



December 1, 2022

Mr. Dustin Hubbard
Director Western Region
Pipeline and hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Subject: Interior Gas Utility Response to NOA dated November 3, 2022
Reference: CPF 5-2022-016-NOA

Dear Mr. Hubbard,

Please accept this letter and amended procedures (See attachments) in response to the notice of amendment dated November 3, 2022. We've briefly listed the specific items in the NOA below.

(1) 192.605(b)(1) Procedural manual for operations, maintenance, and emergencies.

1. Interior Gas Utility (IGU) does not contest this item and has amended SOP S1-7125 Relief, ESD, Regulator and Control System Maintenance.

The NOA refers to 49 CFR Part 192.743. Capacity must be consistent with the pressure limits of § 192.201(a) except as provided in § 192.201(b). This capacity must be determined, "...by testing the devices in place or by review and calculations".

IGU has amended *Standard Operating Procedure S1-7125* to replace bench test with procedures to test in-place or to prove by review and calculations.

Exhibit [1]

2. IGU does not contest this item and amended SOP's S3-7125 and S4-7125 Relief, ESD, Regulator and Control System Maintenance accordingly.

The NOA refers to Standard Operating Procedures for Sites 3 and 4 S-7125 Relief, ESD, Regulator and Control System Maintenance and existing site conditions noting that Site 3 and Site 4 do not have pressure relief valves at the distribution headers.

IGU concurs that Sites 3 and 4 do not have pressure relief valves at distribution headers. SOP's S3-7125 and S4-7125 Relief, ESD, Regulator and Control System Maintenance have PRV testing procedures deleted.

Exhibits [2]



3. IGU Does not contest this item and has amended SOP S3-2175 Relief, ESD, Regulator and Control System Maintenance to include listed regulators.

The NOA refers to SOP S3-7125 Relief, ESD, Regulator and Control System Maintenance and existing system components for Site 3 regulator inspections. It identifies four regulators connected to the distribution header which were not included in the SOP: PCV 400a, PCV 400b, PCV 401a, and PCV 401b.

IGU has listed the four regulators, noted above, under *Distribution/Meter Run regulator* heading. Exhibit [3]

4. IGU does not contest this item and has amended the SOP's listed below.

The NOA indicates that our procedures did not require maintenance in accordance with manufacturer's recommended practices of pipe joining equipment and refers to 49 CFR Part 192.756 Joining plastic pipe by heat fusion; equipment maintenance and calibration.

No SOP number was cited in this comment. We have identified the following standards as applicable for plastic pipe heat fusion equipment which requires maintenance and/or calibration in accordance with Part 192.756. Each SOP is amended for operators to verify current inspection and calibration date on equipment tag. Maintenance will be conducted in accordance with manufacturer's instructions.

- a. SOP D-2220 Plastic Pipe Fusion Precautions
- b. SOP D-2221 Butt Fusion Procedure
- c. SOP D-2222 Saddle Fusion Procedure
- d. SOP D-2225 Side Tap Procedures (Hot Tap Tool)
- e. SOP D-2230 Electrofusion Procedure

Exhibit [4]

5. IGU does not contest this item and has amended SOP D-2115 Maximum Allowable Operating Pressure to satisfy these concerns.

The notice refers to 49 CFR Part 192.619. Notice indicates that the SOP D-2115 Maximum Allowable Operating Pressure did not indicate the requirement that the Maximum Allowable Operating Pressure (MAOP) limits are the lowest of design pressure determined by the HDPE material characteristics divided by 1.5. Additionally, SOP failed to state that the amount of allowable build-up is limited to 10% above MAOP. Include requirements for telemetering reading.

In SOP D-2115, we explain how the MAOP and allowable build-up pressures are determined by 192.619(a)(2)(i). This is done in the context of the IGU's current MAOP of 60 psig. We also added a paragraph to address telemetering system identifying pressure transmitters which record pressure data for the distribution system. Operators are required to respond to HIGH and LOW pressure alarms.

Exhibit [5]



(2) IGU does not contest these items and amended SOP's D-1420 Continuing Surveillance and Pipeline Patrol Procedures, and D-7205 Corrosion Control – Distribution System.

The NOA refers to 192.605 (b)(2) regarding corrosion control. SOP's for distribution piping were inadequate to meet requirement for atmospheric corrosion inspections of above-ground distribution piping outside the LNG storage sites. Further, no tracking process was evident for inspection of meter sets at required intervals.

We amended SOP D-1420 Continuing Surveillance and Pipeline Patrol Procedures to call attention to D-7205 Corrosion Control-Distribution Systems. SOP D-7205 covers all corrosion control for distributions systems including atmospheric corrosion inspections, intervals and logging.

Exhibit [6]

(3) IGU does not contest this item. We have amended SOP G-1001 SOP Manual Statement-General

The NOA identifies 192.605(b)(3) regarding making construction records, maps, and operating history available to appropriate operating personnel. IGU must make construction records, maps, and operating history available to appropriate operating personnel.

We have amended our SOP G-1001 SOP Manual Statement-General to refer operators to IGU Engineering for needed document which are not on Site.

Exhibit [7]

(4) IGU does not contest this item and has amended SOP- G-1005 to address requirements of 49 CFR.

NOA refers to 192.605(b)(4) Gathering of data needed for reporting incidents under Part 191 ... in a timely and effective manner. SOP G-1005 Reporting did not require preparation and filing of an incident report as soon as practicable. Amend procedures to comply with the requirements of 191.9(a).

Existing SOP G-1005 Reporting, page 2 of 7 paragraph 4 states that, "IGU will submit a written report...as soon as practicable, but not more than 30 days after detection of the incident". We expanded this with a preceding clause, "For a distribution system incident..." as written in 191.9 Distribution system: Incident Report. Under the heading, *Reporting an Incident*, paragraph 1, we added, "Immediate notice will be sent no later than one hour after confirmed discovery, as specified in 191.5(a). We added new paragraph 4 for 48-hour update reporting to confirm or correct initial report. In paragraph 5, we added stipulation for 30 day written reporting following distribution system incident.

Exhibit [8]



- (5) **IGU does not contest this item and provides amended SOP D-1405 Line Locating Policy and Procedures.**

Notice refers to 192.614 Damage prevention program. SOP D-1405 did not include details required of how the required Mailing List is compiled. There was no clause requiring IGU inspection if damage is suspected.

SOP D-1405 Line Locating Policy and Procedure is amended to expand means of compiling the Excavator Mailing List. Regarding inspection of distribution system in the event of suspected damage, IGU has included a statement referring reader to SOP D-1425 Investigation of Accidents and Material Failures, which adequately addresses this topic. See last page of Exhibit [9].

Exhibit [9]

As part of our response to the NOA, we are attaching separate PDF electronic documents of the amended procedures mentioned herein. Each SOP is provided in full with the amended portions yellow highlighted.

Exhibit	File Name	Contents
[1]	SOP S1-7125	
[2]	SOP S4-7125	SOP S3-7125, SOP S4-7125
[3]	SOP 3-7125	
[4]	SOP D-2220	SOP D-2220, SOP D-2221, SOP D-2222, SOP D-2225, SOP D-2230
[5]	SOP D-2115	
[6]	SOP D-7205	SOP D-1420, SOP D-7205
[7]	SOP G-1001	
[8]	SOP G-1005	
[9]	SOP D-1405	

If you have any further questions or concerns, please contact us.

Sincerely,

Mark Rockwell, PE
Director of Operations

Cc: G. St. Pierre, PHMSA
B. Kern, IGU Engineer
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