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October 5, 2017

Ms. Kim West
Acting Director, Western Region
Pipeline Hazardous Material Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

CPF 5-2017-0015W

Dear Ms. West

Titan Alaska LNG, LLC (Titan) provides the following in response to PHMSA Warning Letter referenced above.

1. **§192.479(a)Atmospheric corrosion control: General.**
   (a) Each operator must clean and coat pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.
   (b) Coating material must be suitable for the prevention of atmospheric corrosion.

Coatings have degraded between the ground and soil interface and the upstream shutoff valve flange. Maintenance painting was completed but found to be inadequate. Additionally, 2015 recommendations by operator's corrosion consultant, Coffman Engineers which addressed the need for pipe supports to be isolated from the piping to prevent steel on steel contact were made but never implemented.

Response

Titan has corrected the isolation of the support from the pipe with suitable material per Coffman's recommendation. Titan will contract a pipeline coating specialist to apply a specific coating to the subject portion of the pipe mentioned above.

2. **§192.745Valve maintenance: Transmission lines.**
   (a) Each transmission line valve that might be required during an emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.

At the time of inspection, annual records produced by Titan personnel lacked sufficient detail about the inspection process/tasks and whether the valves were partially operated as required by 192.745. In the absence of an established procedure for the maintenance of transmission line valves it becomes difficult to determine whether the records are adequately capturing all of the required maintenance and inspection tasks. Examples of properly recorded tasks could include checking the torque of the bolts on flanged fittings, stroking the valve, lubricating the valve, or inspecting the valve for corrosion, damage, and leaks as defined by 49 CFR 192.745

Response

Titan has a record of the transmission line valve inspection for 2016, and 2017 demonstrating that the valve area was inspected for visual deficiencies (corrosion, damage, other abnormal conditions, as well as internal leaks and the valve was exercised) as defined by Titan (SOP 4210, Transmission Line Valve Inspection, Rev 003, Effective Date 11/1/13). These records and SOP are attached for reference . The manufacturer recommends no lubrication is needed.

3. **§192.807 Record keeping.**
Each operator shall maintain records that demonstrate compliance with this subpart.
(a) Qualification records shall include:
(1) Identification of qualified individual(s):
(2) Identification of covered tasks individual is qualified to perform:
(3) Date(s) of current qualification: and
(4) Qualification method(s)
(b) **Records supporting the individual's current qualification shall be maintained while the individual is performing the coved task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.**

Response

With Titan's recent revision to (SOP 3101, Plan of Initial and Continuing Instruction for Plant Operators, Rev 006, Effective Date 09/25/17, attached) Operator Qualification records are now being generated for Pipeline associated tasks.

Sincerely, James Branch

James Branch, Plant Manager
Titan Alaska LNG, LLC

Attachments:

SOP 3101 Plan of Initial and Continuing Instruction for Plant Operators (Rev 006
SOP 4210 Transmission Line Valve Inspections (Rev 003)
Transmission Line Valve Inspection 2016
Transmission Line Valve Inspection 2017