufficient operator- or facility-specific instruction or training to meaningfully train facility personnel.

Regarding Section 2, Site Safety, FCG was unable to locate for PHMSA's review any of the training modules identified in *S1M1 Introduction* as belonging to this section, either on-site or otherwise. The topics assigned to Section 2 Site Safety include: Scope Safety; Hazards & Physical Properties; Lock and Tag Procedure; Work Permit System; Fire Watch Requirements; Environmental; LNG Physical Health Plan; Protective Clothing (PPE); Cool Down Program; Plant Emergency Plan; Codes, Standards, and Regulations; Reporting Unsafe Conditions; Abnormal Operating Conditions; First Aid; Confined Space Entry; Logbook Entry; General Policies; and Fall Protection & Ladder Usage. Without these materials, FCG's training program fails to ensure the safe operation of an LNG facility in accordance with § 193.2711, § 193.2713(a)(1)(ii), 193.2713(a)(2)(i), and § 193.2713(a)(2)(ii).

Regarding Section 3, Operations, and Section 4, Maintenance, many training modules lacked any form of written or practical assessment that could constitute a proficiency test relevant to the assigned material. Without meaningful proficiency testing, FCG's procedures are unable to ensure the safe operation of an LNG facility in accordance with § 193.2707(a)(3). The modules lacking assessments include: *S3M4 Truck Station System* (rev. 0), *S3M5 LNG Sendout Pump* (rev. 0), *S3M6 Vaporization System* (rev. 0), *S3M7 Instrument Air/Gas System* (rev. 0), *S3M8 Nitrogen System* (rev. 0), *S3M9 Fuel Gas System* (rev. 0), *S4M2 Maintenance Procedures* (rev. 0), *S4M3 Isolating and Purging* (rev. 0), *S4M4 Foreign Material* (rev. 0), *S4M5 Corrosion Protection* (rev. 0), *S4M6 Relief Valves Program* (rev. 0), *S4M7 Maintenance Records* (rev. 0), and *S4M8 Control Systems* (rev. 0).

Regarding Section 5, Emergency Procedures, FCG's training modules failed to require ongoing training on a biennial basis in accordance with 193.2717(b). In addition, the training materials failed to provide for plant fire drills that give personnel hands-on experience in carrying out their emergency duties in accordance with § 193.2717(c). FCG was also unable to locate two modules: *S5M4 Responding to an Emergency* and *S5M5 Recognizing an Emergency*. Without the emergency response training contained in the modules, FCG's procedures are unable to ensure the safe operation of an LNG facility in accordance with § 193.2713(a)(2)(i).

Regarding Section 6, Fire Protection, and Section 8, Operations: Emergency and Fire Equipment, many training modules lacked any form of written or practical assessment that could constitute a proficiency test relevant to the assigned material. Without meaningful proficiency testing, FCG's procedures are unable to ensure the safe operation of an LNG facility in accordance with § 193.2707(a)(3). The modules lacking assessments include *S6M2 Fire Prevention Duties* (rev. 0) and *S6M3 Plant Fire and Leak Survey* (rev. 0).

Regarding the training module in Section 7, Security, *S7M1 Security Procedures* (rev. 0), FCG's procedure primarily refers to and relies upon corporate security policies from FCG's previous

corporate owner. FCG was unable to locate these referenced policies. Without such security training, FCG's procedures are unable to ensure the safe operation of an LNG facility in accordance with § 193.2715.

Based on the foregoing, PHMSA proposes that FCG revise its training procedures to provide specific instructions for the implementation of a training program in accordance with the applicable requirements of § 193.2707, § 193.2709, § 193.2711, § 193.2713, § 193.2715, and § 193.2717.

Response 8:

Corrective Action:

FCG has undertaken a comprehensive revision of its training program to:

- Develop missing training modules;
- Expand facility-specific content for operations, maintenance, emergency response, fire protection, and security;
- Implement written and practical proficiency assessments
- Establish biennial continuing training and hands-on fire drills.
- FCG is exploring the possibility to replace the current training system with the following:

Following up on our discussions regarding a training program for the Homestead facility we have reviewed recent training modules we have developed for other LNG facilities, as well as the requirements of 49 CFR 193. We would propose to develop a training plan for Bishopville and Homestead, structured as follows:

1. Develop an Operations and Maintenance Training Program, to include:
    - Training Plan Summary Document
    - LNG non-site specific training
        - Utilize OverNite E-Learning platform to provide basic LNG training, including LNG properties, LNG equipment, LNG processes, etc. We have recently used this platform for another utility LNG client, who found it to be effective. The platform includes many training modules, which we could work with FCG to select as applicable. The platform includes proficiency tests for students. See https://www.overnitecbt.com/lng-info/.
    - Site-specific training modules – Develop site-specific training presentations for the Homestead Facility. Examples of recent training modules developed for another project are attached. Note these modules would intend to include a classroom presentation, proficiency test, and site walkthrough. Although the final organization of the modules may be adjusted, we are envisioning the following topics would be covered:

- LNG Transport Unloading and Loading Training Module
- LNG Holding Mode Operations Training Module
- LNG Sendout and Vaporization Training Module
- Balance of Plant Training Module
- Receipt Point Area Training Module (if required. As the Receipt Point is a 192 facility)
- Preventative Maintenance and Operator Rounds Training Module
- Hazard Awareness and Emergency Response Training Module

2. Develop a Security Training Program – note that 49 CFR 193 requires training for security personnel The program would include:
    - Training Plan Summary Document
    - Security Training Module to include classroom presentation, proficiency test, and site walkdown.

3. Develop Fire Protection Training Program to review the site-specific fire protection systems at the plant, to include:
    - Training Plan Summary document
    - Fire Protection Training Module to include classroom presentation, proficiency test, and site walkdown.

4. For each of the training programs, we would develop Training Reports to document operator qualification and develop plans for refresher trainings after the initial training is complete.

5. We are assuming that FCG would separately be coordinating and/or delivering the following, separate from the program developed by **Sanborn Head:**
    - Provide first aid training for their personnel
    - Develop a written plan to verify personnel are in adequate physical condition to perform their duties in accordance with §193.2711
    - Perform fire drills
    - Provide fire extinguisher training for their personnel

- Coordinate with the local fire department to ensure local first responders are familiar with the Facility.

We have been working with Sanborn Head to develop a new training platform with the anticipation of it going live before the end of the year.

At Florida City Gas, the safety of the public, our employees and facilities are our utmost priorities. Many of the items referenced in this notice have been corrected or are in process to be implemented in the afore described time frames. We are working diligently to address all items in this notice.

If you need further information or have questions concerning this response, please contact me at 863-224-0417 or mmccarty@chpk.com

Sincerely,

Mike McCarty
Manager, Operations Compliance
Florida Public Utilities/Florida City Gas

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