

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 28, 2020

Mr. Daniel Britton
President
Fairbanks Natural Gas, LLC
3408 International Way
Fairbanks, Alaska 99701

CPF 5-2020-0004M

Dear Mr. Britton:

On May 6 through 10 and June 24 through 27, 2019, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Fairbanks Natural Gas's (FNG) maintenance & operations procedures in Fairbanks, Alaska.

On the basis of the inspection, PHMSA has identified apparent inadequacies found within FNG's plans or procedures, as described below:

1. **§ 192.285 Plastic pipe: Qualifying persons to make joints.**
 - (a)
 - (d) **Each operator shall establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with this section.**

FNG Standard Operating Procedure (SOP) 2220 Plastic Pipe Fusion Precautions, SOP 2222 Saddle Fusion Procedure, SOP 2221 Butt Fusion Procedure, SOP 2225 Side Tap Procedures (Hot Tap Tool) and SOP 2230 Electrofusion Procedure were inadequate because they did not

establish a method to determine that each person making joints in plastic pipelines in the operator's system is qualified in accordance with the testing required by § 192.285(b). The Training & Qualification sections of the above listed procedures stated operators will be qualified to make hot tap or other joints based on on-the-job training, SOP review, performance on-the-job, oral examination, and written examination. A person must be qualified based on the joint specimen testing as required by the code.

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.

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

FNG's SOP 2225 Side Tap Procedures (Hot Tap Tool) was inadequate because it did not require individuals performing hot taps to be qualified as required by § 192.627.

3. § 192.617 Investigation of failures.

Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

FNG's SOP 1425 Investigation of Accidents and Material Failures was inadequate because they do not require the selection of samples of failed facilities or equipment for laboratory examination, where appropriate, for determining the causes of the failure, as required.

4. § 192.1007 What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements:

(a) *Knowledge.* An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.

(1) Identify the characteristics of the pipeline's design and operations and the environmental factors that are necessary to assess the applicable threats and risks to its gas distribution pipeline.

- (2) Consider the information gained from past design, operations, and maintenance.**
- (3) Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities).**
- (4) Develop and implement a process by which the IM program will be reviewed periodically and refined and improved as needed.**
- (5) Provide for the capture and retention of data on any new pipeline installed. The data must include, at a minimum, the location where the new pipeline is installed and the material of which it is constructed.**

FNG did not have a written Distribution Integrity Management Plan (DIMP) beyond some sections printed out of the Simple, Handy, Risk-based Integrity Management Plan (SHRIMP) assessment. The plan did not have an adequate description of data sources, consideration of environmental risk factors, a risk evaluation model or method, methods of ranking threats, or periodic review and improvement plan.

5. § 192.1007 What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements:

- (a)**
- (b) *Identify threats.* The operator must consider the following categories of threats to each gas distribution pipeline: corrosion, natural forces, excavation damage, other outside force damage, material or welds, equipment failure, incorrect operations, and other concerns that could threaten the integrity of its pipeline. An operator must consider reasonably available information to identify existing and potential threats. Sources of data may include, but are not limited to, incident and leak history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, and excavation damage experience.**

FNG's DIMP does not contain an adequate description of the consideration given, if any, to environmental factors such as flooding, or frost heave as common threats unique to its system when identifying threats to the distribution system. The threats that were considered did not go beyond those recommended by SHRIMP.

6. § 192.1007 What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements:

- (a)**
- (e) *Measure performance, monitor results, and evaluate effectiveness.* (1) Develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM Program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks. These performance measures must include the following:**

- (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
- (ii) Number of excavation damages;
- (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
- (iv) Total number of leaks either eliminated or repaired, categorized by cause;
- (v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and
- (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.

FNG's DIMP did not have any written procedures discussing how to measure performance, monitor results, and evaluate effectiveness of its integrity management plan.

7. § 192.1007 What are the required elements of an integrity management plan?

A written integrity management plan must contain procedures for developing and implementing the following elements:

(a)

(g) Report results. Report, on an annual basis, the four measures listed in paragraphs (e)(1)(i) through (e)(1)(iv) of this section, as part of the annual report required by § 191.11. An operator also must report the four measures to the state pipeline safety authority if a state exercises jurisdiction over the operator's pipeline.

FNG's DIMP did not have any written procedures discussing the requirements for reporting the four measures listed in § 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11.

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 Compliance 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 Fairbanks Natural Gas 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, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2020-0004M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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

cc: PHP-60 Compliance Registry
PHP-500 G. St. Pierre (#162682)
Mark Rockwell, Director of Operations, Fairbanks Natural Gas (via email)
Chris Gillespie, Chief of Engineering, Fairbanks Natural Gas (via email)