

NORTH SLOPE BOROUGH

DEPARTMENT OF PUBLIC WORKS
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Scott K. Danner, Director

VIA ELECTRONIC MAIL TO: dustin.hubbard@dot.gov

November 30, 2023

Dustin Hubbard
Director, Western Region
US Department of Transportation
Office of Pipeline and Hazardous Material Safety Administration
12300 W. Dakota Ave. Suite 110
Lakewood, CO 80228

Re: CPF 5-2023-038-NOA

Dear Mr. Hubbard,

On November 2, 2023, the North Slope Borough ("the Borough") received the initial notice for CPF No. 5-2023-038-NOA. This letter is intended to communicate the Borough's understanding of PHMSA's notice, define the status of each finding and convey the Borough's plan for corrective action to ensure that the system is in compliance.

We have reviewed each of the 11 items noted in the notice:

Regarding NOA Item # 1, *Plastic Pipe (192.59) – Cast Iron Pipe Joining*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will revise the Operations and Maintenance (O&M) Manual to remove sections that pertain to cast iron pipe from the plastic pipe section of the manual.

Regarding NOA Item # 2, *Excess flow valve (EFV) installation (192.383)* – EFV installation notice. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to reflect the requirement to notify customers of their right to request installation of an EFV and implement the notification policy.

Regarding NOA Item # 3, *Test requirements for plastic pipe (192.513) – Maximum test pressure*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to reduce the maximum test pressure to bring it into compliance with Part 192.513.

Regarding NOA Item # 4, *Procedural manual for operations, maintenance, and emergencies (192.605) – Maintenance and normal operations*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to remove references to rupture disks and to align the relief valve procedures with the processes utilized and the requirements of Part 192.605.

Regarding NOA Item # 5, *Procedural manual for operations, maintenance, and emergencies (192.605) – Controlling corrosion*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to align the procedures with the current practice of monitoring the concentration of corrosive elements of the gas. Component concentration thresholds will be added to define corrosivity and procedures will be added to provide direction in the event that the gas is found to be corrosive.

Regarding NOA Item # 6, *Emergency plans (192.615) – Communications*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to include instructions on coordination with local emergency personnel and the ConocoPhillips control room. The manual will also be amended to reflect the establishment of a liaison with local emergency personnel and ConocoPhillips. The Pipeline Specific Operations and Maintenance manual (PSOM) will also be revised to adequately describe the response steps in the case of an emergency.

Regarding NOA Item # 7, *Investigation of failures and incidents (192.617) – Post-failure and incident procedures*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to include procedures for failure or incident investigation and to define parameters for laboratory analysis requirements.

Regarding NOA Item # 8, *Odorization of gas (192.625) – Sampling*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M and PSOM manuals to remove “sniff” terminology, clearly require instrumented testing for combustible gases, and amend the procedures to provide consistency with regards to the frequency of testing.

Regarding NOA Item # 9, *Tapping pipelines under pressure (192.627) – Maintenance and normal operations*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to provide hot tapping procedures for each different form of piping in the system.

Regarding NOA Item # 10, *Distribution systems: Leakage surveys (192.723) – Leakage program and surveys*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to define the classification of business districts and document the business districts within the system.

Regarding NOA Item # 11, *Joining plastic pipe by heat fusion; equipment maintenance and calibration (192.756) – Maintenance of equipment*. Within 180-days of receipt of the subject NOA (or 4/30/24), the Borough will amend the O&M manual to provide procedures for the maintenance of plastic heat fusion equipment, including the documentation of continued maintenance.

Formal written notice and documentation of the amended O&M and PSOM procedures will be provided to the Director of the Western Region within 180-days of receipt of the subject NOA (or 4/30/24).

Sincerely,

Scott K. Danner, Director
Department of Public Works

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