



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

12300 W. Dakota Ave., Suite 340
Lakewood, CO 80228

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: esudduth@interiorgas.com

December 3, 2025

Ms. Elena Sudduth
General Manager
Interior Gas Utility
2525 Phillips Field
Fairbanks, AK 99709

CPF 5-2025-007-NOA

Dear Ms. Sudduth:

From July 29 through August 3, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Interior Gas Utility's (IGU) Gas Control Plan and procedures in Fairbanks and North Pole, Alaska.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within IGU's plans or procedures. The items inspected and the inadequacies are described below:

1. §192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of:

(i) Distribution with less than 250,000 services, or

(ii) Transmission without a compressor station, the operator must have and follow written procedures that implement only paragraphs (d) (regarding fatigue), (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section.

IGU's procedures were inadequate to ensure the safe operation of a pipeline facility. Specifically, a review of IGU's Gas Control Plan (GCP), Revision 03, effective date July 22, 2024, revealed that the GCP did not include what criteria IGU used to establish what it considered to be a control room. IGU has three physical sites and several portable laptop computers capable of accessing its Supervisory Control and Data Acquisition (SCADA) system in order to monitor and control parts of its pipeline facility. A review of IGU's GCP found that while it identified the three physical locations as primary and backup control rooms, it was silent regarding the laptop computers. Further, the plan did not define a control room. As its control room personnel were required to be qualified controllers, without defining what was a control room or identifying through specified criteria whether the laptops capable of accessing its SCADA system were considered control rooms per IGU's GCP, it is unclear whether IGU required its personnel to be qualified controllers in order to access and operate the SCADA system via the laptops.

Accordingly, PHMSA proposes that IGU must amend its written procedures to establish criteria defining a control room.

2. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

IGU's procedures were inadequate to ensure the safe operation of a pipeline facility. Specifically, IGU's GPC failed to provide a clear process for reviewing the fatigue education training program, required by its plan.

During the inspection, PHMSA reviewed IGU's GCP. While reviewing the GPC's section on Fatigue Management and Training, PHMSA observed that the section stated, in part that "[t]he Fatigue Management plan shall be reviewed once per calendar year, not to exceed 15 months." However, upon further review, the GCP did not include any details or specifics on how IGU's personnel would conduct the review. In addition, the GPC was silent regarding who was responsible for conducting the annual review, what metrics IGU's personnel should use to determine effectiveness, how IGU's personnel should address identified deficiencies, and how the review would be documented.

Accordingly, PHMSA proposes that IGU must amend its written procedures to provide a process on how to conduct the annual review of its fatigue management and training plan.

3. § 192.631 Control room management.

(a) ...

(d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

(1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep;

IGU's procedures were inadequate to ensure the safe operation of a pipeline facility. Specifically, a review of IGU's GCP revealed the plan failed to establish schedule rotations that provided controllers off-duty time sufficient to achieve eight hours of continuous sleep, as required.

During the inspection, PHMSA reviewed IGU's GCP and found the Fatigue Mitigation and Scheduling section did not provide schedule rotations (*e.g.*, DuPont Schedule or modified versions) demonstrating that controllers are given sufficient off-duty time to achieve eight hours of continuous sleep. While the plan outlined day and night shift times, it lacked detail on how shifts rotate or how the scheduling system ensures adequate rest between shifts.

Further, PHMSA identified that the Fatigue Mitigation and Scheduling section failed to address on-call personnel who are qualified controllers. The GCP did not define or identify on-call controllers who may be called in to operate the control room. These individuals appear to maintain traditional work schedules with other responsibilities outside the control room but who are available to fill in when needed. The GCP did not outline shift lengths or shift rotations for these on-call personnel nor did it describe how their hours would be tracked to ensure the ability to achieve eight hours of continuous off-duty sleep. On-call controllers are subject to the same fatigue mitigation standards as regular controllers including defined shift lengths and schedule rotations to ensure fatigue risk is managed.

Accordingly, PHMSA proposes that IGU must amend its written procedures to establish shift length and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep.

4. § 192.631 Control room management.

(a) ...

(d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

(1) ...

(4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility.

IGU's procedures were inadequate to ensure the safe operation of a pipeline facility. Specifically, a review of IGU's GCP revealed it was unclear regarding the establishment of a maximum limit on controller hours-of-service.

During the inspection, PHMSA reviewed IGU's GCP. Within the Fatigue Mitigation and Scheduling section, the plan stated that controller hours of service would be limited to 65 hours in a sliding seven day period and that all work performed for the operator, regardless of what functions the controller performed would be counted as part of the 65 hours. PHMSA observed that the plan also required that a controller was not to work for more than 14 consecutive hours during normal operating conditions in a 24 hour sliding period. However, the plan also stated that "[i]n the event a controller is required to exceed the consecutive hourly limitation or exceed 16 hours in a single shift, a Deviation Form shall be filled out and approved by the Director of Operations or their designee."

This language was unclear if all deviations, including the exceeding of 65 hours in any 7 day sliding day period needed to be recorded on a Deviation Form, or if it was only referencing the requirement to not exceed 14 consecutive hours in a 24 hour sliding period. In addition, the language of the Gas Control Plan was unclear if 14 or 16 hours was the correct maximum consecutive hours of service in a 24 hour sliding period.

Accordingly, PHMSA proposes that IGU must amend its written procedures to provide clarity on maximum hours of service and how deviations of these hours would be documented.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your

plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Interior Gas Utility maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2025-007-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

DUSTIN B HUBBARD Digitally signed by DUSTIN B HUBBARD
Date: 2025.12.03 14:11:04 -07'00'

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*

cc: PHP-60 Compliance Registry
PHP-500 D. Fehling (24-303396 & 24-298947)
Jeremiah Flint, Operations Supervisor, Interior Gas Utility, jflint@interiorgas.com
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