



RESPONSE FOR NOTICE OF PROBABLE VIOLATION

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: NOPV – Florida City Gas LNG (2432) - CPF 4-2026-23-NOPV

Dear Mr. Lethcoe,

Florida City Gas (FCG) does not contest this NOPV and provides this response to the Notice of Probable Violation resulting from the inspection from May 5 to May 8, 2025, of the Miami Dade LNG Facility in Homestead, Florida. As a result of this inspection, PHMSA issued the referenced Notice alleging a probable violation of the Pipeline Safety Regulations.

1. § 193.2625 Corrosion protection.

(a)

(b) Components whose integrity or reliability could be adversely affected by corrosion must be either -

- (1) Protected from corrosion in accordance with § 193.2627 through § 193.2635, as applicable; or**
- (2) Inspected and replaced under a program of scheduled maintenance in accordance with procedures established under § 193.2605.**

§ 193.2627 Atmospheric corrosion control.

Each exposed component that is subject to atmospheric corrosive attack must be protected from atmospheric corrosion by—

- (a) Material that has been designed and selected to resist the corrosive atmosphere involved; or**
- (b) Suitable coating or jacketing.**

FCG failed to protect from corrosion components whose integrity or reliability could be adversely affected by corrosion in accordance with § 193.2625(b)(1). Specifically, FCG failed to protect the water glycol piping system at its Miami Dade LNG facility from atmospheric corrosive attack with suitable coating or jacketing. During the inspection, PHMSA personnel using viewing ports observed multiple instances of corrosion underneath the insulation on the water glycol system piping.



The extent and severity of the corrosion observed indicate an aggressive corrosion mechanism because the degradation present is very unlikely to have developed within the approximately two-year period between the commissioning of the Miami Dade LNG facility in April 2023 and the on-site inspection in May 2025 had the system been adequately protected from atmospheric corrosive attack through appropriate coating or jacketing.

Therefore, FCG failed to protect from corrosion components whose integrity or reliability could be adversely affected by corrosion in accordance with § 193.2625(b)(1).

Response:

Corrective Actions

Upon identification of the condition, Florida City Gas initiated corrective actions to address both the immediate condition and the broader atmospheric corrosion control program applicable to the Miami-Dade LNG Facility. These actions include, but are not limited to, the following:

Condition Assessment and Mitigation

- Identification of affected water glycol piping segments;
- Evaluation of the extent and severity of corrosion; and
- Implementation of protective measures, as appropriate.

Repair and Protection Measures

- Removal of insulation in affected areas;
- Repair or replacement of degraded piping components, as necessary; and
- Application of suitable protective coatings and/or jacketing designed to resist the corrosive environment.

Programmatic Enhancements

- Review and revision of corrosion control and maintenance procedures to ensure compliance with 49 CFR §§ 193.2625 through 193.2635;
- Integration of atmospheric corrosion inspection results into scheduled maintenance programs established under § 193.2605, where applicable.

Documentation and Oversight

- Documentation of inspection findings and corrective actions will be documented within the Limble CMMS.
- Management oversight to verify continued compliance and the ongoing effectiveness of corrosion protection measures.

FCG is currently reviewing quotes to remove the jacketing on the water glycol piping. All active corrosion will be addressed and the piping will be recoated with a suitable epoxy coating to prevent atmospheric corrosion. The jacketing will then be reinstalled with observation ports and the piping placed in a routine maintenance schedule for inspection following specific procedures for atmospheric corrosion inspection and control.

All future correspondence related to this matter will reference CPF 4-2026-023-NOPV, as requested. Should PHMSA require additional information or clarification, Florida City Gas will cooperate fully.



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

cc: Jeffrey M. Householder, President and Chief Executive Officer, Chesapeake Utilities Corporation, jhouseholder@chpk.com
Jeffrey S. Sylvester, Senior Vice President and Chief Operating Officer, Chesapeake Utilities Corporation, jssylvester@chpk.com
J. Solomon McCloskey, AVP Operations Services, Chesapeake Utilities Corporation, smccloskey@chpk.com
Will Haffecke, AVP Florida Operations, Chesapeake Utilities Corporation, whaffecke@chpk.com
Rick Wunsch, Regional Manager, Gas Operations, Chesapeake Utilities Corporation, rwunsch@chpk.com
James Kendall, Regional Manager Florida City Gas, Florida City Gas, jkendall@chpk.com