



August 9, 2024

CC-2259

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

Reference: CPF 5-2024-013-NOA

Subject: Response to a DOT "Notice of Amendment" Concerning Inadequacies in MSCC's Plans or Procedures.

Dear Mr. Hubbard:

From March 6, 2023 through March 9, 2023, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), conducted an onsite inspection of the MSCC/Mojave Gas Pipeline Procedural Manual and our pipeline facility. As a result of that inspection was a DOT "Notice of Amendment" notifying Midway Sunset Cogeneration Company (MSCC) of the identified apparent inadequacies found within MSCC's plans or procedures (please find attached a copy of "Notice of Amendment" CPF 5-2024-013-NOA). MSCC's following plan is numbered in concert with the "Notice of Amendment":

1. Midway's procedures for corrosion control monitoring were inadequate to ensure the safe operation of a pipeline as required by § 192.465(d). Specifically, a review of Midway's written Corrosion Control Inspection Procedure, located within the Operations and Maintenance Manual, showed that Midway lacked a stipulated timeline or timeframe for completing remediation after identification. Midway's procedure for monitoring and remediating deficiencies does not state an explicit time period by which a corrective action plan will be developed and implemented in accordance with § 192.465(d). See, Section 105 of Midway's Corrosion Control Inspection Procedure, Exhibit C. Midway's procedure must designate a timeline for remedial action in accordance with the regulation.

Response: MSCC has included attached, the amended section of its MSCC/Mojave Gas Pipeline O & M Manual Section 105 Corrosion Control Inspection.

MSCC has revised the procedural manual and associated Plant Procedures. Copies of the revisions are available to the DOT on request. MSCC embraces the importance of public safety and, therefore, wishes not only to meet the letter of the law but also the overriding intent.

MSCC commends PHMSA OPS representative's professional demeanor during the inspection. It proved an excellent opportunity for MSCC's employees to interact with and learn from a knowledgeable, professional, DOT representative.

Please note, as of February 19, 2024, Lowell Pollema, Aera Energy, has been appointed Executive Director of MSCC replacing Greg Jans as Acting Executive Director.

If you have any questions or comments, please email me at; management@midwaysunset.com or call me at (661)768-3000.

Sincerely,



Greg Jans
Plant Manager

Attachment

cc:	File CC-2259	G. Jans	M. Williams	C. Lahammer
	M. Bojorquez	G. Davis	L. Pollema	S. Urias